

## **Appendix E. Cultural Memo**

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March 21, 2025

City of Anaheim  
Community Service Department, Park Division  
200 S. Anaheim Boulevard, Suite 433  
Anaheim, California 92805  
Contact: Ana Straabe, Principal Project Planner

**Project: Orange County River Walk Project; Cultural Resources Survey Letter Report – Negative Findings**

Ms. Straabe:

Please be advised that a survey has been conducted by Harris & Associates on the above referenced project. It has been determined that cultural resources are not present on the subject properties. The project is plotted on the attached U.S. Geological Survey (USGS) 7.5-minute topographic map for your information.

**County:** Orange

**USGS 7.5' Quad:** Anaheim, Orange; **Date:** 1974

**Section:** 13, 18, 19, 24, 25, 30; **Township:** 10S; **Range:** 09W, 10W; **Land Grant:** None

**City:** Anaheim and Orange; **State:** California

**Locational Data:** Santa Ana River Corridor between Oranewood Avenue and Ball Road Bridge Crossings, Anaheim and Orange, CA

**Assessor Parcel Number(s):** 232-072-07, -08; 253-451-02, -03, -04, -07; 253-472-01; 253-521-36; 253-631-39; 374-721-08; 374-791-01, -02, -03; 374-792-01, -02, -08, -10, -12; 375-221-01, -02, -03, -09, -10, -16, -17, -18, -19, -20, -21, -26; 375-301-01, -14, -15, -16; 375-311-13, -14, -15, -24, -27; 375-361-22; 386-521-02, -18

**UTMs:** 11S 419061mN, 3741958mE

**Survey Type:** Intensive Pedestrian/Phase I

**Date of Survey:** July 30, 2024

**Field Crew:** Jasmine Alvarez-Ceja

## Setting

### Project Description, Location, and Setting

The project site is located within a portion of the Santa Ana River between the Ball Road and Oranewood Avenue bridge crossings, is a 450-foot wide by 9,000-foot-long area (approx. 90 acres and 1.7 miles), and extends to the existing Anaheim Coves. It is adjacent to Angel Stadium, Anaheim Regional Transportation Intermodal Center, and the Honda Center. The project site is located within the Cities of Orange and Anaheim (Cities) with different landowners and jurisdictional bodies. (Attachment 1, Figures; Figure 1, Regional Location, Figure 2, Project Site, and Figure 3, USGS Topographic Map)

The majority of the project site includes the Santa Ana River corridor surrounded by urban development, including commercial, industrial, and residential uses. The northern portion of the project site includes the Orange County Water District (OCWD) pump house, associated water detention basins, and the eastern portion of the Islands Golf Center. Refer to Attachment 2, Photographs, for photographic documentation of the existing condition of the project site.

The OC River Walk Conceptual Master Plan consists of various multi-purpose improvements to transform the Santa Ana River corridor and portions of the existing Santa Ana River Trail (SART), along with related off-site improvements necessary for its implementation. The main components of the Conceptual Master Plan involve creating two water impoundments by installing three inflatable rubber dams, modifying the riverbanks, constructing two pedestrian/bike bridges, providing new trails, improving existing trails, creating new and protection of existing access ramps, constructing two new undercrossings on the west bank at the Union Pacific Railroad and the Metrolink railroad, providing enhanced community amenities (e.g., terraced seating, nature play areas, parklets, plazas, gathering areas for large-scale events, festivals, and other activities, water access, kayak launch, etc.), and other improvements. These improvements would require the implementation of 19 project elements, which have been categorized into four groups: Group A – Impoundments, Storm Drain Diversions, and Embankments; Group B – New Pedestrian/Bike Bridges; Group C – New Trails and Trail Improvements; and Group D – Enhanced Community Amenities. THistorical topographic maps and historical aerials were reviewed to understand the development of the project area of potential effect (APE) and surrounding properties. Historical aerials were reviewed from 1946 through 2020 (NETR Online 2024). Prior to 1955, the Santa Ana River was channelized and by 1977 the access roads are paved. The surrounding areas were in agricultural use in 1946 and by the early 1970s residential and commercial uses are present. By the 1990s the area was fully developed.

The cultural investigation described in this letter report was implemented to support the City’s responsibilities under the California Environmental Quality Act (CEQA) to incur no significant impacts to cultural resources resulting from the project.

## **Cultural Setting**

The following cultural setting is taken in part from the City of Anaheim and City of Orange General Plan Environmental Impact Reports (EIR) (City of Anaheim 2004, City of Orange 2010a).

### **Prehistoric Setting**

The generally accepted framework recognizes four broad temporal periods or cultural horizons. These are the Paleo-coastal or Early Man period dated to more than 10,000 years ago; the Millingstone Period, falling between 10,000 years ago and 3,000 years ago; the Intermediate Period from 3,000 years to 1,350 years ago, and the Late Prehistoric from 1,350 to 650 years ago.

#### ***Early Man/Initial Occupation***

Initial occupation is thought to have occurred between 8,500 and 11,000 years ago (6,500 – 9,000 B.C.) in Southern California. One recent radiocarbon date from Santa Rosa Island suggests human occupation as early as 11,500 years ago and future research may prove even earlier occupation. Early occupants were viewed as mobile foragers primarily dependent on hunting terrestrial game. This period is characterized by the presence of large projectile points and scrapers, which is an indicator of a reliance on hunting. However, recent archaeological evidence from some coastal sites indicates the systematic and intensive use of marine resources, including shellfish, during this period.

