Appendix D Historical/Archaeological Resources Survey Report

Appendix

This page intentionally left blank.

HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT

TUSTIN UNIFIED SCHOOL DISTRICT EDUCATION CENTER PROJECT

City of Tustin
Orange County, California

For Submittal to:

Tustin Unified School District
1302 Service Road
Tustin, CA 92780

Prepared for:

HANA Resources
20361 Hermana Circle
Lake Forest, CA 92630

Prepared by:

CRM TECH
1016 E. Cooley Drive, Suite A/B
Colton, CA 92324

Bai "Tom" Tang, Principal Investigator
Michael Hogan, Principal Investigator

June 28, 2025
Revised September 4, 2025
CRM TECH Contract No. 4252A

Title:	Historical/Archaeological Resources Report: Tustin Unified School District Education Center Project, City of Tustin, Orange County, California
Authors:	Bai "Tom" Tang, Principal Investigator/Historian Elizabeth Beckner, Project Archaeologist/Report Writer Melissa Portilla, Project Archaeologist
Consulting Firm:	CRM TECH 1016 E. Cooley Drive, Suite A/B Colton, CA 92324 (909) 824-6400
Date:	June 28, 2025; revised September 4, 2025
For Submittal to:	Tustin Unified School District 1302 Service Road Tustin, CA 92780 (714) 730-7301
Prepared for:	Sloan Sanchez, Director of Operations HANA Resources 20361 Hermana Circle Lake Forest, CA 92630 (949) 648-4988
USGS Quadrangle:	Tustin, Calif., 7.5' quadrangle; Tract 46, T5S R9W, San Bernardino Baseline and Meridian
Project Size:	Approximately nine acres
Keywords:	Los Angeles Basin region, northeastern Orange County; Phase I cultural resources survey; no "historical resources" under CEQA

EXECUTIVE SUMMARY

Between March and June 2025, at the request of HANA Resources, CRM TECH performed a cultural resources study on approximately nine acres of undeveloped land in the City of Tustin, Orange County, California. The subject property of the study is located at the southwest corner of Legacy Road and Valencia Avenue, within the former boundaries of the decommissioned Marine Corps Air Station Tustin. It comprises a portion of Tract 46, Township 5 South, Range 9 West, San Bernardino Baseline and Meridian, as depicted in the United States Geological Survey Tustin, California, 7.5' quadrangle.

The study is a part of the environmental review process for the proposed construction of offices and outdoor event space for the Tustin Unified School District (TUSD). As the lead agency for the project, the TUSD required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the TUSD with the necessary information and analysis to determine whether the project would cause a substantial adverse change in the significance of a "historical resource," as defined by CEQA. In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, initiated a Sacred Lands File search, pursued historical background research, and carried out an intensive-level field survey.

Throughout the course of these research procedures, no potential "historical resources" were encountered within or adjacent to the project boundaries. Based on these findings, CRM TECH recommends to the TUSD a conclusion of *No Impact* regarding "historical resources." No further cultural resources investigation is recommended for the project unless development plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are discovered during earth-moving operations associated with the project, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

TABLE OF CONTENTS

LIST OF FIGURES

INTRODUCTION

Between March and June 2025, at the request of HANA Resources, CRM TECH performed a cultural resources study on approximately nine acres of undeveloped land in the City of Tustin, Orange County, California (Fig. 1). The subject property of the study is located at the southwest corner of Legacy Road and Valencia Avenue, within the former boundaries of the decommissioned Marine Corps Air Station (MCAS) Tustin. It comprises a portion of Tract 46, Township 5 South, Range 9 West, San Bernardino Baseline and Meridian, as depicted in the United States Geological Survey (USGS) Tustin, California, 7.5' quadrangle (Figs. 2, 3).

The study is a part of the environmental review process for the proposed construction of offices and outdoor event space for the Tustin Unified School District (TUSD). As the lead agency for the project, the TUSD required the study in compliance with the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of the study is to provide the TUSD with the necessary information and analysis to determine whether the project would cause a substantial adverse change in the significance of a "historical resource," as defined by CEQA.

In order to identify such resources, CRM TECH conducted a historical/archaeological resources records search, initiated a Sacred Lands File search, pursued historical background research, and carried out an intensive-level field survey. The following report is a complete account of the methods, results, and conclusion of the study. Personnel who participated in these research procedures are named in the appropriate sections below, and their qualifications are provided in Appendix 1.

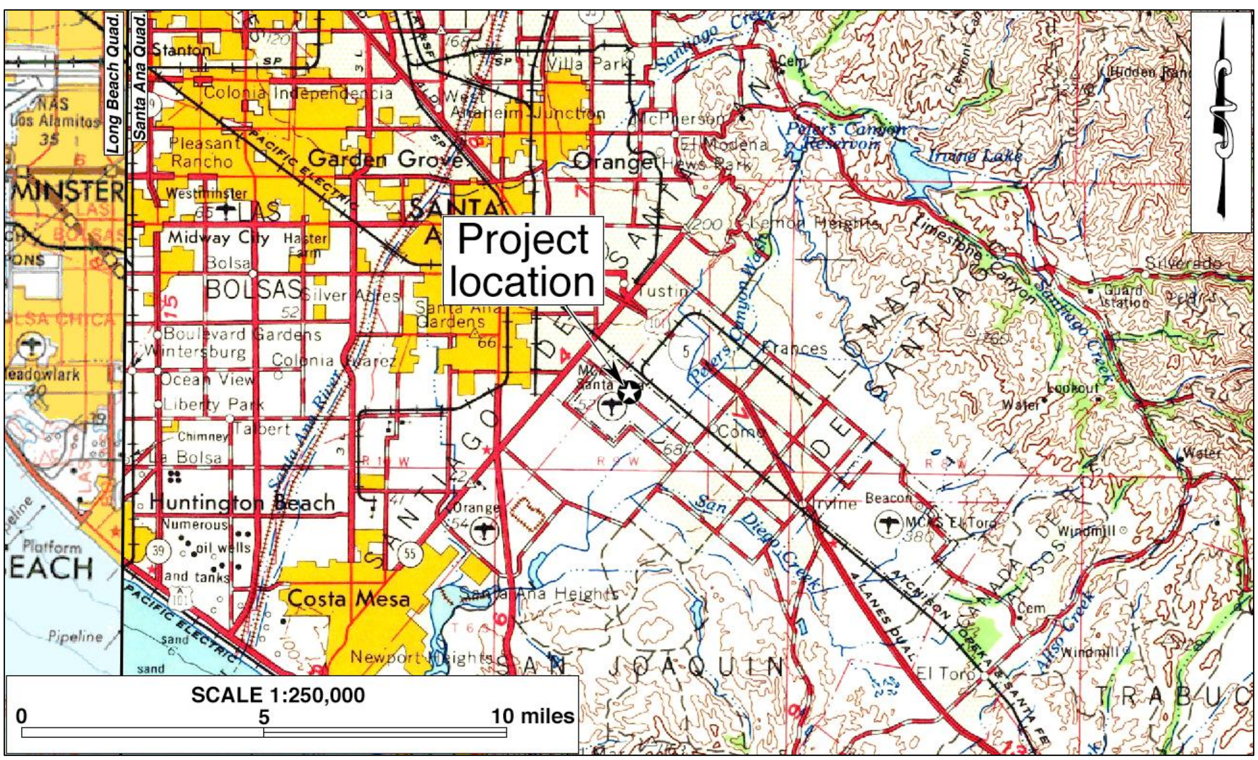

Figure 1. Project vicinity, based on USGS Long Beach and Santa Ana, Calif., 120'x60' quadrangles (USGS 1978; 1979).

