MEMORANDUM OF AGREEMENT
AMONG THE
VETERANS AFFAIRS LONG BEACH HEALTHCARE SYSTEM, THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION REGARDING FACILITY IMPROVEMENTS AT LONG BEACH MEDICAL CENTER, LONG BEACH, CALIFORNIA

WHEREAS, the Veterans Affairs Long Beach Healthcare System (VALBHS) proposes to conduct subsurface excavations for facility improvements on its campus at 5901 East Seventh Street, Long Beach, California (see Attachment A) which constitutes an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), (54 USC 306108) and its regulations (36 CFR Part 800); and

WHEREAS, the VALBHS initiated consultation with the California State Historic Preservation Officer (SHPO) pursuant to the standard review process as identified under 36 CFR Part 800 on August 14, 2014, and provided additional information requested by SHPO on October 23, 2014; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), VALBHS notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP, by letter dated September 12, 2014, has chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the VALBHS invited the Native American Graves Protection and Repatriation Act (NAGPRA) committee of neighboring California State University Long Beach, the City of Long Beach Historic Preservation Planner, the Pacific Coast Archaeological Society, and archeologists who have performed previous work at VALBHS to participate as consulting parties pursuant to 36 CFR § 800.2 on October 23, 2014; and

WHEREAS, the VALBHS initiated consultation on May 21, 2014 with "Tribal Organizations," defined herein as non-federally recognized local groups, including and limited to the Gabrielino-Tongva Tribe, the Gabrielino Tongva Indians of California, the Gabrieleno/Tongva Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Tongva Ancestral Territorial Tribal Nation, the Gabrielino Band of Mission Indians-Kizh Nation and the Ti'at Society; and

WHEREAS, the Signatories of this Memorandum of Agreement (MOA) recognize that traditionally associated Tribal Organizations possess the expertise to identify and evaluate historic properties of religious and cultural significance on the VALBHS campus; and

WHEREAS, SHPO concurred on November 17, 2014 with the VALBHS determination that none of the campus buildings are eligible for National Register of Historic Places (NRHP)

inclusion (Appendix 1); and

WHEREAS, the Area of Potential Effects (APE) for the undertaking is defined as the entire VALBHS campus (Attachment A), which is part of the Puvungna Indian Villages District (CA-LAN-234 in particular) listed on the NRHP in 1974, (National Register Reference Number 7400052); and

WHEREAS, SHPO concurred on November 17, 2014 with the VALBHS determination that the undertaking will adversely affect an archeological historic property as a result of subsurface excavations up to twenty feet below the surface (refer to Appendix 1), and traditionally associated Tribal Organizations agree; and

WHEREAS, the VALBHS, the SHPO and the ACHP agree that the exact location and nature of the historic property cannot be identified prior to implementation of the undertaking due to the developed nature of the APE with the ground surface obstructed by buildings, parking lots and landscaping; and

WHEREAS, the VALBHS, SHPO, and traditionally associated Tribal Organizations agree that the undertaking will adversely affect historic properties of religious and cultural significance to traditionally associated American Indian tribes and groups; and

WHEREAS, this MOA provides the mechanism to resolve the adverse effects of the undertaking and complete any and all requirements of Section 106 with regard to any activities relating to the undertaking; and

NOW THEREFORE, the VALBHS, the SHPO and the ACHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

I. VA will implement a Historic Property Treatment Plan

A. VALBHS will ensure that the Historic Property Treatment Plan (HPTP) attached hereto (Attachment B) is implemented.
B. Should VA determine that changes to the HPTP are needed, VA will consult with the SHPO and such other parties as are interested in the matter to effect such changes, affording the parties at least thirty (30) days to consult, and need not amend the Memorandum of Agreement (MOA) in accordance with Stipulation VIII unless dispute resolution pursuant to Stipulation VII indicates that such further consultation is needed.

II. Tribal Organization Cultural Monitoring

Except as provided in paragraph II.C below, VALBHS will ensure that actions involving ground disturbance shall be conducted with at least one Tribal Organization monitor present to ensure that construction actions and archeological data recovery activities are carried out in a manner

that is respectful of tribal interests and concerns. Tribal Organization cultural monitoring will occur during the course of ground disturbing activities as described in the VALBHS NAGPRA Plan of Action (POA) (Attachment C). VALBHS will also invite the Tribal Organization monitor to attend project meetings and prepare a summary report of non-confidential findings.

A. **Evaluation of Archeological Sites/Components;** Any evaluation of the significance of archeological sites and/or components will take into account the cultural significance ascribed to the Puvungna District by the Tribal Organizations for its association with the origin of the religious tradition *Chinichngish* and as the home of a culture hero important in this religious tradition. Any evaluations made with reference to NRHP shall address all Criteria (36 CFR 60.4(a) through (d)).

B. **Observation and Traditional Treatment;** VALBHS will afford representatives of the Tribal Organizations the opportunity to inspect and review all artifact collections and records from the project for the purpose of identifying sacred objects and objects of cultural patrimony. Representatives of the Tribal Organizations shall have the opportunity to inspect the excavations while in progress and perform traditional ceremonies per the VALBHS NAGPRA POA (Attachment C).

C. Where it appears that ground disturbance has little or no potential to disturb cultural material (for example, where it occurs only in recently deposited fill, or at depths below those at which cultural material could occur), VA may elect, following consultation with the signatories of this agreement, to terminate excavation monitoring.

III. Standards and Special Conditions

A. **Definitions.** The definitions provided at 36 CFR 800.16 are applicable throughout this MOA.

B. **Project Standards.** The standards, guidelines, regulations, and codes cited below shall be followed in execution of the undertaking:

1. **Professional qualification standards.** Individuals meeting the Secretary of Interior's Professional Qualifications Standards for prehistoric archeology (48 FR 44738-39) shall directly supervise all archaeological activities implemented pursuant to this MOA.

2. **Curation standards.** VALBHS shall curate non-NAGPRA artifacts and records resulting from actions stipulated by this MOA in accordance with 36 CFR 79. VALBHS will adhere to the curation agreement with Fowler Museum.

3. **Disclosure of archeological site information.** The signatories to this MOA acknowledge that historic properties covered by this MOA are subject to the provisions of Section 304 of the National Historic Preservation Act, as amended relating to the disclosure of archeological site information.

IV. Duration

This MOA will take effect on the date that it is signed by the last signatory and filed with ACHP and will expire ten (10) years from the date of its execution. Prior to such time if the terms are not satisfactorily carried out, VALBHS may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VI.

V. Post-review Discoveries

If archeological historic properties are discovered or unanticipated effects on such historic properties found, the VALBHS shall implement the NAGRAPA POA and the HPTP (Attachments B & C). If other types of potential historic properties are encountered, VALBHS shall follow 36 CFR 800.13(b).

VI. Monitoring and Reporting

Each year following the execution of this MOA until it expires or is terminated, VALBHS shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in VALBHS's efforts to carry out the terms of this MOA.

VII. Dispute Resolution

Should any signatory party to this MOA object at any time in writing to VALBHS to any actions proposed or the manner in which the terms of this MOA are implemented, VALBHS shall notify the other signatory parties about the objection and consult with such party to resolve the objection. If VALBHS determines that such objection cannot be resolved through consultation, VALBHS will:

A. Forward all documentation relevant to the dispute, including the VALBHS's proposed resolution, to the ACHP. The ACHP shall provide VALBHS with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, VALBHS shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. VALBHS will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, VALBHS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, VALBHS shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. VALBHS's responsibilities to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute shall remain unchanged.

D. At any time during implementation of this MOA, should an objection to any stipulation or the manner of implementation be raised in writing by a member of the public or consulting parties, VALBHS shall take the objection into account and consult as needed with the objecting party, the ACHP and the SHPO to resolve the objection.

VIII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

IX. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall notify in writing the other signatories to and consult to develop an amendment per Stipulation VII. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, VALBHS must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. VALBHS shall notify the signatories as to the course of action it will pursue.

X. ANTI-DEFICIENCY CLAUSE

This agreement is subject to the Anti-Deficiency Act (31 U.S.C. Section 1341). VALBHS's responsibilities under this agreement are contingent upon the availability of appropriated funds from which payment, if any, can be made. Should funds not be available to allow VALBHS to meet is responsibilities, it will defer its final decision(s) on implementing the undertaking until it has re-initiated consultation and complied with 36 CFR §§ 800.4 through 800.7 as applicable.

Execution of this MOA by VALBHS, the SHPO, and the ACHP and implementation of its terms evidence that the VALBHS has taken into account the effects of this undertaking on historic properties and has afforded the ACHP an opportunity to comment.

Signatories

VETERANS AFFAIRS LONG BEACH HEALTHCARE SYSTEM

Date: 7/28/15

Michael W. Fisher, Director

CALIFORNIA HISTORIC PRESERVATION OFFICER

Date: 30 July 15

Julianne Polanco

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Date: 8/5/15

John M. Fowler, Executive Director

LIST OF APPENDICES AND ATTACHMENTS

Appendix 1. SHPO letter of concurrence with VALBHS determinations

Attachment A. Undertaking and Area of Potential Effect Description and Maps

Attachment B. VALBHS Historic Property Treatment Plan

Attachment C. VALBHS NAGPRA Plan of Action

Attachment D. Curation Agreement with Fowler Museum

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., *Governor*

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DEPARTMENT OF PARKS AND RECREATION
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calshpo@parks.ca.gov
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SHPO Concurrence Letter 11/17/14

November 17, 2014

Reply in Reference To: VA_2014_0829_001

Michael W. Fisher, Director
Department of Veterans Affairs
VA Long Beach Healthcare System
5901 East Seventh Street
Long Beach, CA 90822

Re: Continuing Section 106 Consultation for the Proposed Construction Projects at the Veterans Administration Long Beach Healthcare System (Reference Number 600/00), Long Beach, Los Angeles County, CA

Dear Mr. Fisher:

Thank you for your letter dated October 23, 2014 in which the Veterans Affairs Long Beach Healthcare System (VALBHS) is continuing Section 106 consultation with the State Historic Preservation Officer (SHPO) on the above referenced undertaking. The VALBHS is requesting concurrence of a finding of adverse effect to historic properties as a result of this undertaking per 36 CFR §800.5(d)(2).

In our previous round of consultation, I could not concur with the VALBHS's finding of effect and National Register of Historic Places (NRHP) eligibility determinations and provided the following comments and information requests:

1. Delineate the area of potential effects (APE) for all 11 projects as the entirety of the Long Beach campus.
2. Positively confirm the VALBHS's determination of how and to what extent historic properties will be affected through the implementation of this undertaking.
3. Provide a map clearly illustrating the known boundaries of the identified historic properties in relation to all areas of proposed ground disturbances.
4. Provide specific credentials for Ms. Furnis.

Thank you for responding to my comments in your letter. Your letter indicates that VALBHS has modified the APE to encompass the entire Long Beach campus and you also provide expanded qualifications for Ms. Furnis in Appendix A of the revised report *Historic Properties for Eleven Proposed Projects at the Veterans Affairs Long Beach Healthcare System, Long Beach, Los Angeles County, California* (Furnis and Gust 2014) enclosed with your letter. The revised report also provides further information as to how the VALBHS has determined a finding of effect to archaeological site, CA-LAN-234 (Puvungna), located within the APE.

Previous archaeological investigations (Leonard 1974) conducted within the VALBHS campus determined the presence of Puvungna based on surface survey and augers. In 2011 ECORP conducted a Phase I archaeological assessment of a portion of the campus and their survey did not identify archaeological resources on the surface (Smallwood 2011). Efforts to identify subsurface historic properties through surface and subsurface investigations within the APE for this undertaking were limited due to extensive development including, buildings, hardscaping and landscaping. However, results from the 1974 archaeological investigation identified four locations within the VALBHS campus, and current APE that contain subsurface archaeological deposits associated with Puvungna. Therefore, the VALBHS has determined that subsurface archaeological deposits associated with Puvungna are present within the APE, and that this undertaking will result in adverse effects to Puvungna because of subsurface excavations ranging from three to 20 feet below the surface. In an effort to resolve adverse effects to Puvungna, the VALBHS is proposing to develop a Memorandum of Agreement (MOA). Lastly, having evaluated the Long Beach campus buildings and structures for NRHP eligibility, the VA has concluded that no campus buildings meet NRHP criteria.

After reviewing the information provided by the VA, I concur with the VA's determination that none of the campus buildings are eligible for NRHP inclusion and with their finding of adverse effects. Thank you for seeking my comments, and I look forward to continuing Section 106 consultation with you to resolve adverse effects as a result of this undertaking. If you have any questions or concerns, please Historian Ed Carroll at (916) 445-7006 / Ed.Carroll@parks.ca.gov or Archaeologist Jessica Tudor at (916) 445-7016 / Jessica.Tudor @parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph.D.

Carol Roland-Nawi, PhD
State Historic Preservation Officer

ATTACHMENT A. UNDERTAKING AND APE

MOA ATTACHMENT A

UNDERTAKING

The Veterans Affairs Long Beach Healthcare System (VALBHS) is proposing eleven projects to take place on their campus in Long Beach, California (see following maps). All projects are briefly described below.

Project A. New group house – Fisher House.
Construct the 10,000 sq. ft., two-story tall Fisher House and new dedicated parking lot with 20 spaces within an existing, large parking lot. Maximum depth of excavation will be 3 feet for foundations and up to 20 feet for utilities.

Project B. Replacement of Water Distribution System.
Install a new 10-inch water main routed from west campus to east campus on existing parking lots, on streets, and within lawn areas. Maximum depth of excavation 8 feet.