#### ***Millingstone Period***

Sites dating from around 8,000 years before present (6,000 B.C.) are far more common than those from the Initial Occupation period. They typically include groundstone assemblages, indicating a probable dependence on hard seeds. At coastal sites, there is continued evidence of a wide variety of marine resource exploitation, most commonly shellfish. Some archaeologists believed that terrestrial game still provided the foundation of the diet. Some archaeologists note that the abundance of Millingstone Horizon sites suggests a sedentary settlement system, rather than a mobile foraging pattern, with central settlements and a logistically based economy supplied from special purpose camps and task sites. Sites of this time period typically yield large numbers of metates and manos, as well as unique artifacts of unknown use, called cogged stones or discoidal.

#### ***Intermediate Period***

This period, from 1,000 B.C. to A.D. 750, reflects the transitional period between the Milling Stone and Late Prehistoric Horizons. At the beginning of this period important changes began to occur in settlement, technology and subsistence intensification caused by a growing population. Changes included the increased use of acorns, elaborate fishing technology, such as the introduction of the shell fishhook, and a diverse amount of hunting tools. The apparent disuse of the Newport Coast area during this period is thought to have indicated the arrival of Shoshonean-speaking groups from the deserts to the east. Archaeologists believe these people were proto-Gabrielino and Luiseño who were not yet familiar with marine resources.

### ***Late Prehistoric Period***

The Late Prehistoric Period, beginning approximately 1,350 years B.P. (650 A.D.), reflects high population densities and complex political, social, technological, and religious systems throughout the Los Angeles Basin. Economic systems, primarily based around the growing marine fisheries, became more diverse and intensive. The growing geographic complexity of trade networks is reflected in shell-bead currency and a variety of materials traded or acquired from remote locations. Technological improvements are seen in the appearance of the bow and arrow, the plank canoe in coastal sites, and a broad variety of marine resources including mammals and fish taken in deep sea environments. Settlements became permanent towns supported by temporary camps set up at resource procurement sites. Archaeological evidence of this time period includes the presence of projectile points, soapstone bowls, callus shell beads, steatite effigies and cremations. This period ended abruptly when Spanish colonists began establishing missions along the California coast.

### **Ethnographic Setting**

The project is situated within the ethnographic territory of the Gabrielino Indians of California. Gabrielino lands included most of present-day Los Angeles and Orange counties, and several offshore islands. The Gabrielino spoke a Cupan language in the Takic family, which in turn is a member of the Uto-Aztecan linguistic stock. The Gabrielino people lived in either permanent or semi-permanent villages. Known settlement locations seem to have favored two different locales; coastal estuaries and major inland watercourses. Villages are thought to have been the focus of family life, with each individual group linked to others by paternal kinship relations. Coastal Gabrielino exploited bay and kelped fish, shellfish, and occasionally sea mammals. Inland groups collected and processed plants and hunted deer, bear, quail and other terrestrial game.

Gabrielino culture was heavily affected by colonial Spanish missionary efforts long before systematic ethnographic studies could be conducted. Disease and forced participation in the mission system disrupted most traditional cultural lifeways and resulted in a catastrophic reduction of the native population. Information about their material culture and life ways is very limited and derived largely from historical sources, such as the diaries and records of early missionaries, soldiers and explorers. While traveling through the area in 1769, Father Crespi noted the presence of a large village, Hotuuknga, upstream from present day Olive on the north side of the Santa Ana River. Crespi wrote that 52 Indians came to greet them and accepted blankets, beads and other goods. When he returned two years later the group was hostile and the Spaniards quickly continued on their way. A small "Indian camp" was visible on the north side of Santiago Creek just west of the Glassell Street crossing as late as the 1870s.

What little ethnographic information is available suggests that the Late Prehistoric Gabrielino settlement pattern may have been characterized by a complex of central villages occupied by patrilineally constructed family lineages and smaller special purpose sites where specific resources were extracted or where food or other resources were collected for transportation back to central villages. Such a pattern is consistent with the "collector" economic model for complex hunter-gatherer societies such as the Gabrielino.

### **Historic Period**

The earliest known records of European contact with Southern California Native Americans date to the mid-1500s, representing the early explorations of the Spanish. These explorations included the identification of populations from ships, but did not include direct contact. Personal contact was not made until the 1770s, when Father Garces traversed the Mojave Desert and entered coastal Southern California through the Cajon Pass.

In 1771, the Mission San Gabriel Archangel was founded. It soon became one of the richest missions controlling all of the property in Orange County north of Aliso Creek and a large portion of Los Angeles County. The Gabriellino Indians are named after the mission.

In the late 18th Century, Felipe de Neve, Spanish Governor of California, saw the opportunity to establish a pueblo along the River Los Angeles north of the San Gabriel Mission. The primary purpose of the pueblo was to reaffirm Spain's claim over the territory in the face of encroachments by Russia in the north and Britain from the sea. The pueblo would also help to keep Spain's California military garrisons supplied and fed.

In August 1781, Governor de Neve, the settlers (11 men, 11 women, and 22 children), soldiers, mission priests, and a few Native Americans arrived at the new pueblo alongside the Los Angeles River. Governor de Neve recorded the date of September 4, 1781, as the official date of establishment of El Pueblo de la Reina de Los Angeles.

Americans first arrived in Los Angeles by way of nearby San Pedro, then an unimproved port. Beginning in 1805, U.S. vessels kept up an intermittent trade with the area's farmers, and in 1818 a crewmember, Joseph Chapman, helped construct the town's first church. In 1826, Jedidiah Smith, a fur trapper, became the first white man to reach Los Angeles by traveling overland from the Missouri frontier.

Los Angeles was little affected by the revolution that replaced Spanish rule with that of an independent Mexican government in 1821. Mexico's Congress declared Los Angeles the capital of California in 1835, but the provincial governor refused to move south from San Francisco. Therefore, the City's relative isolation and the local authority of farmers and ranchers remained unthreatened. By the 1840s, Los Angeles had become the largest settlement in Southern California.

