Appendix B
Cultural Resources Assessment

Public Version

IBC MULTI-USE TRAIL CREEKWALK SEGMENT PROJECT

Cultural Resources Assessment

Prepared for
BKF Engineers
4675 MacArthur Court, Suite 400
Newport Beach, California 94065
Contact: Sheila Amparo

November 2024

Public Version

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4675 MacArthur Court, Suite 400
Newport Beach, California 94065
Contact: Sheila Amparo

November 2024

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Project Location:
Tustin (CA) USGS 7.5-minute Topographic Quad
Township 6 South, Range 9 West, Section 58

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IBC MULTI-USE TRAIL CREEKWALK SEGMENT PROJECT

Cultural Resources Assessment

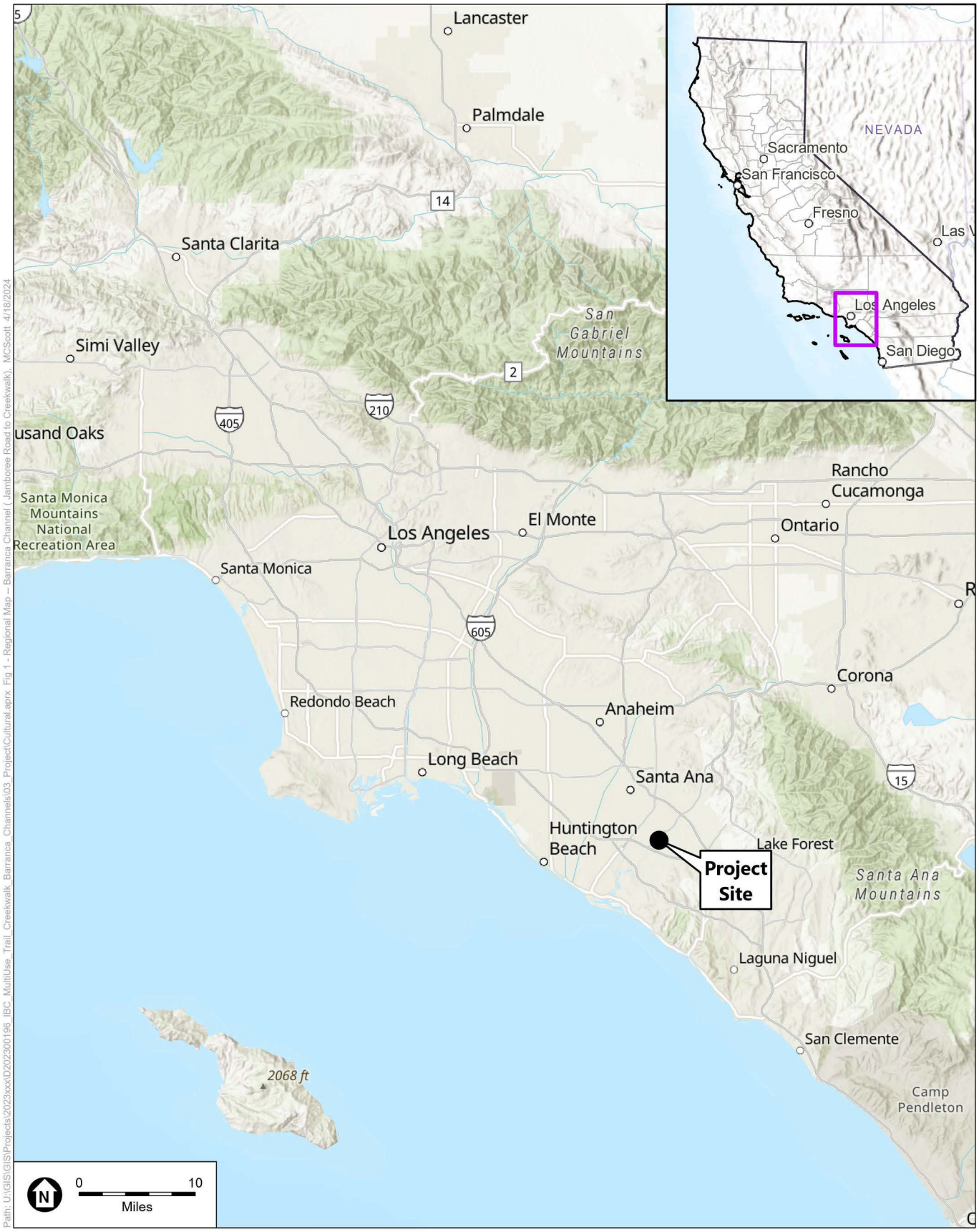
Introduction

Environmental Science Associates (ESA) has been retained by the BKF Engineers to prepare a cultural resources assessment in support of an Initial Study/Mitigated Negative Declaration for the Irvine Business Complex (IBC) Multi-Use Trail Creekwalk Segment Project (Project). The Project would include the construction and operation of an approximately 1.75-mile multi-use paved trail along the western edge of the San Diego Creek and Peters Canyon Wash, extending from Coronado in the south to Warner Avenue in the north in Irvine, California (Project Site). ESA prepared a cultural resources assessment to identify and evaluate the potential impacts to cultural resources (archaeological and historic built environment/architectural resources) associated with the Project for the purpose of complying with the California Environmental Quality Act (CEQA). The scope of work for this assessment included conducting land use history research, property history research, a cultural resources records search through the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), geologic map review, a pedestrian survey, and an archaeological subsurface sensitivity assessment. The City of Irvine (City) is the lead agency pursuant to CEQA.

ESA personnel involved in this assessment and the preparation of this report are as follows: Kyle Garcia, M.A., RPA, Project Manager/Director; Alison Garcia Kellar, M.S., Project Manager, Senior Architectural Historian and report author, Valerie Smith, M.S., Architectural Historian and report author. Evan Tudor-Elliot, senior report reviewer (archaeology), and Claudia Camacho-Trejo, B.A., report author and surveyor (archaeology). Resumes of key personnel are included in **Appendix A**.

Project Location

The Project Site is located within the western portion of the City in Orange County, California (**Figure 1**). The Project Site is located along the western edge of the San Diego Creek, spanning from Coronado to just south of Barranca Parkway, and continues northward along the western edge of the Peters Canyon Wash, between Barranca Parkway to Warner Avenue. The Project Site is situated within an unsectioned portion of Township 5 and 6 South, Range 9 West of the Tustin, CA U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (**Figure 2**).

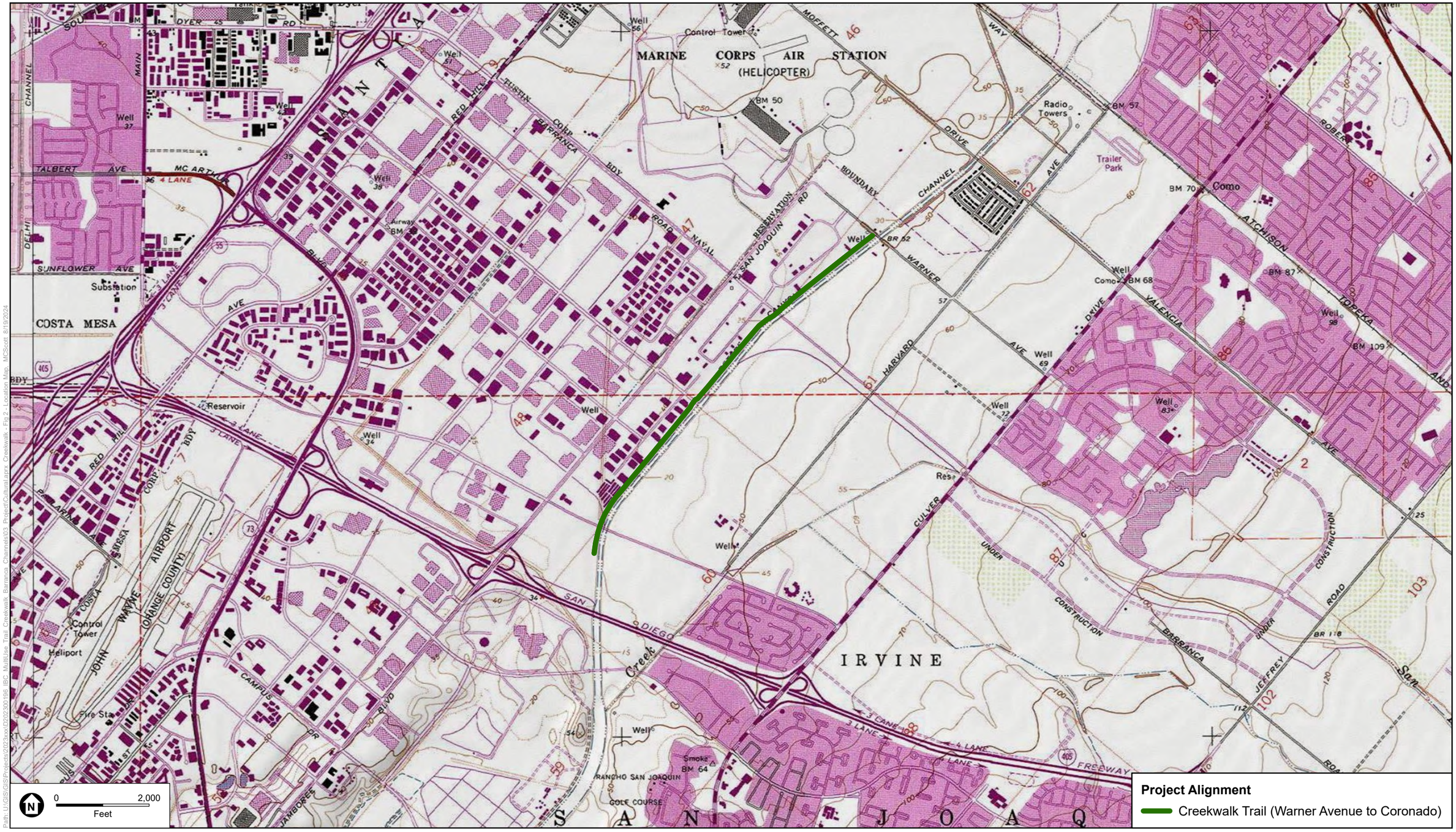


SOURCE: ESA, 2024

IBC Multi-Use Trail Creekwalk and Barranca Channel Segments Project

Figure 1
Regional Map

ESA



SOURCE: Bedrossian et al, 2012; ESA, 2024

IBC Multi-Use Trail Creekwalk and Barranca Channel Segments Project

ESA

Figure 2
Location Map

Path: U:\GIS\GIS\Projects\202\xxx\D202300196_IBC_MultiUse_Trail_Creekwalk_Barranca_Channels\03_Project\Cultural.aprx Creekwalk - Fig 2 - Location Map. MCScott 8/19/2024

The land uses surrounding the Project Site are comprised of urban and built-up land. Commercial uses are located to the west of the San Diego Creek and multi-family residential uses are located to the east. The eastern side of the San Diego Creek also includes commercial uses in the southern portion and recreation uses in the central and northern portion, including San Marco Park and the Bill Barber Memorial Park. Creekside High School is also located east of the San Diego Creek, located north of Barranca Parkway.

The existing San Diego Creek Trail (also known as the Mountains-to-the-Sea Trail and Bikeway) is located on the opposite bank from the Project Site along the easterly side of the San Diego Creek. The San Diego Creek Trail continues north and connects with the existing Peters Canyon Trail, which is located on the opposite bank from the Project Site along the easterly side of the Peters Canyon Wash.

Existing Conditions

The Project Site currently consists of an existing maintenance road on top of the western bank of the channel, owned by the Orange County Flood Control District (OCFCD). The OCFCD maintenance road is approximately 20-feet (ft) wide without noticeable slope, except at under crossings. The maintenance road is bound by a chain-linked fence on the west and the channel bank on the east. The banks of the water channel are generally armored with large stone riprap, with banks at under crossings armored with concrete. The OCFCD maintenance road is graded with crushed gravel throughout, except for underpasses which are paved with concrete under Alton Parkway, Barranca Parkway, and Warner Avenue. The maintenance road connects with each street crossing through on-street fenced driveways at Coronado, Main Street, Alton Parkway, Barranca Parkway, and Warner Avenue.

Project Description

Trail Characteristics

As discussed earlier, the Project would include the construction and operation of a multi-use paved trail along the western edge of the San Diego Creek and Peters Canyon Wash, extending from Coronado in the south to Warner Avenue in the north. The proposed trail would total approximately 1.75 miles. The proposed trail would include a two-foot wide paved shoulder nearest to the channel, an eight-foot wide paved path for pedestrians and cyclists, and a five-foot wide decomposed granite (DG) path for equestrian use. A two-foot wide earthen swale would be located on the western side of the path. The eastern side of the path would include an approximately 42-inch high steel safety railing with concrete footing. The proposed trail would also include white led unidirectional flush-mount in-pavement markers for superior visibility improving pedestrian and cyclists' safety. The total depth of ground disturbance for the Project would reach a depth of up to 12 inches for the trail construction.

Intersection Improvements

The proposed trail would follow the existing path of the OCFCD maintenance road. The proposed trail would begin at Coronado and continue north, through the intersections of Main Street, Alton Parkway, Barranca Parkway, and end at Warner Avenue. Each street crossing and entrance to the trail would include in-pavement lighting, signage, and landscaping.

Setting

The Project is located within an urbanized section of the City in central Orange County, itself part of the Los Angeles Metropolitan Area. Irvine shares borders with several other cities, including Tustin to the north, Santa Ana to the northwest, Lake Forest to the east and southeast, Laguna Hills and Laguna Woods to the south, Costa Mesa to the west, and Newport Beach to the southwest. Its northern border with Orange is located on open lands by State Route 261. The primary watercourse in Irvine is San Diego Creek, which flows northwest around the San Joaquin Hills before turning southwest into Upper Newport Bay, and the most significant tributary is Peters Canyon Wash. Irvine is mostly situated in a broad, flat valley between Loma Ridge in the north and San Joaquin Hills in the south. However, there are several hills, plateaus, and canyons in the extreme northern and southern areas, which provide a diverse natural landscape. Irvine's open space is home to various native habitats that support a wide range of flora and fauna. The City's open space also serves as a refuge for numerous threatened or endangered plant and animal species, such as the California gnatcatcher and the San Diego fairy shrimp.

Natural Setting

Western Orange County surrounding the Project Site is the furthest southeastern portion of the Los Angeles Basin, a large sedimentary basin set within the Transverse ranges, ending at the Santa Ana Mountains and the San Joaquin Hills adjacent to the City (Yerkes et al. 1965). This basin represents a trough that subsided and was filled with Miocene marine and nonmarine sediments brought by the Los Angeles, San Gabriel, and Santa Ana rivers (Hall 2007:170, 177; Schoenherr 2017:268). By the late Pleistocene epoch, this formed a broad alluvial floodplain, surrounded by high mountains with smaller ranges of hills within it (Schoenherr 2017:268). The underlying alluvium is up to 14,000 ft thick. The climate of the Los Angeles Basin is Mediterranean, with almost all precipitation coming in winter, although there are pronounced periods of fog in the spring and summer and the occasional tropical storm that bring torrential summer rain from the Pacific Ocean to the south (Schoenherr 2017:268).

This Mediterranean climate shapes the natural habitats and vegetation communities, with broad swaths of coastal sage scrub on the plains, chaparral on the southern and inland sides of the hills and mountains, and mixed oak woodlands on the cooler northern and coastal slopes (Hall 2007; Schoenherr 2017:277-279). The coastal sage scrub is characterized by low shrubs, bunch grasses, and annual wildflowers, including California Sagebrush (*Artemisia californica*), Black and Purple sages (*Salvia mellifera* and *S. leucophylla*), Bush Sunflower (*Encelia californica*), and California Buckwheat (*Eriogonum fasciculatum*) (Schoenherr 2017:279-283). The lower chaparral vegetation community has similar plants to the coastal sage scrub, but they tend to be woodier and grow larger with wide root systems. These can include chamise (*Adenostoma fasciculatum*), scrub oaks (*Quercus berberidifolia* or *Q. dumosa*), and manzanitas (*Arctostaphylos* spp.) (Hall 2007; Schoenherr 2017:289-290). The oak woodlands in this region are dominated by Coast Live Oak (Q. agrifolia), with smaller numbers of California Black Walnut (Juglans californica), and an understory of toyon (*Heteromeles arbutifolia*), Lemonade Berry (Rhus integrifolia), and poison oak (*Toxicodendron diversiloba*).