Project C. New security barrier.
Construct new 8-ft tall, open, wrought iron fence along the entire north and south property lines. Maximum depth of excavation is approximately 5 feet.

Project D. Demolition of Golf Shack.
Demolish Building 94, a wood-frame structure from 1944. Demolition requires full foundation removal and safe-end of abandoned sewer line. Maximum depth of excavation approximately 15 feet.

Project E. New Parking Lot on Old Golf Course.
Construct a new surface parking lot atop the existing golf course grounds to provide 400 + parking spaces. The project will include building of curbs, gutters, a storm drain, and installation of lighting. It may require removal of many mature trees. Maximum depth of excavation is eight feet for proper compaction base and lighting standards and up to 15 feet for utilities.

Project F. B125 Replace Emergency Generator.
Install a replacement emergency generator at Building 125 (water pump house) constructed in 1967. The new generator is to replace the existing generator in the building, now in poor condition. Project requires raising of the building's roof by 72 inches and

will include exterior generator pad, underground fuel piping, and electrical lines. Maximum depth of excavation is approximately 10 feet.

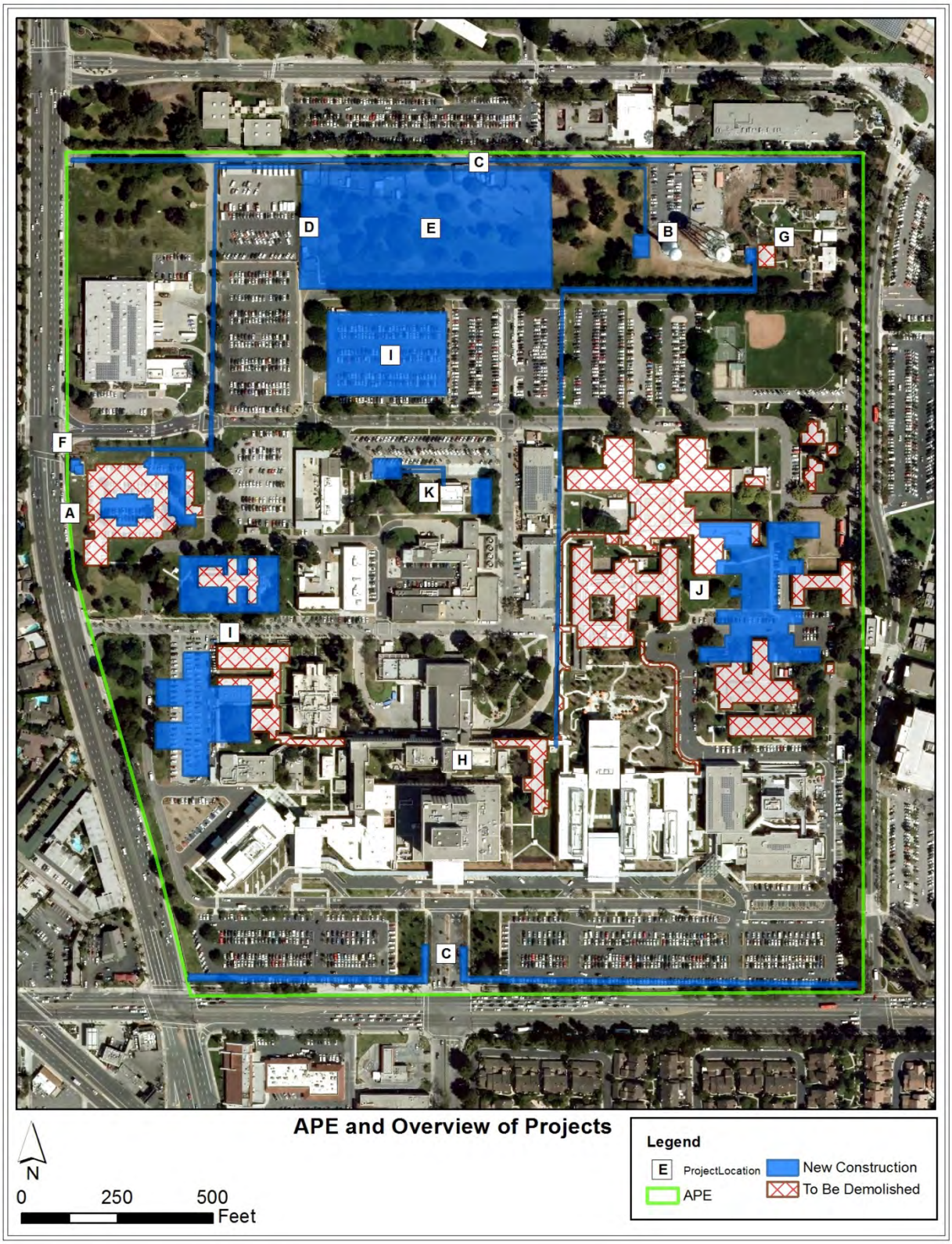
Project G. Back-up Oxygen System.
Install new Oxygen Tank farm and route new piping from north campus tank farm to south campus. Building 43 (pump house) will be demolished as part of this project; already determined not eligible to the NRHP in 2013. Will disturb existing roadways, parking lots, sidewalk, lawn, and concrete slab. Maximum depth of excavation for tanks approximately 10 feet and for piping 5 feet.

Project H. Seismic Upgrade, Various Buildings.
Demolish historic-era, Building 8 (not eligible for NRHP as of 2006) of three-stories plus basement, backfill basement level 15-feet below finished grade, and reroute 20- inch Chilled Water Lines. Maximum depth of excavation approximately15 feet.

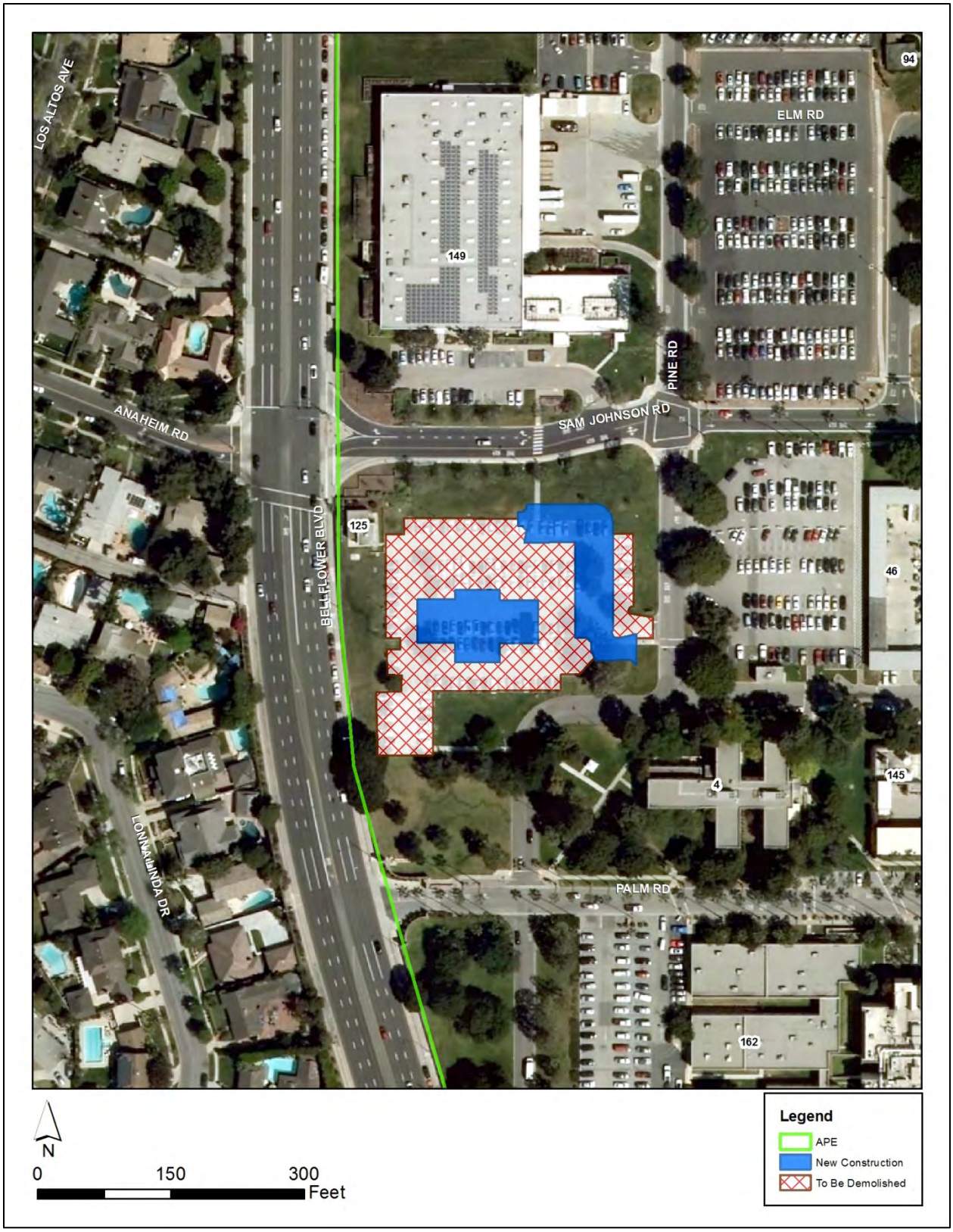
Project I. New Mental Health Facility.
Install two new Mental Health Buildings, a new 300 space Parking Structure and new Energy Center; demolish buildings T162 and 4; re-route Pine Road. Maximum depth of excavation approximately 20 feet for utilities.

Project J. New Community Living Center.
Construct new Community Living Center; demolish Buildings 3, 11, 40, 47, 89, 90, 92, 123, 128, and 133; re-route East Road. Maximum depth of excavation approximately 20 feet for utilities.

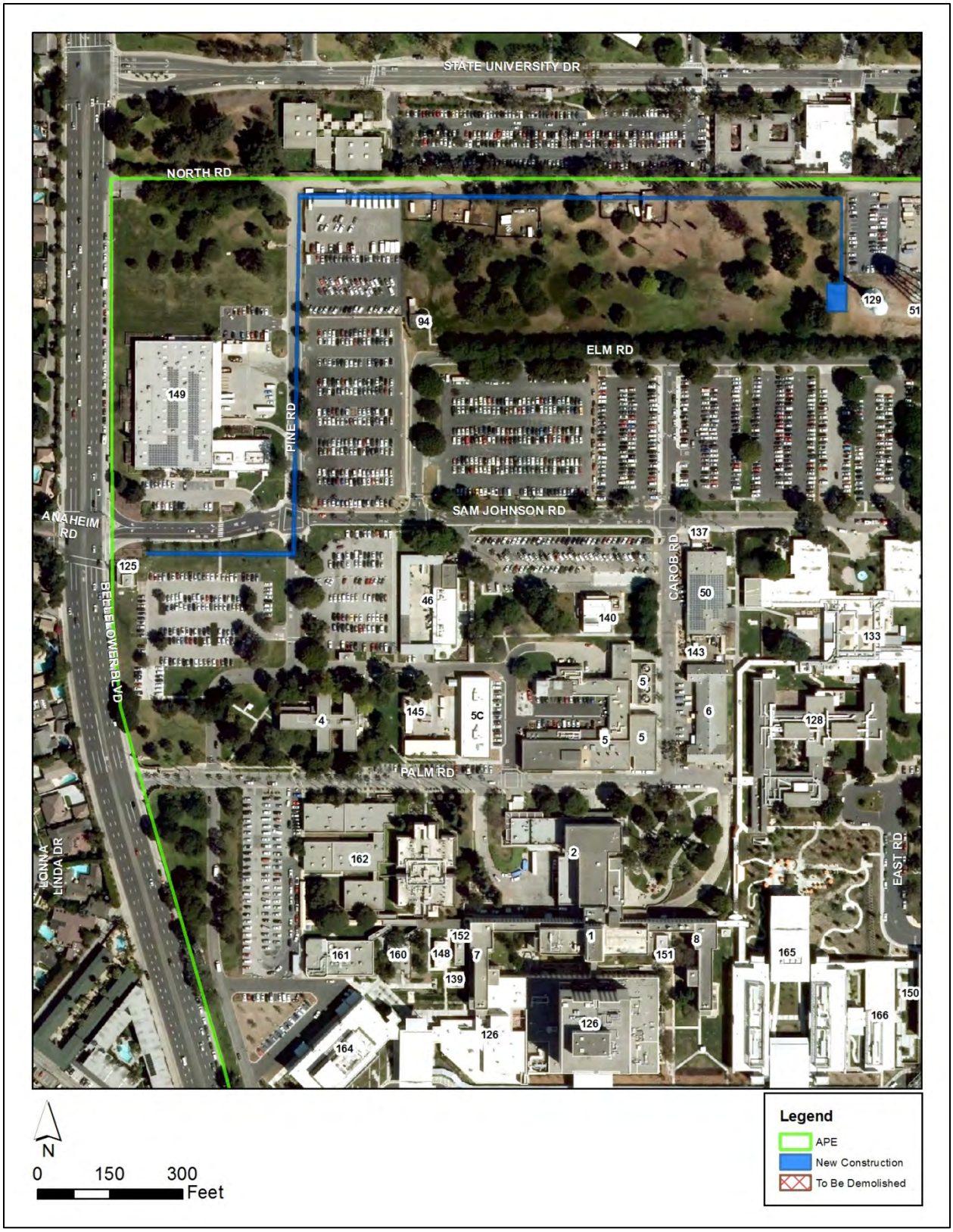
Project K. Install Emergency Management Generator, Phase 2.
This project installs a new generator with a new 60,000 gallon underground fuel tank and associated fuel piping. Maximum depth of excavation for tank is 14 feet and piping is 6 feet. This generator will be housed in Building 5B constructed in 2012.