## **Methods, Regulatory Setting, Analysis of Project Effects, and Recommendations**

The project includes the development of recreational, pedestrian, and bikeway improvements to the Santa Ana River corridor. This letter report provides an environmental baseline of the cultural resources present, an analysis of resources that have the potential to be present, and an analysis of impacts on cultural resources from project construction activities. The analysis was prepared in accordance with requirements of CEQA. Literature reviews and an intensive pedestrian cultural survey were conducted in July 2024 in support of this letter report.

### **Prior Research**

Staff conducted a records search of the surrounding area using the California Historic Resources Inventory System (CHRIS) (Confidential Attachment 3, CHRIS Background Data). Data reviewed included identified reports and resources, historic maps, the National Register of Historic Places, California Register of Historical Resources, and Built Environment Resources Directory.

Thirty-seven studies have been conducted within a 0.50-mile radius. Of those, 15 intersect with portions of the project site (Table 1, Previous Studies within 0.50-Mile Buffer). Five resources (four historic structures and one prehistoric isolate) were previously recorded within the 0.50-mile radius. One resource, the Atchison, Topeka & Santa Fe Railroad Bridge (ATS Bridge) aka Burlington Northern Santa Fe Railroad (P-30-176663) crosses over the project site.

The ATS Bridge was evaluated in 1987 by Roger Hatheway. According to the study:

The existing structure is not the original Santa Fe railroad bridge built to cross the Santa Ana River at this point. The earlier structure was replaced in 1916 and again in 1938 as a result of flood damage. The present structure is interesting, however, in that it is of a seemingly inordinate length. An answer to this problem is found through an examination of additional U.S.G.S. Maps. The 1950 edition clearly shows that the river channel widened considerably at this point. This may have been a result of either the 1916 or 1938 floods. The river channel has since been narrowed considerably, hence the anomaly between the



bridge length and width of the river channel. The present bridge is, therefore, of engineering interest, although it is not of a unique design, method of construction, or of outstanding historical interest.

The bridge does not possess a high degree of integrity as the original structure was replaced more than once. The present structure contains portions of a 1916 bridge, but is primarily a 1938 structure. The setting has also been altered, including the narrowing of the river channel. The majority of the structure is not more than 50 years old. This fact should, however, not be a major determining factor as the bridge is only one year less old than the 50-year eligibility date. The structure does not possess high artistic or design value as it is a simple standardized well deck girder common throughout California. The structure itself does not have significant historical associations. It is part of a major and historic transportation system, but was not one of the first or most significant elements of this system. The structure does represent unusual scale in terms of its overall length. The structure is not an unusual or rare surviving example of its type.

The study determined that the ATS Bridge did not meet criteria for eligibility to the National Register of Historic Places.

**Table 1. Prior Studies within 0.50-Mile Buffer**

Study #	Title	Author	Year
<b>OR-00270</b>	<b>Description and Evaluation of Cultural Resources Within the US Army Corps of Engineers' Santa Ana River Project</b>	<b>Leonard, Nelson N. III and Matthew C. Hall</b>	<b>1975</b>
OR-00609	Cultural Resources Report on 5 Proposed Hazardous Waste Storage Sites Located in Northern Orange County, California	Desautels, Mark	1981
<b>OR-00801</b>	<b>Phase II Archaeological Studies Prado Basin and the Lower Santa Ana River</b>	<b>Langenwalter, Paul E. and James Brock</b>	<b>1985</b>
OR-00814	ARCHAEOLOGICAL SURVEY REPORT for the Route I-5 Santa Ana Transportation Corridor, Route 405 in Orange County to Route 605 in Los Angeles County Pm 21.30/44.38; 0.00/6.85	Romani, John F.	1982
OR-00894	An Archaeological Survey of the Orange Drive-in Thester Property Orange, California	McKenna, Jeanette A. and Hatheway, Roger G.	1988
<b>OR-00895</b>	<b>Archaeological Survey Report: Villa Park-Lewis 230 Kv Transmission Line Right-Of-Way Orange County, California</b>	<b>Taylor, Thomas T.</b>	<b>1988</b>
OR-01162	Monitoring Report for the Sports Arena in the City of Anaheim	Brown, Joan C.	1991
OR-01806	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: Cm 069-12 Anaheim, Orange County, California	Mason, Roger D.	1998
<b>OR-01836</b>	<b>Cultural Resource Review for Groundwater Replenishment System Program EIR/Tier I/EIS, Orange County Water District and County Sanitation Districts of Orange County</b>	<b>Padon, Beth</b>	<b>1998</b>
<b>OR-01900</b>	<b>Historical and Architectural Evaluation of Four Railroad Bridges, Lower Santa Ana River and Santiago Creek Orange County, California</b>	<b>Hatheway, Roger G.</b>	<b>1987</b>
OR-02091	Cultural Resources Assessment for Pacific Bell Wireless Facility CM 282-02, County of Orange, California	Lapin, Philippe	2000

