

APPENDIX C – CULTURAL RESOURCES SURVEY LETTER REPORT



CULTURAL RESOURCES SURVEY LETTER REPORT FOR THE NEW FLEET FACILITY PROJECT

Orange County Public Works

CHAMBERS
GROUP

October 10, 2025

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Subject: Cultural Resources Survey Letter Report for the New Fleet Facility Project, Santa Ana, Orange County, California

Chambers Group provides this cultural resources survey letter report to Orange County Public Works (OCPW; Applicant; Lead Agency) in support of the proposed New Fleet Facility Project (Project) in Santa Ana, Orange County, California. This Phase I cultural resources assessment includes a records search, literature review, and field survey results for the Project site and surrounding half-mile radius search area (study area) in support of this study. The purpose of the study was to gather and analyze information needed to assess the potential for effects to any historical resources, per California Environmental Quality Act (CEQA) Guidelines § 15064.5(a), within the Project site.

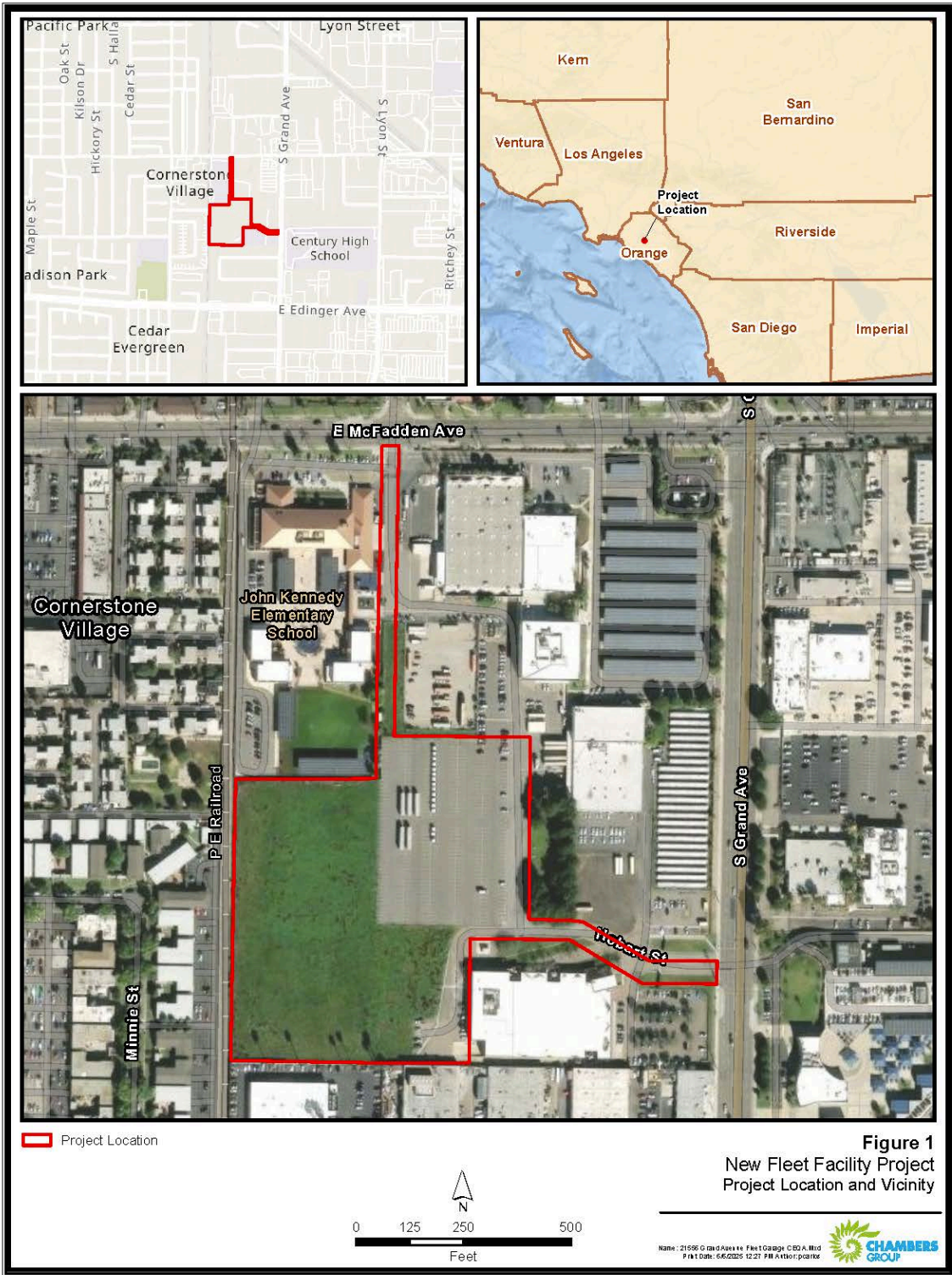
Project Description and Location

The Project Applicant proposes the development of one single 45,706 square foot (SF) building containing vehicle maintenance bays, administrative staff offices, technician workspaces, and storage spaces. Additionally, the Project will include a future 20,000 SF Facility Operations Building, a 10,000 SF solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The Project would serve the fleet vehicles of the Orange County Public Works OC Fleet Services Division. The proposed Project would extend the existing access roads to provide ingress and egress for the Project site via the existing driveways off McFadden Avenue and South Grand Avenue. The Project would add approximately 50,000 SF of paved roadway to the access road.

The Project is situated in the central Santa Ana Valley. The Project is located in the City of Santa Ana, Orange County (Figure 1). The Project site is located on Assessor's Parcel Numbers (APNs) 014-161-07, 988-355-04, 014-161-04, 014-161-05, 014-451-01, and 014-451-02 at 1400 South Grand Avenue, in the City of Santa Ana. The Project is located within the bounds of the former Rancho Santiago de Santa Ana, a historic Spanish land grant. The Project is depicted on the United States Geological Survey (USGS) topographic *Tustin*, California 7.5-minute quadrangle. The Project site elevation ranges from 87 to 99 feet above mean sea level (AMSL).



Figure 1: Project Location and Vicinity Map



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Regulatory Context

As the lead California Environmental Quality Act (CEQA) agency for the Project, the District must determine whether a project may have a significant effect on historical resources (PRC § 21084.1). In addition to the State of California (State) the Project is subject to Orange County regulations relating to cultural resources. The regulatory framework as it pertains to cultural resources under CEQA is detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC §§ 21083.2 and 21084.1), the CEQA Guidelines (Title 14 CCR § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for eligibility for listing in the California Register of Historical Resources (CRHR).