APE and Overview Projects Map

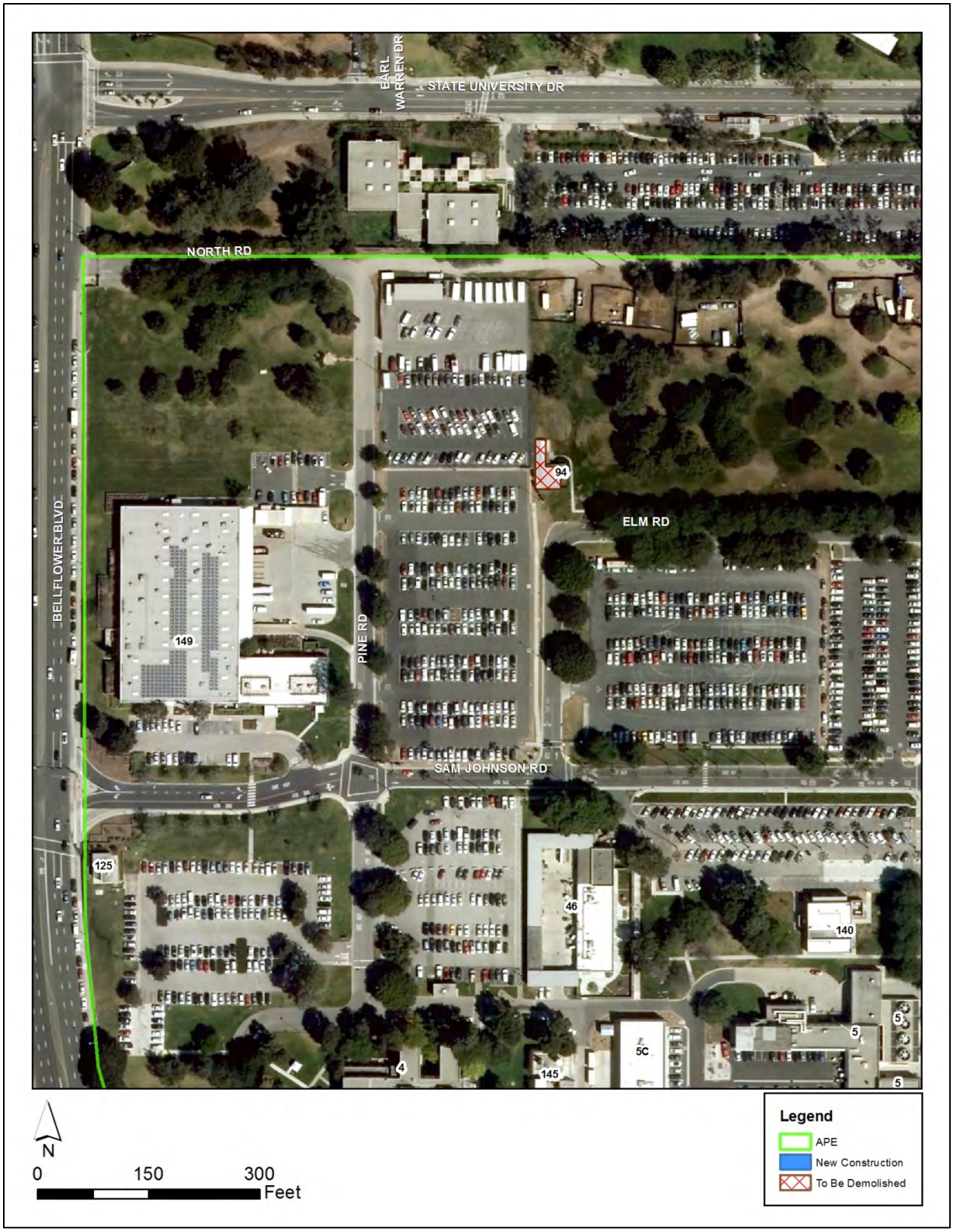


Project A Map



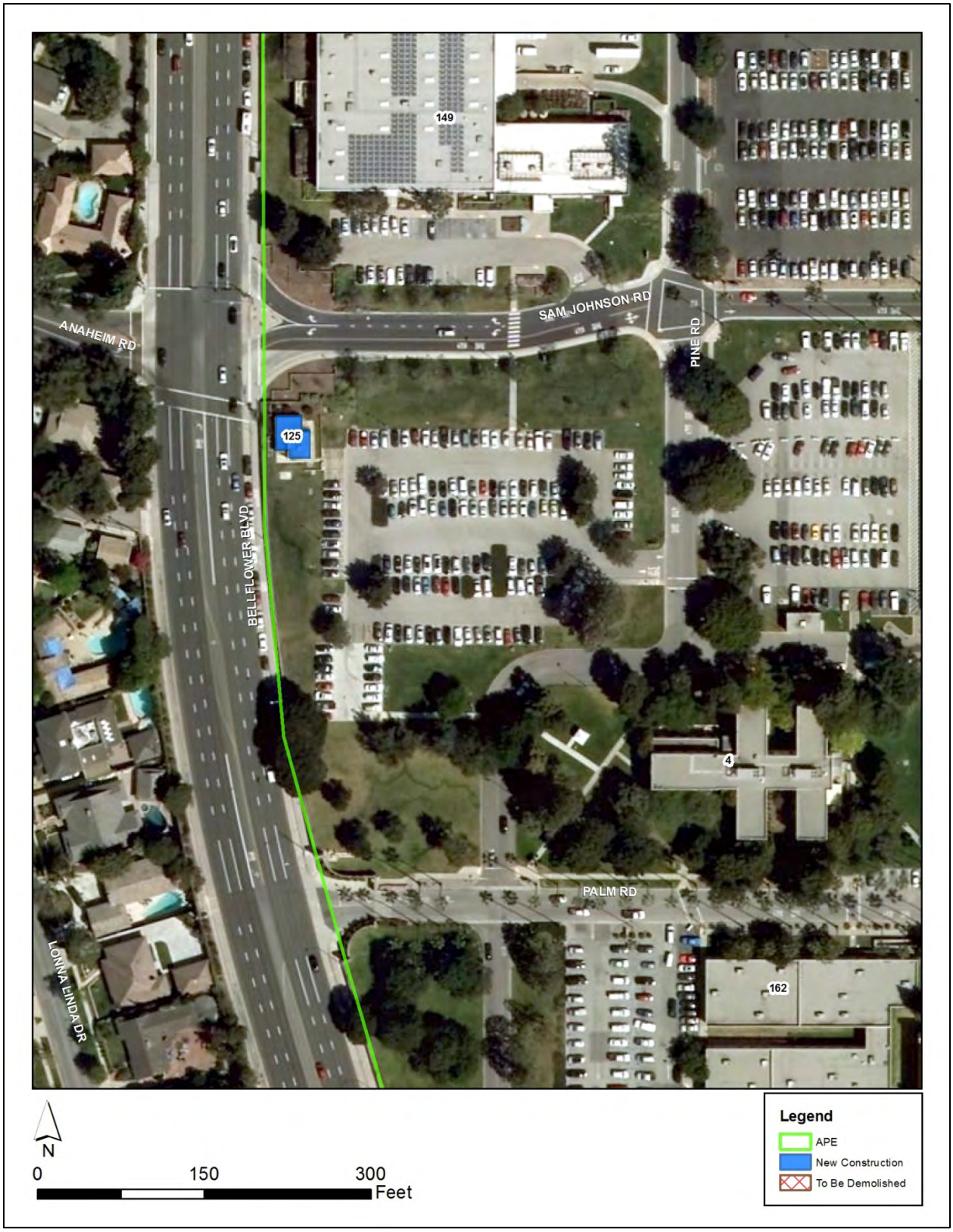
Project B Map

Project C Map

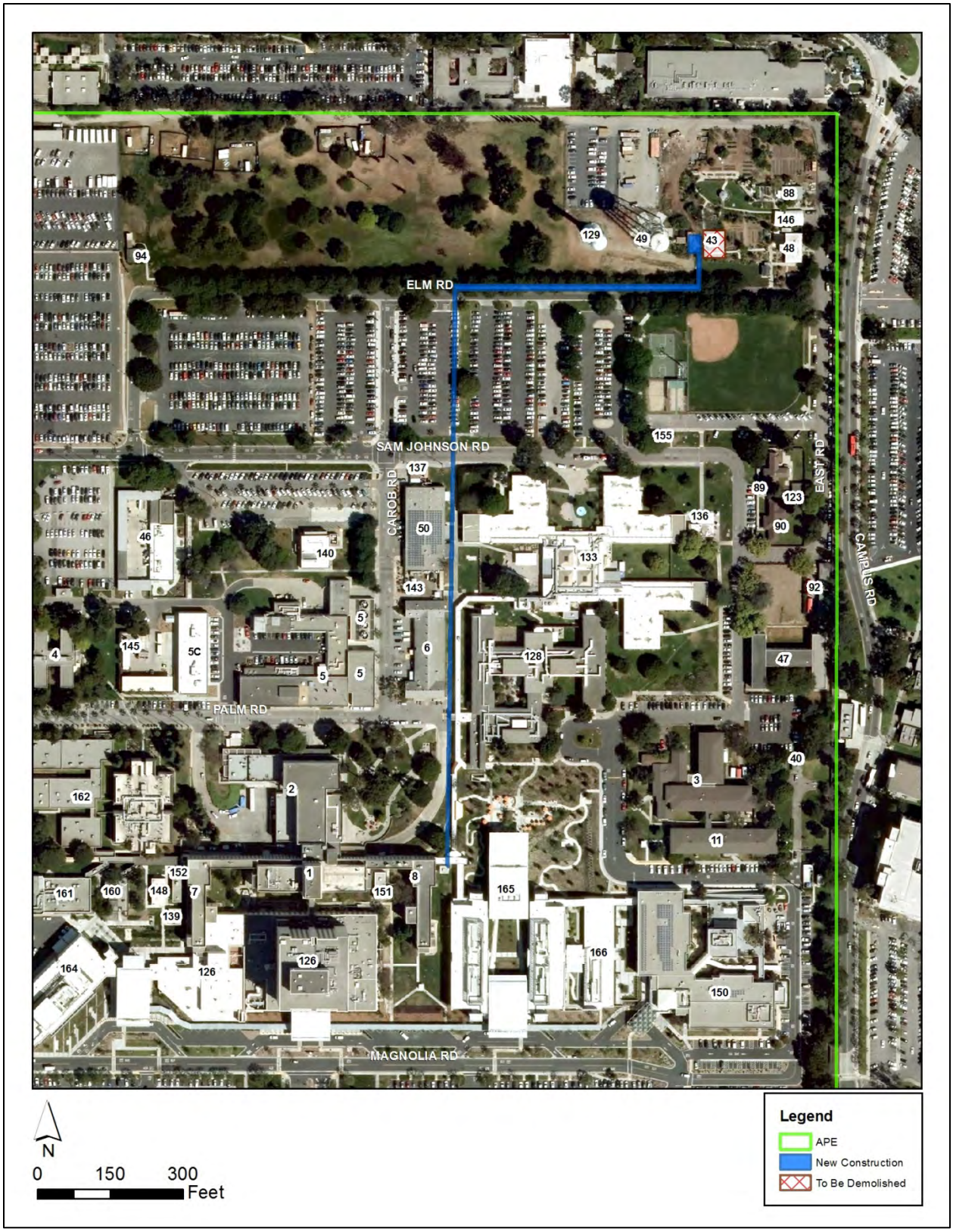


Project D Map

Project E Map

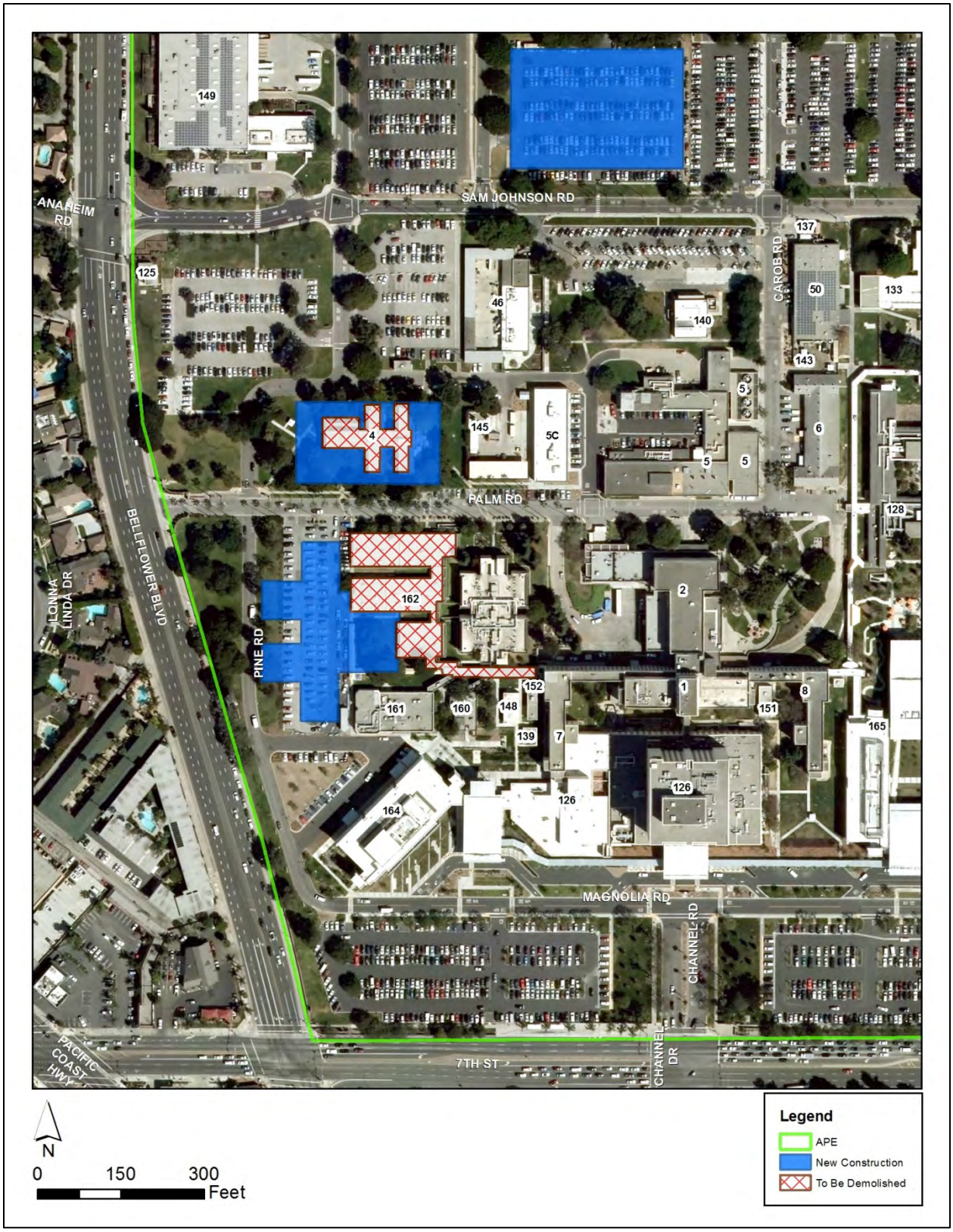


Project F Map

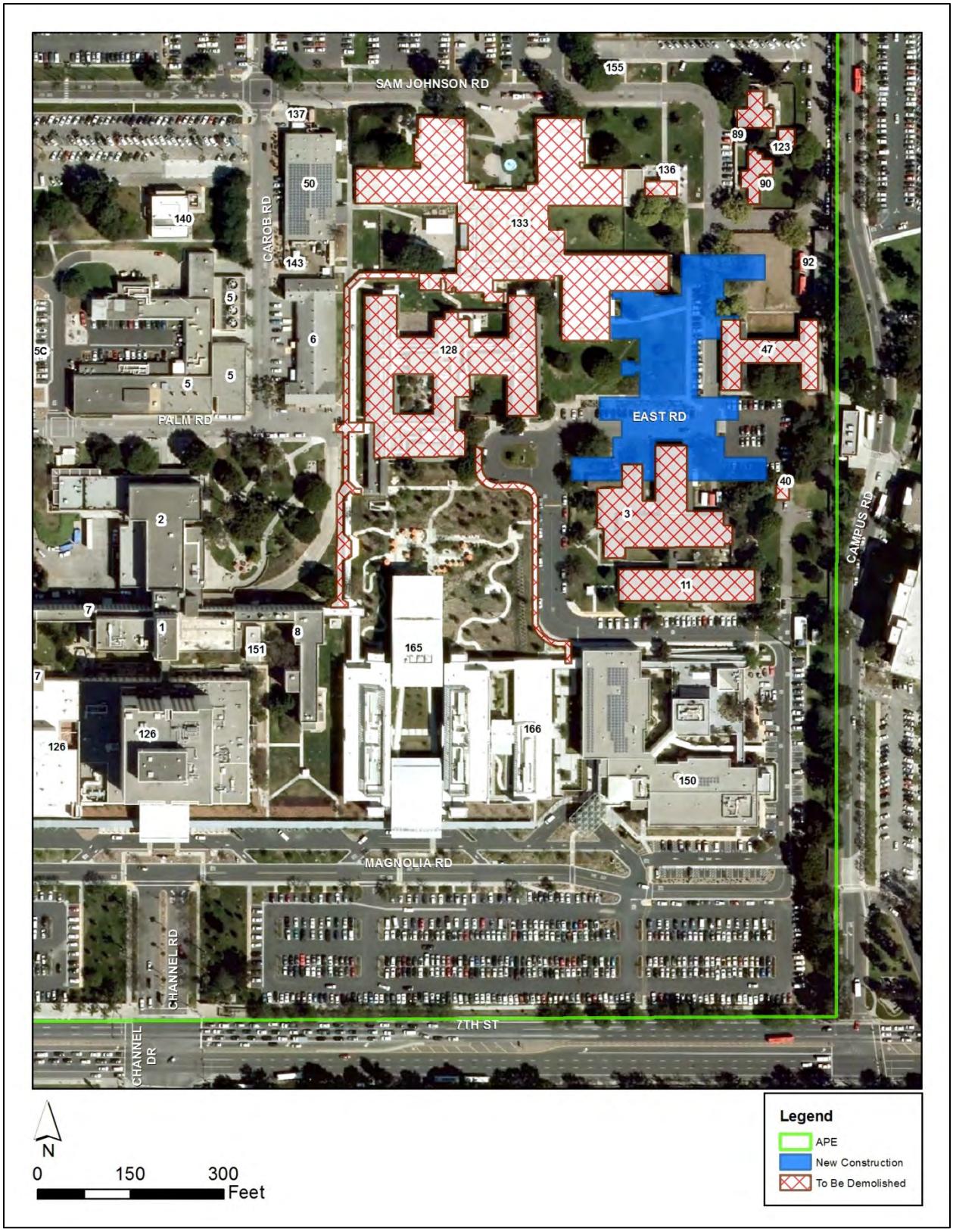


Project G Map

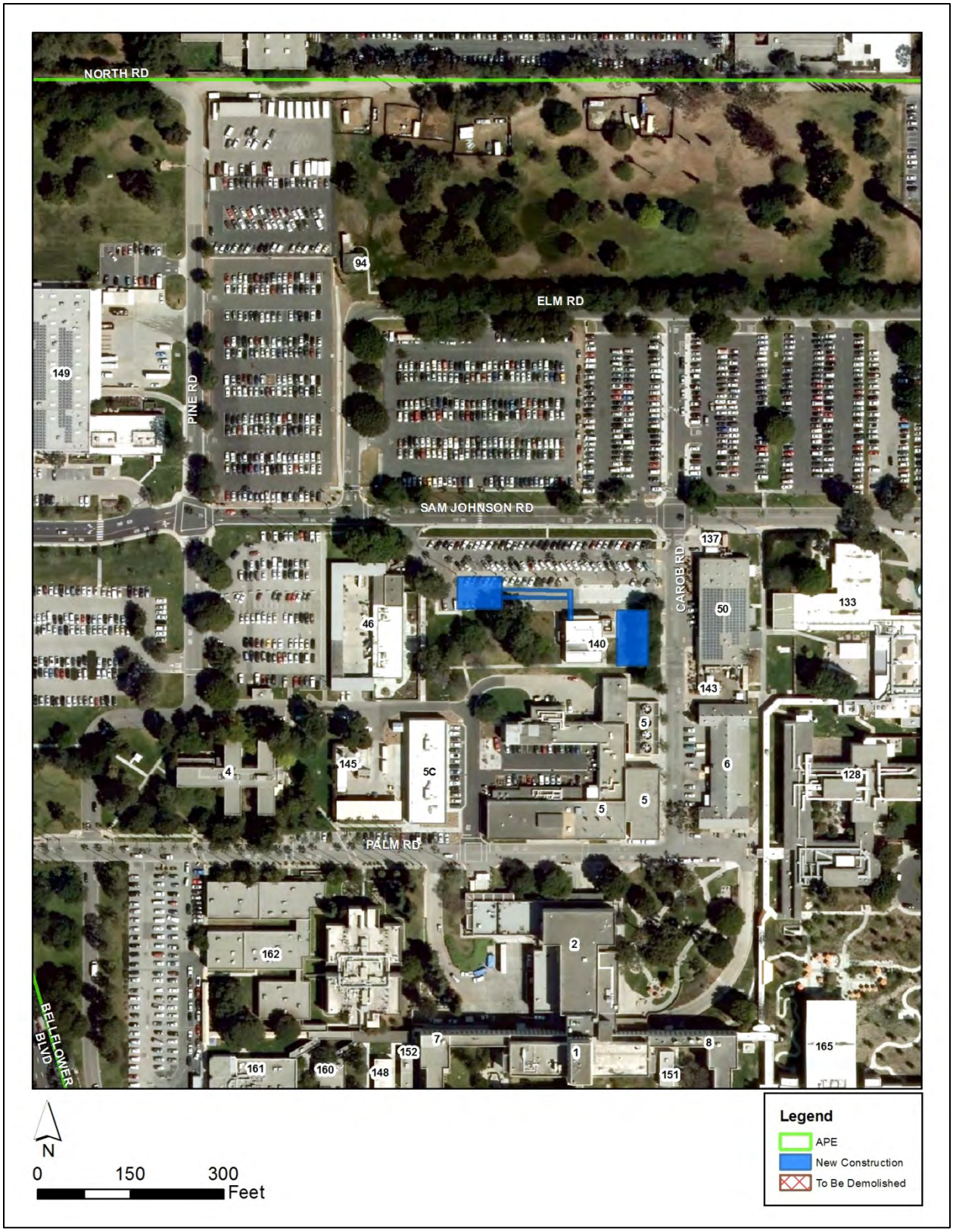
Project H Map



Project I Map



Project J Map



Project K Map

AREA OF POTENTIAL EFFECTS (APE)

The APE encompasses the entire VALBHS campus, thereby including all eleven projects. In 1974, archaeological survey and subsurface borings determined that the NRHP-listed Puvungna Indian Village site extends onto the VALBHS campus. Very limited areas of open ground surface existing at that time so only four separate areas were defined (see map below). The modern campus is completely build, hardscaped or landscaped and thus pre-construction testing is not feasible. VALBHS therefore assumes the village is present below the surface throughout the campus and that it will be adversely effected by unavoidable subsurface excavations ranging from three to 20 feet below the surface during construction throughout the VALBHS campus.

Map of Surface Indications of CALAN-234 in 1974

ATTACHMENT B REVISED SEPTEMBER 2017

REVISED HISTORIC PROPERTY TREATMENT PLAN FOR THE PORTION OF THE PUVUNGNA INDIAN VILLAGES DISTRICT WITHIN THE UNITED STATES DEPARTMENT OF VETERANS AFFAIRS LONG BEACH HEALTHCARE SYSTEM CAMPUS

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SUMMARY OF REVISIONS

The Veterans Affairs Long Beach Healthcare System (VALBHS) determined in 2015, and confirmed in 2016, that the portion of the Puvungna Indian Villages District designated CA-LAN-234, is not present throughout its campus as was previously assumed. This has been documented in the 2015 and 2016 MOA Yearly Reports and in the revision of the CA-LAN-234 site record.

The most recent updates (September 2017) restrict the boundaries on the VALBHS campus to the area defined by Leonard (1974) in the northwest corner of the campus where the site is contiguous with the portion on the CSULB campus.

The only one of the originally proposed eleven projects which will impact the revised boundaries is the Security Fence Project (Project C). On this basis, archaeological data recovery and monitoring are restricted to this project within the new boundary of CA-LAN-234. All other subsurface work outside of the site boundary shall be subject to a standard unanticipated discoveries clause.