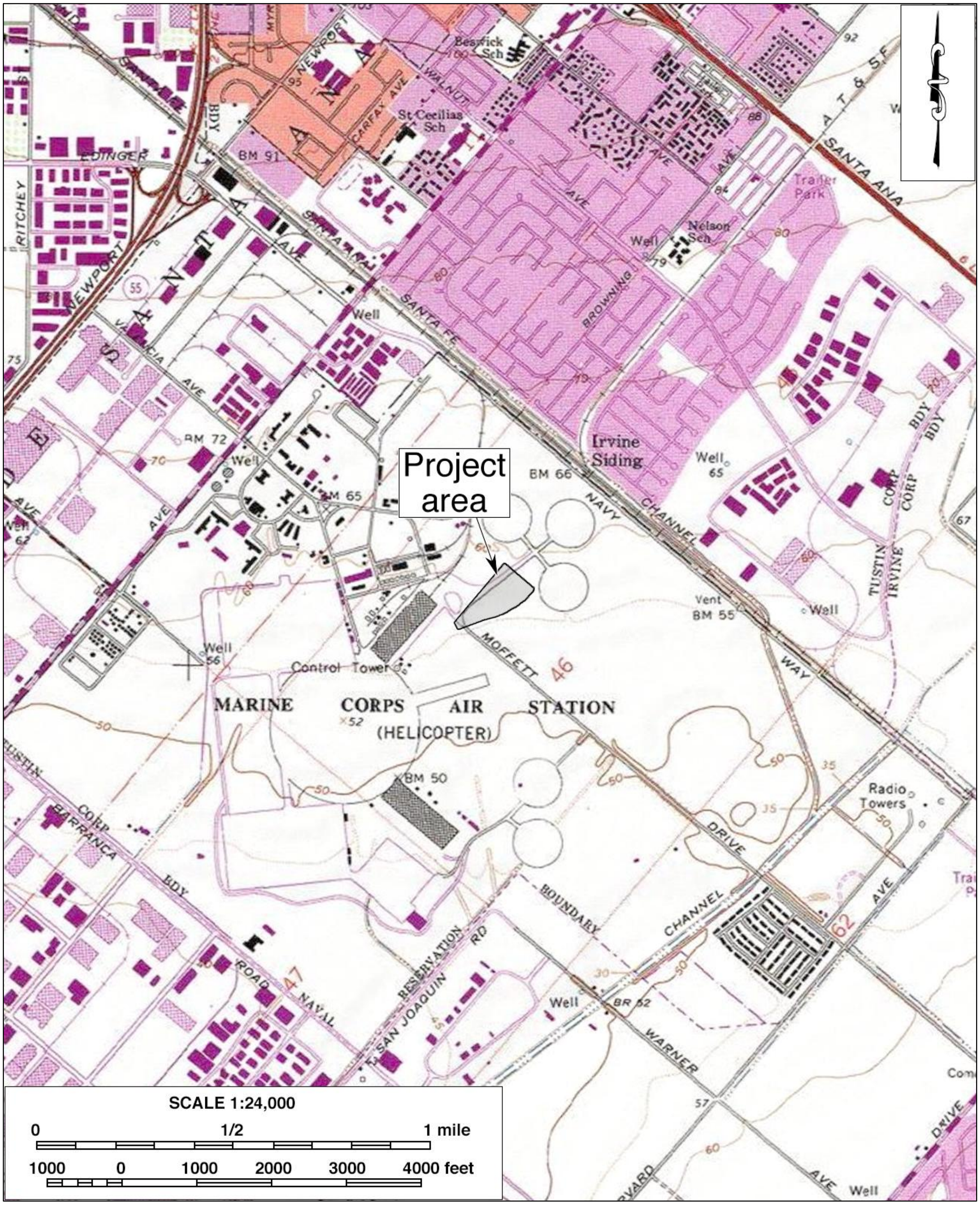

Figure 2. Project location, based on USGS Tustin, Calif., 7.5' quadrangle (USGS 1981).

Figure 3. Recent satellite image of the project area.

SETTING

NATURAL SETTING

The City of Tustin is located on the southeastern rim of the Los Angeles Basin, which is surrounded by the Palos Verdes Peninsula and the San Gabriel, Santa Monica, and Santa Ana Mountains. The region is a part of the Peninsular Ranges Province, a geomorphic province made up of a series of northwest-southeast trending structural blocks featuring uplifted mountains separated by valley basins that have developed along the intervening fault zones. The Mediterranean-type climate and environment of this region are marked by warm, dry summers and mild, rainy winters. In the general vicinity of the City of Tustin, summer temperatures average around 85ºF, and winter lows can dip below freezing. Average annual precipitation is less than 15 inches, most of which occurs in winter and early spring.

Situated in the southwestern portion of the City of Tustin, the project area is surrounded by residential neighborhoods and commercial buildings to the northeast, the Legacy Magnet Academy to the south, and remaining structures of the decommissioned MCAS Tustin to the west (Figs. 3). Within the project area, there is a stockpile of soil that spans the length of the project area as well as several soil mounds near the southern and northern boundaries, likely spoils from recent construction nearby. Elevations on the property range around 55 feet above mean sea level. In its native state, the project area would be a part of the California Coastal Scrub Plant Community, but vegetation observed includes primarily invasive species such as foxtails and black mustard (Fig. 4).

Figure 4. Current natural setting of the project area. (Photograph taken on May 9, 2025; view to the southwest)

CULTURAL SETTING

Prehistoric Context

It is widely acknowledged that human occupation in what is now the State of California began 8,000-12,000 years ago. In attempting to describe and understand the cultural processes that occurred in the ensuing years, archaeologists have developed a number of chronological frameworks that endeavor to correlate the technological and cultural changes that are observable in archaeological records to distinct time periods. The general framework for the prehistory of the southern Californian coastal region is outlined in Moratto (1984), which is the basis for the following discussion.

