

December 12, 2006

Ms. Josephine Alido
David Evans and Associates
Via email to: jalido@deainc.com
Cc: rybi@deainc.com

**RE: Revised Cultural Resources Letter Report for the Wal-Mart Ontario Project,
Ontario, San Bernardino County, California**

Dear Ms. Alido:

SWCA Environmental Consultants (SWCA) was retained by David Evans and Associates (DEA) to conduct a cultural resources study in support of the Environmental Impact Study for the Wal-Mart Ontario Project (Project) located in the city of Ontario, San Bernardino County, California. SWCA's services included a records search of the 15-acre Project area and a 0.5-mile radius surrounding the area, initial Native American consultation, and a site visit of the project area to inspect it for cultural resources. The results of the study are presented in this letter report.

Project Description

The project proposes to redevelop a commercially zoned portion of the city of Ontario. Vacant buildings in disrepair surrounded by an asphalt parking lot currently occupy the 15-acre project area. The project intends to replace the existing structures with a shopping center anchored by a Wal-Mart store.

Cultural Resources Study

Cultural Resources Records Search. SWCA archaeologist Emily Game conducted a review of the California Historical Resources Information System files maintained by the San Bernardino Archaeological Information Center (SBAIC), located at the San Bernardino County Museum, on December 1, 2006, to determine if cultural resources were previously recorded within the project area. Information regarding archaeological sites and studies within a 0.5-mile radius of the study area was compiled. SWCA also reviewed the National Register of Historic Places (NRHP; Office of Archaeology and Historic Preservation 1997), Archaeological Determinations of Eligibility, the Office of Historic Preservation (OHP), and the Directory of Properties in the Historic Property Data File.

The SBAIC records search revealed one previously recorded cultural resource (P-36-016417) within 0.5 mile of the project site. No cultural resources have been recorded within the project area.

Linear resource P-36-016417, also identified as California Point of Historical Interest CPHI-SBR-21, is a portion of the northern branch of the Emigrant Trail, “which forked near Aguanga and continued via Beaumont, Redlands, Old San Bernardino, Colton, and Agua Mansa, and crossed the present Euclid Avenue in Ontario a mile north of the Southern Pacific Railroad tracks” (per the CPHI-SBR-21 Form dated 1973). Prior to its use by American emigrants, “between 1822 and 1827, the San Gabriel Mission Fathers used this road to reach the San Bernardino Asistencia, and Jedediah Smith followed this route in 1827 on his way out of southern California” (also per the CPHI-SBR-21 Form dated 1973).

Five cultural resource studies have been previously conducted within mile 0.5 mile of the project area: two of the studies (1062863 and 1063248) were associated with the widening of Interstate 10; the remaining three (1063553, 1063906, and 1064510) were associated with cellular communications projects. None of these cultural resource studies were conducted within the project area.

Initial Native American Consultation. The City of Ontario contacted the California Native American Heritage Commission (NAHC) for a project review on an unknown date. The NAHC responded to the city in a letter dated November 3, 2006, and corrected on December 4, 2006. A list of seven Native American contacts was provided by the NAHC, with the recommendation that they be contacted for additional information. SWCA prepared and mailed a letter to each of the seven NAHC-listed contacts on December 4, 2006, requesting that they contact SWCA with information regarding Native American cultural resources within or immediately adjacent to the project area.

SWCA prepared and submitted a separate request to the NAHC of their Sacred Lands File for the project on December 4, 2006. The NAHC responded on December 12, 2006, that the search failed to indicate the presence of Native American cultural resources in the immediate project area. A list of seven Native American contacts was provided with the recommendation that they be contacted for additional information. SWCA had previously submitted letters regarding this project on December 4, 2006, to all but two of these NAHC-listed contacts. SWCA prepared and mailed a letter to the remaining two NAHC-listed contacts on December 12, 2006, requesting that they contact SWCA with information regarding Native American cultural resources within or immediately adjacent to the project area.

The following responses were received as of December 12, 2006:

On December 6, 2006, Anthony Morales of the Gabrielino/Tongva Tribal Council telephoned SWCA archaeologist Kevin Hunt with questions about the project. After discussing the project, Mr. Morales agreed that the likelihood of identifying buried cultural resources during construction of this project was low and he did not recommend any measures.

Britt Wilson, representing the Morongo Band of Mission Indians (Tribe) contacted Kevin Hunt via email on December 7, 2006, and stated that the Tribe had no specific information regarding cultural resources in the project area. Mr. Wilson also made the following recommendations:

- If Native American cultural resources (other than isolates) are found on the project site, or the site is in a medium to high-probability area for those resources, the Tribe recommends a cultural resources survey and archaeological site monitoring—preferably utilizing Native American monitors.
- In accordance with state law, the County Coroner should be contacted if any human remains are found during earthmoving activities.
- If Native American cultural resources are uncovered during earthmoving activities, work in the immediate vicinity of the find shall cease and an archaeologist meeting Secretary of Interior standards shall be retained to assess the find.

Finally, Mr. Wilson stressed that if the project is associated with the City's specific plan or general plan action, it is subject to the provisions of SB18-Traditional Tribal Cultural Places, which would require the City to participate in formal, government-to-government consultation with the Tribe.

Cultural Resources Site Visit. After securing permission to enter the project area, SWCA archaeologist John Covert conducted a site visit on December 4, 2006. The entire project area was paved, and included dilapidated buildings. Mr. Covert inspected and photographed the project area and the buildings. No cultural resources were observed within the project area. The buildings appear to be of unremarkable modern construction, and thus are not eligible for the California Register of Historical Resources.

Recommendations. No cultural resources were identified within the proposed project area either through the records search, Native American consultation, or the site visit. Archaeological monitoring of ground-disturbing construction activity is not recommended for the proposed project, as the project area is not considered sensitive for

buried cultural resources. In the event that cultural resources are discovered during construction a qualified archaeologist should be retained to evaluate the discovery.

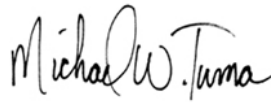
Although unlikely, the discovery of human remains is always a possibility; State of California Health and Safety Code Section 7050.5 covers these findings. This code section states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendent (MLD). The MLD shall complete the inspection of the site within 24 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Please do not hesitate to contact Kevin Hunt at (626) 240-0587, extension 106, or khunt@swca.com if you have any questions regarding this report.

Sincerely,



Kevin Hunt
Project Manager-Cultural Resources



Michael Tuma, MS, RPA
Principal Investigator-Cultural Resources