These habitats have similar fauna, including reptiles like western fence lizards (*Sceloporus occidentalis*), gopher snakes (*Pituophis catenifer*), and rattlesnakes (*Crotalus* spp.) and birds such as western scrub-jay (*Aphelocoma californica*), California quail (*Callipepla californica*), acorn woodpecker (*Melanerpes*

formicivorus), mourning dove (*Zenaida macroura*), northern flicker (*Colaptes auratus*), great horned owl (*Bubo virginianus*), and hawks such as red-tailed hawk (*Buteo jamaicensis*) (Schoenherr 2017:317-328). Mammals in these areas are primarily small, such as various mice, woodrats (Neotoma lepida), California ground squirrels (Otospermophilus beecheyi), California gray squirrels (*Sciurus griseus*), and black-tailed jackrabbit (*Lepus californicus*), with small predators including gray fox (Urocyon cinereoargenteus),bobcat (Lynx rufus), and the ringtail (Bassariscus astutus). Larger mammals include coyotes (Canis latrans), Mule Deer (*Odocoileus hemionus*), Mountain Lion (*Puma concolor*). Previously this area supported Grizzly Bear (*Ursus arctos*), but they were hunted to regional extirpation by the early 20th century (Schoenherr 2017:328-335).

Cutting through those are riparian corridors leading to freshwater wetlands and coastal saltmarsh (Hall 2007; Schoenherr 2017:277-279). One such riparian corridor is Peters Canyon Wash, the modern channelized route of which flows through the Project Site, joining San Diego Creek before emptying into the Upper Newport Bay to the southwest. This area is shown on the 1841 *diseño* of *Rancho Bolsa de San Joaquin* as faintly blue, likely representing seasonal wetlands spreading from the *Cienega de las Ranas* ("Marsh of the Frogs") between Upper Newport Bay and Peters Canyon Wash. The area also contains small copses of trees labeled "*saucita*", meaning willow (Marsh 1994; Bolsa de San Joaquin Rancho 1841). Riparian corridors and the small groves within the coast scrub and seasonal wetlands often contain California Sycamore (*Platanus racemosa*), Black Willow (*Salix gooddingii*), and California Bay Laurel (*Umbellularia californica*) (Schoenherr 2017:308). The frogs referenced in the name "*Cienega de las Ranas*" may have been one or both of the two kinds of treefrogs or chorus frogs found in southern California: the Baja California Treefrog or Pacific Chorus Frog (*Pseudacris hypochondriaca*) or the California Treefrog/Chorus Frog (*P. cadaverina*) (Schoenherr 2017:317).

Precontact Setting

The chronology of the southern coast of California is typically divided into three general time periods representing portions of the current geological Holocene Epoch: Early Holocene (11,700 to 8,000 years before present [B.P.]), Middle Holocene (8,000 to 4,000 B.P.), and Late Holocene (4,000 B.P. to ~200 BP/A.D. 1769). The archaeological expressions of the lifeways of people during those periods are generally described in terms of "cultural complexes." In this model, a complex is a specific archaeological manifestation of a general mode of life, characterized archaeologically by technology, particular artifact types, economic and trade systems, mortuary practices, and other aspects of culture apparent in archaeological assemblages.

The first generalized chronology of coastal southern California was produced by William J. Wallace in 1955, dividing the precontact past into four general time periods. Wallace referred to these as Horizon I through IV, with Horizon I being speculative due to limited evidence at the time. The subsequent three periods were called the "Millingstone," the "Intermediate," and the "Late" horizons (Wallace 1955). This remains a basis for commonly used chronologies of the region. In the late 1960s, Claude Warren (1968) and Makoto Kowta (1969) revised and updated Warren's chronology, using terms for periods based on particular locales. Excavations in Orange County by Mason and Peterson (1994) led to refinement of the Millingstone Period into three subcategories (MS1-3). More recent refinements to this chronology were based on the decades of excavation at Playa Vista along the Ballona Lagoon (Stoll et al. 2003; Homburg et al. 2014). This report follows that most recent chronology: the Paleocoastal Period (12,000 to 8,500

years before present [B.P.]), the Millingstone Period (8,500 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to A.D. 1542), ending at the first documented contact between indigenous Californians and Europeans (Homburg et al. 2014:26, 28, 33, 35). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

Early Holocene (11,000 to 8,000 B.P.)

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 years B.P., while radiocarbon dates from the Arlington Springs Woman site on Santa Rosa Island indicate a human presence in the region by about 13,000 years B.P. (Byrd and Raab 2007; Erlandson et al. 2007:57, 62; Glassow et al. 2007:191-192). On the southern Channel Island of San Clemente, site SCLI-43 (Eel Point) revealed evidence of boat technology dating to around 8,000 B.P. (Cassidy et al. 2004). This fits with the coastal migration hypothesis from Erlandson and others (2007b) wherein humans followed the coast and the offshore kelp forest habitats from northeast Eurasia. Contrary to the common view of early inhabitants of North America, based largely on the Clovis tool technology, the limited evidence indicates that Paleocoastal peoples along the Pacific appear had diverse diets, harvesting plants, fishing, gathering marine shellfish, and hunting sea birds and marine mammals (Erlandson et al. 2007a:60-61; Glassow et al. 2007:191-192).

On the mainland, radiocarbon evidence confirms occupation of the Orange County and San Diego County coasts by about 9,000 B.P., primarily in lagoon and river valley locations, but limited archaeological evidence of Paleocoastal occupation with secure dates in the Los Angeles Basin (Douglass et al. 2014:27-28; Gallegos 2002:29-30). The earliest dates on the San Diego coast are from the southern portion of the county and have ranges between approximately 10,500 BP and 9,500 BP (Gallegos 2017:6-8). During the Early Holocene, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Horne and McDougall 2003).

The primary Early Holocene cultural complex in coastal Southern California was the San Dieguito Complex, related to the broader Paleocoastal Tradition (Gallegos 2017:1-3). The people of the San Dieguito Complex (about 10,000–8,000 B.P.) inhabited the chaparral zones of southwestern California, exploiting the plant and animal resources of these ecological zones (Moratto 1984; Warren 1967). Leaf-shaped and large-stemmed projectile points are typical of San Dieguito Complex material culture.

Middle Holocene (8,000 to 4,000 B.P.)

During the Middle Holocene, there is evidence for the processing of acorns for food and for the increased importance of hunting (Horne and McDougall 2003). As the processing of plant foods, particularly acorns, increased, a wider variety of animals were hunted, and trade with neighboring regions intensified (Horne and McDougall 2003). Major technological changes appeared as well, particularly with the advent of the bow and arrow, which largely replaced the use of the dart and atlatl.

The Middle Holocene La Jolla Complex (about 8,000–4,000 B.P.) is essentially a continuation of the San Dieguito Complex. La Jolla groups lived in chaparral zones or along the coast, often migrating between

the two. Coastal settlement focused on the bays and estuaries of coastal Orange and San Diego counties. La Jolla peoples produced large, coarse stone tools, but also produced well-made projectile points, and milling slabs. The La Jolla Complex represents a period of population growth and increasing social complexity, and it was also during this time period that the first evidence of the grinding of seeds for flour appears, as indicated by the abundance of millingstones in the archaeological record (Horne and McDougall 2003).

Late Holocene (4,000 B.P. to A.D. 1769)

During the Late Holocene, native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab 2007). In coastal Southern California, conditions became drier and many lagoons were transformed into saltwater marshes. Because of this, populations abandoned mesa and ridge tops to settle nearer to permanent freshwater resources (Gallegos 2002). Trading reached its zenith during this time period, with asphaltum (tar), seashells and steatite being exchanged from Southern California to the Great Basin.

Ethnographic Setting

The Project Site is in an area of intersection between the traditional and ancestral territory of people referred to as the Gabrielino or Gabrieleño, including those who self-identify as the Tongva or the Kizh, and of people referred to as the Juaneño or The languages of these people are very similar and belong to the Takic branch of the Uto-Aztecan language family (Golla 2011; Kroeber 1925). The following summary is not intended to provide a comprehensive account of these groups, but is instead a brief historical overview based on available information from resources cited below.

The terms “Gabrielino” or “Gabrieleño” generally refer to those Native Americans who were forcibly removed from their lands and relocated by the Spanish to Mission San Gabriel Arcángel, as well as their descendants today, while the term Juaneño refers to the people forcibly relocated to Mission San Juan Capistrano and their descendants (Bean and Shipek 1978; Bean and Smith 1978; Golla 2011). Additionally, there are indigenous terms commonly used by descendants and tribal groups to refer to themselves, with some Gabrielino descendant groups preferring Tongva and others preferring Kizh, while Acjachemen is commonly used by Juaneño descendants to refer to themselves (Golla 2011; Heizer 1968). The Gabrielino language is a dialect of the Gabrielino-Fernandeño (Tongva) language, part of the Takic branch of the Uto-Aztecan language family (Bean and Smith 1978; Golla 2011:178-179). Prior to European colonization, speakers of the Gabrielino-Fernandeño language occupied a diverse area that included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Bean and Smith 1978; Golla 2011:178-180). The Luiseño-Juaneño is a language in the Takic subfamily of the Uto-Aztecan language family, classified in the Cupan group along with Cupeño and Cahuilla. The Juaneño dialect is based on the Ahachmai variety spoken at San Juan Capistrano (Golla 2011:180–181). The territories belonging to groups speaking Luiseño-Juaneño encompassed what today are portions of southern Orange, southwestern Riverside, and northwestern San Diego counties, perhaps all the way north to the San Jacinto River. Gabrielino and Juaneño groups were characterized by large populations in permanent

villages and complex material culture, reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith 1978).

The Gabrielino were hunter-gatherers and lived in permanent communities located near persistent water supplies, with distributed camps and settlements at areas with food resources. Gabrielino subsistence consisted of hunting, fishing, and gathering a variety of resources in several ecological zones. Acorns, sage, and yucca were gathered throughout the inland areas whereas shellfish, fish, as well as a variety of plants and animals were exploited within the marshes and along the coast. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows on an opportunistic basis. Their material culture reflected subsistence technology. Lithic tools such as arrow points and modified flakes were used to hunt and process animals. A variety of ground stone grinding implements, such as the mortar, pestle, mano, and metate, were used to process both plant and animal remains for food (Bean and Smith 1978). The lifeways of the colonial-period indigenous were very similar to those documented archaeologically from the Late Prehistoric Period (1,500 years B.P. to the mission era), a time associated with the florescence of these coastal groups (Wallace 1955).

Gabrielino community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. Kroeber (1925:893) estimated that the population of the Gabrielino to be around 5,000 in the pre-contact period, a number that Cook (1976:38-41) agreed with, despite there being at least 5,500 baptisms at the San Gabriel and San Fernando missions alone. Preston (1996; 1999; 2002) argues that this number is low (along with most estimates of precolonial Indigenous Californian populations) as European diseases rapidly arrived in California, likely prior to Spanish missionaries. Events such as the devastating 1781 smallpox outbreak at Mission San Gabriel Arcangel were unlikely to have been confined to just the mission and would have had depopulating effects on the surrounding areas (Preston 2002:84). The fact that overall, there are few epidemics recorded during the early Spanish colonial period, despite the presumed lack of immunity to European diseases in Indigenous Californians, suggests that many of these diseases had already arrived through the extensive precolonial trade networks (Preston 2002:86). It follows then that the populations observed by the Spanish and who were subject to baptism in the missions had already experienced declines from these diseases.

Subsistence practices and lifeways of Luiseño groups depended on their proximity to the ocean and other geographically limited resources, but generally focused on hunting small and large game, harvesting coastal marine foods, and gathering a wide variety of plant foods. The Luiseño subsistence system and settlement pattern was seasonally based. Acorns from a variety of oak species were one of the most heavily used plant foods, along with grass seeds, for groups living in the western areas. East of the Peninsular Ranges, mesquite beans and agave were dietary staples. Other major plant foods included a wide range of seeds, foliage, fruits, and berries. Major faunal resources used by the Luiseño and Juaneño included deer, rabbit (heavily used), other small mammals, quail, duck, grasshoppers, marine fishes, mollusks, and trout (Bean and Shipek 1978; Kroeber 1925). Some accounts suggest that there was no fixed gender division of labor among the Luiseño, but that women performed most of the food gathering activities while men did most of the hunting and fishing. Many of the subsistence activities were undertaken using a combination of both male and female input (Bean and Shipek 1978; Kroeber 1925).

The Juaneño sociopolitical system was organized around independent village communities or “tribelets”, centered on permanent villages with relationships with patrilineal clan membership (Sparkman 1908).

These central villages were often associated with seasonal camps used for accessing particular resources or resource-rich areas, although some groups may have followed an annual circuit between seasonal settlements or switched between permanent winter and summer settlements. Each village or clan had an associated territory and hunting, collecting, and fishing areas. Villages were typically located in proximity to a food or water source, or in defensive locations, often near valley bottoms, streams, sheltered coves or canyons, or coastal strands (Bean and Shipek 1978). These villages were made up of a group of semisubterranean conical houses built of thatched reed, brush, or bark, rectangular thatched ramadas, and central round fenced ceremonial structure called a *wámkiš* (Bean and Shipek 1978).

At the time of prolonged European contact in the late 1700s, there may have been around 50 Luiseño and Juaneño village communities, with populations of perhaps 200 people each, meaning the total population may have been as high as 10,000 (Bean and Shipek 1978; White 1963). Initial contacts with Europeans, however, quickly led to the deterioration of these traditional lifeways. This process began with the introduction of diseases to which the natives had no immunity, resulting in severe population reductions. The introduction of Christianity into their culture also represented a substantial change in the native social fabric. While natives affiliated with Mission San Luis Rey were encouraged to maintain their own settlements and subsistence practices, agriculture was introduced, including the raising of certain European grain staples, including wheat, oats, and barley (Bean and Shipek 1978; Kroeber 1925).

In October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino when his ship landed on what is likely Santa Catalina Island. The following day Cabrillo sailed across the channel into what he called the “Bay of Smokes,” commonly considered to be San Pedro Bay. Interestingly, some of the Gabrielino who paddled out to meet Cabrillo’s ship communicated that there were parties of Spanish exploring the interior, perhaps the multiple expeditions to the Southwest Pueblo region in the 1530s, Francisco de Ulloa’s 1536 visit to the Gulf of California, or Hernando Alarcón’s exploration of the lower Colorado River (Elsasser 1979; McCawley 1994; Rabbitt 1976). After sailing north to Monterey Bay, Cabrillo’s party overwintered on Santa Catalina, where Cabrillo himself died (McCawley 1994). In 1595, Sebastian Rodriguez Cermeño’s ship, the San Agustín, wrecked off Drakes Bay in Marin County, and he and his crew built a small boat and travelled down the California coast for seven weeks before arriving in Navidad, Mexico. This crew likely interacted with Gabrielino people during this voyage (Dell’Osso 1995). Seven years later, Sebastián Vizcaíno followed Cabrillo and stopped in Santa Catalina in 1602 (McCawley 1994). The next Spanish contact was with Gaspar de Portolá, who crossed Gabrielino territory three times in 1769 traveling between San Diego and Monterey as the first expedition of Spanish conquest and colonization (McCawley 1994).The area directly surrounding the Project Site is not known to have contact period villages, although the three associated sites to the south (ORA-195, ORA-196/H, and ORA-197) may represent an unknown village or an intensely used seasonal camp. One of the closest Gabrielino villages was Pasbengna, on the Santa Ana River near the original center of the City of Santa Ana (Johnston 1962:87). The village of Genga or Kengaa was located on Upper Newport Bay, while Lupuk or Lukuupang-na was likely near Corona del Mar and Moyo or Moyongna was either near the mouth of Newport Bay or a ways northwest at Bolsa Chica (Johnston 1962: 87 ; McCawley 1996:72). Whether these last were inhabited by speakers of Gabrielino or by speakers of Juaneño is uncertain.

Historic Setting

The following history and development of Irvine below has been adapted from the City's *"History of the City"* (City of Irvine City 2015).