According to some theories, migration of indigenous groups from the interior deserts of southern California to the already inhabited coastal region took place around 7,500 years ago. Unfortunately, very little is known about the coastal groups during this early period in prehistory. With the immigration of people from the interior, a fusion of regional cultural traits, specifically those pertaining to subsistence procurement, occurred between the newcomers and original coastal inhabitants. The newcomers introduced new plant resources and plant-processing techniques to the coastal groups, and at the same time learned to exploit more intensively the littoral resources.

Archaeological investigations at various sites along the southern Californian coast have uncovered valuable data regarding later time periods in this region. Sites dating to the La Jolla I Period, ca. 5500-3500 B.C., have yielded numerous millingstone tools, crudely shaped scrapers, and flexed burials. The La Jolla II Period, ca. 3500-2000 B.C., is distinguished from the previous period by the presence of cemeteries, discoidals, and various projectile point types. Following this is the La Jolla III Period, ca. 2000-1000 B.C., which is characterized by the influence of Yuman cultural traits from the east on the coastal cultures.

With this second intrusion of eastern groups to the area, increased exploitation of terrestrial food sources further diminished the coastal people's dependence on littoral resources. With an increasing focus on acorn-processing activities, indigenous groups along the southern Californian coast slowly began settling the interior regions. There was also a shift from inhumation to cremation around 500 B.C., possibly another result of eastern influences.

Ethnohistoric Context

The Los Angeles Basin region is generally considered a part of the traditional territory of the Gabrielino, a Takic-speaking people who were considered among the most populous and powerful ethnic group in aboriginal southern California (Bean and Smith 1978:538). The Gabrielino's territory spanned from San Clemente Island along the coast to the present-day San Bernardino-Riverside area and south into southern Orange County, and their influence spread as far as the San Joaquin Valley, the Colorado River, and Baja California. The leading ethnographic sources on Gabrielino culture and history include Bean and Smith (1978), Miller (1991), and McCawley (1996). The following discussion is based mainly on these sources.

Prior to European contact, native subsistence practices were defined by the varying landscape and based primarily on gathering, cultivating, hunting, and fishing, exploiting nearly all of the resources available in a highly developed seasonal mobility system. In inland areas, the predominant food sources included acorns, piñon nuts, other seeds, roots, wild fruits/berries, and wild onions. Medicinal and ceremonial plants such as yerba buena, elderberry, and sage were typically cultivated near villages. Common game animals included deer, antelope, rabbits, wood rats, fish, and waterfowl. Coastal Gabrielino utilized marine resources and had an advanced maritime navigation technology with an emphasis on the *ti'at*, the plank canoe (Gamble 2002).

Both inland and coastal Gabrielino populations had a variety of technological skills that they used to acquire subsistence, shelter, and medicine or to create ornaments and decorations. Common tools included manos and metates, mortars and pestles, hammerstones, fire drills, awls, arrow straighteners, and stone knives and scrapers. These lithic tools were made from locally sourced material as well as those procured through trade or travel. The Gabrielino also used wood, horn, and bone spoons and stirrers as well as baskets for winnowing, leaching, grinding, transporting, parching, storing, and cooking. However, much of this material cultural, elaborately decorated, does not survive in the archaeological record. As usual, the main items found archaeologically relate to subsistence activities.

The intricacies of Gabrielino social organization are not well known, although evidence suggests the existence of a moiety system in which various clans belonged to one or the other of two main social/cultural divisions. There also seems to have existed at least three hierarchically ordered social classes, topped with an elite consisting of the chiefs, their immediate families, and the very rich. Some individuals owned land, and property boundaries were marked by the owner's personalized symbol. Villages were politically autonomous, composed of nonlocalized lineages, each with its own leader. The dominant lineage's leader was usually the village chief, whose office was generally hereditary through the male line. Often several villages were allied under the leadership of a single chief. The villages were frequently engaged in warfare against one another, resulting in what some consider to be a state of constant enmity between coastal and inland Gabrielino groups.

As early as 1542, the Gabrielino were in contact with the Spanish during the historic expedition of Juan Rodríguez Cabrillo, but it was not until 1769 that the Spaniards took steps to colonize Gabrielino territory. Shortly afterwards, most of the Gabrielino people were incorporated into the mission system. Due to forced labor, dietary deficiencies, introduced diseases, and forceful reduction, Gabrielino population dwindled rapidly. By 1900, they had almost ceased to exist as a culturally identifiable group (Bean and Smith 1978:540). In recent decades, however, there has been a renaissance of Native American activism and cultural revitalization among groups of Gabrielino descendants, including the reconstruction and utilization of *ti'at* and incorporating the ethnographic names *Kizh* and *Tongva* into official documentation (Stickel 2016).

Historic Context

Shortly after the beginning of Spanish colonization of Alta California, the establishment of Mission San Gabriel Arcangel in 1771 and Mission San Juan Capistrano in 1776 absorbed the present-day Orange County area into the mission system. The first private European landholder in central Orange County was Juan Pablo Grijalva of San Diego, a former Spanish soldier who had served with the 1775 Juan de Anza overland expedition from Mexico (Beck and Haase 1974:37; Brigandi n.d.). In 1801, Grijalva received a provisional concession from the Spanish colonial government to a roughly

70,000-acre tract of land between the two missions (Brigandi n.d.). After Grijalva's death in 1806, his son-in-law José Antonio Yorba and grandson Juan Pablo Peralta petitioned to inherit the concession, which was approved in 1810 under the name of Rancho Santiago de Santa Ana (*ibid.*).

As the Yorba and Peralta families acquired additional acreage during the ensuing years, their landholdings eventually extended from the Riverside County line along the Santa Ana River to the Pacific Ocean (Brigandi n.d.; Santa Ana Historical Society n.d.). One of Yorba's sons, José Antonio Yorba II, settled in the area that would later become the City of Orange (Brigandi n.d.). In 1866, a member of the extended family, Leonardo Cota, defaulted on a loan from Abel Stearns, then the largest landowner in southern California (City of Orange Public Library n.d.). Rancho Santiago de Santa Ana was subsequently divided among the family members and the claimants in a lawsuit over the debt (*ibid*.).

In 1868, Columbus Tustin purchased 1,300 acres in the area and established Tustin City among the sycamore and wild mustard trees (Tustin Area Historical Society n.d.). During the 1870s-1880s, a major land boom swept through much of southern California following the completion of the Southern Pacific Railroad and the competing Atchison, Topeka and Santa Fe Railway. It was during this time that Tustin grew and saw the establishment of a hotel, a bank, three churches, and a horse-drawn trolley line, along with many new homes and groves (*ibid.*). By the 1890s, Tustin was a thriving agricultural community and had replaced groves of walnuts and apricots with Valencia oranges (*ibid*.; City of Tustin n.d.).