Cultural resources consultants are responsible to read and understand the entire MOA. Native American monitoring is a rotation among four Tribal Organizations and invitations to monitor shall reflect an equitable distribution. Reports along with all field paperwork, photos and shapefiles shall be submitted to VA on compact disc for the VA's use including for the Yearly MOA Report. Consultants are expected to cooperate with the contractor selected to prepare the Yearly MOA Report. The VA is responsible to ensure that the MOA is adhered to.

INTRODUCTION

The Veterans Affairs Long Beach Healthcare System (VALBHS) determined in 2015, and confirmed in 2016, that the portion of the Puvungna Indian Villages District designated CA-LAN-234 (hereafter, Puvungna South), is not present throughout its campus as was previously assumed.

Under the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR Part 800), federal agencies are required to consult with the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and other interested parties to seek agreement on ways to resolve adverse effects on historic properties. Resolutions agreed upon are embodied in a memorandum of agreement (MOA) for each undertaking.

This Treatment Plan is a binding attachment to the MOA that VA has developed pursuant to 36 CFR 800.6(b)(2), intended to outline the activities that VA will ensure are carried out to resolve its adverse effects on Puvungna.

The VALBHS campus faces south onto East Seventh Street in Long Beach, with Bellflower Boulevard serving as the west boundary of the campus, and CSULB adjoining it to the north and east. VA originally defined the area of potential effects (APE) as the entire VALBHS campus (refer to MOA Attachment A).

PUVUNGNA

Although there has been some dispute about the matter, the preponderance of historical and oral historical evidence indicates that the coastal mesa occupied by the VALBHS and CSULB campuses represents the Tongva community known as Puvungna. The community is renowned in Tongva tradition for its association with Chingichngish, variously described as a deity and as a prophet from the Tongva origin time. In tradition, Chingichngish came to the people after their creator, Wiyot, was killed. Chingichngish directed the Tongva ancestors in the arts of food acquisition and preparation, and set forth moral principles involving sacrifice, fasting, and obedience to his will. He directed them to construct temples in which to carry on his moral order, and created spirits that would enforce his will; he then ascended to the stars (Loewe 2015).

The close association between Chingichngish and Puvungna has caused the area to be regarded by Tongva people and other Native Americans as a sacred place, and it is recorded as such in the Sacred Lands files maintained by the California Native American Heritage Commission. Puvungna is the end-point of an annual "Ancestor Walk" sponsored by the Ajachemem (Acagchemem) community, an intertribal organization, and is the site of an annual Bear Dance (Loewe 2015).