In 1769, the Spanish explorer Gaspar de Portola arrived to the San Joaquin Valley. Upon their arrival, the Spanish divided lands for the missions and a few large private land grants. However, in 1831, after the Mexican government gained independence from Spain, it secularized the missions and distributed ranchos to Mexican citizens who applied for grants. Specifically, the Project Site is located in the former Rancho San Joaquin area which was granted to Don Jose Sepulveda in 1837. In 1846, Rancho Lomas de Santiago was granted to Teodosio Yorba. In 1864, James Irvine, Thomas Flint, and Llewellyn Bixby purchased Rancho San Joaquin from Sepulveda. In 1866, Irvine, Flint and Bixby acquired Rancho Lomas de Santiago, and shortly after, in 1868, Rancho Santiago de Santa Ana was purchased and divided among the three owners **(Figure 3).**

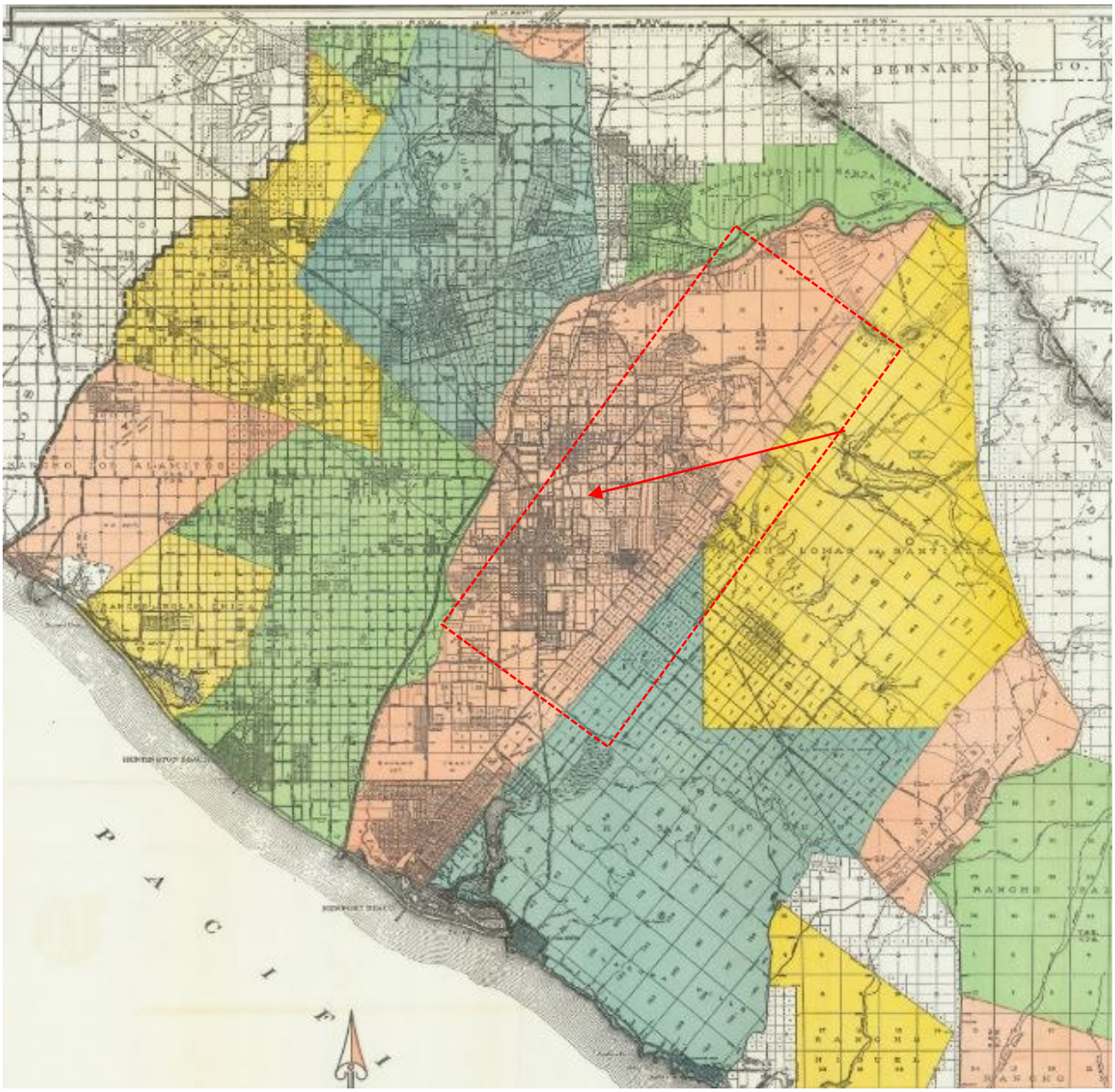
The land purchased by Irvine, Flint and Bixby was combined to form Irvine Ranch, and was devoted to sheep grazing primarily in the early days, and tenant farming was allowed in the 1870s. This land included the Peters Canyon Channel, where the Project Site is located. In 1878, Irvine acquired his partners' shares for $150,000 and owned 110,000 acres of land from the Pacific Ocean to the Santa Ana River and labeled on maps as Irvine's Subdivision **(Figure 4).** Irvine passed away in 1886, and in 1893, his son James Irvine Jr., took possession of the rancho, incorporating the land into The Irvine Company a year later. James Irvine Jr. shifted the rancho's operations from cattle ranching into agricultural activities. James Irvine Jr. sold land to the government during World War II and one of the Marine Corp air facilities constructed during those years is directly west of the Project Site at Barranca Road (later Parkway).

When James Irvine Jr. passed away in 1947, his son Myford took over and started opening small sections of the ranch for urban development. Myford passed away in 1959, and it was at this time the University of California purchased land from The Irvine Company to construct a new school campus. Renowned architect William Pereira was responsible for the planning and design of the campus which is located to the southeast of the Project Site. Pereira also worked with Irvine Company architects and planners to design the city around the campus which incorporated residential planned communities with recreational and educational centers, commercial centers, and greenbelts. The Irvine Industrial Complex (now the Irvine Business Complex) developed by the Irvine Company developed around the university and to the west of the Project Site. It was not until 1971 that the City of Irvine was incorporated.

SOURCE: Title Insurance & Trust Company, 1955.

Figure 3

An illustration of the Ranchos in Orange County. The approximate location of the subject property is marked with a red arrow.



SOURCE: Title Insurance & Trust Company, 1955.

Figure 4

Irvine's Subdivision (approximate border in red) overlaid on the Rancho Lomas de Santiago and Rancho San Joaquin. The approximate location of the subject property is marked with a red arrow.

Development of the Surrounding Area and Project Site

Development of the Surrounding Area

The subject property was originally a part of the San Juan Capistrano mission land that was granted to Sepulveda in 1837, as detailed in the History Setting above. Much of the land was swampland extending south from Peters Canyon to Upper Newport Bay. The area contained millions of frogs and by 1840 was known as the "Swamp of the Frogs." The loud croaking of the frogs became known by nighttime travelers

to the area (Bell, 2020). The City of Irvine General Plan lists the Swamp of the Frogs as a Landform Site (northeast of the Project Site) in the list of Historical / Archeological Landmarks. Sepulveda's first home and the San Joaquin Rancho Headquarters were both located approximately 1 mile to the southeast of the Project Site near Michelson Drive and are listed in the General Plan as Historical / Archeological Landmarks (City of Irvine, 2015) **(Figure 5).**

After Irvine acquired his partners' shares of the land grants as described above, Irvine Ranch was formed which included the Peters Canyon Wash and the Project Site. In the late 1800s, a railroad line crossed Irvine Ranch to the north of the Project Site and the General Plan marks the end of the Southern Pacific Railroad as a city landmark. In 1888, Irvine began extensive efforts to drain "Swamp of the Frogs" to make the land suitable for cattle grazing. Water wells were installed and Santiago Canyon and Peters Canyon became part of the extensive network to retrieve water. In 1906, the installed, Investment Company was formed in partnership with C.E. Utt, Sherman Stevens and James Irvine. Located approximately 2.5 miles northeast of the Project Site, the agricultural company farmed olives, walnuts, apricots, sugar beets and citrus (Nelson, 2009). The City of Irvine categorized the San Joaquin Fruit Company as a formerly existing Archeological / Historical Landmarks. The Irvine Walnut House is located northeast of the Project Site and listed as a formerly existing Archeological / Historical Landmark. Both are no longer extant.

Two additional sites of historical interest just under 2 miles from the Project Site are noted in the General Plan: the Martin Airport and Michelson Vacuum Tube Site **(Figure 6)**. The Martin Airport was constructed at Main Street and Newport Road and later became the Orange County Airport (City of Irvine, 2015). Albert Michelson, the first American to win a Nobel prize, experimented with the speed of light in 1927 that included a visit from Albert Einstein to view the research (Bloom, ND). By the 1930s, there was still limited development in the immediate area around the Project Site. There were several small-scale buildings located near roadways such as Culver Road, Harvard Road, Channel Lane Road, and Delhi Road, as shown in topographical maps (EDR, 2023). By the 1930s, three separate gun clubs developed in the surrounding area to the west of the Project Site: the Twenty Ranch Gun Club, the Aliso Gun Club, and the Sprig Gun Club. Twenty Ranch was approximately 1.8 miles, Aliso Gun Club was approximately 0.50 miles, and Sprig Gun Club was 1 mile from the Project Site. The gun clubs had a few small-scale buildings clustered near the roadways. A few other structures were visible on topographical maps and were also located along private roadways. These were likely part of the Irvine Ranch agricultural operations **(Figure 7)**. The agricultural activities led by James Irvine Jr. after his father's passing are visible in aerial and topographical maps of from the 1930s with crops and groves in the area around the Project Site (EDR, 2023). A large orchard was visible south of Delhi Road near Harvard Road, that extended to the east of Culver Drive. The Irvine Ranch became famous for its Valencia Oranges and came to operate one of the largest Valencia orange groves in the world (Nelson, 2009) **(Figure 8)**.

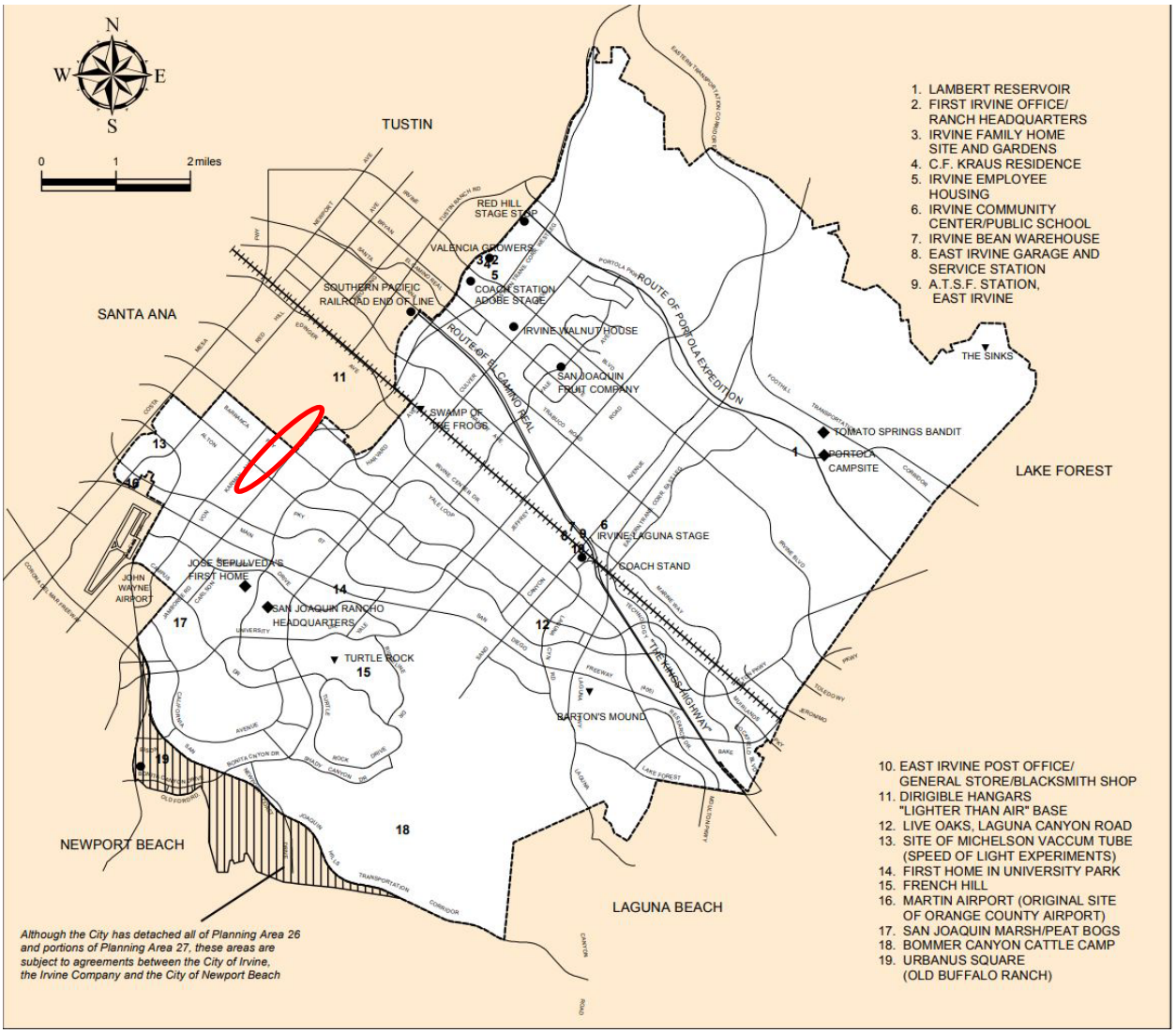
When James Irvine Jr. passed away in 1947, his son Myford took over the company and started dividing small sections of the ranch for urban development. The parcels can be seen in maps that depict Irvine's Subdivision which extended from the Pacific Ocean to the Santa Ana River. In 1943, the Santa Ana Naval lighter-than-air base, approximately 0.50 miles to the west of the northern portion of the Project Site, was constructed. It was developed with two hangars to store blimps or "airships" and was one of ten sites developed in the United States (National Park Service, ND). That same year, the Project Site south of the

naval base was excavated for a "pilot channel" to carry water runoff to protect the new facility. The Project Site was still private property and owned by the Irvine Company **(Figures 9, 10)**.

The Irvine Ranch continued to urbanize the land with real estate development into the 1960s. As mentioned in the history of Irvine above, a master design plan was developed with Irvine Company professionals and William Pereira. As land was sold from Irvine Ranch in 1961 for the future site of the University of California to the southeast of the Project Site, the area remained largely undeveloped. Channel projects which would help drain Irvine Ranch were essential before the campus was completed which included improvements to the Project Site and the Peters Canyon Wash.

The "lighter-than-air" base increased in size and was depicted as the Marine Corps Air Facility on maps. The orchards to the southeast were extant in the 1960s along with all three-gun clubs. A large duck pond was located between the Aliso and Sprig Gun Clubs **(Figures 11, 12)**. The land around the Project Site remained largely undeveloped until the l970s. The development of planned communities which Irvine became known for began to be constructed near the Project Site to the north and around the San Diego Freeway south of the Project Site **(Figure 13, 14)**. The Irvine Business Complex began to be developed to the west of the Project Site with various office buildings **(Figure 15)**.

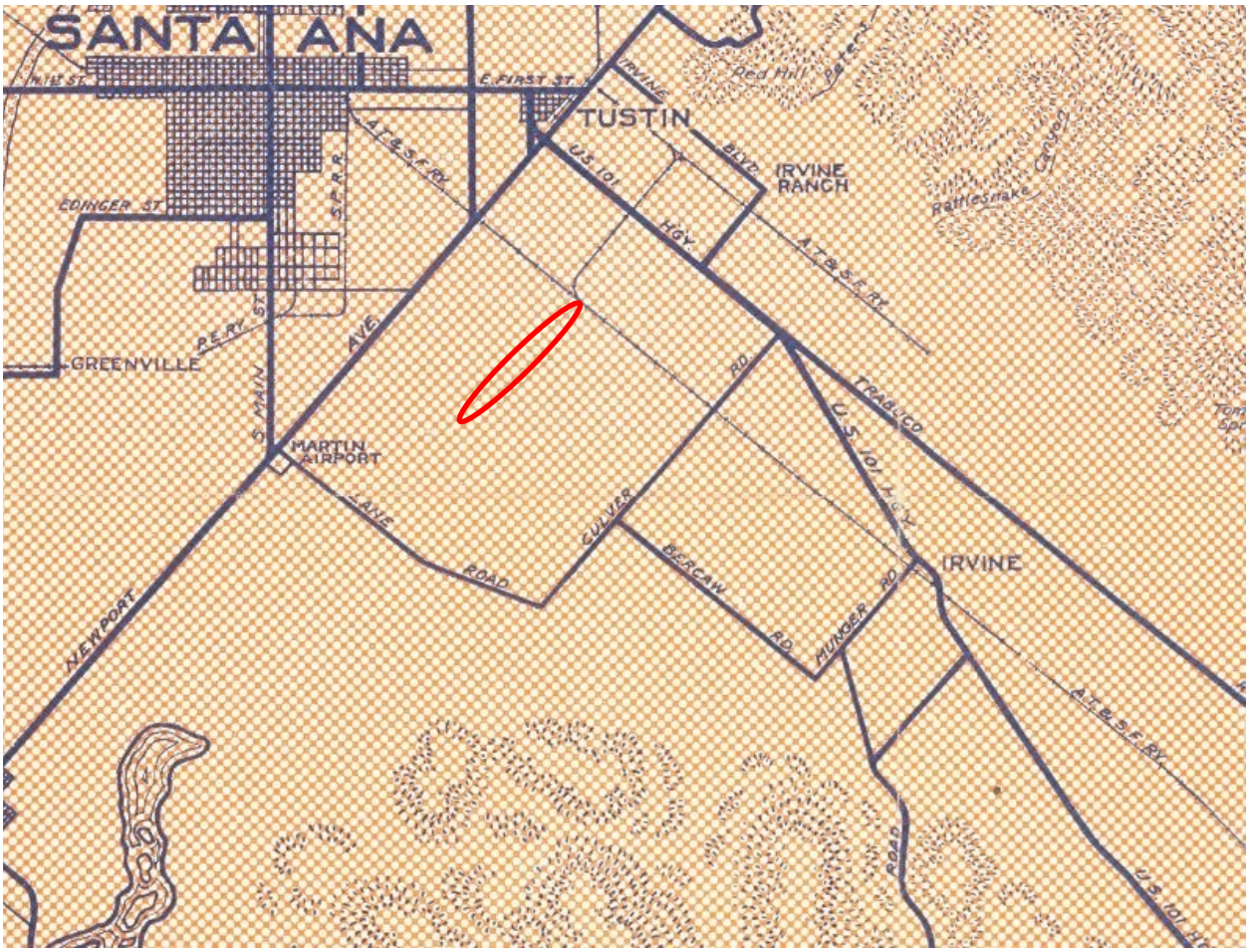
The 1980s brought the further development of the Irvine Business Complex to the south and west of the subject site and stretched south from the Marine Corps Air Station at Barranca Parkway to south of the San Diego Freeway near John Wayne Airport **(Figure 16).** While the area immediately east of the Peters Canyon Channel remained largely undeveloped as of 1981, planned communities continued to develop further east at Culver and Valencia Drive. The orchards to the east of the Project Site were reduced to a small patch near Culver Drive and the area was labeled as "under construction" on a 1981 topographical map indicating the construction of more planned communities. The planned communities to the east of the Project Site began to be developed in 1987 and are today part of the neighborhood of Westpark. The 1987 subdivisions in Westpark were planned and developed by the Irvine Company with residential villas and townhouses designed in a neo-revival styles. Curvilinear streets provide access throughout the community and contain Italian-themed names (Irvine Villages Guide, ND). The communities are accessed from a few major roadways such as Harvard Avenue, Main Street, Alton Parkway, and Culver Drive. Schools, parks, swimming pools and other amenities are incorporated into the subdivisions. The 42-acre Colonel Bill Barber Marine Corps Memorial Park is owned and maintained by the City of Irvine and located in Westpark adjacent to the Project Site (City of Irvine, 2015). By 1994, the land east of the Project Site became almost fully developed with residential neighborhoods and a maze of streets can be seen on aerial photos, resulting from the many planned residential communities **(Figure 17)**. The Irvine Business Complex to the west was also mostly fully developed at this time as well. Today the Peters Canyon Channel, the Project Site is flanked by predominately commercial office parks on the west, and the residential planned communities on the east. The Bill Barber Memorial Park located generally to the northeast of Project Site between Alton Parkway and Barranca Parkway was completed by the early 2000s. An aerial image from 2006 shows how the Project Site divides the predominately commercial properties to the west and residential properties to the east **(Figure 18)**.