The town continued to grow, and its population reached over 900 by 1927, when Tustin was incorporated (Tustin Area Historical Society n.d.). In 1942, during World War II, Tustin was chosen as the site of two Lighter-than-Air Ship Hangars to house blimps tasked with patrolling the coast to protect ships and guard against enemy submarines, which became the root of MCAS Tustin (Weitze and Dolan 2000). After the war, Tustin saw accelerated growth in the 1950s, with the development of freeways, post-war industries, and quality schools attracting thousands of people to the city (Tustin Area Historical Society n.d.). Meanwhile, with the increasing diversification of its economic livelihood, Tustin's citrus acreage gradually gave way to urban expansion. Today, like the rest of northern and central Orange County, the Tustin is a fully urbanized community, with an estimated population of nearly 79,000 as of 2024 spread over an 11-square-mile area (USCB n.d.).

RESEARCH METHODS

RECORDS SEARCH

On March 27, 2025, CRM TECH archaeologist Eulices Lopez conducted the cultural resources records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, which is the State of California's official cultural resource records repository for Orange County. During the records search, Lopez examined pertinent maps and records for previously identified cultural resources and existing cultural resources reports within a one-mile radius of the project area. Previously identified cultural resources include properties designated as California Historical Landmarks or Points of Historical Interest, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Resources Inventory.

SACRED LANDS FILE SEARCH

On March 24, 2025, a written request was submitted to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. The NAHC is the State of California's trustee agency for the protection of "tribal cultural resources," as defined by California Public Resources Code §21074, and is tasked with identifying and cataloging properties of Native American cultural value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout the state. The response from the NAHC is summarized below and attached to this report in Appendix 2.

HISTORICAL RESEARCH

Historical background research for this study was conducted by principal investigator/historian Bai "Tom" Tang. Sources consulted during the research included published literature in local and regional history, historical maps of the City of Tustin, and aerial/satellite photographs of the project vicinity. The maps consulted were primarily USGS topographic maps dated 1896-1981, which are accessible at the USGS website. The aerial and satellite photographs, taken in 1946-2025, are available on the Nationwide Environmental Title Research (NETR) Online website and through Google Earth software.

FIELD SURVEY

On May 9, 2025, CRM TECH archaeologist Melissa Portilla carried out the field survey of the project area. The survey was completed on foot at an intensive level by walking a series of parallel transects oriented northeast-southwest and spaced 15 meters (approximately 50 feet) apart. In this way, the ground surface in the entire project area was systematically and carefully examined for any evidence of human activities dating to the prehistoric or historic period (i.e., 50 years or older). Ground visibility was generally poor (5-10%) in much of the project area due to either thick vegetation or the presence of soil stockpiles (Fig. 4). In light of the extent of past ground disturbances in the vicinity, however, the visibility level was not considered a major hindrance to the survey effort.

RESULTS AND FINDINGS

RECORDS SEARCH

The record search results indicate that the project area, either in segments or as a whole, was included in 10 previous surveys carried out between 1979 and 2008. Among these, six provided a literature review of research that had been conducted within the project area and its vicinity, while three studies were monitoring reports for development projects nearby. One study included a systematic field survey that was conducted on three parcels of land located on MCAS Tustin, two of which covered portions of the northern part of the project area. Despite this extensive coverage of the project area and its vicinity, no cultural resources were previously recorded within or adjacent to project boundaries. Since all of these past studies are now more than 10 years old, they are considered out-of-date for statutory compliance purposes today.

Outside of the project area but within the one-mile scope of the records search, SCCIC records identify 49 additional studies completed between 1978 and 2017, none of which was adjacent to the project area. In all, approximately 95% of the land within the records search scope has been surveyed. The results of these studies suggest that the project area lies in two archaeologically and historically noteworthy areas, Irvine Ranch and MCAS Tustin. The Irvine Ranch was originally made up of several Mexican and Spanish land grants in Orange County, spanning 100,000 acres (Schroth 1979). The first archaeological survey on the ranch was conducted in 1912, in which several shell midden sites were located (*ibid.*). By the late 1970s, as many as 600 archaeological sites had been found on the ranch (Strozier 1978).

Located within the Irvine Ranch property is the MCAS Tustin. In 1942, agricultural land that was formerly used to grow lima beans became the site of the Santa Ana Lighter-than-Air Base, which later became the MCAS Tustin (RBF Consulting and Petrone Communications 2008). The Station housed two massive blimp hangars, which were designated Buildings 28 and 29 by the U.S. Navy (*ibid.*). These buildings were among the largest wooden structures ever built, measuring 189 feet high, over 1,000 feet long, and just under 300 feet wide (Kuci 1974). At the end of World War II, MCAS Tustin was decommissioned and later recommissioned in 1951 to house helicopters and for Marine helicopter training and operations (*ibid.*; RBF Consulting and Petrone Communications 2008). In 1975, the station was listed in the National Register of Historic Places. In addition, it also contained a prehistoric archaeological site, designated 30-000381, which was destroyed by construction activities in 1971 (White and White 1993). MCAS Tustin was closed in 1999 (Weitze and Dolan 2000), and in 2023 Building 28 was lost to a fire.

According to SCCIC records, 20 cultural resources were previously recorded within the one-mile radius, as listed in Table 1. Thirteen of these were prehistoric (i.e., Native American) in origin. Among them were three archaeological sites and 10 isolates (i.e., localities with fewer than three artifacts), including Site 30-000381 mentioned above. All of these sites and isolates consisted of scattered groundstone, flaked-stone, and/or faunal artifacts. The other seven resources, including five sites and two isolates, dated to the historic period and included the Lighter-than-Air Ship Hangers, a segment of the Burlington Northern Santa Fe Railway, two buildings from the 1960s-1970s, and various refuse items. Among the 20 known cultural resources, the nearest to the project location was one of the two Lighter-than-Air Ship Hangers, the remains of which are located a few hundred feet to the west. All of the other sites and isolates were recorded at least one-third of a mile from the project area, including the surviving hanger.

SACRED LANDS FILE SEARCH

In response to CRM TECH's inquiry, the NAHC stated in a letter dated April 7, 2025, that the Sacred Lands File (SLF) identified no Native American cultural resources in the project vicinity (see App. 2). Noting that tribes do not always record their sacred sites in the SLF, however, the NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 22 individuals associated with 11 local Native American groups who may have knowledge of such resources. The NAHC's reply is attached in Appendix 2 for reference by the TUSD in future government-to-government consultations with the pertinent tribal groups, if necessary.