This begs the question of just what Puvungna is. The answer to this question is far from unambiguous. Most public attention has focused on Puvungna North, where today the Ancestor Walk ends and the Bear Dance is held. The distinction between this site and Puvungna South, however, is an artifact of modern land use and archaeological convenience; those who lived at Puvungna in the past hardly shrank from crossing the then-nonexistent street and boundary between today's VALBHS and CSULB campuses. In fact, the entire mesa top on which the two campuses were built was probably occupied by Tongva people in ancient times, and very likely comprises what they, the Spanish conquistadores, and such early 20th century ethnographers as J.P. Harrington referred to as Puvungna (McCauley 1994).

The sites we call Puvungna South (CA-LAN-234) and Puvungna North (CA-LAN-235) were first recorded in October of 1960 by archaeologist Keith Dixon of CSULB. In 1972, a partial skeleton was unearthed during water line trenching on Puvungna North, triggering a conflict between the University and tribal people. This resulted, among other things, in nomination of the Puvungna District to the NRHP. A much bigger conflict arose in the 1990s when the University proposed to construct a commercial mall on part of Puvungna North; this led to on-site demonstrations an occupation of the site by protesters, extensive adverse publicity, and litigation, leading the University to abandon the project.

When he recorded the sites, Dixon noted that the ground surface exhibited marine shell and flaked stone detritus, typical of the "midden" that usually marks a prehistoric California coastal occupation site. Testing on Puvungna South by N. Nelson Leonard III in 1974 indicated that the midden deposit extended to 75-90 centimeters in depth and was visible on the surface in multiple locations. Subsequent surveys did not reveal midden material on the surface, leading to the conclusion that the site had been buried by recent fill. In fact, of course, modern fill, landscaping, and buildings cover much of both campuses, and areas beyond the campus boundaries but still within what was probably prehistoric Puvungna are covered with modern housing.

In 2006, a CSULB tree removal project near the northern edge of Puvungna South (but on University land) encountered prehistoric human remains, and in 2014, surface survey by CSULB archaeology students discovered multiple human hand bones, possibly but not certainly from one individual. These remains may have come from the individual found in 2006, since they were found in close proximity to the location of the removed tree and there has been no other subsurface ground disturbance in that area (Lipo et al 2014).

In 1979 and 1980 Scientific Resources Surveys (SRS) conducted test excavations in two portions of Puvungna North in support of the University's proposed installation of wastewater pipelines and an Arboretum and Japanese Garden. Both excavations utilized both hand excavation and trenching in order to understand the site's extent, depth and composition (SRS 1979). SRS concluded that the area that they tested had no subsurface cultural deposits although a "scant scatter" of shell was visible on the surface. In 1984 a CSULB archaeology class excavated in another portion of Puvungna North and found intact midden at 10 cm below the surface. The midden was described as containing animal bones, shell and chert flakes (Lipo et al 2014).

Boxt (Boxt and Raab 2000) carried out radiocarbon sample testing on shell from Puvungna North and obtained four radiocarbon dates that ranged from about 1,640 B.C. to about 85 B.C. Boxt also obtained over 100 radiocarbon dates from elsewhere in the Puvungna District and found that the majority ranged in age from A.D. 900 to 1700.

In summary, the sites on the VALBHS and CSULB campuses – and probably other sites in the vicinity – appear to be manifestations of a single prehistoric community that probably extends beyond both campuses and represents the ancient Tongva village of Puvungna. Although prehistoric midden, chipped stone, shell, faunal remains, and human remains have been observed or recovered through piece-meal efforts over for the last fifty-five years, there has been no synthetic interpretation of the data collected. The boundaries of the sites have not been delineated, and a detailed chronology of their occupation has yet to be developed.

BACKGROUND

NATURAL ENVIRONMENT OF THE PROJECT AREA

Puvungna lay in close proximity to the San Gabriel River and its branch streams and creeks, overlooking the Alamitos Bay estuary to the southwest (See Figure 14). The coastal plain, riverine, estuarine, marsh and marine environments provided substantial subsistence resources, year-round as well as seasonally, during the Proto-historic and Historic periods, and Alamitos Bay provided ready access to the Pacific Ocean, 2.6 miles south, for Tongva ocean-going canoes (*ti'at*).

Boxt et al. (1999), using microfossil, geomorphological and archaeological data collected from archaeological sites CA-LAN-705, CA-LAN-1000, CA-LAN-2616 and CA-LAN-2630, all located on the CUSLB campus approximately half a mile to the northeast of the VALBHS campus, reconstructed the paleoenvironment of the area for the last 1,000 years (A.D. 849 - 1700). Their research shows that area was subjected to extreme weather conditions, including drought during the Medieval Climatic Anomaly (approximately A.D. 900-1300). In excavations at CA-LAN-235, Scientific Resource Surveys (1980) argued that the area consisted of a beach during the Late Pleistocene while in the early Holocene the area was seasonally marshy.

Previous studies at Ballona Lagoon to the northwest have documented a dramatic decline in effective precipitation after 5,000 BP. Regionally increasing sedimentation reduced the size of estuaries and increased the size of mud flats as is evident by the abundance of Venus clam in sites dated 5,000-3,000 BP. Continuing sedimentation of the estuaries eventually resulted in a shift to increased use of marine resources by the Tongva ancestors, as demonstrated in the increase in the number of faunal remains recover from sites dating to after 1,000 BP (Altschul et al. 2007).

CULTURAL BACKGROUND

According to oral origin traditions, the Tongva emerged into this world at Puvungna (Martinez and Teeter 2015:26). They are considered by ethnohistorians to have been one of Southern California's wealthiest and most influential tribes (Kroeber 1976:621), trading widely with and greatly influencing other groups. They lived in large, permanent villages made up of domed, thatched houses (Bean & Smith 1978:542), and traveled up and down the coast and to the

Channel Islands in their large seagoing plank canoes (ti'at). They were known for their artistically decorated stone (steatite) and shell implements and works of art.

Economically, the Tongva were sedentary hunters and gatherers, maintaining large, highly organized communities through the skillful management of local natural resources including acorns, hard seed crops, greens, bulbs, roots, and other plant foods as well as deer, rabbit, antelope, many types of bird, and such seafood as sea mammals, salmon and other pelagic fish, fresh-water fish, and many kinds of shellfish. They built their villages near springs and other water sources, often on coastal terraces like the one on which Puvungna lies.

Archaeologists working in the Los Angeles Basin have typically organized data on prehistory with reference to "traditions" based on distinctive assemblages of artifacts, mortuary and architectural practices, radiocarbon and other age determinations, and where possible with cultural traditions. The following outline of "traditions" reflects current archaeological thinking (see Appendix A for details).

The earliest well-documented tradition, the Encinitas Tradition, is characterized by abundant metates and manos, core and flake tools, bone tools, shell ornaments, and very few projectile points, with subsistence focusing on collecting (plants, shellfish, etc.) (Sutton and Gardner 2010:7). Faunal remains vary by location but include shellfish, land animals, marine mammals, and fish.

The Encinitas Tradition is currently viewed as comprising four geographical patterns (Sutton and Gardner 2010: 8-25). These are (1) Topanga in coastal Los Angeles and Orange counties, (2) La Jolla in coastal San Diego County, (3) Greven Knoll in inland San Bernardino, Riverside, Orange and Los Angeles counties, and (4) Pauma in inland San Diego County.

About 3,500 years before present the Encinitas Tradition gives way to the Del Rey Tradition (Sutton 2010), reflecting what archaeologists call the Intermediate and Late Prehistoric periods. The changes that characterize the Intermediate Period include new settlement patterns, economic foci, and artifact types that are thought to have coincided with the arrival of a biologically distinctive population. The Intermediate and Late Prehistoric periods have not been well-defined. Many archaeologists have proposed, however, that the beginning of the Intermediate marked the arrival of Takic-speaking groups (of which the Tongva were a part) from the Mojave Desert, southern Sierra Nevada and San Joaquin Valley, and that the Late

Prehistoric Period reflected Shoshonean groups (from the Great Basin). Related cultural and biological changes occurred on the southern Channel Islands about 300 years later.

As defined by Sutton (2010), the Del Rey Tradition is subdivided into two regional patterns named Angeles and Island. The Del Rey Tradition is thought to represent the arrival, divergence, and development of the Tongva.

Tongva communities along the coast experienced first contact with Europeans when Spanish explorers worked their way up the coast in 1542 A.D., but serious – and disastrous – contact began with construction of Mission San Gabriel Arcángel in 1771. Over the next century, Tongva communities on the mainland and in the islands were devastated by epidemic European diseases and their members were variously persuaded, coerced, and simply forced to work for the Spanish missions and ranchos that sprang up across the Los Angeles Basin. It was from their association with Mission San Gabriel that they came to be known as Gabrieliño, a name that some Tongva groups and many outsiders continue to use today.

Despite a revolt in 1785 led by the female chief Toypurina, Tongva society essentially collapsed under the weight of the Spanish conquest. Mexican independence in 1821 led to secularization of the missions and division of the lands they had appropriated into large ranchos, on which Tongva and other indigenous people ("Mission Indians") had no choice but to work. Acquisition of California by the United States did little or nothing to improve the Tongva's condition; although U.S. negotiators executed treaties with the Tongva and other California tribes that would have set aside substantial reservations for them, the treaties were never ratified by Congress. As a result, the Tongva have remained unrecognized by the federal government.

In recent years there has been a resurgence of Tongva assertiveness with respect to ancestry, with multiple efforts both to reorganize the tribe and gain federal recognition, and to form alliances with other tribes. VA has consulted with several contemporary Tongva and Tongva-associated groups in the course of Section 106 review on the current undertaking. At least 1700 people today identify as Tongva, and the state of California has recognized the Tongva (but no specific organization) as the Los Angeles Basin's aboriginal tribe.

DISCUSSION OF MITIGATION APPROACHES

While some archaeologists argue about whether the sites on the VALBHS and CSULB campuses are the exact location of the Puvungna where the Tongva originated and Chingichngish established his social order, the sacred character of Puvungna is widely accepted in the Tongva community and beyond, and the Puvungna District is included in the NRHP in part for this reason. The District is recognized as eligible for the NRHP under NRHP Criterion "a" for its association with Tongva traditional history, and under NRHP Criterion "b" for its association with Chingichngish. It is also eligible under Criterion "d" for its presumed archaeological research value.

But Puvungna is also covered with modern buildings and landscaping, including those associated with the VALBHS campus. This means that there is a great deal of uncertainty about just what physically remains intact below the ground at Puvungna, and that it is difficult to find out. However, it is necessary to disturb the ground on which Puvungna lies in order to meet the urgent medical needs of the veteran community in the VALBHS service area, and the proposed improvements require disturbing the ground at multiple locations.

When this sort of situation is encountered during the planning of projects subject to review under the California Environmental Quality Act (CEQA), a common response is to arrange for archaeological and tribal "monitoring." In a monitoring program, archaeologists and tribal representatives are employed to observe construction-related ground disturbance, and can affect a work stoppage if and when something of cultural importance (a grave, a major cluster of artifacts, architectural remains) is found. This can be a mutually agreeable and cost-effective solution to development/preservation conflicts, and it is in fact what some Tongva representatives have requested be done at Puvungna both during Section 106 review and in comments on VA's draft Environmental Assessment (EA). However, monitoring has at least two down-sides, from the point of view of historic preservation.

From a preservation standpoint, while monitoring may be an acceptable way to preserve artifacts and cultural features like human burials, it is necessarily a fast, often rushed arrangement, with archaeologists and tribal representatives scrambling to recover things while the construction contractor stands by. Much data potential and context can be lost this way. Further, monitoring does a poor job of addressing values that are not integrally related to artifacts and other physical objects (e.g. burials). Monitoring is unlikely to capture and preserve the significance of Puvungna as a traditional cultural place. The California SHPO has pointed out to VA that while

monitoring may be an adequate way to address archaeological research significance per NRHP Criterion "d," for some sites, it is not adequate with reference to the Puvungna District's Criteria "a" and "b" significance.

From the standpoint of efficient construction management, the down-side to monitoring is that it may, in fact, turn up something important, resulting in lengthy work stoppages and the award of substantial penalty payments to contractors. There have been cases in which reliance on monitoring, whether under that name or another, has resulted in eleventh-hour construction project delays that have been very costly to the taxpayer. In a place like Puvungna, which evidence suggests was at the very least a central place for one of California's most populous and prosperous tribes, it is advisable to consider other options. There may not be much left below the ground on the VA portion of Puvungna, but previous research suggests that the risk of encountering intact cultural deposits below the ground is quite high. This is particularly true for the potential to encounter intact cemeteries and ritual structures.

Under the circumstances, VA proposes to pursue a two-pronged approach to mitigating its undertaking's impacts on Puvungna.

APPROACH

HONORING PUVUNGNA'S ASSOCIATIVE SIGNIFICANCE

VALBHS proposes to construct a modest interpretive facility on the VALBHS campus to tell patients, families, and visitors the stories of Puvungna, Chingichngish, and the Tongva, and to provide Native American veterans and visitors with a place to interact and celebrate their cultural heritage. The character and location of the facility will be determined based upon discovery of intact prehistoric midden or features. VA will invite the Tongva consulting parties and CSULB to consult about and participate in designing and implementing the facility.