SOURCE: City of Irvine, 2015

Figure 5

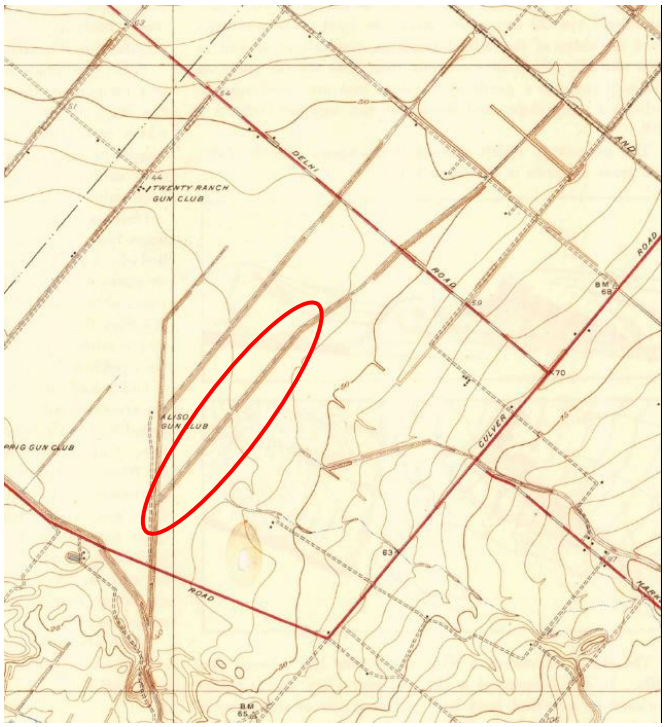
While no Irvine landmarks are located within a 0.25-mile radius of the Project Site, this map shows the sites in the surrounding area as described above. The approximate location of the Project Site is indicated in red.



SOURCE: Board of Supervisor of Orange County, California, circa 1926

Figure 6

Map from circa 1920 showing Martin Airport, Irvine Ranch headquarters, and Peters Canyon to the north. The approximate location of the future Project Site is indicated in red.



SOURCE: EDR, 2023

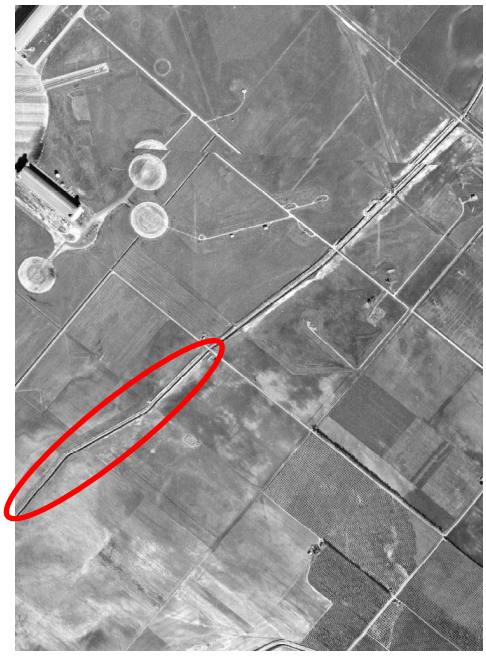
Figure 7

A 1932 topographical map with the approximate location of the future Project Site is indicated in red.

SOURCE: Irvine Valencia Growers, Schmidt Litho. Co, 1900-1940

Figure 8

Irvine Ranch Valencia orange produce label, circa 1900-1940.



SOURCE: EDR, 2023

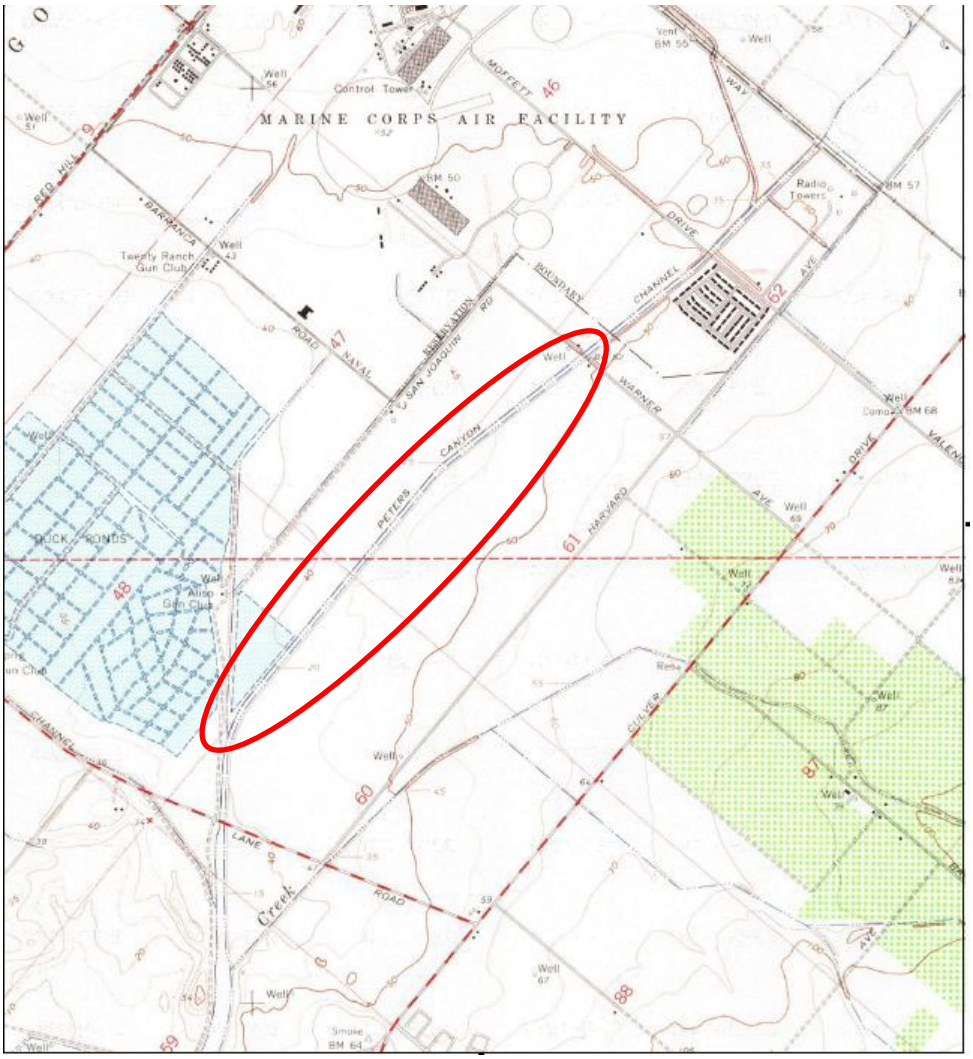
Figure 9

An aerial image from 1946 showing the “Lighter-than-air” base with the general location of the future Project Site is depicted in red.

SOURCE: EDR, 2023

Figure 10

An aerial image from 1946 showing the “Lighter-than-air” base with the general location of the future Project Site is depicted in red.



SOURCE: EDR, 2023

Figure 11

1965 topographic map showing the area around the Peters Canyon Channel. The general location of the Project Site is depicted in red.

SOURCE: EDR, 2023.

Figure 12

A 1963 aerial image of the surrounding area with orchards to the south and the “Lighter-than-air” base in the northwest. The general location of the future Project Site is depicted in red.

SOURCE: EDR, 2023.

Figure 13

Another view of the Project Site in 1963 with a largely undeveloped surrounding area except for the “Lighter-than-air” base in the north. The general location of the future Project Site is depicted in red.

SOURCE: EDR, 2023

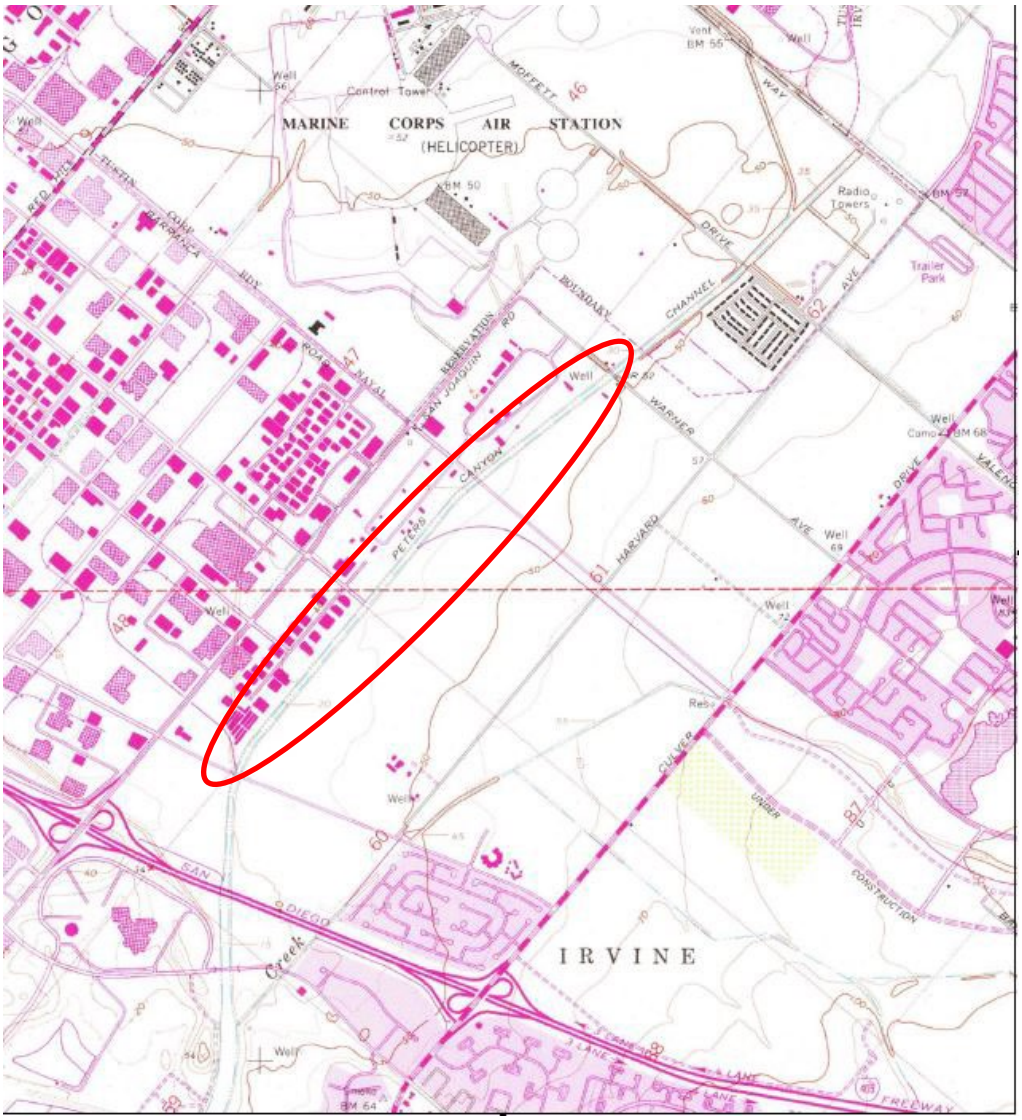
Figure 14

Development near the San Diego Freeway, 1972. The general location of the future Project Site is depicted in red.

SOURCE: EDR, 2023

Figure 15

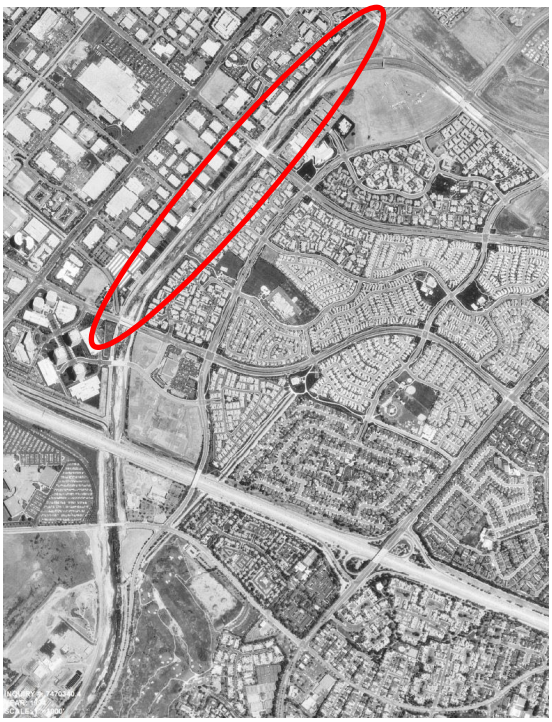
The development of the Irvine Business Complex shown in a 1977 aerial image. The general location of the Project Site is depicted in red.



SOURCE: EDR, 2023

Figure 16

Topographical map from 1981 showing the area around the Project Site: Irvine Business Complex to the west, the “lighter-than-air” base to the northwest, a tract development abutting to the northeast, open land to the east, and a tract development to the south near the freeway. The general location of the Project Site is depicted in red.



SOURCE: EDR, 2023

Figure 17

The development of the Irvine Business Complex and planned communities around the Project Site as shown in a 1994 aerial image. The general location of the Project Site is depicted in red.

SOURCE: EDR, 2023

Figure 18

The development of planned communities as shown in a 2006 aerial image. The general location of the Project Site is depicted in red.

Development of the Project Site: Peters Canyon Channel

The "Creekwalk Trail" runs northeast near Main Street to Warner Avenue. The Project Site is located within the Irvine Planning Districts Irvine Business Complex, Westpark I and II. Key dates related to the Peters Canyon Channel are listed below.

1893

James Irvine began to divert water from the Santiago Canyon (later Irvine Regional Park) down Peters Canyon to his ranch house located to the northeast of the Project Site (Nelson, 2009). The Peters Canyon became a crucial source of water for the Irvine Ranch operations and tenants farmers leasing land from the ranch. The Project Site is downstream of the Peters Canyon in the City of Irvine, which was named after James Peter who was the first tenant to live in the canyon area (Nelson, 2009).

1930s and 1940s

In 1930s topographical maps, the intermittent stream of the Project Site is visible as a topographical feature. In 1943, the U.S. Naval Station "lighter-than-air base" supervisors authorized digging a "pilot channel" south of the air field (Approve Water, 1943). Millions of dollars had been invested in the naval base by the government and flood control with a channel to carry water runnoff was needed to protect this facility. The cost was estimated to be $3,500 and 17,000 cubic yards of material were to be excavated to create the channel which extended south of the naval base to Lane Road. The property at this time was owned by the Irvine Company. It was at this time that it became known as the "Peters Canyon Wash."

