

## FAX COVER

TO: Sam A. Joumblat, Executive Director  
ICTF- JPA

FAX: 562-901-1727

DATE: 2-16-09

FROM: Sam Dunlap  
Gabrielino Tongva Nation

PHONE: 909-262-9351 cell

[samdunlap@earthlink.net](mailto:samdunlap@earthlink.net)

Re: NOP & Initial Study  
ICTF Modernization & Expansion Project

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Pages including cover sheet: 3

Response to Comments - Native American Consultation



# Gabrielino Tongva Nation

## A California Tribal Sovereign

Post Office Box 86908 - Los Angeles, CA 90086

February 16, 2009

Council of Elders

Department of Provisory  
Government

Sam Dunlap  
Tribal Secretary

Sam A. Joumblat, Executive Director  
Intermodal Container Transfer Facility Joint Powers Authority  
P.O. Box 570  
Long Beach, CA 90801-0570

Sent Via Fax & U.S. Mail  
Fax: (562) 901-1727

Re: Intermodal Container Transfer Facility (ICTF) Modernization & Expansion Project  
Notice of Preparation & Initial Study - Native American Consultation

Dear Mr. Joumblat,

This letter is in response to your request for comments on the proposed Intermodal Container Transfer Facility Modernization & Expansion Project located in the County of Los Angeles. Since the proposed project is within the traditional tribal territory of the Gabrielino Tongva Nation it is my responsibility to respond with the concern that the proposed project as described in your correspondence may have an impact to the cultural resources of our tribe.

After review of the correspondence provided by your office I find that Chapter Two, Section 2.1 (V.) Cultural Resources (pages 39 thru 42) of the **Initial Study fails to properly identify the potential impact to archaeological resources and disturbance to human remains (Native American burials) in the project area. The proposed project location (as identified on page 6 of the Initial Study) is within 150 feet east of a recorded archaeological site (LAN-2682) and Native American burial ground.** In September 1998 during construction activities at the then Arco refinery, 52 Native American burials and associated grave goods were located and subsequently excavated and removed with eventual re-interment. For this reason I would suggest that the project area has an increased potential to contain buried archaeological deposits. Furthermore, previously developed areas as described in the Initial Study does not eliminate the presence of archaeological deposits since past construction practices in older industrial and urban areas did not afford adequate protection to identify and protect the cultural resources of the Gabrielino Tongva Nation. **The cultural resources orientation for construction workers as described in the Initial Study (bottom of page 40) is inadequate training to enable and expect construction personnel to properly identify the cultural resources of the Gabrielino Tongva Nation, nor is it their responsibility to do so.**


(1)

ICTF Response  
February 16, 2009

I recommend that an archaeological and Native American monitoring component be a necessary mitigation measure during the construction phase of the proposed project. I also request that consideration be given that the Native American monitors be selected from the Gabrielino Tongva Nation.

I look forward to corresponding with you on cultural resource issues and matters of environmental compliance. Please feel free to contact me at any time.

Sincerely,

  
\_\_\_\_\_  
Sam Dunlap  
Tribal Secretary  
(909) 262-9351 cell  
[samdunlap@earthlink.net](mailto:samdunlap@earthlink.net)