California Register of Historic Resources

The purpose of the CRHR is to maintain listings of the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term *historical resources* includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CCR § 15064.5[a]). The criteria for listing properties in the CRHR were expressly developed in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP). The California Office of Historic Preservation (OHP 1995:2) regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation.

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing in the CRHR. The CRHR was designed to be used by State and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

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.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A *unique archaeological resource* is defined as follows:

- 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 that 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



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- Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a “unique archaeological resource” under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, “A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” (PRC § 21083.2[h]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project:

- (1) physically destroys or damages all or part of a resource;
- (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or
- (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

Assembly Bill 52

Assembly Bill (AB) 52 was enacted in 2015 and expands CEQA by defining a new resource category: tribal cultural resources (TCR). AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment” (PRC § 21084.2). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency. It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a TCR, when feasible (PRC § 21084.3). PRC § 21074(a)(1)(A) and (B) define TCRs as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” which meet either of the following criteria:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC § 5020.1(k)
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1 (in applying the criteria set forth in subdivision (c) of PRC § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe).

County of Orange

In addition to State regulations, projects built in the City of Santa Ana are also subject to a number of local regulations relating to historical resources. Chapter VI of the County of Orange General Plan discusses historic preservation within the County as follows:

Goals, Objectives, and Policies: Cultural-Historic Resources

Goal 1

To raise the awareness and appreciation of Orange County's cultural and historic heritage.