1950s

Heavy rains in the early 1950s were experienced in Orange County which caused flooding and damage to the area around the Project Site. A great amont of damage was done near the naval base, to the northwest of the Project Site, as well as other areas (Damage to Flood, 1952). In 1951, a project was intiated for storm drain construction in East Tustin which included four miles of storm drain and replacing "a series of farm bridges and removing considerable fencing along the present channel" (Tustin Storm, 1951). It is likely this included the channel portion where the Project Site is located. $2.3 million of government bonds were awarded to make flood control improvements to the area beginning in 1956 (New Control, 1959). It was proposed that the Peters Canyon Creek be widened and deepened from the junction of the San Diego Creek north to the Santa Fe Railroad bridge (Nelson, 2009). By 1959, additional work was done on the various flood channels in the area which included a proposed $441,000 of improvements for the Peters Canyon Channel inclusive of the Project Site (New Control, 1959).

1960s

In the early 1960s, 1,000 acres of the Irvine Ranch were donated by the Irvine Company for the channel projects which would help drain Irvine Ranch and the nearby areas of Tustin and Santa Ana (Contract Furthers, 1963). The infrastrucure was targeted as essential before the University of California Irvine was completed and students began to arrive to campus. The goal of the earth-filled channel, was to keep tidal waters out and prevent the formation of salt water mud flats at low tide and was to connect to the Upper Newport Bay (Supervisors Call For, 1963). Bids were accepted one of the largest drainage projects in Orange County's history, which included the construction of the San Diego Channel and the Peters Canyon Channel (Construction On University, 1963). The Project Site segment bid was won by Kirst

Construction of Altadena and extended on the Lane Road to Navy Way (now Barranca Parkway) (OC Flood Controls, 1963).

The Peters Canyon Channel portion was completed in 1964 with a grand opening that was covered in the *Orange County Register* newspaper (New Flood Channel, 1964). Hiking and riding trails were designed alongside the the channels which was noted in the *Anaheim Bulletin* to fit within architect William Pereira's master design plan for the city which envisioned "greenbelt" recreational areas. The trails were popular and as the population grew in Irvine and the surrounding areas, and the *Tustin News* called for the extension of the Peters Canyon Channel trails (Population Explosion, 1969). In 1969, a historic images looking south from Navy Way north of the Project Site, and outside of the project site, depicts that there was no reinforcement or retaining walls along the channel at the time and the mud walls are crumbling into the channel after a large storm which led to flooding in the area (Orange County Archives, 1969). The bridge at Navy Way appears to be of simple wood and concrete construction **(Figure 19).** Aerials of the Project Site at this time reflect that other bridges along the channel may have had a similar construction typology.

SOURCE: Orange County Archives, 1969

Figure 19
Flood, Navy Way Bridge, Peters Canyon Channel, Irvine, looking downstream, 1969.

1970s - Present

In 1979, repairs were made to sections of the Peters Canyon Channel that had been eroded which included rock riprap reinforcements (Waterways Get Repairs, 1979). In 1985, an 825-foot stretch of the Peters Canyon wash was lined with concrete according to the *Los Angeles Times* (Marine Corps, 1985).

Contaminents from the Tustin Marine Corps Helicopter Air Station had seeped into the wash and the concrete liner and drain system was part of a longterm cleanup plan. It is unclear if any of the trails were expanded in the 1960s as called for by the newspaper, but a master plan for a network of trails in Irvine was documented in 1989. The Project Site is part of this network of trails, and is classified as a riding and hiking trail, as shown in Figure B-4 of the Circulation Element in the *City of Irvine General Plan* (City of Irvine, 2015). In 1998, the Army Corps of Enginners conducted a study on how to widen the Peters Canyon Channel at the Marine base without disturbuing the toxic waste that had been buried underground at the base (Navy Wants, 1999). It appears a number of changes and repairs have occurred to the Peters Canyon Channel including a large project by the City of Tustin, Public Works Department in 2019 which demolished, widened and relined approximately 5,000 ft of the existing rock riprap lined channel. The construction company Butier details the project included the channel in both Tustin and Irvine which likely included the Project Site segement of the channel as observed in the field (Butier Construction, ND).

Bridges

The five bridge overcrossings that extend across the Peters Canyon Channel or San Diego Creek Channel within the Project Site include the Barranca Parkway Bridge (with Eastbound and Westbound segments), the Main Street Bridge (with Eastbound and Westbound segments), the Alton Parkway Bridge, the Coronado Bridge, and the Warner Avenue Bridge.

Aerial imagery and archival research indicated simple farm bridge crossings had previously extended across the wash in some locations when the land was private property and operated as part of the Irvine Ranch, prior to the construction of the bridges as they exist today over the channel. All earlier farm bridges were demolished and replaced with more substantial modern bridge crossings between 1969 and 1997. The construction chronology of the five bridges that extend over the Project Site is included below, each with a Caltrans-assigned bridge number (Caltrans 2019):

- 1969, Barranca Parkway Bridge Westbound segment over Peters Canyon Channel (#55C0342L), reconstructed in 1978
- 1969, Barranca Parkway Bridge Eastbound segment over Peters Canyon Channel (#55C0342R), reconstructed in 1978
- 1969, Main Street Bridge Westbound segment over San Diego Creek Channel (#55C0339L), reconstructed in 1988
- 1988, Main Street Bridge Eastbound segment over San Diego Creek Channel (#55C0339R)
- 1988, Alton Parkway Bridge over San Diego Creek Channel (#55C0568)
- 1989, Coronado Bridge over San Diego Creek Channel (#55C0576)
- 1997, Warner Avenue Bridge over Peters Canyon Channel (#550634)

These bridges along the Project Site were surveyed and documented by Caltrans in a 2019 *Structure and Maintenance Investigation* report (Caltrans 2019). In this survey, Caltrans determined that all bridges in the Project Site were ineligible for listing in the NRHP. ESA concurs with this assessment based on the reconnaissance survey and historic research as part of this report. A full re-evaluation was not within the scope of the effort for this report.

Adjacent Neighborhood Description

The Irvine Business Complex and other commercial development is located north and northwest of the Project Site between Main Street and Warner Avenue. The corporate complex includes a mixture of office and light industrial buildings, most of which appear to be between one and three stories in height. Extensive planned single-family residential communities are constructed along the southeast of the Project Site, largely between Main Street and Alton Parkway. The Harvard Place Shopping Center sits south of Main Street to the southeast of the Project Site. The Bill Barber Memorial Park sits generally to the northeast of Project Site between Alton Parkway and Barranca Parkway. Much of the residential development is buffered from the Project Site with concrete masonry unit walls along the south and southwest extents, while much of the commercial development is separated from the Project Site with chain link fences, or no fencing.

Regulatory Setting

Historical resources fall within the jurisdiction of the federal, state, and local designation programs. Federal laws provide the framework for the identification, and in certain instances, protection of historical resources. Additionally, state and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended and the California Public Resources Code (PRC), Section 5024.1, are the primary federal and state laws and regulations governing the evaluation and significance of historical resources of national, state, regional, and local importance. Descriptions of these relevant laws and regulations are presented below.

Federal

National Register of Historic Places

The National Register was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The National Register recognizes properties that are significant at the national, state, and/or local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture (National Park Service 1997a). Four criteria for evaluation have been established to determine the significance of a resource:

A. Associated with events that have made a significant contribution to the broad patterns of our history;

B. Associated with the lives of persons significant in our past;

C. Embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;

D. Yields, or may be likely to yield, information important in prehistory or history.

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria *and* retain integrity (that is, convey their significance) to be eligible for listing.

Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time (National Park Service 1997b).

Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association:

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historic role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space.

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components.

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. A property must retain key exterior materials dating from the period of its historic significance.

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.

Association is the direct link between an important historic event or person and a historic property. A property retains association if it *is* the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer (National Park Service 1997a).

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance (National Park Service 1997b). Determining which of these aspects are most important to a particular property requires knowing why, where and when a property is significant (National Park Service 1997a). For properties that are considered significant under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* explains, "a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s) (National Park Service 1997a)." In assessing the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* states, "a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique" (National Park Service 1997a).

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at *Public Resources Code (PRC) Section 21000 et seq.* CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the *CEQA Guidelines*, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in Section 21083.2 of CEQA a "unique" archaeological resource is an archaeological artifact,

object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (*CEQA Guidelines* Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (*CEQA Guidelines* Section 15064.5(b)(1)). According to *CEQA Guidelines* Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards) (Grimmer, 2017) is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5[b][3]).

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse

change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon the National Register of Historic Places (National Register) criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four 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; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the

remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

California Public Resources Code Section 5097.98

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Government Code Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.” Section 6254.10 specifically exempts from disclosure requests for “records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency.”

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by California State Governor Edmund Gerry “Jerry” Brown, Jr. on September 25, 2014. The act amended California PRC Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial

evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3[d][2) and [3]).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Local

City of Irvine General Plan

Cultural Resources Element, Element E

The City of Irvine General Plan identifies the goals, objectives, and policies relevant to cultural resources. These are provided below.

Goal: Ensure the proper disposition of historical, archaeological, and paleontological resources to minimize adverse impacts, and to develop an increased understanding and appreciation for the community's historic and prehistoric heritage, and that of the region.

Objective E-1: Historical, Archaeological, Paleontological Surveys: Identify and obtain information on the existence and significance of historical, archaeological, and paleontological sites and encourage land use planning which incorporates this information.

The following policies support Objective E-1:

Policy (a): Require appropriate surveys and necessary site investigations in conjunction with the earliest environmental document prepared for a project, in accordance with California Environmental Quality Act (CEQA) and the City's CEQA procedures.

Policy (b): Require surveys, prior to discretionary approval, for areas where the possibility of encountering sites exists. Additional specific site investigations may also be required in order to obtain sufficient information to determine the site's significance. The project sponsor shall fund this level of investigation.

Policy (c): Require a written report be submitted to the City following a survey or investigation describing the findings and making recommendations as to the site's significance, future disposition, and the amount of further investigation which should be undertaken. Copies of site survey records and reports shall be filed with the appropriate clearinghouse.

Policy (d): Encourage, if appropriate, removal of all materials collected during the survey/investigation to local museums, universities, or other depositories providing access for public review or scientific research.

Policy (e): Funding of Archaeological Excavations: Use the following in the case of archaeological salvage excavations: 75 percent project sponsor; 25 percent City or other public or quasipublic agency or organization. The costs of other mitigation measures may also be shared by the landowner or developer, the City, and other agencies or organizations.

Policy (f): Maintain information on areas surveyed, numbers of sites located, their status and the names and addresses of individuals or organizations knowledgeable of the sites.

Policy (g): Maintain specific locations of unprotected sites as confidential information to avoid vandalism and the resultant irretrievable loss of the historic and prehistoric record of the community.

Objective E-2: Hazard Occurrence: Evaluate surveyed sites for their present and potential cultural, educational, recreational, and scientific value to the community and region, and determine their proper disposition prior to the approval of any project which could adversely affect them.

The following policies support Objective E-2:

Policy (a): Ensure that sites determined to be significant are protected through the City's planning policies, ordinances, approval conditions, and mitigation measures.

Policy (b): Encourage the nomination of significant historical sites to the National Registry of Historic Places.

Policy (c): Include sites which are appropriate for educational or recreational purposes as an integral part of either public or community facilities or as part of the Citywide bikeway, pedestrian, and equestrian trail systems. Encourage agencies, organizations, and individuals to develop interpretive and educational programs in order to properly utilize the site for the benefit of the entire community.

Policy (d): Ensure that appropriate staff is available to act in matters relating to the implementation of this element to include identification of costs, and to coordinate the investigation and disposition of sites between City departments and Commissions, The Irvine Company, and other agencies, institutions, organizations, and individuals.

Policy (e): Determine the methods and means of preservation on a case-by-case basis according to a site's importance and disposition methods available. These may include public or private acquisition or one of the following, provided extreme care is exercised not to adversely affect the site:

- Including the site within greenbelts, parks, open space spines, preservation areas or other open space.
- Covering surface or sub-surface sites by adequate fill, pavement, or buildings.
- Using the site for nondestructive public interest or educational purposes, such as museums, interpretive centers, or outdoor classrooms.
- Moving buildings for preservation as part of a consolidated historic site.
- Using significant historic buildings in a preserved state as a part of their functional capacity (e.g., a building preserved and used as an office, restaurant, or home).

Policy (f): Encourage site preservation through economic incentives such as increased building densities, reduced taxes, credit toward park dedication, or reduction of other amenity requirements. Where incentives are not sufficient, the land owner shall be directly compensated by the City or other public or quasi-public agencies or organizations for land preserved as an archaeological, paleontological, or historical site. The costs of site preservation may be the principal responsibility of the City, other public, or quasi-public agencies, or other organizations.

Policy (g): Ensure that adverse impacts of a proposed project on cultural resources are mitigated in accordance with CEQA, as well as other appropriate City policies and procedures, where preservation of a significant site is not practical.

Policy (h): Assign the Community Services Commission the responsibility to oversee implementation programs for sites or buildings which have been acquired by the City.

Policy (i): Identify and implement revenue sources which can be expended in support of this objective.

Policy (j): Undertake a comprehensive survey to inventory the remaining historical resources within the City of Irvine incorporated territory and adopted Sphere of Influence, including the location and significance of all remaining tenant farm homes over 50 years of age. This survey shall be used to determine the appropriate disposition of the resources located within any area not designated for preservation as a historical resource.

Archival Research

Archival Research Methods

Archival research for the project included a review of the National Register and its annual updates, the California Register, the California Built Environment Resources Directory (BERD) database maintained by the OHP, and the Irvine Cultural Resources Element to identify any previously recorded properties within or near the Project Site. A cultural resources records search for the Project was conducted by Valerie Smith on August 28, 2023, at the SCCIC housed at California State University, Fullerton. The records search included a review of all previously documented historic architectural resources and studies within a one-half mile radius for archaeological resources and one-quarter mile radius for historic architectural resources within or immediately adjacent to the Project Site). For historic resources, a 0.25-mile radius is a standard distance for considering nearby historic resources in an urban environment such as the Project Site. No architectural resources were identified at SCCIC, in the BERD, or in the Irvine Cultural Resources Element within a 0.25-mile radius. Note that the Tustin USAR Center (P-30-176837) is within the 0.5-mile buffer but not within the 0.25-mile buffer used for the review of historic architectural resources.

Results

Previous Cultural Resources Investigations.

According to the records search results, 77 cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Approximately 60 percent of the 0.5-mile radius searched has been covered in these previous cultural resources assessments. Out of the 77 studies, 18 (OR-00252, 00362, 00808, 00847, 00863, 01099, 01143, 01587, 01628, 02004A, 02004B, 02200, 02225, 02534, 03255, 03373, 04000, 04544) overlap with nearly 90 percent of the Project Site, including adjacent roads.

Previously Recorded Cultural Resources

The records search results indicate that a total of four cultural resources have been recorded within the 0.50-mile radius (**Table 1**). Of the four resources, two are precontact archaeological sites (P-30-000195 and -00508); one is a precontact isolate (P-30-100201); and one is a multicomponent archaeological site (P-30-000196). No previously recorded archaeological resources are located within the Project Site or immediately adjacent. There are also no previously recorded historic architectural resources identified within the Project Site, or 0.25-mile radius.

TABLE 1
PREVIOUSLY RECORDED CULTURAL RESOURCES WITHIN 0.5-MILE BUFFER

P Number (P-30)	Permanent Trinomial (CA-ORA-)	Description	Dates Recorded	CRHR/ Eligibility
000195	195	Precontact site: cobble manos, pestle, 2 broken points, chert chipping waste, small chert scraper, metate sections, hammerstone, knife. Shells: pecten, mostly *Chione* sp., wavy top frag. Moonsnails, 40-ribbed cockle.	1967	Not Evaluated

P Number (P-30)	Permanent Trinomial (CA-ORA-)	Description	Dates Recorded	CRHR/ Eligibility
000196	196/H	Multicomponent site: precontact component consists primarily of lithics, groundstone, shell, bone, Brown Ware ceramics, charcoal, and three Native American human burials. Historic-era component consists of glazed ceramic fragments, artifactual debris including pipes, cans, and domestic refuse. An archaeological excavation was previously conducted at the site.	1987;2018	Not Evaluated
000508	508	Precontact site: lithic, groundstone, and shell scatter	1987;2018	Not Evaluated
100201	-	Precontact isolate: granitic pestle	2011	Not Evaluated

Source: SCCIC

Sacred Lands File Search

The NAHC (Native American Heritage Commission) maintains a confidential Sacred Lands File (SLF) that contains information about places that hold a traditional, cultural, or religious value to Native American communities. On August 7, 2023, a request was made to the NAHC for a SLF search for the Project Site. On August 23, 2023, the NAHC responded to the request stating that the results of the SLF were positive. The letter did not provide details on the positive results but recommended that the Juaneño Band of Mission Indians and the Juaneño Band of Mission Indians Acjachemen Nation – Belardes be contacted for additional information. The NAHC provided a list of tribal contacts and recommended that they be contacted to obtain additional information. The SLF search has been included in **Appendix B**.