REFINING THE BOUNDARIES OF CA-LAN-234 ON CAMPUS

VALBHS originally proposed a flexible program of archaeological data recovery, combining monitoring with more traditional mechanized archaeology based on the assumption that CA-LAN-234 was present throughout the campus. Two years of archaeological work have

demonstrated that this is not the case and the boundaries of CA-LAN-234 have been redrawn based on archaeological work performed in 2015-2017. The most recent updates (September 2017) restrict the boundaries on the VALBHS campus to the area defined by Leonard (1974) in the northwest corner of the campus where the site is contiguous with the portion on the CSULB campus. The easternmost portion of his boundary has been demonstrated not to contain midden (based on excavations six feet deep) and has thus been modified. The methods for monitoring and traditional mechanized archaeology below are restricted to projects within the new boundary and for all other projects subsurface work shall be subject to the unanticipated discoveries clause listed below.

ARCHAEOLOGICAL DATA RECOVERY

Monitoring by archaeologists and Tongva representatives will be employed where locations to be excavated are limited in scale and duration, and where other approaches to data recovery (such as mechanized archaeology; see below) would be unduly difficult to carry forward. Examples are tree removal, small-scale trenching, and geotechnical boring.

Traditional mechanized archaeology will be employed in advance of all substantial grading within the revised boundaries of the prehistoric site. At least two weeks before construction-related earthmoving is scheduled to begin, and earlier where construction schedules and weather permit, the area where such earthmoving is planned will be mechanically stripped under archaeological and Tongva supervision. Should graves, house features, or other culturally sensitive features be uncovered, they will be excavated carefully by hand, with standard archaeological controls. Any midden deposits encountered will be sampled using standard archaeological methods. The size and number of the excavation units will depend on the nature of the cultural material found and consultation with affiliated tribal groups to determine respectful methodology based on cultural traditions. Should control test units clearly establish that the deposits lack cultural material and stratigraphic integrity, the VA and their consultants may determine that the area does not contribute to the Puvungna District and construction activities in this area may continue with Native American and archaeological monitors. Archaeologists and Native American monitors will also be on-call during building demolition and elsewhere, in case of unanticipated discoveries.

Unanticipated Discoveries for all excavation outside of the new boundaries of CA-LAN-234 on the VALBHS campus shall require immediate halt of excavation work until the find can be evaluated by a qualified archaeologist.

The results of all archaeological work will be analyzed and reported in accordance with contemporary archaeological standards.

Prehistoric artifacts and other material recovered that are not subject to repatriation under the Native American Graves Protection and Repatriation Act (NAGPRA) will be curated at UCLA's Fowler Museum under a curation agreement executed between VALBHS and the Fowler Museum. Human remains and Native American cultural items will be repatriated in accordance with VALBHS's NAGPRA Plan of Action (POA).

For details regarding archaeological methods to be employed, see Appendix B.

APPENDIX A: OUTLINE OF LOCAL CULTURAL HISTORY

Archaeologists in Southern California conceptualize prehistory in terms of named chronological "patterns" and spatial "traditions," each comprising suites of cultural expressions like artifact types, burial forms, and inferred subsistence practices. Patterns are subdivided into "phases."

The earliest pattern reported to be expressed in archaeological sites near the VALBHCS campus is the Topanga Pattern of the Encinitas Tradition (Sutton and Gardner 2010; Table 1). Later, this pattern is replaced by the Angeles pattern of the Del Rey Tradition (Sutton 2010; Table 1).

Topanga Pattern groups are thought to have been relatively small and highly mobile. Sites known are thought to have been temporary campsites, not villages, and tend to be along the coast in wetlands, bays, coastal plains, near- coastal valleys, marine terraces and mountains. The Topanga toolkit is dominated by manos and metates used for grinding hard seeds, with projectile points scarce (Sutton and Gardner 2010:9).

In Topanga Phase I other typical characteristics were a few mortars and pestles, abundant core tools (scraper planes, choppers and hammerstones), relatively few large, leaf-shaped projectile points, cogged stones, and early discoidals (Table 1). Secondary inhumation under cairns was the common mortuary practice. In Orange County as many as 600 flexed burials were present at one site and dated 6, 435 radiocarbon years before present (Sutton and Gardner 2010:9, 13).

In Topanga Phase II, flexed burials and secondary burial under cairns continued. Adoption of the mortar and pestle is a marker of this phase. Other typical artifacts include manos, metates, scrapers, core tools, discoidals, charmstones, cogged stones and an increase in the number of projectile
points. In Orange County stabilization of sea level during this time period resulted in increased use of estuary, near shore and local terrestrial food sources (Sutton and Gardner 2010:14-16).

The Angeles pattern of the Del Rey Tradition generally is restricted to the mainland and appears to have been less technologically conservative and more ecologically diverse, with a largely terrestrial focus and greater emphases on hunting and nearshore fishing (Sutton 2010).

In Angeles Phase I Elko points for atlatls or darts appear, small steatite objects such as pipes and effigies from Catalina are found, shell beads and ornaments increase, fishing technologies increase including bone harpoons/fishhooks and shell fishhooks, donut stones appear, and hafted

Table 1. Cultural Patterns and Phases

Phase	Dates BP	Material Culture	Other Traits
Topanga I	8,500 to 5,000	Abundant manos and metates, many core tools and scraper s, few but large points, charmstones, cogged stones, early discoidals, faunal remains rare	Shellfish and hunting important, secondary burials under metate cairns (some with long bones only), some extended inhumations, no cremations
Topanga II	5,000 to 3,500	Abundant but decreasing manos and metates, adoption of mortars and pestles, smaller points, cogged stones, late discoidals, fewer scraper planes and core tools, some stone balls and charmstones	Shellfish important, addition of acorns, reburial of long bones only, addition of flexed inhumations (some beneath metate cairns), cremations rare
Angeles I	3,50 0 to 2,600	Appearance of Elko dart points and an increase in the overall number of projectile points from Encinitas components; beginning of large-scale trade in small steatite artifacts (effigies, pipes, and beads) and *Olivella* shell beads from the southern Channel Islands; appearance of single-piece shell fishhooks and bone harpoon points; Coso obsidian becomes important; appearance of donut stones	Appearance of a new biological population (Takic proto-Gab/Cupan language), apparent population increase; fewer and larger sites along the coast; collector strategy; less overall dependence on shellfish but fishing and terrestrial hunting more important; appearance of flexed and extended inhumations without cairns, cremations uncommon
Angeles II	2,60 0 to 1,600	Continuation of basic Angeles I material culture with the addition of mortuary features containing broken tools and fragmented cremated human bone; fishhooks become more common	Continuation of basic Angeles I settlement and subsistence systems; appearance of a new funerary complex
Angeles III	1,60 0 to 1,250	Appearance of bow and arrow technology (e.g., Marymount or Rose Spring points); changes in *Olivella* beads; asphaltum becomes important; reduction in obsidian use; Obsidian Butte obsidian largely replaces Coso	Larger seasonal villages; flexed primary inhumations but no extended inhumations and an increase in cremations; appearance of obsidian grave goods; possible expansion into eastern Santa Monica Mountains, replacing Topanga III groups
Angeles IV	1,25 0 to 800	Cottonwood points appear; some imported pottery appears; birdstone effigies at the beginning of the phase and "spike" effigies dropped by the end of the phase; possible appearance of ceramic pipes	Change in settlement pattern to fewer but larger permanent villages; flexed primary inhumations continue, cremations uncommon; expansion into the San Gabriel Mountains, displacing Greven Knoll III groups
Angeles V	800 to 450	Trade of steatite artifacts from the southern Channel Islands becomes more intensive and extensive, with the addition or increase in more and larger artifacts, such as vessels and comals; larger and more elaborate effigies	Strengthening of ties, especially trade, with southern Channel Islands; expansion into the northern Santa Ana Mountains and San Joaquin Hills; development of mainland dialects of Gabrielino
Angeles VI	450 to 150	Addition of Euroamerican material culture (e.g., glass beads and metal tools), locally made pottery, metal needle-drilled *Olivella* beads	Change of settlement pattern, movement close to missions and ranches; use of domesticated species obtained from Euroamericans; flexed primary inhumations continue, cremations uncommon to the north (nearer the Chumash) but somewhat more common to the south (nearer the Luiseño).

micro blades for cutting/graving wood or stone appear. In addition, several Encinitas (Topanga) traits, such as discoidals, cogged stones, plummet-like charmstones, and cairn burials (Sutton and Gardner 2010: Table 1) virtually disappear from the record. Mortuary practices changed to consist of primarily flexed primary inhumations, with extended inhumations becoming less common. Settlement patterns made a shift from general use sites being common to habitation areas separate from functional work areas. Subsistence is thought to have shifted from mostly collecting to increased hunting and fishing (Sutton 2010)

Angeles Phase II is identified primarily by the appearance of a new funerary complex, with other characteristics similar to Angeles I. The complex features killed (broken) artifacts including manos, metates, bowls, mortars, pestles, points, and others plus highly fragmented cremated human bones and a variety of faunal remains. In addition to the cremains, the other material also often burned. None of the burning was performed in the burial feature (Sutton 2010).

The Angeles III Phase is the beginning of what has been known as the Late Period and is marked by several changes from Angeles I and II. These include the appearance of small projectile points, steatite shaft straighteners and increased use of asphaltum all reflecting adoption of bow and arrow technology, obsidian sources changed from mostly Coso to Obsidian Butte and shell beads from Gulf of California species began to appear. Subsistence practices continued as before and the geographic extent of the Angeles Pattern increased (Sutton 2010).

The Angeles IV phase is marked by new material items including Cottonwood points for arrows, Olivella cupped beads and Mytilus shell disks, birdstones (zoomorphic effigies with magico-religious properties) and trade items from the Southwest including pottery. It appears that populations increased and that there was a change in the settlement pattern to fewer but larger permanent villages. Presence and utility of steatite vessels may have impeded the diffusion of pottery into the Los Angeles Basin. The settlement pattern altered to one of fewer and larger permanent villages. Smaller special-purpose sites continued to be used (Sutton 2010).

Angeles V components contain more and larger steatite artifacts, including larger vessels, more elaborate effigies, and comals. Settlement locations shifted from woodland to open grasslands. The exploitation of marine resources seems to have declined and use of small seeds increased. Many Gabrielino inhumations contained grave goods while cremations did not (Sutton 2010).

The Angeles VI phase reflects the ethnographic mainland Tongva (“Gabrielino”) of the post-contact (i.e., post-A.D. 1542) period. One of the first changes in Tongva culture after contact

was undoubtedly population loss due to disease, coupled with resulting social and political disruption. Angeles VI material culture is essentially Angeles V augmented by a number of Euroamerican tools and materials, including glass beads and metal tools such as knives and needles (used in bead manufacture). The frequency of Euroamerican material culture increased through time until it constituted the vast majority of materials used. Locally produced brownware pottery appears along with metal needle-drilled *Olivella* disk beads.

The ethnographic mainland Tongva subsistence system was based primarily on terrestrial hunting and gathering, although nearshore fish and shellfish played important roles. Sea mammals, especially whales (likely from beached carcasses), were prized. In addition, a number of European plant and animal domesticates were obtained and exploited. Ethnographically, the mainland Tongva practiced interment and some cremation (Sutton 2010).

ETHNOGRAPHY

Much of the southern California archaeological literature argues that the Tongva moved into southern California from the Great Basin around 4,000 Before Present (B. P.), "wedging" themselves between the Hokan-speaking Chumash, located to the north, and the Yuman-speaking Kumeyaay, located to the south (see Sutton 2009 for the latest discussion). This Shoshonean Wedge, or Shoshonean "intrusion" hypothesis, is contradicted by the Tongva community's traditions, which hold that they have always lived in their traditional territory since their emergence into this world at Puvungna (Martinez and Teeter 2015:26).

The Tongva speak a language that is part of the Takic language family. Their territory encompassed a vast area stretching from Malibu in the northwest, to the base of Mount Wilson in the north, to
San Bernardino in the east, Aliso Creek in the southeast and the Southern Channel Islands, in all an area of more than 2,500 square miles (Bean and Smith 1978, McCawley 1996). At European contact, the tribe consisted of more than 5,000 people living in settlements throughout the area. Some of the villages could be quite large, housing up to 150 people.

The Tongva are considered to have been one of the wealthiest tribes and to have greatly influenced tribes they traded with (Kroeber 1976:621). Houses were domed, circular structures thatched with tule or similar materials (Bean and Smith 1978:542). The best known artifacts were made of steatite and were highly prized. Many common everyday items were decorated

with inlaid shell or carvings reflecting an elaborately developed artisanship (Bean and Smith 1978:542).

The main food zones utilized were marine, woodland and grassland (Bean and Smith 1978). Plant foods were, by far, the greatest part of the traditional diet at contact. Acorns were the most important single food source. Villages were located near water sources necessary for the leaching of acorns, which was a daily occurrence. Grass seeds were the next most abundant plant food used along with chia. Seeds were parched, ground and cooked as mush in various combinations according to taste and availability. Greens and fruits were eaten raw or cooked or sometimes dried for storage. Bulbs, roots and tubers were dug in the spring and summer and usually eaten fresh. Mushrooms and tree fungus were prized as delicacies. Various teas were made from flowers, fruits, stems and roots for medicinal cures as well as beverages (Bean and Smith 1978:538-540).

The principal game animals were deer, rabbit, jackrabbit, woodrat, mice, ground squirrels, antelope, quail, dove, ducks and other birds. Most predators were avoided as food, as were tree squirrels and most reptiles. Trout and other fish were caught in the streams, while salmon were available when they ran in the larger creeks. Marine foods were extensively utilized. Sea mammals, fish and crustaceans were hunted and gathered from both the shoreline and the open ocean, using reed and dugout canoes. Shellfish were the most common resource, including abalone, turbans, mussels, clams, scallops, bubble shells and others. (Bean and Smith 1978:538-540).