Objectives

- 1.1 Facilitate and participate in activities that inform people about the social, cultural, economic, and scientific values of Orange County's heritage.
- 1.2 Work through the Orange County Historical Commission in the areas of history, paleontology, archaeology, and historical preservation.



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Policies

- 1.1 To stimulate and encourage financial support for projects in the public and private sector.
- 1.2 To coordinate countywide programs and be the liaison for local organizations.
- 1.3 To advise and aid the public and private sectors in meeting museum needs and finding funding sources for same.
- 1.4 To stimulate and encourage research, writing, and publication of articles on Orange County subjects.
- 1.5 To develop and maintain a County archive for historically valuable records.
- 1.6 To encourage and facilitate cooperation among local historical societies.

Goal 2

To encourage through a resource management effort the preservation of the county's cultural and historic heritage.

Objectives

- 2.1 Promote the preservation and use of buildings, sites, structures, objects, and districts of importance in Orange County through the administration of planning, environmental, and resource management programs.
- 2.2 Take all reasonable and proper steps to achieve the preservation of archaeological and paleontological remains, or their recovery and analysis to preserve cultural, scientific, and educational values.
- 2.3 Take all reasonable and proper steps to achieve the preservation and use of significant historic resources including properties of historic, historic architectural, historic archaeological, and/or historic preservation value.
- 2.4 Provide assistance to County agencies in evaluating the cultural environmental impact of proposed projects and reviewing EIRs.
- 2.5 Provide incentives to encourage greater private sector participation in historic preservation.

Policies

The following policies addressing archaeological, paleontological, and historical resources shall be implemented at appropriate stage(s) of planning, coordinated with the processing of a project application, as follows:

- Identification of resources shall be completed at the earliest stage of project planning and review such as general plan amendment or zone change.
- Evaluation of resources shall be completed at intermediate stages of project planning and review such as site plan review, subdivision map approval, or at an earlier stage of project review.
- Final preservation actions shall be completed at final stages of project planning and review such as grading, demolition, or at an earlier stage of project review.

Archaeological Resources Policies:

1. To identify archaeological resources through literature and records research and surface surveys.
2. To evaluate archaeological resources through subsurface testing to determine significance and extent.
3. To observe and collect archaeological resources during the grading of a project.
4. To preserve archaeological resources by:
 - a) Maintaining them in an undisturbed condition, or
 - b) Excavating and salvaging materials and information in a scientific manner.

Paleontological Resources Policies:

1. To identify paleontological resources through literature and records research and surface surveys.
2. To monitor and salvage paleontological resources during the grading of a project.
3. To preserve paleontological resources by maintaining them in an undisturbed condition.



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Historic Resources Policies:

1. To identify historic resources through literature and records research and/or on-site surveys.
2. To evaluate historic resources through comparative analysis or through subsurface or materials testing.
3. To preserve significant historic resources by one or a combination of the following alternatives, as agreed upon by RDMD and the project sponsor:
 - a) Adaptive reuse of historic resource.
 - b) Maintaining the historic resource in an undisturbed condition.
 - c) Moving the historic resource and arranging for its treatment.
 - d) Salvage and conservation of significant elements of the historic resources.
 - e) Documentation (i.e., research narrative, graphics, photography) of the historic resource prior to destruction.

Goal 3

To preserve and enhance buildings structures, objects, sites, and districts of cultural and historic significance.

Objectives

- 3.1 Undertake actions to identify, preserve, and develop unique and significant cultural and historic resources.
- 3.2 Develop and maintain a County archive for historically valuable records, thereby promoting knowledge and understanding of the origins, programs, and goals of the County of Orange.

Policies

- 3.1 To pursue grants and innovative funding strategies for acquisition or development of significant properties.
- 3.2 To develop, utilize, and promote effective technical conservation and restoration strategies.
- 3.3 To appraise, collect, organize, describe, preserve, and make available County of Orange records of permanent, historical value.
- 3.4 To serve as a research center for the study of County history.

Environmental Setting

The Project site is located within the broad alluvial fan that forms the Coastal Plain of Orange County. The coastal plain bound on the northeast by the Santa Ana Mountains and on the south by the Laguna Hills and San Joaquin Hills southwest of the Santa Ana Mountains. These ranges have resulted in the formation of a complex of small alluvial fans that originate along the flanks of the noted mountain ranges at elevations ranging from 350 to 500 feet above sea level.