**Table 1. Prior Studies within 0.50-Mile Buffer**

<b>Study #</b>	<b>Title</b>	<b>Author</b>	<b>Year</b>
OR-02141	Inspection of Kinder Morgan Energy Partners Electrical Substation and Control Building Proposed Sites, Orange County.	Self, William	2000
OR-02200	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California.	Atchley, Sara M.	2000
OR-02256	Cultural Resources Assessments for Orange County Sanitation Districts.	Demcak, Carol R.	1999
OR-02354	Review of Cultural Resource Assessment/Evaluation for Cingular Wireless Site CM-282-03, Orange County, California.	McKenna, Jeanette A.	2001
OR-02503	Construction of a Vehicular Parking Area Within a Portion of Caltrans Right-of-way Near the Southeasterly Corner of the Orange Freeway (State Route 57) Interchange at Ball Road in Anaheim.	Shepard, Richard S.	2001
OR-02587	Revised Archaeological/Paleontological Monitoring Report for Arena Corporate Center Project, Contract Number PO#1058, Project #714375-01	Brown, Joan C.	2002
OR-02765	The Pinnacle at Uptown Orange	McKenna, Jeanette A.	2002
OR-02828	Archaeological Monitoring During Excavations for the Westwood College Project, Anaheim, California	Brown, Joan C.	2003
OR-02911	Sunkist Gardens, City of Anaheim, Orange County, California	Garcia, Kyle H.	2005
OR-03090	Taft/CA-8214 1320 South Sanderson Avenue, Anaheim, Ca Orange County	Thal, Sean and Lorna Billat	2004
OR-03097	Cultural Resources Records Search Results and Site Visit for Sprint Nextel Candidate Ca7061 (monterey), 2023 West Collins Avenue, Orange, Orange County, California	Bonner, Wayne H.	2006
OR-03108	Cultural Resource Records Search and Site Visit for Cingular Telecommunications Facility Candidate Sc-043-02 (Calvary Baptist Church), 2780 East Wagner Avenue, Anaheim, Orange County, California	Bonner, Wayne H.	2003
<b>OR-03287</b>	<b>Historic Property Survey Report for Tustin Branch Trail Network, City of Orange, Orange County, California</b>	<b>Mason, Roger D.</b>	<b>2002</b>
OR-03373	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and li	Arrington, Cindy and Nancy Sikes	2006
OR-03651	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate LA2658A (SCE Barre Villa Park M6-T6), 1511 North Main Street, Orange County, California	Bonner, Wayne H. and Kathleen A. Crawford	2007
OR-03654	Direct APE Historic Architectural Assessment for Royal Street Communications, LLC Cadidate LA2658A (SCE Barre Villa Park M6-T6), 1511 North Main Street, Orange, Orange County, California	Bonner, Wayne H. and Kathleen A. Crawford	2007

**Table 1. Prior Studies within 0.50-Mile Buffer**

Study #	Title	Author	Year
OR-04017	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33523-A (Dupont Commercial), 2165 Dupont Drive, Anaheim, Orange County, California	Bonner, Wayne H.	2011
<b>OR-04087</b>	<b>Program EIR/Tier 1 EIS, for the Groundwater Replenishment System</b>	<b>Salenius, Sylvia</b>	<b>1998</b>
OR-04091	Cultural Resources Assessment for the Burris Basin Interpretive Loop Trail and the Lincoln Avenue Multi-Use Staging Area, City of Anaheim, Orange County, California	Fulton, Terri	2009
OR-04113	Cultural Resources Study of the Anaheim Stadium Project, AT&T Site No. OC0360, 2000 E. Gene Autry Way, Anaheim, Orange County, California 92806	Supernowicz, Dana E.	2010
<b>OR-04156</b>	<b>Draft, Phase I Archaeological Resources Survey Report, Anaheim Regional Transportation Intermodal Center Project City of Anaheim, Orange County, California</b>	<b>Wood, Catherine M.</b>	<b>2009</b>
<b>OR-04259</b>	<b>Cultural Resources Monitoring Report, Orange County Water District Groundwater Replenishment System, Orange County, California</b>	<b>Becker, Kenneth, Goodman, John, Sewell, Kristin, and Van Galder, Sarah</b>	<b>2007</b>
<b>OR-04266</b>	<b>Cultural Resources Reconnaissance for the Groundwater Replenishment System, Orange County, California</b>	<b>Bissell, Ronald M.</b>	<b>2000</b>
<b>OR-04291</b>	<b>Results of Rough Grade Monitoring for the Artic Project in the City of Anaheim, CA</b>	<b>Taft, Ryan</b>	<b>2012</b>
<b>OR-04367</b>	<b>Cultural Resources and Paleontological Resource -- Phase I Assessment for the Orange County Water District's Ball Road Basin General Plan Amendment and Zone Change Project, City of Anaheim, Orange County, California</b>	<b>Akyuz, Linda</b>	<b>2013</b>
OR-04470	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02069A (CM069 Anaheim Auto Center Sign) 1383 South Auto Center Drive, Anaheim, Orange County, California	Bonner, Wayne H.	2013

**Bold** = Studies that intersect with the project site.

**Table 2. Previously Recorded Cultural Resources within 0.50-Mile Buffer**

Primary Number	Trinomial	Chronological Placement <sup>1</sup>	Site Type	Resource Name
P-30-100402	N/A	Prehistoric	Isolate - Mano	Isolate 1
<b>P-30-176663</b>	<b>N/A</b>	<b>Historic</b>	<b>Structure- Railroad</b>	<b>Atchison, Topeka &amp; Santa Fe Railroad (aka Burlington Northern Santa Fe Railroad)</b>
P-30-177113	N/A	Historic	Structure- Stadium	Angel Stadium of Anaheim
P-30-177465	N/A	Historic	Structure- Basin and Channel	Fletcher Retarding Basin and Channel

**Table 2. Previously Recorded Cultural Resources within 0.50-Mile Buffer**

Primary Number	Trinomial	Chronological Placement <sup>1</sup>	Site Type	Resource Name
P-30-177610	N/A	Historic	Structure- Transmission Tower	SCE M6 T6 Barre Villa Park Transmission Tower

**Note:** <sup>1</sup> This column indicates the time period for each resource type that was recorded from previous studies but does not determine whether a resource qualifies as a historical resource under CEQA Guidelines Section 15064.5.