Cultural Resources Survey

Methods

On January 30, 2024, ESA archaeologist Claudia Camacho-Trejo, B.A., and architectural historian Valerie Smith, M.S., conducted an intensive pedestrian cultural resource inventory of the Project Site. The inventory methods consisted of a combined opportunistic and systematic survey using transects intervals spaced between 5 to 10 meters (approximately 15 to 30 ft). The Project Site boundaries were verified using the ArcGIS Field Maps application on an Android phone. Additionally, photo logs, field observations, and results were documented using Survey 123 with a Samsung 10S device. The goal of the survey was to document the existing conditions and to identify any archaeological or built environmental cultural resources within the Project Site. No subsurface investigation was performed during the pedestrian inventory. The architectural resources survey was to determine if there were any potential resources within the Project Site or immediately adjacent. The photographs from architectural survey and archaeological survey that document the existing conditions of the project site through digital photography and can be found in **Appendix C** and **Appendix D**, respectively, of this report.

Results

Historic Architectural Resources

ESA surveyed on a paved and unpaved gravel path along the Peters Canyon Channel and San Diego Creek. The survey began at the northern portion of the Project Site at Warner Avenue and concluded to the south at the Coronado Bridge. The San Diego Creek joins the Peters Canyon Channel just south of Barranca Parkway. The Peters Canyon Channel underwent extensive modifications in 2019 which included the demolition, widening, and relining of the channel, which was confirmed on site. Therefore, the channel segment at the Project Site is not considered a historical resource under CEQA due to its age and loss of integrity. No original fabric appears to exist from the original construction at the Project Site. There is variation in the channel embankment from concrete liners to stone portions which span from the waterline to the trail in a combination of set stones to loose gravel. The Peters Canyon Bike Trail is situated to the southwest of the channel and was accessible from various access points including the southwest corner of the Warner Street Bridge.

Five reinforced concrete bridges observed by ESA during the survey include: the Barranca Parkway Bridge (Eastbound and Westbound), the Main Street Bridge (Eastbound and Westbound), the Alton Parkway Bridge, the Coronado Bridge, and the Warner Avenue Bridge. Beginning in the late 1960s through the 1990s, the extant concrete bridges replaced earlier wood farm bridges in the same locations. The extant bridges represent typical bridge construction along the channel from this period. All bridges within the Project Site have been determined ineligible by Caltrans surveys and ESA did not find evidence during the reconnaissance survey that they should be eligible at the national, state or local level. A full historic survey and historic resources evaluation of the bridges within the Project Site was not part of this effort.

ESA also conducted a windshield survey of adjacent development, including the Irvine Business Complex and adjacent commercial and light industrial development, generally constructed between 1970 and 1992, to the west and northwest, in addition to the planned residential communities to the east and southeast generally constructed between 1985 and 1992. Research and visual inspection during survey did not yield the presence of any potential historic architectural resources in these areas due to age of construction and lack of architectural import.

The bridges along the Project Site are not considered historical resources under CEQA as determined by Caltrans in 2019. Adjacent contemporary development did not meet the age threshold for consideration as a historical resource. As such, ESA did not identify any historic architectural resources that qualify as historical resources within the Project Site or adjacent to the Project Site.

Archaeological Resources

Approximately 98 percent of the Project Site was subject to intensive-level pedestrian survey. Roughly two percent were subject to opportunistic survey seeking areas of ground surface visibility within the portions of the Project Site where visibility was limited due to modern debris or erosion. Almost all of the Project Site is characterized by a relatively flat topography. The first 300 ft of the path is paved (beginning at Warner), while the rest consists of imported soil mixed with small angular pebbles. The trail has a paved pathway beneath Barranca Pkwy and Alton Pkwy, but there is no under-crossing path for Main St and Coronado, and both active streets transect the trail. The Peters Canyon Channel runs

alongside the Project Site and joins San Diego Creek. The adjacent creek is highly disturbed by modern trash, including debris from homeless encampments. Vegetation and wildlife within the creek are present. The banks of the channel and creek did not show any obvious stratigraphic profiles. No archaeological resources were identified as a result of the survey.

Archaeological Sensitivity Assessment

Precontact Archaeological Analysis

The potential for finding buried precontact archaeological deposits at the Project Site has been assessed based on the following concepts: (1) age of the underlying soil contemporaneous with period of human occupation of the area, (2) proximity to permanent or semi-permanent water sources capable of supporting long-term or seasonal occupation of the area, (3) flat or gently sloped topography conducive to human habitation, (4) the degree of disturbance from previous land uses, (5) the proximity to known archaeological resources within the vicinity, and (6) the proposed excavation parameters for the Project. Previous research conducted elsewhere in California has indicated that the presence of buried archaeological sites is positively correlated with proximity to water, as well as flat to gently sloped landforms (Meyer et al. 2010).

The geologic map review indicates that the entire Project Site is underlain by Quaternary alluvium, lake, playa, and terrace deposits; both unconsolidated and semi-consolidated. The sediments are mostly nonmarine but do include marine deposits nearer the coast forming low terraces of gravelly sand and alluvium. (California Department of Conservation 2024). These sedimentary deposits date to the late Pleistocene and Holocene (11,700 years ago to present)—the period for which there is widely accepted evidence for human occupation of Southern California. The soils in the Project Site consist primarily of Omni series and Chino series soils, with smaller inclusions of other types (California Soil Resource Lab 2024). In other portions of Southern California, Meyer and others (2010) dated the Chino and Omni series soils to the Latest Holocene, between 2000 and 150 cal BP. Such soils have the potential to contain archaeological deposits dating within that period or earlier. Most of the Project Site is located in a relatively flat area and immediately adjacent to the Peters Canyon Channel, which is the channelized version of Peters Canyon Wash that joined San Diego Creek and then emptied into Cienega de las Ranas, the marsh formerly present at the top of Newport Bay. While the wash is not depicted on historical USGS topographic maps (neither is San Diego Creek), the marshes of Cienega de las Ranas are shown. The Peters Canyon Wash could have provided a freshwater source to precontact inhabitants and various dietary and other resources could have been obtained from the marshes. Three archaeological sites with precontact components (ORA-195, ORA-196/H, and ORA-508) and one precontact isolate (P-30-100201) were recorded within the 0.50-mile radius of the Project Site. Moreover, during excavation, three human burials were recovered from ORA-196/H. These sites were located on a series of knolls above Peters Canyon Wash and Cienega de Las Ranas. The Project Site is also above the wash, but does not contain the additional elevation of knolls, both currently and as depicted in historical maps. The positive results of the SLF search from the NAHC suggest that that resources are present within or near the Project Site. Considering these factors, ESA assesses the Project Site as having a moderate to high potential for containing buried precontact archaeological resources.

Historic Archaeological Analysis

One multi-component resource (P-30-000196; precontact and historic-period archaeological site) is recorded within the 0.50-mile radius of the Project Site. The historic-era component of P-30-000196 consists of glazed ceramic fragments, pipes, cans, and domestic debris. The review of historical maps and aerial photographs did not show evidence that historic-period structures formerly existed within the Project Site. However, land grant plat maps and diseños show various roads and trails passing through or close to the Project Site, including one labeled El Camino de San Juan or San Juan Road and another labeled Camino de la Casa, likely leading the San Joaquin Adobe a short way to the south. Camps and discarded refuse often occur along such roads and the roads themselves may be able to be detected archaeologically. The pedestrian survey did not identify remnants of historic-era structures within the Project Site. Taken together, these factors indicate a low to moderate potential for finding buried historic-period archaeological resources.

CEQA Impacts Analysis

Significance Thresholds

The thresholds for determining the significance of environmental effects on historical resources identified below are derived from Appendix G of the *CEQA Guidelines* as defined in §15064.5. Pursuant to this guidance, a project that would physically detract, either directly or indirectly, from the integrity and significance of the historical resource such that its eligibility for listing in the National Register of Historic Places, or in the California Register of Historical Resources would no longer be maintained, is considered a project that would result in a significant impact on the historical resource. Adverse impacts, that may or may not rise to a level of significance, result when one or more of the following occurs to a historical resource: demolition, relocation, conversion, rehabilitation, or alteration, or new construction on the site or in the vicinity.

CEQA Guidelines

According to the State *CEQA Guidelines*, Section 15064.5(b) a project involves a “substantial adverse change” in the significance of the resource when one or more of the following occurs:

1. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
2. The significance of an historical resource is materially impaired when a project:
    A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
    B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Direct Impacts Analysis

Under CEQA, the evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or may otherwise impact any historic resource(s), and, if so, (2) a determination of whether the Project would result in a "substantial adverse change" in the significance of the identified resource or resources.[1] This study did not identify any historical resources or potential historic resources as defined by CEQA along the Project Site. Therefore, pursuant to CEQA, the Project would have no direct impacts on historic architectural resources.

Indirect Impacts Analysis

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of historic architectural resources located within a 0.25-mile study area of the Project Site that would detract from their ability to convey their significance. As mentioned above, a 0.25-mile radius is a standard distance for considering nearby historic architectural resources in a dense environment such as the Project Site and is also used to assess potential indirect impacts from the Project on such resources.

A review of the SCCIC records search and the BERD indicated that there are no previously recorded historic architectural resources within 0.25-miles of the Project Site. Aerial research and site visit results to review built environment development adjacent to the Project Site, including the commercial, light industrial, and suburban development, did not identify any potential historic architectural resources in the vicinity of the Project. Therefore, the Project would have no impact significant impact on historic architectural resources that qualify as historical resources under CEQA.

Summary of Results and Recommendations

Historic Architectural Resources

ESA did not identify any historic architectural resources within or adjacent to the Project Site. As such, no historic architectural resources that qualify as historical resources under CEQA would be directly or indirectly impacted by the Project.

Archaeological Resources and Human Remains

As a result of the archival research of the Project Site, three precontact archaeological sites (ORA-195, ORA-196/H, and ORA-508) and one precontact isolate (P-30-100201) were identified within the 0.50-mile radius of the Project Site, including one site (ORA-196/H) that yielded Native American human remains. During the intensive pedestrian survey, the archaeologists did not identify any additional resources. However, this does not preclude the possibility that subsurface archaeological deposits underlie the Project Site. Such resources could qualify as historical resources or unique archaeological resources under CEQA and impacts to any such resources would constitute a significant impact or effect on the

[1] Pub. Res. Code § 21084.1; CEQA Guidelines § 15064.5

environment. The Project Site has a moderate to high potential for buried precontact archaeological resources and low to moderate for buried historic-period archaeological resources. The Project involves ground-disturbing activities that have the potential to significantly impact unknown archaeological resources. To minimize the impact of the Project on archaeological resources and human remains, ESA recommends implementation of the following mitigation measures. With these mitigation measures in place, the Project would result in less than significant impacts to archaeological resources and human remains.

CUL-1: Prior to the issuance of a demolition permit or ground-disturbing activities, the City of Irvine (City) shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as demolition, clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.

Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

CUL-2: In the event that historic or precontact archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the City, the Qualified Archeologist shall establish an appropriate buffer in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with City to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the John D. Cooper Archaeological and Paleontological Center, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

CUL-3: The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures

CUL-4: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

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Appendix A
Professional Qualifications

Kyle Garcia, MA, RPA

Principal Archaeologist

EDUCATION

MA, Anthropology (Archaeology Option), California State University Los Angeles

BA, Anthropology, (Physical/ Biological Emphasis), University of California, Santa Barbara

20 YEARS' EXPERIENCE

CERTIFICATIONS/ REGISTRATION

Registered Professional Archaeologist, #4587

Secretary of Interior-Qualified Archaeologist

Riverside County Registered Archaeologist #202 and Paleontologist

Orange County Certified Archaeologist

Orange County Certified Paleontologist

40-Hour HAZWOPER Training – Update, 2020

PROFESSIONAL AFFILIATIONS

Society for American Archaeology

Society for California Archaeology

Pacific Coast Archaeological Society

Kyle Garcia has 20 years of experience in the archaeology and prehistory of southern California, with a specialization in faunal analysis. During his career, he has authored or contributed to more than 800 projects subject to the requirements of the California Environmental Quality Act, the National Environmental Policy Act (NEPA), and regulations implementing Section 106 of the National Historic Preservation Act (Section 106 of the NHPA). He is well-versed in the archaeological resources of California's coastal, interior, and island settings. He is skilled in evaluation historic and prehistoric archaeological resources; agency and Native American consultation; pedestrian surveys, testing and evaluation excavations as well as archaeological and paleontological construction monitoring, and laboratory processing. During his tenure, he has authored or contributed to more than 400 technical reports and sections to support all levels of CEQA and NEPA documents. Kyle's portfolio of projects includes energy, water, and transportation infrastructure as well as residential, commercial, mixed-use, institutional, and urban redevelopment serving public and private sector clients. Kyle has conducted archaeological work throughout California and is a certified archaeologist and paleontologist in Riverside and Orange counties.

Project Type Specific Experience

Water Infrastructure. Kyle has performed the archaeological and paleontological resources surveys and assessments for a number of regional water infrastructure projects including the Reservoir No. 1 Reconstruction Project MND for Burbank; the Pasadena Groundwater Storage Program; and recycled water facilities projects for San Clemente, Pasadena, the Town of Rosamond, and Palmdale. As part of these project, Kyle has worked alongside State and federal agencies such as U.S. Army Corps of Engineers, U.S. Bureau of Reclamation, and the State Water Resources Control Board, and others, and have assisted them with their cultural resource compliance.

Public Works. Kyle has also conducted numerous archaeological and paleontological work for numerous public works projects in southern California including the Malibu Civic Center Wastewater Treatment Facility Project, the Ola Vista Street/Sidewalk Improvement Project (San Clemente), Pasadena Non-Potable Water Project, and the Newport Overcrossing Bridge Reconstruction Project (Grand Terrace). Under a cultural resources on-call contract with the County of San Bernardino Department of Public Works, Kyle has conducted cultural resource work for the Needles Highway Realignment Project, the Flood Control Facility System-wide Maintenance Project (analyzing more than 500 flood control facilities throughout the County), the Maple Lane Drainage Improvements Project, the Hatchery Drive Road and Drainage Improvement Project, and the Mountain View Acres Drainage Improvement Project.

Utility - Southern California Edison On-Call Cultural Resources Services Contract, Various Locations, CA. *Project Director.* As an on-call consultant to Southern California Edison (SCE), Kyle managed over 100 SCE projects and managed SCE purchase order

contracts in excess of $1.5 million. These projects were subject to requirements of CEQA, Section 106 of the NHPA, and other local ordinances. These projects included deteriorated pole replacements, conduit and vault installations, and distribution circuit installations (aboveground and underground) located throughout SCE's service area in Central and Southern California. Kyle not only managed the budgets and supervised the work for these projects but also conducted most of the record searches, surveys, report writing, site recordation, and client/agency coordination for these projects. In addition, Kyle supervised and participated in the emergency on-call archaeological survey and monitoring services for SCE property that was affected by the Devore Heights, Corral, and Santiago fires located in Devore, Malibu, and eastern Orange County, California, respectively. These projects entailed rapid response services, including close-interval surveys, construction monitoring, and sensitivity assessments for SCE property in areas damaged by the fires.

Project Experience

Palos Verdes Peninsula Water Reliability Project, Los Angeles County, CA. *Archaeological Task Manager.* Kyle conducted a cultural resources assessment of the proposed project from 2016 to 2017 in to support the CEQA IS/MND for the project and in accordance with Section 106 of the NHPA. California Water Service Company is proposing to construct new potable water pipelines and a new booster pump station to replace the current water distribution system serving the Palos Verdes Peninsula, which has reached its useful service life, and improve overall system reliability. The Project involves the construction of approximately seven (7) miles of 24-inch and 30-inch pipelines within portions of the Cities of Rolling Hills Estates and Rancho Palos Verdes and portions of unincorporated Los Angeles County. In accordance with the COAs and the MMRP for the project, Kyle also currently overseeing the archaeological, paleontological, and Native American monitoring services during construction and development of the project.

Archaeological and Paleontological Monitoring for the LAX Crossfield Taxiway Improvements, Los Angeles, CA. *Project Manager/Archaeological Monitor.* Between 2009-2010, Kyle performed archaeological and paleontological monitoring services during earthmoving operations associated with the development of the Crossfield Taxiway project in accordance with established mitigation measures from the LAX Crossfield Taxiway Project (CFTP) EIR. PCR conducted archaeological and paleontological field visits, paleontological sediment sampling, and monitoring of earthmoving operations associated with the construction of CFTP until activities requiring monitoring ended. These operations included excavations for filter boxes, water pipeline installation, and the realignment of World Way West. In addition to monitoring, Kyle performed an archaeology and paleontology training session for appropriate project personnel involved with construction of the project. The training session focused on how to identify archaeological and paleontological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event. No resources were identified during the monitoring effort and these findings were summarized in a report that was submitted to Los Angeles World Airports. Kyle served as project director/manager, crew chief, monitor, and co-author of the final report.