Among Tongva settlements, Puvungna was and is especially significant as the traditional origin place of Chingichngish, the spiritual tradition bearing his name, and indeed the Tongva people. It has remained an important central place throughout Tongva history, as documented in Spanish military and mission records and the extensive early 20th century ethnographic notes of John Peabody Harrington.

APPENDIX B: PLANNED ARCHAEOLOGICAL METHODS

Altschul (1994) has summarized the status of knowledge regarding the Puvungna District reporting on archaeological work within three miles of and including Puvungna South, and concludes that while many portions of sites have been disturbed, intact midden is present at several locations to depths of at least five feet. In some developed areas, imported fill has been observed to have capped intact archaeological deposits.

Only two data recovery excavations have been performed in the complex of sites that comprise the Puvungna District as currently recorded. CA-LAN-270 (Los Altos) produced items that suggested a habitation/village site; these included at least twenty human burials[4], both functional and ceremonial artifacts, and faunal remains. The human remains were in a cemetery that contained individuals of all ages including infants with associated grave goods. The other excavated site within the district may be a peripheral resource procurement and processing site; it appears to contain shellfish refuse with few artifacts but with some isolated burials without grave goods. Ecological reconstruction indicates that this complex of sites was situated along the edge of an estuary whose boundaries shifted over time.

The only archaeological work prior to 2015 on the VALBHS portion of Puvungna South was the survey and augur testing by Leonard in 1974. Work since 2015 has clearly demonstrated the site is not present throughout most of the VALBHS campus.

RESEARCH QUESTIONS AND DATA NEEDS

To the extent allowed by the data, monitoring and data recovery will be organized to address the following questions:

1. Is there anything about the site(s) that elucidates its association with Chingichngish and Tongva origins? We cannot predict exactly what might indicate associations with Chingichngish, but we might expect a relatively large number of high-status cultural items, richly endowed burials, large ceremonial structures, and evidence of substantial status differentiation in the population. Conversely, close similarity to other sites excavated in the area might indicate non-association with Chingichngish. Association or non-association with Tongva origins is largely a matter of chronology: how long has the site been occupied, and is there evidence of

population replacement at any point in its history? As work progresses, predictions and test implications can be refined.

2. Descriptive Questions. Whatever evidence of Chingichngish it may contain, the site can provide basic descriptive data for comparison with other excavated sites in the vicinity. The following descriptive questions will be addressed to the extent feasible:

a. What is the horizontal and vertical extent of the site on the VALBHS campus? Data that can answer these questions include thickness of undisturbed midden across the campus. Answering this question requires careful and precise mapping of intact archaeological midden and features throughout the lifespan of the undertaking. High resolution Global

Positioning System units, such as Trimble© Geo6000 units, will be utilized. Careful stratigraphic mapping of all trench and excavation side walls and floors with archaeological deposits will be performed by the archaeological team.

b. What time periods are represented? Data that can answer this question includes faunal materials from intact contexts, lithic analysis and dating, and special sampling of site sediments for dating. Samples suitable for optical stimulated luminescence (OSL) dating will be obtained by the archaeological team above and below archaeological deposits including features and at any stratigraphically evident boundaries. Organic materials may be submitted for radiocarbon dating if undisturbed by prior development or rodent burrows. If recovered, obsidian will be submitted for X-ray Fluorescence Spectrometry (XRF) and obsidian hydration to contribute information on both sourcing the material and chronological analysis of the deposit.

c. What type of site is Puvungna South? Data that can address this question include range and nature of the resource base, seasonality of resource exploitation, thickness of cultural deposits, nature of residential architecture, and presence or absence of functional site areas such as specific food processing areas and cemeteries. This would help determine degree of sedentism, community structure and seasonality. Answering this question requires thorough documentation of all artifacts, ecofacts, and features followed by identification and analysis. The archaeological team will ensure collection of this data and perform subsequent analysis, supplemented by outside consultants as necessary, following the work plan below.

d. Does the site contain burials, either isolated or in a cemetery? Are burials associated with grave goods? What is the chronology of any burials? Data that can answer these questions

requires recovery of entire individuals (not partial recovery) and at least one foot of sediment around the entire burial. Each burial will be pedestalled and illustrated before removal. Samples suitable for optical stimulated luminescence (OSL) dating will be obtained by the archaeological team above and below the burial for chronological placement. Faunal materials associated with the burial may be radiocarbon dated if they are not identified as Native American cultural items for which repatriation is required, or if the party to whom the material will be repatriated consents to their analysis. OSL samples should be collected as a backup in case sufficient material is not present for radiocarbon dating.

e. How does the biological and demographic information from skeletal remains and artifacts/ecofacts associated with any VA site burials compare to the CA-LAN-270 burials, to the isolated burials from Puvungna North, and to burials from other Tongva/Gabrielino sites? Are ceremonially important indicators such as abalone, shark teeth, raptor claws, or dogs/foxes/coyotes present with burials? Data that can address these questions requires non-invasive documentation, illustration and measurement of skeletal remains and careful identification of associated artifacts, ecofacts , and faunal remains and will be conducted by the archaeological team following the work plan below. Health and demographic information will be limited by the number of burials present.

f. What types of food resources were utilized? Do these change over time? Data that can answer these questions requires study of vertebrate, invertebrate and plant resources recovered with identification by experts and comparison to other sites and will be conducted by the archaeological team, supplemented by outside consultants as necessary. Protein residue analysis and associated types of special studies will be conducted on non- ceremonial artifacts if recovered from stratigraphically intact contexts.

g. What was the environmental setting of the site at the time in which it was occupied? Did this change over time? Data that can address these questions requires column samples from intact stratigraphic contexts and will be conducted by the archaeological team, supplemented by outside consultants as necessary. Column samples will be analyzed to provide information on background vegetation and climate, wetlands availability, salinity, sedimentation and chronology.

WORK PLAN

RETENTION OF QUALIFIED ARCHAEOLOGISTS

The VALBHS will retain a contractor whose supervisory archaeological personnel meet the Secretary of Interior's Professional Qualifications Standards (SIPQS) for prehistoric archeology (48 FR44738-39). The supervisory personnel will be responsible for employing appropriately qualified workers, for assembling necessary equipment, and for developing and implementing scopes of work, subject to VALBHS approval. All written analysis prepared for the technical report shall be written by an archaeologist meeting the SIPQS for prehistoric archaeology.

NATIVE AMERICAN MONITORING

The VALBHS contractor will manage the Native American monitoring program on behalf of VALBHS. The contractor will coordinate with those Tribal Organizations involved in the program and schedule Native American monitors on a rotation basis and shall ensure that work is offered on a reasonably equal basis to all four groups. Within the 2017 revised boundaries of CA-LAN-234, no ground disturbance for the undertaking deeper than 4 inches below the current surface will occur without the presence of a Native American monitor. The contractor will also ensure that tribal monitors are trainedso that all share an understanding of the reasons for monitoring, the methods employed, the items or features to which they should be alert, and the safety and other constraints that must be observed. Should more than one project of the undertaking be excavating concurrently, one monitor per piece of heavy equipment will be required. An individual qualified as both an archaeological and a tribal monitor may fulfill both functions.

SCHEDULING AND MONITORING CONSTRAINTS

With respect to traditional data recovery operations, the VALBHS and contractor will coordinate to ensure adequate time, funding, and support to complete all necessary work.

With respect to monitoring, the VALBHS will provide the contractor with a schedule of ground disturbing activities within the 2017 revised boundaries of CA-LAN-234 in writing a minimum of seven days prior to initiation of work and update the schedules as needed. The VALBHS, contractor, and tribal organizations may agree to exclude excavation in particular areas or depth-ranges from monitoring if they believe that such areas or ranges have been disturbed to the point of having lost the potential for containing intact deposits, material, features or cultural items.

No ground disturbance for the undertaking deeper than 4 inches below the current surface will occur without the presence of appropriate monitors. Should more than one project of the undertaking be excavating concurrently, one archaeological and one tribal monitor per piece of heavy equipment will be required. An individual qualified as both an archaeological and a tribal monitor may fulfill both functions.

CULTURAL AWARENESS TRAINING

All undertaking earth-moving personnel will participate in Cultural Awareness Training prior to commencement of any ground-disturbing activity. New personnel commencing work on the project must receive the training prior to start of work. Presentations will be conducted in the field using flipbooks in conjunction with the preconstruction meeting and safety tailboards. The monitors will have the training materials on hand each day of work.

The training will include instruction on: (1) the reasons for conducting the archaeology and tribal monitoring, (2) the possibility of unearthing cultural artifacts and deposits; (3) the types of artifacts and deposits that may be unearthed, including human remains; (4) the importance of, and legal basis for, the protection of such materials; and (5) the requirement that they immediately halt work within 50 feet of artifacts, archaeological deposits or human remains. All attendees will sign to verify that they understand the project cultural requirements and will be issued hard-hat stickers. This permits the monitors to immediately identify any personnel requiring training.

ARCHAEOLOGICAL MONITOR AUTHORITY AND RESPONSIBILITIES

Archaeological monitors will observe operations as continuously as possible, giving special attention to the walls and floors of trenches and other excavations, making notes and taking photographs regularly. They will document and collect any items that are uncovered that may fall into classes relevant to the research questions outlined above or to constitute Native American cultural items as defined under NAGPRA. When and if a monitor or his/her supervisor notes that something requiring extended attention has been exposed, the monitor will inform the VA construction manager immediately; the construction manager has authority to initiate a temporary work stoppage in order to document and/or recover a potentially significant discovery. The monitor will attempt to minimize schedule impacts.

ARCHAEOLOGICAL RECORDING

Archaeological data recovery and monitoring will be conducted in ways consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects will be taken. The contractor will ensure that all personnel are appropriately trained and qualified.

HUMAN BURIALS

Should an apparent human burial (grave) be exposed during monitoring, the construction manager will divert work away from its vicinity and establish a lathe and flagging-marked exclusion zone of at least 50 feet around the discovery. Should such a burial be found during archaeologically supervised grading, the archaeologists in charge will protect it in the same manner. VA will take steps to determine whether the burial remains are of Native American or non-Native American origin, and will seek the advice and other services of the County Coroner.

Work must remain diverted while VA determines whether the remains are Native American and for any subsequent treatment. Protection of human burials while awaiting VA's determination will include keeping the discovery confidential and securing the discovery location and a buffer of no less than 50 feet to prevent disturbance of the remains and associated materials.

If the County Coroner, in cooperation with the VA, determines that the remains are most likely of Native American origin, VA will carry out the terms of its NAGPRA Plan of Action (POA), in consultation with the POA consulting parties.

If the County Coroner, in cooperation with the VA, determines the remains represent a historic non- Native American burial VA will consult with the SHPO and ACHP regarding their proposed treatment of these remains.

CLEANING AND STABILIZATION

Recovered materials generally require cleaning to permit identification. Most will be washed with plain water. Human skeletal materials and fragile faunal remains will be dry-brushed only and no preservatives will be applied.

IDENTIFICATION AND CATALOGING

Classification of all materials and objects will be identified by experts. All identifications will be as specific as possible. The identification data gathered will be entered into a computer data file that is linked to the provenience log using corresponding lot numbers, thus generating a master

catalog. Classes of cultural remains will then be submitted to the specialists for technical analysis. Following special analyses, all cataloged artifacts and materials will be placed in resealable plastic bags along with archival tags denoting provenience and artifact information before delivery to the curation
facility.

ANALYSES

Analyses conducted depend to a great extent on the number of artifacts and other material recovered, their condition, and their relevance to the research issues listed above. Typical analyses include botanical/pollen/phytolith or organic residues, radiocarbon dating, stone tool laser ablation, x-ray diffraction and hydration, manufacture, chronological indicators, placing recovered materials into the regional framework, intra- site distribution, trade, subsistence and similar work.

Spatial analysis will utilize high resolution Global Positioning System data to delineate horizontal and vertical extent of the site on the VALBHS campus. The nature of the archaeological deposits requires geological/geoarchaeological analysis of sediments and stratigraphic mapping of all archaeological deposits

Chronology is a critical aspect of understanding the deposits and allowing suitable comparisons. The IIRMES facility at California State University Long Beach will be utilized for OSL and laser ablation. Radiocarbon samples are anticipated to be submitted to Beta-Analytic. Obsidian hydration samples are anticipated to be submitted to Origer Laboratories.

Human skeletal remains will not be subjected to any destructive (physically destroying any portion of the skeletal remains) or invasive analyses (sampling within the cranium for example). No photographs or scans of human skeletal remains are permitted but hand-drawn illustrations are permitted for documentation. Human skeletal remains will be documented in accord with the Standards for Data Collection from Human Skeletal Remains (Buikstra & Ubelaker 1994).

As outlined in the POA, funerary and sacred objects, objects of cultural patrimony, and artifacts of bone and shell will not be subjected to any destructive analyses. Sacred objects and objects of cultural patrimony will not be photographed or scanned without consent of the POA consulting parties. Hand- drawn illustrations are permitted for documentation. All other artifacts may be photographed and scanned. Faunal (animal) bone and shell may be subjected to radiocarbon

dating in limited quantities. Limited quantities of stone tools or debitage may be subjected to hydration or laser ablation.

The archaeological team will include experts in human osteology, geology/geoarchaeology, faunal analysis, and all other necessary areas. The archaeological team is expected to utilize outside consultants if experts are not on staff.

