



**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luiseño Mission Indians*

Post Office, Box 2183 • Temecula, CA 92593  
Telephone (951) 770-6300 • Fax (951) 506-9491

June 17, 2022

**VIA E-MAIL and USPS**

Kirt Coury, Case Planner  
City of Moreno Valley  
Planning Division  
14177 Frederick Street  
P.O. Box 88005  
Moreno Valley, CA 92552-0825

**Re: Pechanga Tribe Comments on the Cultural Resource Survey Report for the Perris at Pentecostal Project in the City of Moreno Valley [PEN 21-0216].**

Dear Mr. Coury,

This comment letter is written on behalf of the Pechanga Band of Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe submits these comments to the City of Moreno Valley (“City”) for the official record concerning the Cultural Resource Survey Report (“Report”) for the Perris at Pentecostal Project [PEN 21-0216] (“Project”) prepared by Laguna Mountain Environmental, Inc. and dated December 2021.

The Tribe extends its thanks to the City for providing the Report so the Tribe can review and provide comments on the content based upon the Tribe’s traditional tribal knowledge regarding its Ancestral territory, tribal cultural resources, and cultural teachings so we may preserve and protect all *'Atáaxum* (Luiseño) tribal cultural resources. Furthermore, the *'Atáaxum* are irrevocably connected to the land within the jurisdiction of the City of Moreno Valley. The soil, rocks, animals, plants, water, and air are all a part of the living people and their ancestors. Attached electronically, the Tribe has provided the report with in-document comments.

The Report notes that Shoshonean peoples migrated into the project region and that the *'Atáaxum* are descendants of these people. Pechanga attends that the *'Atáaxum* have lived in the projects regions since time immemorial and that they have never migrated. The Shoshonean Wedge theory is an outdated linguistic theory that is no longer supported by most linguistic research of the region. Linguist David Shaul<sup>1</sup> uses both linguistic and archaeological research to

<sup>1</sup> Shaul, David L., *A Prehistory of Western North America: The Impact of Uto-Aztecan Languages*. University of New Mexico Press, Albuquerque. 2014.

Chairperson:  
Neal Ibanez

Vice Chairperson:  
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Richard B. Scearce, III  
Robert Villalobos  
Shevon Torres  
Juan Rodriguez

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Tuba Ebru Ozdil

Planning Specialist:  
Molly Escobar

show that the Takic expansion began in southern California and migrated out to the Great Basin. Archaeologically, Sutton<sup>2</sup> puts the linguistic time depth to 3000 years B.P. or more. Pechanga understands that Tribal perspective and archaeological perspectives do not always coincide, however, Pechanga recommends that the linguistic information be updated for future project reports within this region.

Additionally, the report references that the *'Atáaxum*. "territory encompassed an area from roughly Agua Hedionda on the coast, east to Lake Henshaw, north into the Hemet Region, and west through San Juan Capistrano to the coast." This description leaves off approximately 66% of the traditional territory; the traditional territory of the *'Atáaxum* encompasses approximately 2,000 square miles, including all of Western Riverside County and northwestern San Diego County. The aboriginal territory is determined by our oral tradition (i.e., songs and historical accounts) and is defined by place names, rock art, pictographs, petroglyphs, and an extensive artifact record. The northern border of the territory follows the Santa Ana River and covers the western slopes of the San Jacinto Mountains to the east. At Idyllwild, the territory boundary turns to the south, includes Aguanga, and then extends east again to the middle of San Jose de Valle (Warner Valley). At Lake Henshaw it turns southwest, and incorporates portions of Escondido, all of San Marcos, and Batiquitos Lagoon. The Pacific Ocean is the western border and it encompasses the coastal areas of Carlsbad, Oceanside, and all of Camp Pendleton. The southern Channel Islands, San Clemente, Santa Catalina, San Nicolas, and Santa Barbara Islands are also included. At the northern border of Camp Pendleton, *'Atáaxum* territory curves east and skirts the ridgeline of the Santa Ana Mountains up to the northern boundary, the Santa Ana River. The truest source of territory information is found in the *Chamtéela* (Luiseño) language, including traditional songs and narratives, which are deemed sacred and religious, and the least likely to have been changed over the millennia. To further define the territory, information is gathered from published and unpublished historical sources such as anthropological studies, newspaper articles, old diaries, books, plat maps, Spanish Land Grants, and local histories.

The Tribe would like our letter and attached in-document comments to be forwarded to Laguna Mountain Environmental, Inc. so they may review and for the City to include this letter in the official record for the environmental review of this Project. The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Should the need arise, the Tribe welcomes the opportunity to meet with the City to further explain our comments.

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<sup>2</sup> Sutton, Mark. "A Reevaluation of Early Northern Uto-Aztec Prehistoric in California". Paper Presented at the 2009 Annual Meeting of the Society for California Archaeology, Modesto.

Sutton, Mark. "People and Language: Defining the Takic Expansion into Southern California" *Pacific Coast Archeological Society Quarterly*, Volume 41, Number 2 & 3. 2009

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The Pechanga Tribe thanks City of Moreno Valley for working collaboratively in protecting the invaluable and non-renewable 'Atáaxum resources found in the Project area. Please contact me at 951-770-6314 or at [mearp@pechanga-nsn.gov](mailto:mearp@pechanga-nsn.gov) if there are any questions or concerns regarding our cultural report comments. Otherwise, please contact our Cultural Analyst, Ebru Ozdil at 951-770-6313 or at [eozdil@pechanga-nsn.gov](mailto:eozdil@pechanga-nsn.gov) regarding all other project related questions or concerns. Thank you.

Sincerely,



Molly Earp, Cultural Planning Specialist

Cc Pechanga Office of the General Counsel

Electronic Attachment: Pechanga Comments on the CRA

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians  
Post Office Box 2183 • Temecula, CA 92592*

*Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need*