Archaeological Monitoring of the Los Rios Park Project, San Juan Capistrano, CA. *Project Manager.* Kyle managed archaeological monitoring services for the City of San Juan Capistrano (City) during the construction and development of 5-acre Los Rios Park (Park) from 2008-09. Numerous items of modern, historic, and prehistoric age were encountered during archaeological and Native American monitoring services associated with Park development. PCR classified these items into one archaeological site (P-30-001708) and eight isolated artifacts and/or features (P-30-100126 through P-30-100133). P-30-001708 (CA-ORA-1708/H) includes 13 individual Features (Feature A through Feature M). It is apparent that the Park retains buried prehistoric artifacts, domestic, residential and ranch maintenance components and numerous subsurface features such as trash pits, privy holes, fire pits, domesticated animal refuse and similar features. These

findings are consistent with the long history of prehistoric and historical-period occupation of the Los Rios Street Historic District area. Bottles identified and collected during monitoring indicate dates of use between the 1890s and 1950s. Although five isolated prehistoric resources were encountered (Feature M of P-30-001708 and P-30-100126, -100127, -100128, and -100129), the results of the archaeological monitoring effort have also confirmed the lack of intact or stratified buried prehistoric deposits or features across the Park. Kyle served as project director/manager, liaison with the City and Native American monitors, artifact sorter and analyst, and co-author of the final report.

Long Beach Unified School District District-Wide Cultural Resources Assessment, Long Beach, CA. *Lead Archaeologist.* As a part of ESA's on-call contract, Kyle led the archaeological and paleontological resources assessment as a part of the overall cultural resources assessment to assess the District's proposed Facility Master Plan which would include various improvements to 94 schools and 12 administrative facilities. The assessment determined the potential impacts to paleontological resources and to develop management guidelines and mitigation measures to avoid, reduce, or mitigate potential impacts for the purpose of partially complying with the paleontological resources requirements of the California Environmental Quality Act (CEQA). Kyle performed the assessments, and co-authored the associated Archaeological Resources Assessment and the Paleontological Resources Assessment.

University High School Beautification Project, Los Angeles, CA. *Archaeologist.* Kyle performed archaeological monitoring during earth-moving activities on the campus. The archaeological monitoring program ensured the protection of the village site and springs, and resulted in the discovery of remains of the original portico of the Administration Building which was destroyed by the Long Beach Earthquake of 1933.

Northwest Casmalia Exploratory Enhanced Oil Recovery Project, near Orcutt/Casmalia, CA. *Project Manager and Archaeological Monitor.* The 245-acre Project included the drilling for and extract of petroleum from subsurface deposits. The project area is located in the Casmalia Hills along the northeastern margin of Casmalia Canyon in northern Santa Barbara County, approximately six miles west of the town of Orcutt. Kyle conducted Phase II testing and evaluation investigations in the project area and archaeological monitoring in compliance with Santa Barbara County's conditions of approval for the Project. The monitoring was conducted alongside the Santa Ynez Band of Chumash Indians. The scope of work included testing of eight previously recorded prehistoric archaeological sites, three previously recorded prehistoric isolates, two previously recorded historic-period sites, and archaeological construction monitoring of all ground-disturbing activities in the project area. The goals of the Phase II testing program were to determine whether or not the previously identified archaeological resources and surrounding buffer zones contained buried archaeological deposits and to collect enough information to support significance evaluations pursuant to CEQA and provide further recommendation measures.

Rancho Campana High School and Performing Arts Center Construction Monitoring, Camarillo, CA. *Project Manager.* Kyle led the archaeological and paleontological monitoring for the project as a part of ESA's on-call contract with Oxnard Union High School. He managed and coordinated the effort and prepared the associated report. ESA identified two archaeological resources (56-001512/CA-VEN-1512 and 56-001513/CA-VEN-1513H) during monitoring efforts and several paleontological localities during the monitoring and sediment screening activities and worked together with the Ventureño Chumash regarding treatment for the archaeological resources. Although several archaeological and paleontological resources were encountered during the construction monitoring efforts, the resources were treated in accordance with the mitigation measures and, as a result, the impacts to the resources were reduced to a less than significant level pursuant to the CEQA.

Alison Garcia Kellar

Senior Architectural Historian

EDUCATION

MS, Historic Preservation, University of Pennsylvania

BA, Design, University of California at Davis

13 YEARS EXPERIENCE

PROFESSIONAL AFFILIATIONS

Latinos in Heritage Conservation, Education Committee Member

California Preservation Foundation, Member

Society of Architectural Historians, Member

National Trust for Historic Preservation, Member

Alison is a senior architectural historian with 13 years of professional experience with a background in historic preservation, design, and museum collections. Her work with historic resources and cultural heritage in California has included managing and authoring historic resource assessments, National Register Nominations, historic structure reports, feasibility studies, in addition to extensive archival research and resource documentation. Alison applies her understanding of preservation design and historic interiors to inform impacts analyses for proposed redevelopment and recommendations for adaptive reuse.

Relevant Experience

Morningside High School Historic Resources Assessment and Impacts, Inglewood, CA. *Senior Architectural Historian.* Alison was the lead author of the Historic Resources Assessment which determined that the high school campus buildings and landscape are significant as a potential historic district. Constructed in 1950, the property is significant for its association with the challenges of public-school integration in California and within the City of Inglewood, for its Mid-Century Modern architectural style, and for its association with notable modernist architectural firms. Alison assembled the construction history for the campus and created a character-defining features analysis identifying features at the campus, and specifically, interior and exterior features of the theatre building. Alison reviewed the upgrade project to ensure that the project met the SOI Standards and CEQA compliance. She authored and oversaw the production of a HABS report to document the campus prior to selective demolition and project construction.

3619 Martin Luther King Jr. Boulevard Historic Resources Evaluation, Los Angeles, CA. *Project Manager and Senior Architectural Historian.* Alison was the lead author of the Historic Resources Assessment which determined that the Mid-Century Modern commercial bank building is eligible at the local level for its association with mid-century commercial development in Crenshaw, importance as a Black banking business, and for its association with notable Black bank owner, Peter W. Dauterive. Constructed as the Santa Barbara Savings and Loan Bank in 1963, the bank building was later operated by Founders Savings and Loan, a Black-owned banking institution. Alison conducted in-depth research regarding the development of the Crenshaw Shopping District that rose to prominence following World War II, profiling its decline after the 1965 City-wide Watts Riots which led to tremendous City disinvestment in predominantly African American and other minority communities. The report will be used for future redevelopment efforts.

MacArthur Park Historic Viaduct Railings Historic Structure Evaluation and Treatment Plan, Los Angeles, CA. *Senior Architectural Historian.* Alison was the lead author of a report that documents and recommends treatments for a historic 1938 concrete wall that lines either side of Wilshire Boulevard through McArthur Park. Alison conducted extensive archival research on the park and on the walls, and later conducted a significance evaluation for the walls. She conducted a character-defining features analysis

for the walls and associated roadway which helped to inform architectural and structural recommendations with a team of subconsultants. Alison coordinated with the engineering and architectural contractor subconsultants to compile recommendations and present them to the City.

Weintraub Real Estate Group, Orchid Tree Inn Historic Preservation Consulting Services, Palm Springs, CA. *Deputy Project Manager.* Alison is on the management team for ESA's providing of historic preservation services for a boutique resort hotel project that will incorporate and rehabilitate two locally designated historic resources in Palm Springs—the Palm Springs Community Church and the Orchid Tree Inn. ESA prepared a Historic Resources Assessment Report, Character Defining Features Analysis, and Conditions Assessment, as well as provided preservation consulting services for conformance with the SOI Standards. ESA assisted with several challenges, including preservation of the partially damaged (burned roof) masonry Gothic Revival-style Community Church; rehabilitation of the bungalow court based on historic photographs and physical analysis; and accommodation of utility, ADA, and structural code upgrades. ESA is reviewing construction plans and preparing an SOI Standards conformance review and CEQA impacts analysis for the final project.

Whittier Public Library Historic Resources Assessment, Whittier, CA. *Senior Architectural Historian.* Alison was the lead author of the Historic Resources Assessment which determined that the library is significant as an individual resource under National Register Criteria A and C. Constructed in 1958, the property is significant for its association with Mid-Century Modernism, postwar period institutional properties, and architect William Henry Harrison. Alison assembled the construction history for the library and the Whittier Civic Center. She created a detailed character-defining features analysis identifying significant and contributing features at the property's interior, exterior, and site. Alison coordinated with the project architect to ensure that the project met the SOI Standards in order to meet community's contemporary needs while respecting the building's historic character. Alison authored and oversaw the production of a HABS report to document the library building prior to selective demolition and project construction.

Earl Carroll Theatre Historic Structures Report, Los Angeles, CA. *Senior Architectural Historian.* Alison was the lead author of the Historic Structure Report created for the rehabilitation of the historic Earl Carroll Theatre in Hollywood. Constructed in 1938, the property is significant for its association with owner-operator Earl Carroll, Hollywood nightlife, and architect Gordon B. Kaufmann. The theatre is a listed LA Historic-Cultural Monument and has been identified as eligible for the National Register. In recent years the theatre was rented by television studios as sound stages, and as a result some public areas had been modified. Alison assisted with the preparation of the historic structures report and conducted supplemental in-depth research, participated with the creation of a detailed interior and exterior character-defining features analysis, and assisted with the analysis of the theatre's current condition. She developed recommendations in compliance with the SOI standards that sensitively guide ongoing preservation efforts.

Mt. Helix Park Rock Wall Short-Term Preservation Project, San Diego, CA. *Senior Architectural Historian.* Alison is serving as the deputy project manager for a rehabilitation project to document and provide short term preservation recommendations for the 1932 rock wall that borders a hilltop park. Work has included documentation of failing portions of the rock wall with digital photograph, extensive research through local archives, and the development of a character-defining features matrix for the rock walls. Working closely with Mel Green Associates and Silman Structural Engineers, ESA has developed treatment and stabilization recommendations for the deteriorating rock wall portions.

Port of San Diego Old Police Headquarters Assembly Building Peer Review, San Diego, CA. *Project Manager, Senior Architectural Historian.* Alison is conducting a peer review for proposed rehabilitation modifications and tenant

improvement to a historic former police headquarters in San Diego. Work has included a review of historic documentation including nomination forms and original plans, and a review of the applicant's proposed plans to modify the historic building into an events space. Alison is recommending that the applicant include a more robust Standards review discussion, provide supportive graphics, reference historic documentation, and a create more comprehensive project description for the proposed submission to be adequately substantiated for City review and approval.

989 Cliff Drive Historic Resources Evaluation and Impacts Analysis, Laguna Beach, CA. *Senior Architectural Historian and Project Manager.* Alison served as the project manager and provided research assistance and guidance for the development of the Historic Resources Assessment for the 1928 Mediterranean Revival style residence, which is an identified historic resource. Further, Alison oversaw the development of impacts analysis to assess impacts to the property's historic garage which included creating a character-defining features analysis to ensure that the integrity of the property will be protected and maintained as part of the new proposed project.

989 Cliff Drive Historic Resources Evaluation and Impacts Analysis, Laguna Beach, CA. *Senior Architectural Historian and Project Manager.* Alison served as the project manager and provided research assistance and guidance for the development of the Historic Resources Assessment for the 1928 Mediterranean Revival style residence, which is an identified historic resource. Further, Alison oversaw the development of impacts analysis to assess impacts to the property's historic garage which included creating a character-defining features analysis to ensure that the integrity of the property will be protected and maintained as part of the new proposed project.

Long Beach Airport Airplane Showroom, Long Beach, CA. *Senior Architectural Historian.* Alison provided research assistance related to regional general aviation in the post-World War II era for an EIR amendment project. ESA conducted preliminary research to determine that an existing airport building which was most recently used as a terminal building was formerly a mid-20th century airplane showroom. As part of this research effort, Alison compiled the overall history of the Long Beach airport, in addition to reviewing patterns of both roadside architecture and car showroom which were researched for comparison between airplane and car sale marketing efforts.

McDonnell Douglas Assembly and Warehouse Building, Long Beach, CA. *Senior Architectural Historian, Project Manager.* Alison served as the project manager for a mitigation document which evaluated a historic assembly and warehouse building constructed for the production of the DC-10 luxury commercial aircraft in 1967. Located adjacent to the Long Beach Airport, the building was later repurposed for the development and assembly of the C-17 military cargo aircraft in the 1980s. The property was determined to be significant for its association with aviation history in Southern California and in Long Beach and is reflective of an industry that was critical in the post-World War II economic development of the region. The historic resources assessment was required as part of a larger PEIR effort.

31204 Ceanothus Drive Plan Review and Impacts Analysis, Laguna Beach, CA. *Senior Architectural Historian.* Alison served as the project manager for the plan review for an undeveloped portion of property that was once associated with the locally designated Halliburton House. The proposed new hillside residential project was reviewed for conformance with the Standards utilizing the National Park Service's *National Register Bulletin 30: How to Evaluate and Document Rural Historic Landscapes* and *Preservation Brief 36: Protecting, Treatment and Management of Historic Landscapes,* and for compliance with a previously established Project Design Feature and for conformance with mitigation measures for the historic adjacent property.

2949 S. Coast Highway, Laguna Beach, CA. *Senior Architectural Historian and Project Manager.* Alison served as the project manager and co-author for a plan review of a locally designated resource which was formerly a mixed-use

building constructed in 1929. The property had since been converted into a single-family residence and included a large contemporary addition. Work included the assessment of unpermitted previous modifications and design consultation with the property owner in order to assess the home against CEQA impacts thresholds and for conformance with the Standards.

1221 Hermosa Avenue Preservation Consulting, Hermosa Beach, CA. *Senior Architectural Historian.* ESA serves as a historic preservation consultant to the City of Hermosa Beach, and has a longstanding relationship with the building at 1221 Hermosa Boulevard, known as the Bijou Building. The building is a former historic theatre and bank designed in the Neo-Classical Revival style, constructed in 1923. Alison evaluated proposed tenant improvement modifications including the removal of non-original features and the retention of original features related to original theatre and bank uses. Alison has conducted design reviews which included an understanding of all modifications to the space over time, character-defining features analyses, and reviews of proposed plans against CEQA thresholds and the SOI Standards for compliance. Alison is currently participating with overseeing the construction monitoring efforts for the theatre space as part of this ongoing project.

3325 Monterey Road CEQA Impacts Analysis and Design Review, San Marino, California. *Senior Architectural Historian.* A two-story Art Deco style single-family residence, constructed in 1927 in San Marino, California was determined to be a historic resource. Proposed modifications to the residence included a two-story rear addition and building rehabilitation. Alison assisted with preservation design consultation and conducted a plan review for conformance with the SOI Standards for the proposed project. She coordinated with the project architect to better convey preservation components of the proposed work into the drawing set for city review. The review required a character-defining features analysis to determine the level of significance of the remaining features.

Universal Hilton Historic Resources Technical Report and Environmental Impacts Report for 555 W Universal Terrace Parkway, Los Angeles, CA. *Senior Architectural Historian.* The Universal Hilton Hotel was designed by master architect, William L. Pereira in 1983 in the Postmodern style. As one of Pereira's final commissions, the hotel building was originally part of a master plan and was designed to accommodate visitors to the expanding Universal Theme Parks. Alison conducted in-depth architect and postmodern style research, and evaluated the property for historic significance as part of the Historic Resources Technical Report.

Presentations

National Trust for Historic Preservation Past Forward Conference: panelist on the Women's Affinity Session, 'Women Leading the Change,' 2021.

California Preservation Foundation Conference: panelist on modernism in 'Becoming Silicon Valley,' and 'Documenting Hispanic Heritage' tour leader, 2018.

UC Davis Undergraduate Design Studio Lectures: 'Historic Preservation in Northern California,' 2014 and 'Penn Design Thesis: 20th Century Architectural Lighting and Establishing Guidelines for its Preservation,' 2013.