Table 1. Previously Recorded Cultural Resources within the Scope of the Records Search			
Resource Number	**Date Recorded**	**Description**	**Approx. Distance from Project**
30-000381	1972	Prehistoric double-grooved arrowshaft straightener, mortar, metate	3/4 mile
30-001652/ CA-ORA-001652	2006	Prehistoric lithic scatter, shell, faunal bone	1/2 mile
30-001725/ CA-ORA-001725	2013	Prehistoric groundstone scatters, chipped stone artifacts, marine shells	3/4 mile
30-001726/ CA-ORA-001726	2013	Refuse pit, c. 1914-1945	3/4 mile
30-001760	2015	Historic-period artifact concentrations, c. 1820-1987, with a prehistoric mano	1/3 mile
30-100190	2011-2012	Isolate: prehistoric sandstone bowl fragment	3/4 mile
30-100191	2011-2012	Isolate: prehistoric chert projectile point	3/4 mile
30-100192	2011-2012	Isolate: historic-period broken metal arrow-shaped object	3/4 mile
30-100193	2011-2012	Isolate: historic-period broken metal arrow-shaped object	3/4 mile
30-100194	2011-2012	Isolate: prehistoric bifacial mano	1 mile
30-100195	2011-2012	Isolate: prehistoric bifacial mano fragment	1 mile
30-100196	2011-2012	Isolate: prehistoric bifacial mano fragments	1 mile
30-100197	2011-2012	Isolate: prehistoric bifacial mano fragment	1 mile
30-100198	2011-2012	Isolate: prehistoric shell fragments	3/4 mile
30-100199	2011-2012	Isolate: prehistoric metate fragment	1 mile
30-100200	2011-2012	Isolate: prehistoric metate fragments	1 mile
30-100201	2011	Isolate: prehistoric granitic pestle	1/2 mile
30-160312	1974-1975	Lighter-than-Air Ship Hangars, Marine Corps Air Station, 1943; listed in the National Register of Historic Places	300 feet
30-176663	2002	Burlington Northern Santa Fe Railway, 1885-1888	1/3 mile
30-176837	2006	Two buildings, 1963 and 1974	1 mile

HISTORICAL RESEARCH

Historical sources consulted for this study suggest that development activities in the project area began in the early 1940s with the establishment of what would eventually become MCAS Tustin (Figs. 5-10). Prior to that, the project area evidently remained unsettled and undeveloped, except perhaps as agricultural fields, although the original alignment of Valencia Avenue appeared to cross the southwestern tip of the property in the 1930s (Figs. 5-8). After the establishment of the military blimp and, later, helicopter base, the part of Valencia Avenue across the project area became known as Moffett Drive, and another road was built across the northwestern edge of the property, leading to the hangers and helipads nearby (Figs. 9, 10; NETR Online 1946-1980).

No other notable features were known to be present within the project boundaries during the historic period, as most of the property was left unused (Figs. 9, 10; NETR Online 1946-1980). After the closure of MCAS Tustin in 1999, both of these roads were eventually removed and replaced by new roads along the perimeters of the project area, with Valencia Avenue built in 2006-2007 and Legacy Road built in 2017-2019 (NETR Online 1980-2022; Google Earth 1994-2025). In the meantime, the entire project area was cleared in 2016-2017, but no further development occurred on the property after that (*ibid.*).

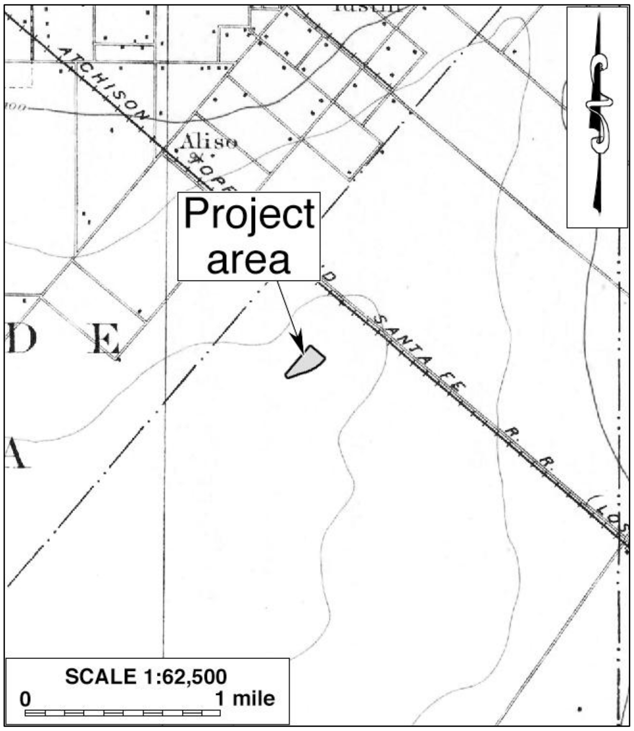

Figure 5. The project area and vicinity in 1894. (Source: USGS 1896)

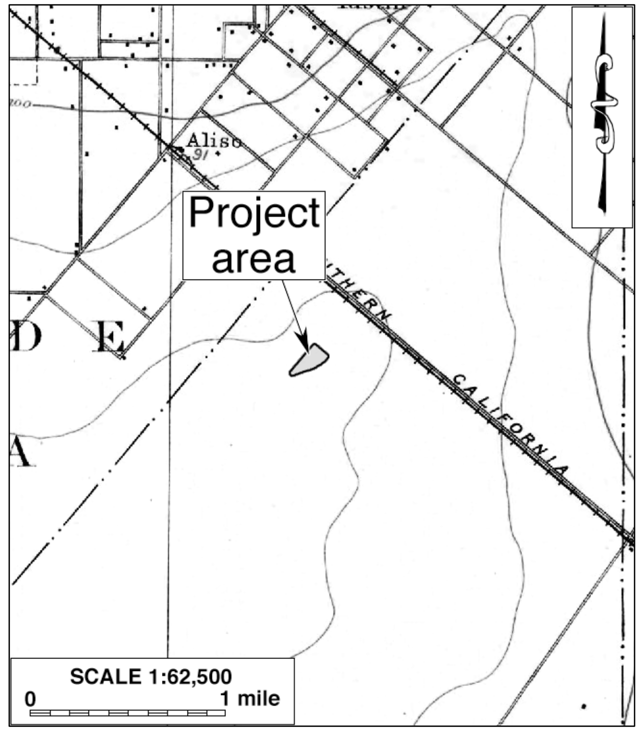

Figure 6. The project area and vicinity in 1900. (Source: USGS 1901)

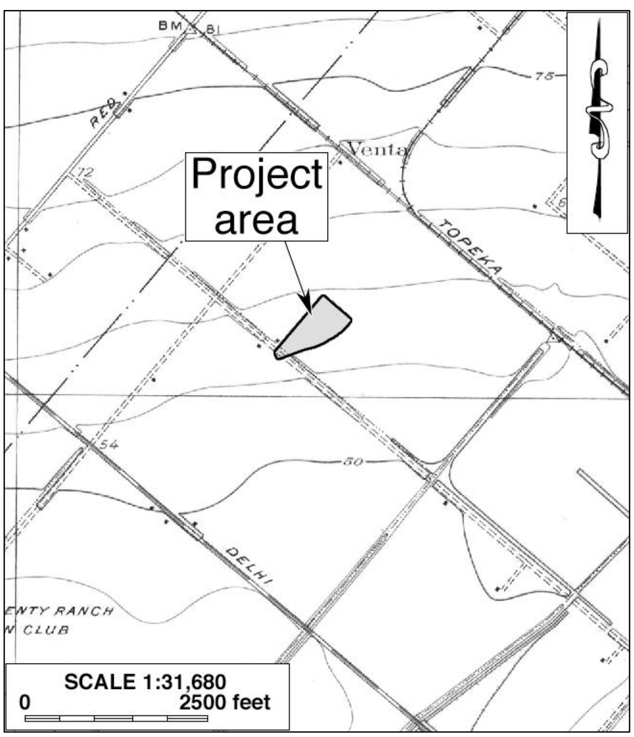

Figure 7. The project area and vicinity in 1932. (Source: USGS 1935)