**Bold** = Resources that intersect with the project site.

## Applicable Regulations

Cultural resource regulations that apply to the project site are CEQA, the California Health and Safety Code, and provisions of the California Register of Historical Resources (CRHR). Historic and archaeological districts, sites, buildings, structures, and objects are assigned significance based on their exceptional value or quality in illustrating or interpreting the heritage of the Cities in history, architecture, archaeology, engineering, and culture. Several criteria are used in demonstrating resource importance.

## State Level Regulations

### California Environmental Quality Act

According to CEQA, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1; 14 CCR 4852) including the following:

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

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or not identified in an historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be an historical resource as defined in California Public Resources Code, Section 5020.1(j) or 5024.1.

CEQA also requires that Tribal Cultural Resources be considered and are defined in California Public Resources Code, Section 21074, as follows:

- (a) “Tribal cultural resources,” are either of the following:
  1. “Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    - A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    - B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1” (discussed below).
  2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.



- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).”

***California Register of Historical Resources (PRC Section 5020 et seq.)***

In California, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (PRC Section 5020.1[j]). In 1992, the California Legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria (PRC Section 5024.1[c]):

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

Resources less than 50 years old are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resources (refer to 14 CCR 4852[d][2]).

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

***California Health and Safety Code, Section 7050.5***

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code, Section 7050.5, requires that, if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5b). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5c). The NAHC will notify the most likely descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

**City of Anaheim Regulations**

***General Plan (2004)***

The General Plan (City of Anaheim 2004b) includes the following goals and policies related to Historical Resources that are specific to residential areas of the Anaheim Colony. However, those goals and policies do not apply to this

project. No goals or policies are included in the General Plan related to archaeological resources or human remains.

### ***Citywide Historic Preservation Plan (2010)***

The City approved the Citywide Historic Preservation Plan (Plan) (City of Anaheim 2010) on May 18, 2010. The plan supplements the 1999 Anaheim Colony Historic District Preservation Plan and applies to the four historic districts (Anaheim Colony, Five Points, Historic Palm, and Hoskins) within the City. The Plan does not apply to this project.

### ***Anaheim Colony Historic District Preservation Plan (1999)***

The Anaheim Colony Historic District Preservation Plan (Preservation Plan) (City of Anaheim 1999) provides basic guidelines, and encourages property owners to take special care in preserving, protecting, or enhancing historic buildings. This plan does not apply to this project.

## **City of Orange**

### ***General Plan***

The General Plan (City of Orange 2010b) includes goals and policies related to Cultural Resources and Historic Preservation. The Cultural Resources and Historic Preservation Element (Element) is based on prior actions taken to recognize historic resources, and is an effort to expand the City's historic preservation program to ensure recognition and preservation of the City's resources. The Element provides guidelines to preserve those resources that represent the history and culture of Orange. Specifically, its purpose is to provide guidance in developing and implementing programs that ensure the identification, designation, and protection of cultural resources in the City's planning, development, and permitting process. The Element also identifies ways in which the City can encourage and coordinate with private property owners in support of historic preservation. The following goals and policies are identified in the Element:

### **Architecture and Community Character**

**Goal 1.0:** Identify and preserve potential and listed historic resources, including buildings, structures, objects, sites, districts, and archaeological resources citywide.

- Policy 1.1:** Maintain an accessible inventory of designated and potential historic resources.
- Policy 1.2:** Promote community education and awareness of the significance of Orange's potential and listed historic resources.
- Policy 1.3:** Provide long term assurance that potential and listed historic resources will be used, maintained, and rehabilitated in conformance with Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Preserving Historic Buildings (Secretary's Standards).
- Policy 1.4:** Encourage alternatives to demolition such as architecturally-compatible rehabilitation, adaptive re-use, new construction, and relocation.
- Policy 1.5:** Require that no permit for alteration or demolition of properties identified in the Orange Historic Resources Inventory as potential historic resources shall be issued until alternatives to demolition have been duly considered.
- Policy 1.6:** Promote the preservation of cultural and historical resources controlled by governmental agencies, including those related to City, School District, and other agencies.

### **Preserving Historic Neighborhood Character**

**Goal 2.0:** Identify and preserve neighborhoods that are culturally and historically significant but do not retain sufficient integrity for eligibility as a local, state, or national district.

**Policy 2.1:** Encourage identification and listing of Neighborhood Character Areas within the El Modena, Cypress Street Barrio, Railroad/Packinghouse Corridor, and Orange Park Acres neighborhoods.

**Policy 2.2:** Promote community and visitor awareness and education concerning the unique and special history and architecture found in Neighborhood Character Areas.

**Policy 2.3:** Ensure that those qualities that contribute to the historic character of designated Neighborhood Character Areas are retained through application of design guidelines consistent with the local context and key physical attributes of each neighborhood.

#### Incentives and Education

**Goal 3.0:** Provide incentives and expand education efforts for historic preservation.

**Policy 3.1:** Expand education efforts to facilitate and encourage historic preservation and recognition of the City's historic resources.

**Policy 3.2:** Provide incentives to encourage and support historic preservation.

**Policy 3.3:** Actively seek funding for historic preservation activities.

**Policy 3.4:** Leverage recognition of the City's historic preservation program, participate directly in federal and state historic preservation programs, and gain access to designated historic preservation funding.

**Policy 3.5:** Explore additional funding sources for maintenance and rehabilitation of historic resources.

#### Archaeological and Cultural Resources

**Goal 4.0:** Identify and preserve archaeological and cultural resources.

**Policy 4.1:** Identify, designate, and protect historically and culturally significant archaeological resources or sites.