Valerie Smith

Architectural Historian

EDUCATION

MS, Historic Preservation, Columbia University

Advanced Certificate, Columbia University

BA, Studio Art, Hope College

3.5 YEARS' EXPERIENCE (HISTORIC PRESERVATION)

23 YEARS' EXPERIENCE (PHOTOGRAPHY)

18 YEARS' EXPERIENCE (FINANCIAL SERVICES)

PROFESSIONAL AFFILIATIONS

Preservation Alumni, Columbia University, Board Member

Mentorship Committee, Columbia University, Board Member

California Preservation Foundation, Member

National Trust for Historic Preservation, Member

DOCOMOMO US, Member

Association for Preservation Technology (APT), Member

Valerie Smith is an architectural historian with experience in historic preservation that includes archival research, historic resource assessments, historic preservation consulting such as plan reviews and construction monitoring, feasibility studies, resource surveys, conservation projects, conditions assessment reports, and knowledge of materials science. Valerie's Master's Thesis was about architect-designed house plans and model houses from the 1920s. Her focused research and interest in the small house typology have resulted in extensive knowledge of single-family houses from 1920-1945. Research projects and her coursework at Columbia University in Paris and New York City gave her extensive knowledge of Modernist architecture, which she has continued to expand upon in Los Angeles. Valerie's studio art background and photography training have proven helpful for onsite documentation and HABS photography. In addition to historic preservation and photography, Valerie has 18 years of professional experience in finance and investor relations, with strong client and project management skills.

Relevant Experience

252 June Street, Preservation Plan Review, Hancock Park, Los Angeles, CA.
Architectural Historian. Valerie authored a Plan Review for compliance with the Hancock Park HPOZ Preservation Plan and Historical Resources CEQA Impacts Analysis for a proposed project located at 252 S. June Street. The lot was improved with a two-story single-family residence constructed in 1933 in the Monterey Revival style that was badly damaged by fire and was to be demolished for a new residence. The new residence was designed in a contemporary style with Tudor Revival references. ESA made some recommendations of modifications to the plans that would allow the new construction to fit more seamlessly into the historic neighborhood.

3916 Martin Luther King Jr, Historic Resource Assessment, Los Angeles, CA.
Architectural Historian. Valerie co-authored the production of a Historic Resource Evaluation (HRA) to establish the building's historic significance in the Crenshaw neighborhood of Los Angeles. Valerie's research provided context for a 1962 bank building in the International Style that was occupied by a Black-owned savings and loan company for over twenty years. The founder, Peter Dauterive was instrumental in race relations in Los Angeles and provided financial services to underserved communities, served on the board of various foundations, and started a scholarship fund at USC for minority students.

1000-1018 N. Croft Avenue, Historic Resource Assessment, Los Angeles, CA.
Architectural Historian. Valerie provided research, wrote historical contexts, and compiled a Historic Resource Assessment for four multi-family properties in Hollywood. One property was designed in a Mediterranean Style using a house stock plan from the local company Bungalowcraft. Two of the properties are Spanish Colonial Revival duplexes constructed in the 1920s and 1930s. The fourth property was designed in 1940

by a notable Los Angeles architect who became known for his unique window treatment and Minimal Traditional designs. The four properties were found significant as early dwellings in the Hollywood Scenic Tract under Criterion A, and as excellent examples of three different architectural styles applied multi-family properties under Criterion C.

133 Vieudelou Avenue, Historic Resource Assessment, Catalina Island, CA. *Architectural Historian.* Valerie researched the oldest house in Avalon, Catalina Island and compiled a Historic Resource Assessment. The house belonged to a family who settled on the island during the early days of development into a resort town. The house is Folk Victorian style and constructed in 1888. The property was found eligible for the National Register and California Register for its significance under Criterion A, B, and C.

301 Beacon Street, Historic Resource Assessment, Catalina Island, CA. *Architectural Historian.* Valerie researched a multi-family property on Beacon Street in Avalon, Catalina Island and compiled a Historic Resource Assessment. The dwelling has been owned by the same family who constructed it in 1923. The style is vernacular with elements of Italianate and Mediterranean Revival. It was called the White House Apartments and housed the original family and other short-term guests visiting the island. The property was found eligible as a rare example of a multi-family property from the 1920s in Avalon, Catalina Island.

West San Gabriel Valley, Historic Context Statement, Los Angeles County, CA. *Architectural Historian.* Valerie authored the residential section of the West San Gabriel Historic Context Statement which involved extensive research, and the development of architectural context narratives and residential resource registration requirements. Valerie conducted an archival record search at the South Central Coastal Information Center (SCCIC) to determine the presence of cultural resources in eight unincorporated study areas.

211 Emerald Bay, California Register Nomination, Orange County, CA. *Architectural Historian.* Valerie provided architectural historian services which included research, the development of historical contexts, and the preparation of a nomination for the California Register of Historical Resources for a property in Emerald Bay. 211 Emerald Bay is in a planned coastal "garden suburb" that was developed beginning in 1929. The community was designed by renowned landscape architect Mark Daniels and notable Pasadena architects such as Roland Coate and H. Palmer Sabin. The house at 211 Emerald Bay contributed to the early development of the neighborhood and is one of the last remaining intact examples of the Mediterranean Revival aesthetic developed by the architectural review board and original developer.

AGBU Manoogian-Demirdjian School Improvements, Categorical Exemption, Canoga Park, CA. *Architectural Historian.* Valerie provided research, wrote historical contexts, conducted a site visit, and compiled a Department of Parks and Recreation form 523 and Notice of Exemption for an Armenian-American school in Canoga Park. The school is operated by the Armenian General Benevolent Union (AGBU), and the organization purchased the parcel in 1985. The campus was originally an LAUSD campus, and the AGBU has made improvements to accommodate the Armenian student body occupying the campus. The buildings are a mixture of 1962 Mid-Century Modern and post-1996 buildings.

Modernist house, Peer Review, Laguna Beach, CA. *Architectural Historian.* Valerie peer-reviewed a California Register of Historical Resources nomination that had been drafted by other historians for a house in Laguna Beach. As part of the peer review, Valerie wrote a historic context statement for modernist architecture in Laguna Beach, focusing on 1960s and 1970s expressionist /organic single-family properties. The house was representative of a local, regional, and national trend for the design of houses by architects practicing in a modernist style. Valere drafted a script and provided guidance to the client and team for the presentation to the California State Historical Resources Commission at the quarterly meeting.

Eastmont Theatre, Historic Resource Evaluation, Oakland, CA. *Architectural Historian.* Valerie provided research, wrote historical contexts, and compiled a Historic Resource Evaluation for the Eastmont Theatre. The Eastmont Theatre was constructed in 1926 during the rise of Art Deco theaters in the United States. The theater is a modest version of the movie palaces of the era and was evaluated for its significance in the city of Oakland and the larger context of Art Deco theaters.

615 E. Ocean Boulevard, Historic Resource Assessment, and Impacts, Long Beach, CA. *Architectural Historian.* Valerie researched and evaluated a 1970s commercial vernacular restaurant that was originally a Copper Penny Family Restaurant. The building design was a modest interpretation of the Late Hollywood Regency style and consisted of a simple box design capped with a mansard roof.

448 West Cypress Street, Historic Resource Evaluation, Glendale, CA. *Architectural Historian.* Valerie provided research, wrote historic contexts, and compiled the Historic Resource Assessment report for the property at 448 West Cypress Street. 448 West Cypress was identified as a historic vernacular warehouse from c. 1907 located in the Tropico section of Glendale, CA.

951 Cliff Drive, Historic Resource Assessment and Impacts, Laguna Beach, CA. *Architectural Historian.* Valerie provided research and updated an existing impact assessment for a 1918 Beach Cottage with a Craftsman-influenced style in Laguna Beach. Valerie evaluated the property using the new Laguna Beach Historic Preservation Ordinance and assessed the impact of a pending addition to the property's historic fabric.

1051 Marine Drive, Historic Resource Assessment and Impacts, Laguna Beach, CA. *Architectural Historian.* Valerie provided research and updated an existing impact assessment for a 1920s Beach Cottage with a Craftsman-influenced style in Laguna Beach. Valerie evaluated the property using the new Laguna Beach Historic Preservation Ordinance and assessed the impact of a pending addition to the property's historic fabric.

Photography

Trained as a photographer, with a B.A. in Studio Art from Hope College, Valerie has 23 years of photography experience. She has a large portfolio of architectural photographs from site visits, college courses and fine art photography exploration. She completed an architectural photography course at UCLA in 2018, and she is currently being trained as a Historic American Buildings Survey (HABS) photographer.

California Historical Resources Information System (CHRIS) – Authorized Researcher

Valerie is authorized to perform record searches to uncover archeological and historic resources at one of the twelve Information Centers managed by the California Office of Historic Preservation. Valerie has been trained to review 7.5 USGS Quadrangle Maps, historical resource records and reports, and computerized data housed at the South Central Coastal Information Center at California State University, Fullerton.

Publications

Preserve Orange County, *Tracts* "Better Homes in America in Anaheim," December 23, 2022.

Columbia University Master's Thesis, "The Small House Movement of the 1920s: Preserving Small 'Better' Houses," 2022.

Claudia Camacho-Trejo

Cultural Resources Specialist III

EDUCATION

MA (In Progress), Anthropology, California State University, Los Angeles

BA, Anthropology, California State University, Los Angeles

AA, Behavioral Studies, East Los Angeles Community College

6 YEARS' EXPERIENCE

PROFESSIONAL AFFILIATIONS

Archaeological Institute of American, since 2016.

Society for California Archaeology, since 2016.

Golden Key International Honour Society, California State L.A. inducted 2015

Lambda Alpha Anthropological Honor Society, California State L.A. inducted 2014

Society of American Archaeology since 2014

Claudia Camacho-Trejo is an archaeologist with eleven years of experience throughout Eastern Sierra Nevada, the Mojave Desert, the California South Coast, and Mexico. Claudia had focused as a cultural resource specialist the last six years of her career, working as an author and co-author of California Environmental Quality Act (CEQA)-level technical reports, Environmental Impact Report (EIR) sections, Initial Study (IS) sections, archaeological peer reviews, archaeological monitoring reports, and reports under Bureau Land Management requirements. She has performed archaeological excavation and testing, site recordation, laboratory analysis, pedestrian surveys, and construction monitoring. She has experience requesting records searches through several California Historical Resources Information Systems-Information Centers. In addition to her archaeological background, Claudia has coauthored paleo reports.

Relevant Experience

Ten West Link Transmission Line Project, Riverside County, CA and La Paz County, AZ. *Senior Cultural Resources Specialist (November 2022 – Present).* Environmental Science Associates (ESA) was retained by Delaney Colorado River Transmission LLC to provide archaeological monitoring during construction as well as perform archaeological and historic architectural resource documentation and evaluation in compliance with Section 106, NEPA, and CEQA requirements. The project involves the construction of 125 miles of high voltage electrical transmission line from Tonopah, AZ, to Blythe, CA. The corridor spans numerous federal, state, and private jurisdictions with varied cultural resource requirements necessitating sophisticated tracking and implementation of numerous agency jurisdiction–specific mitigations. The project passes through many Abandoned Mine Land areas and ESA's team has identified, documented, and evaluated a wide array of historic mining and mining related features such as prospects, cairns and claim markers, roads and trails, mine openings, can and other refuse scatters, and other mining related infrastructure. The project footprint also encompasses culturally sensitive areas important to multiple tribes including CRIT. ESA is providing ESA's team is working alongside the construction contractor, several tribes including CRIT monitors, and with the BLM in two states. Claudia was a lithic specialist who conducted a macroscopic lithic analysis on stone tools artifacts recovered during monitoring and excavation activities. She also curated part of the lithics collection at the Pasadena Lab and co-authored parts of the report.

The San Manuel Ancestral Land Exchange, San Bernardino County, CA. *Cultural Resources Specialist (May 2022 – Present).* Yuhaaviatam of San Manuel Nation, a Federally recognized Indian Tribe, formerly known as the San Manuel Band of Mission Indians and the Forest Service, United States Department Of Agriculture entered into an Agreement to Initiate the San Manuel Ancestral Land Exchange. Environmental Science Associates (ESA) prepared a cultural Resources Assessment in support of the Land Exchange. The study was conducted in compliance with Section 106 of the National Historic Preservation Act

(NHPA) of 1966 and considered a 2,997-acre study area, comprised of the combined six privately owned Non-Federal Parcels and two USFS-administered Federally Parcels. Claudia authored portions of the reports and conducted a heritage record search.

Caltrans-ROW Project, Olancha, CA. *Archaeologist.* Claudia performed archaeological screening from dewatering dwell spoils to recover cultural artifacts. This task was conducted directly with the tribal monitors and ESA supervisors to ensure the protection of culturally sensitive areas and artifact density areas identified during Phase I & II testing.

Material Culture Consulting, Pomona, CA. *Archaeologist/Project Analyst*. Claudia conducted pedestrian surveys for SCE pole replacement on public and private lands as an archaeologist. She also performed background research for archaeological studies, including processing records searches. Additional duties included conducting archaeological desktop reviews, including background data, project information, archaeological sensitivity, land ownership, and preparing DPR reports. Claudia then performed cultural resources monitoring during ground-disturbing activities. As a project analyst, Claudia provided Administrative and operational support for Operations and Maintenance Projects with extensive use of Excel, EHSYNC, and Google Earth. With a focus on archaeology, she collaborated with a team of subject matter experts regarding project status, assignment status, pre-construction and post-construction status, and other project issues as appropriate. She compiled and issued Environmental Clearance Documents to clients, project management, and field staff. Claudia prepared project information (e.g., project maps using GIS, Google Earth, or a similar program, and project description) for agency consultation and approvals. She also performed desktop clearances related to deteriorated pole replacements, Master Special Use Permit pole replacements on U.S. Forest Service Land, and private lands for Southern California Edison.

SWCA, Pasadena, CA. *Archaeologist.* Claudia conducted archaeological pedestrian surveys, construction monitoring, and other field or office tasks. She also prepared DPRs, technical reports and organized the company's artifacts collections being deaccessioned to an Orange County Museum.

California State University, Los Angeles Los Angeles, CA. *Graduate Thesis Reviewer.* Claudia conducted thesis examination meetings for Master degree candidates from all fields of study. She met with graduate students on an individual basis to review theses, provide direction regarding format requirements and academic standards, answer questions, and communicate policy guidelines. Claudia recorded the outcome of student thesis appointments, progress and dates of completion and maintained accurate and complete records of each thesis meeting with students to demonstrate progress. She would also communicate with students, to provide thesis related information, review select thesis pages, deadlines, and/or answer questions. She managed all activities related to the completion, submission and reporting and oversaw the thesis publication process with ProQuest and the distribution of hard copies to the academic units.

Appendix B

NAHC Sacred Lands File Search Results

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
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

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Suite 100
West Sacramento,
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(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

August 31, 2023

Claudia Camacho-Trejo
ESA

Via Email to: camacho-trejo@esassoc.com

Re: IBC Multi-Use Trail Creekwalk and Barranca Channel Project, Orange County

Dear Ms. Camacho-Trejo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Juaneno Band of Mission Indians and the Juaneno Band of Mission Indians Acjachemen Nation - Belardes on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

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. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

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

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Appendix C

Historic Architectural/Built Environment Survey Photographs

Figure 1. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing southwest.

Figure 2. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing northeast.

Figure 3. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing northeast.

Figure 4. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing northeast.

Figure 5. Warner Avenue bridge over the Peters Canyon Channel. View facing northeast.

Figure 6. Barranca Parkway bridge over the Peters Canyon Channel. View facing southwest.

Figure 7. Alton Parkway bridge over the Peters Canyon Channel. View facing southwest.

Figure 8. Main Street bridge over the Peters Canyon Channel. View facing southwest.

Figure 9. Coronado bridge over the Peters Canyon Channel. View facing southwest.

Figure 10. Planned suburban community located south of Warner Avenue, constructed between 1985 and 1992 are situated east of the Project Site. View facing east.

Figure 11. A 1-story industrial building located within the Irvine Business Complex, constructed between 1972 and 1980, is situated west of the Project Site. View facing west.

Figure 12. The Jamboree Center at 2 Park Plaza, constructed 1989, is situated west of the Project Site. View from Main Street facing west.

Figure 13. Overview of Creekwalk Trail division, at Warner Ave. View facing Southwest.

Figure 14. Overview of Creekwalk Trail division, and creek overview. View facing south.

Figure 15. Overview of Creekwalk Trail division, at Barranca Parkway crossing. View facing northeast.

Figure 16. Overview of Creekwalk Trail division, facing Alton Way bridge. View facing southwest.

Figure 17. Overview of Creekwalk Trail division, facing Alton Way bridge. View facing northeast.

Figure 18. Overview of Creekwalk Trail division, towards Main Street View facing southwest.

Appendix D
Archeological Survey Photographs

Figure 1. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing southwest. ESA 2023.

Figure 2. General view of the Peters Canyon Channel adjacent to the Creekwalk Trail (Project Site). View facing west. ESA 2023.

Figure 3. General view of the Peters Canyon Channel bridge crossing adjacent to the Creekwalk Trail (Project Site). View facing southeast. ESA 2023.

Figure 4 General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing southwest. ESA 2023.

Figure 5. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing northeast. ESA 2023.

Figure 6. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing northeast. ESA 2023.

Figure 7. General view of the Peters Canyon Channel and Creekwalk Trail (Project Site). View facing southwest. ESA 2023.