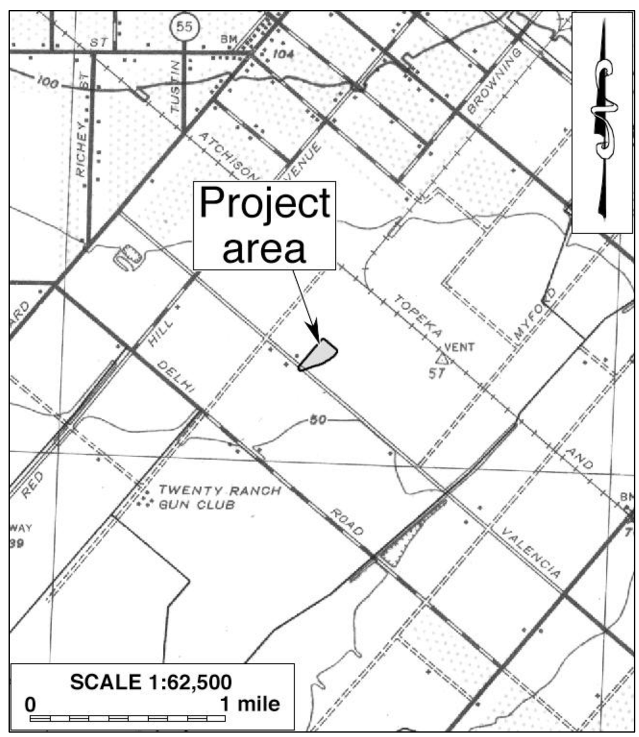

Figure 8. The project area and vicinity in 1940. (Source: USGS 1942)

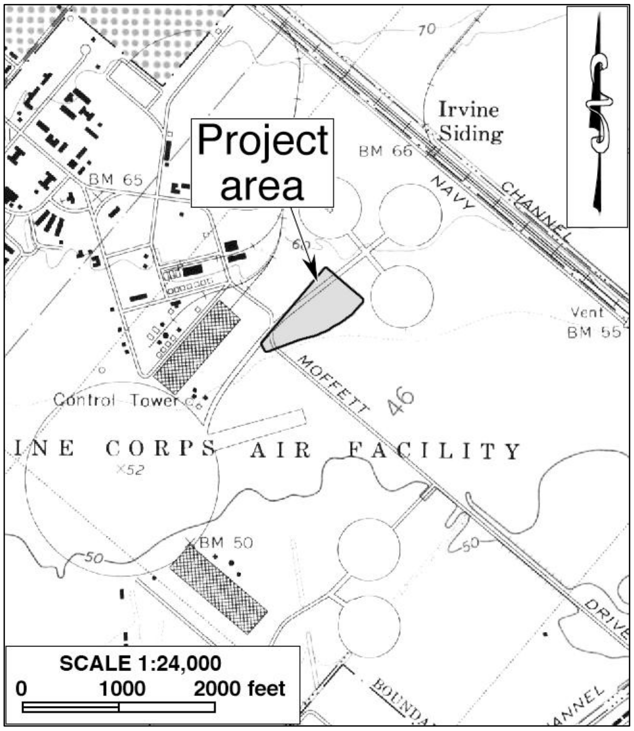

Figure 9. The project area and vicinity in 1946. (Source: USGS 1948)

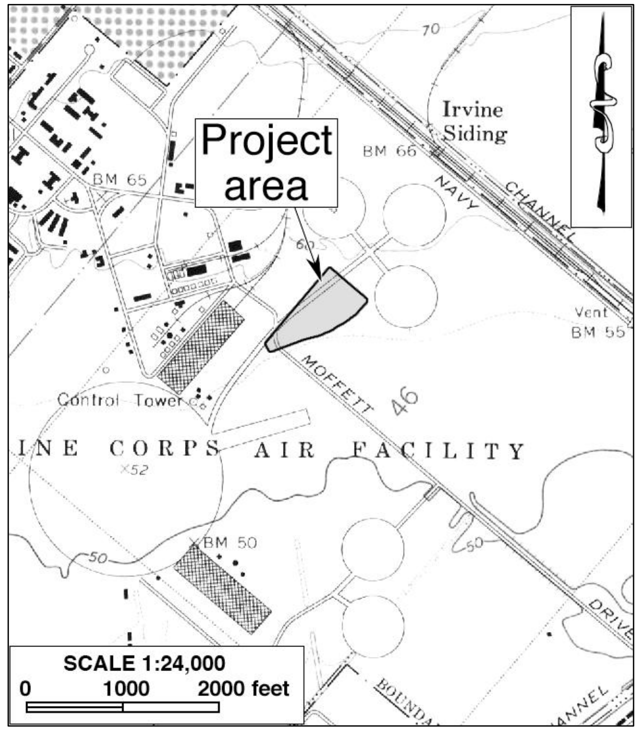

Figure 10. The project area and vicinity in 1963. (Source: USGS 1965)

FIELD SURVEY

The field survey yielded negative results for potential “historical resources,” and no buildings, structures, objects, features, or artifacts of prehistoric or historical origin were observed within or adjacent to the project area. Some scattered refuse was observed throughout the project area, including crushed PVC pipe, plastic bottles, and broken pieces of concrete, but all of the items appeared to be modern in origin, and none of them is of any historical or archaeological interest. Field observations confirmed that the ground surface in the project area had been extensively disturbed in the past, most recently in relation to nearby construction activities, with little vestige of the natural landscape remaining today (Fig. 4).

DISCUSSION

The purpose of this study is to identify any cultural resources within the project area and to assist the TUSD in determining whether such resources meet the official definition of “historical resources,” as provided in the California Public Resources Code, in particular CEQA. According to PRC §5020.1(j), “historical resource” includes, but is not limited to, any object, building, 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.”

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

(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.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

In summary of the research results presented above, no potential "historical resources" were previously recorded within the project area, and none was found during the present survey. The Native American Sacred Lands File identified no properties of traditional cultural value in the vicinity, and no notable cultural features, except roads that have since been removed, were known to be present in the project area throughout the historic period. Based on these findings, and in light of the criteria listed above, the present report determined that no potential "historical resources" exist within the project area.