**Policy 4.2:** Recognize the importance of Santiago Creek as an archaeological resource.

**Policy 4.3:** Encourage curation of any cultural resources and artifacts recovered in the City for public education and appreciation.

**Policy 4.4:** Celebrate the cultural history of the community by increasing community awareness through the design features of public projects and facilities such as parks, plazas, and community buildings.

**Policy 4.5:** Encourage private development to celebrate the cultural history of the community through project design.

**Policy 4.6:** Provide additional resources and promotion for the Orange Public Library Local History Collection.

#### Native American Traditional Cultural Properties

##### ***Native American Heritage Values***

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the project.

Also, potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties in discussions of cultural resources management performed under federal auspices. According to Parker and King (1998), “traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. Examples of properties possessing such significance include the following:

1. A location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
2. A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
3. An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
4. A location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
5. A location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

A Traditional Cultural Property, then, can be defined generally as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (1) are rooted in that community’s history and (2) are important in maintaining the continuing cultural identity of the community.

### **Methodology**

The goal of this survey was to provide a constraints-level survey to identify the location of any cultural resource that may be present on site. Jasmine Alvarez-Ceja, Harris & Associates Junior archaeologist, conducted the survey on July 30, 2024. The survey was conducted in 5- to 10-meter transects. The project site is developed and is primarily developed and covered in disturbed habitat. Dumping on site is evident, and visibility was high due to the paved concrete walkways, dirt patches and dried vegetation. The survey area was relatively level, and greater assessment was focused on open areas.

Historical topographic maps and historical aeriels were reviewed from 1946 to 2022 (1946, 1952, 1963, 1972, 1980, 1985, 1987, 1988, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2002, 2003, 2004, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022). From 1946 through 1952, the project site was undeveloped except for the presence of railroad tracks, agricultural uses and Interstate 5 nearby. By 1963, major roads (Katella Avenue, Struck Avenue, Ball Road, and Taft Avenue) are present or under construction. By 1972, residential and commercial development is present in the surrounding areas including Angels Stadium. State Route 57 is present by 1980. Development in the area remains essentially static through 2022.

This cultural study will be submitted to the South Central Coastal Information Center.

### **Results**

The ATS Bridge that was previously determined not eligible for listing to the NRHP is present in the southern portion of the project site. No changes to the bridge were identified (see photos 21, 39, and 44) and no new information was identified during the preparation of this report. The ATS Bridge is not eligible for listing to either the NRHP or CRHR; as such, it is not significant under CEQA. It will not be impacted by the project because it crosses over the project site. No other resources were identified during the pedestrian survey.

### **Native American Outreach**

The NAHC was contacted for a Sacred Lands File Check to determine whether sacred lands are present on site. The NAHC responded that the check yielded no previously known Native American sacred sites. Outreach to the list of Tribes in the NAHC response letter has been conducted (refer to Confidential Attachment 4, Sacred Lands Tribal Outreach). To date, no responses have been received from the Tribes.

## Recommendations

No historical or archaeological resources were identified during the cultural survey. The APE is developed and has been historically disturbed. Because of the developed/disturbed nature of the project site and the lack of resources within the project site, no additional work or mitigation is recommended.

If you have any questions, please contact me at (619) 236-1778.

Sincerely,



Donna Beddow, RPA  
Senior Archaeologist

## Attachments

- 1 – Figures
- 2 – Photographs

Confidential Attachments – Under Separate Cover  
Confidential Attachment 3 – CHRIS Background Data  
Confidential Attachment 4 – Sacred Lands Tribal Outreach

## References

- City of Anaheim. 2004. Final Anaheim General Plan and Zoning Code Update Environmental Impact Report, No. 330, SCH#2003041105, Volume I, Section 5.4. Accessed August 2024. <https://www.anaheim.net/DocumentCenter/View/2186/54-Cultural-Resources-?bidId=>
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- Hatheway, Roger. 1987. Historical and Architectural Evaluation of Four Railroad Bridges, Lower Santa Ana River and Santiago Creek, Orange County, California. Unpublished manuscript on file at the South Central Coastal Information Center, California State University, Fullerton.
- NETR Online. 2024. Historic Aerials. Accessed July 2024. <http://www.historicaerials.com>.
- Parker, Patricia L., and Thomas F. King. 1998. Guidelines for Evaluating and Documenting Traditional Cultural Properties. U.S. Department of the Interior, National Park Service, National Register, History and Education, National Register of Historic Places. 1990, revised 1992 and 1998.

## National Archaeological Data Base Information

**Authors:** Donna Beddow and Jasmine Alvarez-Ceja

**Firm:** Harris & Associates  
101 Progress  
Irvine, CA 92618  
(949) 655-3900

**Client/Project Proponent:** City of Anaheim  
Community Service Department, Park Division  
200 S. Anaheim Boulevard, Suite 433  
Anaheim, California 92805  
Contact: Ana Straabe, Principal Project Planner