REPORTING

Technical and public reports on cultural materials of all types will be written by a professional meeting the SIPQS of prehistoric archaeology to address previously established research questions and to make data available for future study by others. All research and working documents are the property of the Department of Veterans Affairs. Any and all reports, articles, or information that may become published will be reviewed by VALBHS and its consultants for text that is respectful of any human remains and other cultural items that may be of concern to the traditional values of the NAGPRA POA consulting parties. Line drawings of Native American human remains will be allowed for illustration in publicly available documents, but no photographs will be presented. Any published description of ceremonial activities involving specifically identified sacred objects or objects of cultural patrimony will require the permission of the POA consulting parties. Copies of all reports or papers generated will be provided to the POA consulting parties at no cost to them.

All VALBHS cultural resources contractors shall submit compact disks with their reports, all field paperwork and photos and all shapefiles to VALBHS and the South Central Coastal Information Center promptly upon report approval by VA. The VA will utilize such files for the MOA Yearly Report and other appropriate uses.

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ATTACHMENT C. NAGPRA POA

DEPARTMENT OF VETERANS AFFAIRS
VA Long Beach Healthcare System
5901 East Seventh Street
Long Beach, CA 90822

PLAN OF ACTION FOR THE VETERANS AFFAIRS LONG BEACH HEALTHCARE SYSTEM FACILITY PURSUANT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT

INTRODUCTION

Veterans Affairs Long Beach Healthcare System (VALBHS) acknowledges that the known boundaries of the NRPH-listed prehistoric village of Puvungna extend onto their property and that cultural materials, including burials, may exist outside of that village boundary (defined more than 30 years ago).

In accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations, the following Plan of Action (POA) establishes conditions and directions for the treatment of Native American human remains, associated funerary objects, sacred objects, and objects of cultural patrimony recovered during any construction projects on at the VALBHS facility.

Maintenance activities in areas previously graded such as repairs to existing sidewalks or minor drilling such as for the replacement of signs are not anticipated to produce human remains or cultural items.

ACRONYM GLOSSARY

Acronym	Full Name
ARPA	Archaeological Resources Protection Act
DPR 523	CA Department of Parks and Recreation site record forms
GPS	Global Positioning System unit
MLD	Most Likely Descendent
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission of California
NHPA	National Historic Preservation Act
POA	Plan of Action
POA consulting parties	Tongva and/or Gabrielino parties who consulted to develop this POA
UTM	Universal Transverse Mercator coordinate system
VALBHS	Veterans Affairs Long Beach Healthcare System

DEFINITIONS

The following definitions for terms used in this plan are taken from NAGPRA.

Cultural Items include but are not limited to the following:

Human Remains are any physical remains of a human being.

Associated Funerary Objects are objects that, as a part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Unassociated Funerary Objects are those which may have become separated from their original context but which can be reasonably assumed to have come from a burial.

Sacred Objects are specific ceremonial objects that are needed by traditional Native American religious leaders for the practice of traditional Native American religions by their present day adherents.

Cultural Patrimony is an object having ongoing historical, traditional, or cultural importance central to a Native American group or culture itself, rather than property owned by an individual Native American, and which, therefore, cannot be alienated, appropriated, or conveyed by any individual regardless of whether or not the individual is a member of the Native American group, and such object shall have been considered inalienable by such Native American group at the time the object was separated from such group.

Cultural Affiliation means a relationship of shared group identity that can reasonably be traced historically or prehistorically between a present day Indian Tribe and an identifiable earlier group.

CULTURAL AFFILIATION

The Los Angeles basin, including the VALBHS facility, is the traditional tribal territory of prehistoric peoples called the Tongva or, later in time, the Gabrielino. No band or group of these peoples is currently federally recognized. However, VALBHS has determined that it is appropriate to consult with Tongva and/or Gabrielino groups recommended by the California Native American Heritage Commission and additional parties who requested to consult whether individuals or groups. A list of Tongva and/or Gabrielino parties who consulted to develop this POA is appended and they are hereafter referred to as POA consulting parties.

DEFINITION OF OBJECTS

Funerary objects are any items within a minimum three foot radius of human remains. However a larger radius shall be utilized if demonstrated by stratigraphy.

Sacred objects include any items with ochre applied, bone whistles, quartz crystals, minerals, cogstones, discoidals, green soapstone items, sunstone/staff stones, miniature pestles (less than 3.5 cm wide and 14 cm long) and cupule sized bowls (less than five inch diameter). Other items may be recovered that are sacred and shall be determined by consultation with Tongva and/or Gabrielino parties.

Objects of cultural patrimony include sacred bundles and other community-owned items as determined through consultation with the POA consulting parties.

TREATMENT, CARE AND HANDLING

In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can only be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24 hr. guard should be posted outside of working hours.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags (no transparent or plastic bags may be used). Bone may be bagged separately from funerary objects but both must then be placed into one opaque box so they are not separated.

Human bone may be dry brushed to remove sediment but not washed. All sediment should be retained. No skeletal elements may be scanned or photographed but hand-drawn illustrations are permitted. Quartz crystals, sacred bundles and items with ochre applied shall not be washed. Other artifacts may be washed, photographed, and scanned.

All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to an on-site secure storage container but not removed from the facility. Other cultural items outside of a mortuary context may be removed from the facility in limited quantities for research-design related purposes such as radiocarbon dating, hydration analysis, and other scientific studies.

VALHBS will not publicize recovery of any cultural materials without advance notice to the POA consulting parties. Representatives of all POA consulting parties will be afforded the opportunity to inspect and review all artifact collections and records from the project for the purpose of identifying sacred objects and objects of cultural patrimony. POA consulting parties will be afforded the opportunity to inspect the excavations while in progress for the same purpose and to conduct such ceremonies as are deemed appropriate including an altar inside the onsite storage container.

ARCHAEOLOGICAL EXCAVATION AND RECORDING

Archaeological excavation, including construction monitoring, will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of ten years of experience as a principal investigator in southern California. VA's archaeological contractor shall ensure that all other personnel are appropriately trained and qualified.

Human Burials

Any human burials discovered during archaeological excavations will be treated with care and respect, and in accordance with the applicable treatments prescribed below. Should an apparent human burial (grave) be found during construction, VA will immediately divert work a minimum of 50 feet and place an exclusion zone (lath and flagging) around the burial, thereafter treating it in accordance with the applicable treatments prescribed below.

VA's archaeological contractor will be responsible for documenting the burial. VA will take steps to determine whether the remains are of Native American or non-Native American origin, and may at VA's discretion seek the advice and other services of the County Coroner.

Work must remain diverted while VA determines whether the remains are Native American and for any subsequent treatment. Protection of human burials while awaiting VA's determination will include keeping the discovery confidential and securing the discovery location to prevent disturbance of the remains and

associated materials.

If VA determines that the remains are of Native American origin, VA may notify the Native American Heritage Commission (NAHC) and/or Ms. Cindi Alvitre, whom the NAHC has identified as the Most Likely Descendent (MLD) for Puvungna.

Since protection against disturbance during project construction or future development cannot be reasonably assured, burials will be removed. An archaeologist with osteological expertise will carefully and respectfully excavate the burial to expose in place the skeletal remains and any associated grave objects. During excavation, all matrix associated with burials will be screened (1/8 inch mesh) for artifacts and skeletal materials. The human remains and their associated funerary objects will be exposed *in situ* for measurement, mapping, and documentation. If possible, all matrix three feet around the burial will be maintained separately. If burials are found in restricted excavation openings, the excavation will be expanded to permit recovery of the whole individual. Detailed descriptive records, including both standardized forms and field notes, will also be made. This information must include the position of the skeletal remains, degree of articulation, orientation, and relationship between the skeletal remains and any associated funerary objects.

Cremations will either be removed in bulk (especially if they are still contained within a mortuary vessel) or by such means as necessary to ensure complete recovery of all material.

If VA determines the remains represent a historic non-Native American burial, the burial will be removed. Non-invasive analysis of the skeletal remains and any artifacts will be performed on any burials removed. If VA determines the remains to be non-historic, VA will determine how the remains will be treated.

Site and Feature Documentation
Every feature and site requires a standard set of data be taken. This includes all information on the standard DPR forms including UTM readings using a GPS unit, an accurate elevation measurement, the depth below surface and true north reading. Additional information collected may include one or more samples for further analysis such as botanical, pollen or radiometric analyses.

Cleaning and Stabilization
Recovered materials generally require cleaning to permit identification. Most will be washed with plain water. Human skeletal materials will be dry-brushed only and no preservatives will be applied.

Identification and Cataloging
All materials and objects will be identified by experts. All identifications will be as specific as possible. All specimen information, including identifications, will be entered into a computerized catalog database. Each specimen will be maintained with a tag specifying the provenience and identification information.

ARCHAEOLOGICAL ANALYSIS

Analyses conducted depend to a great extent on the number of artifacts/ecofacts recovered and their condition. Typical analyses include botanical/pollen/phytolith or organic residues, radiocarbon dating, stone tool laser ablation, x-ray diffraction and hydration, manufacture, chronological indicators, placing recovered artifacts/ecofacts into the regional framework, intra-site distribution, trade, subsistence and similar work.

Human skeletal remains shall not be subjected to any destructive (physically destroying any portion of the skeletal remains) or invasive analyses (sampling within the cranium for example). No photographs or scans of human skeletal remains are permitted but hand-drawn illustrations are permitted for documentation. Human skeletal remains will be documented in accord with the *Data Standards for Human Skeletal Remains*.

Funerary and sacred objects, objects of cultural patrimony and artifacts of bone and shell shall not be subjected

to any destructive analyses. Sacred objects and objects of cultural patrimony shall not be photographed or scanned without consent of the POA consulting parties. Hand-drawn illustrations are permitted for documentation. All other artifacts may be photographed and scanned. Faunal (animal) bone and shell may be subjected to radiocarbon dating in limited quantities. Limited quantities of stone tools or debitage may be subjected to hydration or laser ablation.

NOTICE TO POA CONSULTING PARTIES

POA consulting parties will be provided with an email notice within 24 hours for each occurrence of human remains, sacred objects or objects of cultural patrimony and will be afforded the opportunity to perform traditional ceremonies.

TRADITIONAL TREATMENT

Traditional treatment of each occurrence of human remains, sacred objects and objects of cultural patrimony may include offerings of white sage and other traditional plants in addition to modern representations of traditional artifacts.

REPORTING

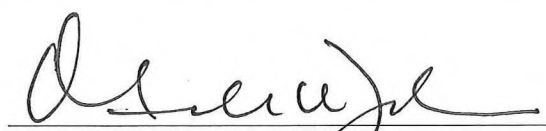
Technical and public reports on cultural materials of all types will be compliance with ARPA, Section 106 of the NHPA, and modern professional standards. The report needs to address previously unanswered/under-answered research questions for the geographical area. The information recovered should be as complete as possible as it is the last opportunity of the scientific and descendant communities to learn about the archaeological site. All research and working documents containing information or photographs of cultural items removed from VALBHS are considered the property of the Department of Veterans Affairs. Any and all reports, articles, or public available accounts of the human remains and other cultural items recovered from VALBHS shall treat them with respect and concern for the traditional values of the POA consulting parties. Line drawings of Native American human remains will be allowed for illustration in publicly available documents, but no photographs shall be presented. Any published description of ceremonial activities involving specifically identified sacred objects or objects of cultural patrimony will require the permission of the POA consulting parties. Copies of all reports or papers generated will be provided to the POA consulting parties at no cost to them.

REPATRIATION

VA will consult with federally recognized American Indian tribes in the vicinity of the Los Angeles Basin to repatriate Native American human remains and cultural items, with the understanding that such tribes will cooperate with the POA consulting parties in establishing how repatriated remains and items will be managed.

REVIEW AND UPDATING

This Plan shall be reviewed periodically by VALBHS and updated as necessary to comply with any changes in NAGPRA or its implementing regulations. Substantive changes will only be made after consultation with the POA consulting parties and/or successor Tongva and/or Gabrielino groups or individuals.



Michael W. Fisher, VALBHS Director — Date: 7/28/15

cc: all POA consulting parties

Group	Email	First Name	Last
Gabrieleno Band of Mission Indians-Kizh Nation	gabrielenoindians@yahoo.com	Andrew	Salas
Gabrieleno/Tongva San Gabriel Band of Mission Indians	GTTribalcouncil@aol.com	Anthony	Morales
Gabrielino Tongva Indians of California	gtongva@verizon.net	Robert	Dorame
Gabrielino/Tongva	desireerm@gmail.com	Desiree	Martinez
Gabrielino/Tongva	mwakwiti@yahoo.com	Craig	Torres
Gabrielino/Tongva Nation	samdunlap@earthlink.net	Sam	Dunlap
Gabrielino-Tongva Tribe	lcandelaria1@gabrielinotribe.org	Linda	Candelaria
Ti'at Society	calvitre@yahoo.com	Cindi	Alvitre
Tongva Ancestral Territorial Tribal Nation	tattnlaw@gmail.com	John Tommy	Rosas

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July 10, 2015

Michael W. Fisher
Medical Center Director
VA Long Beach Healthcare System
Long Beach, CA

Dear Director Fisher:

RE: VALBHS projects curation

We understand that several interrelated construction projects are planned at the Veterans Affairs Long Beach Healthcare System campus and are likely to impact archaeological sites likely to represent the site of ancient *Puvungna.* We further understand that you plan to conduct archaeological data recovery to help mitigate such impacts, under an agreement negotiated pursuant to Section 106 of the National Historic Preservation Act (NHPA). You have provided us with documentation concerning the projects and asked that we curate those materials that are not repatriated in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA), and associated documentation.

The Fowler Museum at UCLA will accept all such materials and documentation generated for these projects for curation in perpetuity contingent upon meeting our archival standards.

Sincerely,

Wendy G. Teeter, PhD, RPA
Curator of Archaeology

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