CONCLUSION AND RECOMMENDATIONS

CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." As stated above, this study has identified no "historical resources," as defined by CEQA and the associated regulations, within or adjacent to the project area. Therefore, CRM TECH presents the following recommendations to the TUSD:

- The proposed project will not cause a substantial adverse change to any known "historical resources."
- No further cultural resources investigation is recommended for the project unless development plans undergo such changes as to include areas not covered by this study.
- If buried cultural materials are discovered during earth-moving operations associated with the project, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

REFERENCES

Bean, Lowell John, and Charles R. Smith

1978 Gabrielino. In Robert F. Heizer (ed.): *Handbook of North American Indians*, Vol. 8: *California*; pp. 538-549. Smithsonian Institution, Washington, D.C.

Beck, Warren A., and Ynez D. Haase

1974 *Historical Atlas of California*. University of Oklahoma Press, Norman.

Brigandi, Phil

2006 *Orange County Place Names, A to Z*. Sunbelt Publications, El Cajon, California.

n.d. The Yorba Family Ranchos. https://www.ochistoryland.com/yorbaranchos.

City of Orange Public Library

n.d. City History ("History of Orange," "the Founding of Orange," and "the Six Ages of Downtown Orange"). https://www.cityoforange.org/411/History-of-Orange; https://www.cityoforange.org/940/The-Founding-of-Orange; https://www.cityoforange.org/941/The-Six-Ages-of-Downtown-Orange.

City of Orange Public Library

n.d. History of Orange. https://www.cityoforange.org/411/History-of-Orange.

City of Tustin

n.d. Tustin History. https://www.tustinca.org/833/Tustin-History.

Gamble, Lynn H.

2002 Archaeological Evidence for the Origin of the Plank Canoe in North America. *American Antiquity* 67(2):301-315.

Google Earth

1994-2025 Aerial photographs of the project vicinity; taken in 1994, 2002-2007, 2009-2011, and 2013-2025. Available through Google Earth software.

Kuci, R. A.

1974 30-160312: Lighter-than-Air Hangars, Marine Corps Air Station (Helicopter), Orange County, California. On file South Central Coastal Information Center, California State University, Fullerton.

McCawley, William

1996 *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press/ Ballena Press, Banning/Novato, California.

Miller, Bruce W.

1991 *The Gabrielino*. Sand River Press, Los Osos, California.

Moratto, Michael J.

1984 *California Archaeology*. Academic Press, Orlando, Florida.

NETR Online

1946-2022 Aerial photographs of the project vicinity; taken in 1946, 1952, 1963, 1965, 1972, 1980, 1985, 1992-2000, 2002-2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022. http://www.historicaerials.com.

RBF Consulting and Petrone Communications

2008 The Tustin Hangars: Titans of History: An Historical Account of the MCAS Tustin Hangars. On file, South Central Coastal Information Center, California State University, Fullerton.

Santa Ana Historical Society
n.d. Rancho Santiago de Santa Ana: The Grijalva, Yorba, Peralta, and Sepulveda Families. https://www.santaanahistory.com/articles/ranchos.html.

Schroth, Adella
1979 The History of Archaeological Research on Irvine Ranch Property: The Evolution of a Company Tradition. On file, South Central Coastal Information Center, California State University, Fullerton.

Stickel, E. Gary
2016 *Why the Original Indian Tribe of the Greater Los Angeles Area Is Called Kizh Not Tongva*. Kizh Tribal Press, San Gabriel, California.

Strozier, Hardy
1978 The Irvine Company Planning Process and California Archaeology: A Review and Critique. On file, South Central Coastal Information Center, California State University, Fullerton.

Tustin Area Historical Society
n.d. Tustin History. https://tustinhistory.com/tustin-history/.

USCB (United States Census Bureau, U.S. Department of Commerce)
n.d. QuickFacts: Tustin City, California. https://www.census.gov/quickfacts/fact/table/tustincitycalifornia/POP010210#POP010210.

USGS (United States Geological Survey, U.S. Department of the Interior)
1896 Map: Santa Ana, Calif. (1:62,500); surveyed in 1894.
1901 Map: Santa Ana, Calif. (15’, 1:62,500); surveyed in 1894, culture revised 1900.
1935 Map: Tustin, Calif. (1:31680); surveyed in 1932.
1942 Map: Santa Ana, Calif. (15’, 1:62,500); surveyed in 1932-1940.
1948 Map: Tustin, Calif. (7.5’, 1:24,000); aerial photographs taken in 1946.
1965 Map: Tustin, Calif. (7.5’, 1:24,000); aerial photographs taken in 1963.
1978 Map: Long Beach, Calif. (120’x60’, 1:250:000); 1957 edition revised.
1979 Map: Santa Ana, Calif. (120’x60’, 1:250,000); 1959 edition revised.
1981 Map: Tustin, Calif. (7.5’, 1:24,000); 1965 edition photorevised in 1978.

Weitze, Karen and Christy Dolan
2000 Historic American building Surve for the Marine Corps Air Station, Tustin Lighter-than-Air Ship Hangars (HABS No. CA-2707), Orange County, California. On file, South Central Coastal Information Center, California State University, Fullerton.

White, Robert S. and Laurie S. White
1993 An Extended Literature and Records Search Addressing Prehistoric Archaeological Resources Located within the Boundaries of the U.S. Marine Corps Air Station (MCAS), Tustin, Orange County, California. On file, South Central Coastal Information Center, California State University, Fullerton.

APPENDIX 1:
PERSONNEL QUALIFICATIONS

PRINCIPAL INVESTIGATOR, HISTORY
Bai "Tom" Tang, M.A.

Education

1988-1993	Graduate Program in Public History/Historic Preservation, University of California, Riverside.
1987	M.A., American History, Yale University, New Haven, Connecticut.
1982	B.A., History, Northwestern University, Xi'an, China.
2000	"Introduction to Section 106 Review," presented by the Advisory Council on Historic Preservation and the University of Nevada, Reno.
1994	"Assessing the Significance of Historic Archaeological Sites," presented by the Historic Preservation Program, University of Nevada, Reno.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1993-2002	Project Historian/Architectural Historian, CRM TECH, Riverside, California.
1993-1997	Project Historian, Greenwood and Associates, Pacific Palisades, California.
1991-1993	Project Historian, Archaeological Research Unit, University of California, Riverside.
1990	Intern Researcher, California State Office of Historic Preservation, Sacramento.
1990-1992	Teaching Assistant, History of Modern World, University of California, Riverside.
1988-1993	Research Assistant, American Social History, University of California, Riverside.
1985-1988	Research Assistant, Modern Chinese History, Yale University.
1985-1986	Teaching Assistant, Modern Chinese History, Yale University.
1982-1985	Lecturer, History, Xi'an Foreign Languages Institute, Xi'an, China.