**Report Date:** October 3, 2024

**Report Title:** Orange County River Walk Project; Cultural Resources Survey Letter Report – Negative Findings

**Type of Study:** Intensive Pedestrian/Phase I

**New Sites:** None

**Updated Sites:** P-30-176663

**USGS Quad:** Anaheim

**Acreage:** 90 acres

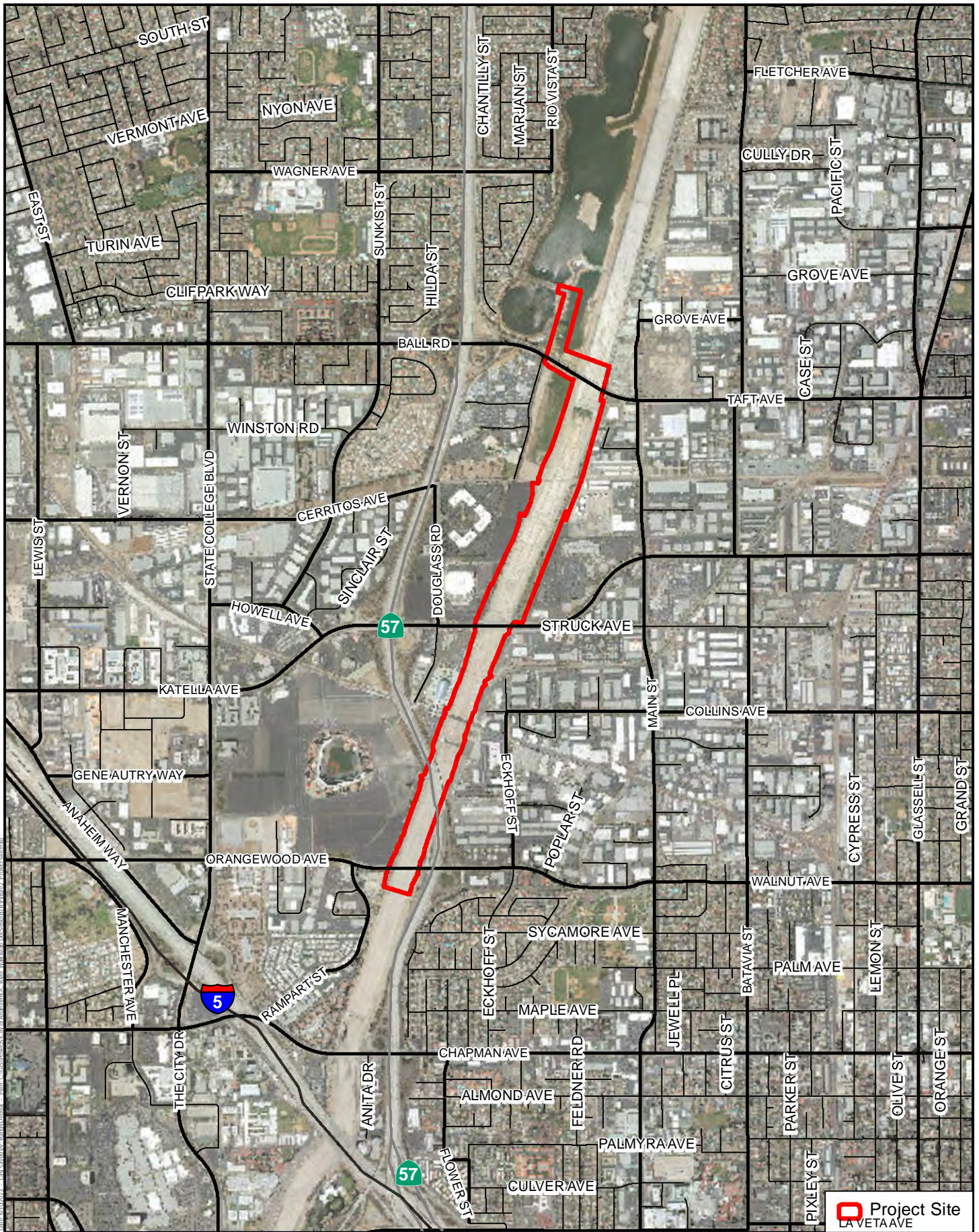
**Key Words:** Historic, P-30-176663, Atchison, Topeka & Santa Fe Railroad Bridge aka Burlington Northern Santa Fe Railroad, Anaheim USGS Quad, Pedestrian Survey