Cultural Resources Management Reports

Preliminary Analyses and Recommendations Regarding California's Cultural Resources Inventory System (with Special Reference to Condition 14 of NPS 1990 Program Review Report). California State Office of Historic Preservation working paper, Sacramento, September 1990.

Numerous cultural resources management reports with the Archaeological Research Unit, Greenwood and Associates, and CRM TECH, since October 1991.

PRINCIPAL INVESTIGATOR, ARCHAEOLOGY
Michael Hogan, Ph.D., RPA (Registered Professional Archaeologist)

Education

1991	Ph.D., Anthropology, University of California, Riverside.
1981	B.S., Anthropology, University of California, Riverside; with honors.
2025	"Introductory Sedimentology for Archaeology," SAA Online Semina by Ervan Garrison.
2021	"An Introduction to Geoarchaeology: How Understanding Basic Soils, Sediments, and Landforms Can Make You a Better Archaeologist," SAA Online Seminar.
2002	"Section 106—National Historic Preservation Act: Federal Law at the Local Level," UCLA Extension Course #888.
2002	"Recognizing Historic Artifacts," workshop by Richard Norwood, Historical Archaeologist.
2002	"Wending Your Way through the Regulatory Maze," symposium by the Association of Environmental Professionals.
1992	"Southern California Ceramics Workshop," presented by Jerry Schaefer.
1992	"Historic Artifact Workshop," presented by Anne Duffield-Stoll.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1999-2002	Project Archaeologist/Field Director, CRM TECH, Riverside, California.
1996-1998	Project Director and Ethnographer, Statistical Research, Inc., Redlands, California.
1992-1998	Assistant Research Anthropologist, University of California, Riverside.
1992-1995	Project Director, Archaeological Research Unit, U.C. Riverside.
1991-1992	Crew Chief, Archaeological Research Unit, U.C. Riverside.
1984-1998	Project Director, Field Director, Crew Chief, and Archaeological Technician for various southern California cultural resources management firms.

Research Interests

Cultural Resource Management, Southern Californian Archaeology, Settlement and Exchange Patterns, Specialization and Stratification, Culture Change, Native American Culture, Cultural Diversity.

Cultural Resources Management Reports

Principal investigator for, author or co-author of, and contributor to numerous cultural resources management study reports since 1986.

Memberships

Society for American Archaeology; Society for California Archaeology; Pacific Coast Archaeological Society.

PROJECT ARCHAEOLOGIST/REPORT WRITER
Elizabeth L. Beckner, Ph.D.

Education

2024	Ph.D., Anthropology, University of California, Riverside.
2017	M.A., Anthropology, University of California, Riverside.
2016	B.A., Anthropology, University of California, Riverside.

Professional Experience

2024-	Project Archaeologist, CRM TECH, Colton, California.
2024-	Lecturer, California State University, San Bernardino.
2019-	Adjunct Instructor, Chaffey College, Rancho Cucamonga, California.
2019	Archaeologist, Dudek, Pasadena, California
2017-2019	Teaching Assistant, University of California, Riverside.
2018	Archaeologist, Proyecto Sacbé Cobá-Yaxuna (Sacbé Cobá-Yaxuna Project), Cobá, Quintana Roo, Mexico.
2016-2017	Field Assistant, Proyecto de Interacción Política del Centro de Yucatán (Political Interaction Project of Central Yucatan), Yaxuna, Yucatan, Mexico.
2015-2017	Information Officer, Eastern Information Center, Riverside, California.

Publication

2023	T.W. Stanton, Traci Ardren, Nicolas C. Barth, Juan C. Fernandez Diaz, Steph J. Miller, Karl A. Taube, Patrick Rohrer, Elizabeth Beckner;, and Aline Magnoni: Roads, Temples, and the Community Boundaries of Cobá, Quintana Roo. In T.H. Guderjan and J.P. Mathews (eds.): *Construction of Maya Space: Causeways, Walls, and Open Areas from Ancient to Modern Times*; pp. 71-98. University of Arizona Press, Tucson.

PROJECT ARCHAEOLOGIST
Melissa A. Portilla, B.A.

Education

2023	A.A. (*cum laude*), Anthropology, Fullerton College.
2019	B.A., Ancient History: Classics, University of Hawaii, Manoa.

Professional Experience

2023-	Project Archaeologist, CRM TECH, Colton, California.
2023-2024	Project Archaeologist, Psomas, Pasadena, California.
2020-2020	Collections Assistant, Museum of Us, San Diego, California.

PROJECT ARCHAEOLOGIST/NATIVE AMERICAN LIAISON
Eulices Lopez, B.S.

Education

2015	B.S., Anthropology, University of California, Riverside.
2013	A.A., Anthropology, East Los Angeles College, Monterey Park, California.

Professional Experience

2024-	Project Archaeologist, CRM TECH, Colton, California.
2017-2024	Deputy Coordinator, Eastern Information Center, University of California, Riverside.
2017-2024	Director Assistant, Archaeological Research Unit, University of California, Riverside.
2017-2024	Curator Facilitator, Archaeological Curation Unit, University of California, Riverside.
2014-2015	Information Officer, Eastern Information Center, University of California, Riverside.
2013	Lithic Analyst Assistant, Anthropology Department, East Los Angeles College, Monterey Park, California.
2012	Hominid Cast Fossils Cataloger, Anthropology Department, East Los Angeles College, Monterey Park, California.

APPENDIX 2

NATIVE AMERICAN SACRED LANDS FILE SEARCH RESULTS

STATE OF CALIFORNIA — Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

April 7, 2025

Nina Gallardo
CRM TECH

Via Email to: ngallardo@crmtech.us

Re: Proposed Tustin USD District Offices Project, Orange County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were negative. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

If you have any questions or need additional information, please contact me at Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Orange County
4/7/2025

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		anthonymad2002@gmail.com	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	(951) 763-2808	chair@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		besparza@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	(626) 286-1262	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles, Orange, Riverside ,San Bernardino, Santa Barbara, Ventura
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761		christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		Chavez1956metro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351		tongvatcr@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Juaneno Band of Mission Indians Acjachemen Nation - Belardes	N	Joyce Perry, Cultural Resource Director	4955 Paseo Segovia Irvine, CA, 92603	(949) 293-8522		kaamalam@gmail.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Nathan Banda, Chairman	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 426-8804		nbanda@jbmian.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Shannon Wingfield, Secretary	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 488-3484		webmaster@jbmian.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Heidi Lucero, THPO/MLD	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(562) 879-2884		thpo@jbmian.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/ Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564		cnejo@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego

Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537		awallick@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515		sgaughen@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	vminott@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	sestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Tustin USD District Offices Project, Orange County.

Record: PROJ-2025-001807
Report Type: List of Tribes
Counties: Orange
NAHC Group: All