## **Attachment 1. Figures**

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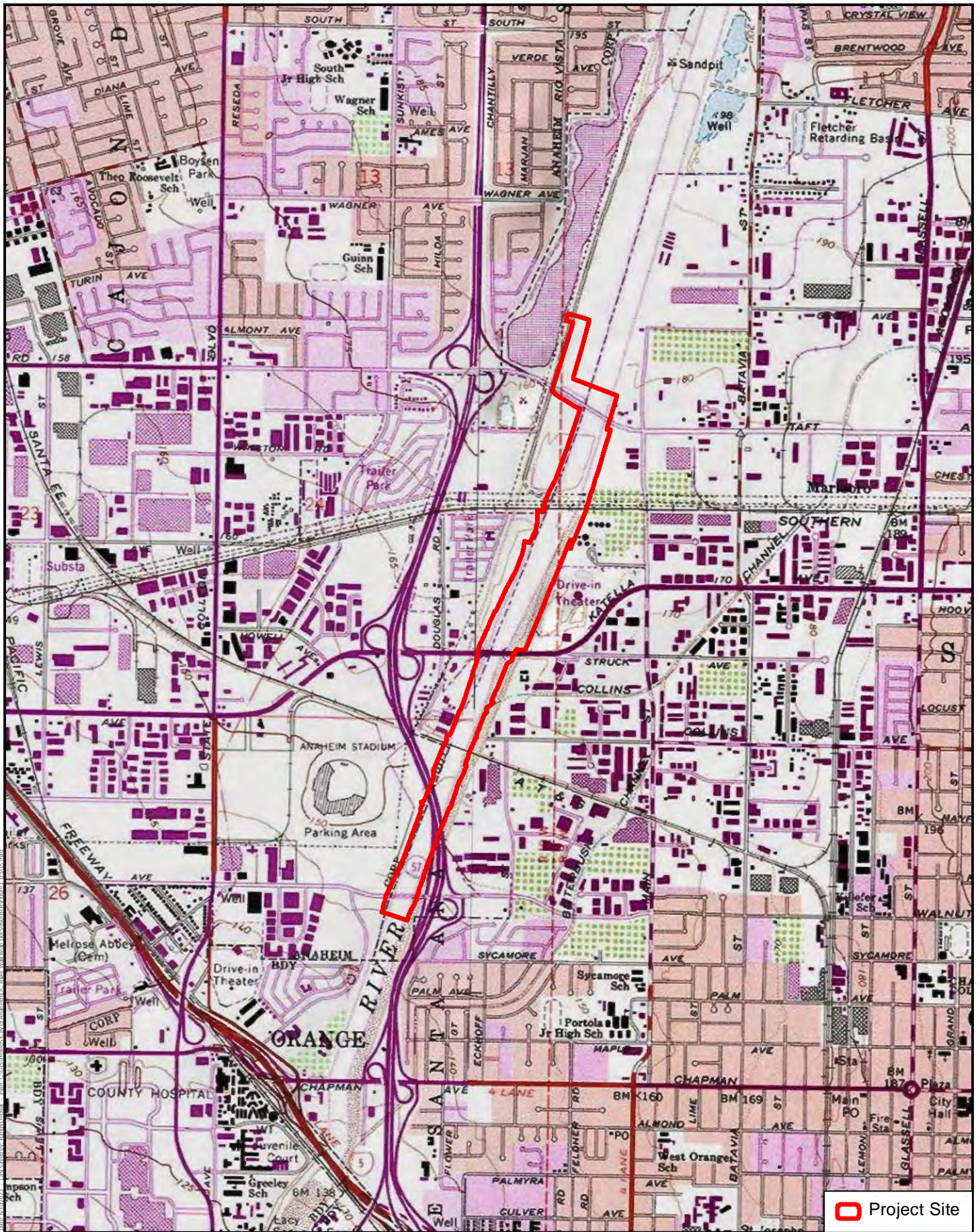
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 Project Site  
 LAVETA AVE

Source: Eagle Imagery 2017.



 Project Site

Source: USGS 7.5 Minute Anaheim and Orange Quadrangles 1974.

**Attachment 2. Photographs**

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**Photograph 1:** Project site from Orangewood Avenue, facing northeast.



**Photograph 2:** Project site from Orangewood Avenue, facing north.



**Photograph 3:** Project site between Orangewood Avenue and Katella Avenue, facing north.



**Photograph 4:** Katella Avenue underpass, facing east.



**Photograph 5:** Katella Avenue underpass, typical ground visibility, facing north.



**Photograph 6:** Northwestern portion of project site.



**Photograph 7:** Southern portion of project site, facing north.



**Photograph 8:** Northern portion of project site. Typical cleared area.



**Photograph 9:** Southern portion of project site, facing east.



**Photograph 10:** South of Katella Avenue underpass. Typical view of Santa Ana River.



**Photograph 11:** Katella Avenue underpass, facing north.



**Photograph 12:** North side of Katella Avenue, facing east.



**Photograph 13:** Western portion of river, facing northeast.



**Photograph 14:** Typical view of Santa Ana River, facing east.



**Photograph 15:** Typical area between pedestrian trail and river, facing north.



**Photograph 16:** Santa Ana River between Katella Avenue and East Ball Road.



**Photograph 17:** Santa Ana River, typical view, facing east.



**Photograph 18:** Santa Ana River, facing southeast..



**Photograph 19:** Santa Ana River, facing east.



**Photograph 20:** Project site between Katella Avenue and East Ball Road, facing northeast.



**Photograph 21:** North portion of railroad tracks, facing east.



**Photograph 22:** Between railroad tracks and East Ball Road, facing northeast.



**Photograph 23:** South side of East Ball Road, facing east.



**Photograph 24:** Project site from north side of East Ball Road.



**Photograph 25:** Fenced section of East Ball Road, facing west.



**Photograph 26:** Fenced section of East Ball Road, facing northwest.



**Photograph 27:** Fenced section of East Ball Road, typical ground visibility, facing north.



**Photograph 28:** Fenced section of East Ball Road, typical ground visibility, facing west.



**Photograph 29:** Project site from pedestrian trail, facing south.



**Photograph 30:** Project site from pedestrian trail, typical ground visibility, facing east.



**Photograph 31:** Typical ground visibility from pedestrian trail, facing east.



**Photograph 32:** Project site from pedestrian trail, facing south.



**Photograph 33:** Typical ground visibility from pedestrian trail, facing east.



**Photograph 34:** East side of project site, facing north.



**Photograph 35:** East side of project site, facing northwest.



**Photograph 36:** East side of project site, facing north.



**Photograph 37:** East side of project site from pedestrian trail, facing northwest.



**Photograph 38:** East side of project site from pedestrian trail, facing north.



**Photograph 39:** East side of project site from pedestrian trail, facing north.



**Photograph 40:** East side of project site from pedestrian trail, facing north.



**Photograph 41:** East side of project site from pedestrian trail, facing northwest.



**Photograph 42:** East side of project site, facing south towards Taft Street.



**Photograph 43:** East side of project site, facing south.



**Photograph 44:** East side of project site from pedestrian trail, facing south.



**Photograph 45:** East side of project site from pedestrian trail, facing southwest.



**Photograph 46:** East side of project site from pedestrian trail, facing south.



**Attachment 3. CHRIS Background Data**

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**Under Separate Cover – See Confidential Attachments**

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**Attachment 4. Sacred Lands Tribal Outreach**  
**Under Separate Cover – See Confidential Attachments**

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