The Project site is underlain by Quaternary alluvium and colluvium, deposited between the late Pleistocene to the middle Holocene (Morton and Miller 1981). Sediments within the Project site are described as Chino silty clay loam, which occupy the western one-third of the parcel, and Mocho loam, 0 to 2 percent slopes, which occupy the remainder of the parcels. Both soil series are associated with shallow gradient alluvial fans (USDA 2025).

Cultural Setting

Prehistoric Overview

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all, or portions of, southern California (Moratto 1984; Jones and Klar 2007). A prehistoric chronology was devised for the southern California coastal region based on early studies and focused on data synthesis that included four horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric (Wallace 1955, 1978). Although initially lacking the chronological precision of absolute dates (Moratto 1984:159), Wallace's 1955 synthesis has been modified and improved using thousands of radiocarbon dates obtained by southern California researchers over recent decades (Byrd and Raab 2007:217; Koerper and Drover 1983; Koerper et al. 2002). The prehistoric chronological sequence for southern California presented below is a composite based on Wallace (1955) and Warren (1968) as well as later studies, including Koerper and Drover (1983).



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It is generally believed that human occupation of southern California began at least 10,000 years before present (BP). The archaeological record indicates that between approximately 11,000 and 8,000 years BP, a predominantly hunting and gathering economy existed, characterized by archaeological sites containing numerous projectile points and butchered large animal bones. The most heavily exploited species were likely those species still alive today. Bones of extinct species have been found but cannot definitively be associated with human artifacts in California, unlike other regions of the continent. Although small animal bones and plant grinding tools are rarely found within archaeological sites of this period, small game and vegetal foods were likely exploited. A lack of deep cultural deposits from this period has been interpreted by some researchers as indicative that the region was occupied by small groups that practiced high residential mobility during this period (Wallace 1978).

The earliest cultural manifestations in Orange County evoke what is termed San Dieguito identified in San Diego County and the broader Great Basin region. San Dieguito culture is a manifestation of the Paleo-Coastal Tradition (Moratto 1984) which dates from 11,500 BP to around 8,500 BP (Colton and Erlandson 1991; Erlandson and Moss 1996). Along the coast, the florescence of this complex wanes during the mid-seventh millennium BP (e.g., Haynes et al. 1967; Warren 1968) although San Dieguito-like components may continue for a millennium or more (Gallegos 1987:23). Thus, the San Dieguito begins at the terminal Pleistocene and continues well into the Early Holocene. Some evidence of San Dieguito culture was identified at CA-ORA-64, a large, Early to Middle Holocene multi-component site on the east side of Newport Bay, dating between 9,400 and 4,300 calendar years before present (CYBP) (Drover et al. 1983:Table 1; Macko 1998:41; Erlandson et al. 2005:Table 1).

First described by Malcolm Rogers (1929, 1939) the understanding and definition of the San Dieguito culture has undergone considerable refinement (e.g., Warren 1967, 1968). Added to the artifact inventory are such things as manos and metates (True 1958; Ezell 1983), ornamentation (Kaldenberg 1982), and asphaltum-hafted tools (Ezell 1977). Chipped stone tools include large leaf-shaped points, a variety of leaf-shaped knives, large ovoid, domed and rectangular end or side scrapers, engraving tools, and crescentics (Warren 1967). Some discussion has been given to whether or not San Dieguito should include milling equipment, such as manos and metates (Bull 1987; Ezell 1987; Gallegos 1987; Warren 1987).

Given the paucity of San Dieguito sites identified in Orange County, the succeeding three major periods of prehistory for the greater southern California region are most relevant to Orange County. These have been refined by recent research using radiocarbon dates from archaeological sites in coastal southern California (Koerper and Drover 1983; Mason and Peterson 1994):

- Millingstone Period (6,000–1,000 B.C., or about 8,000–3,000 years ago)
- Intermediate Period (1,000 B.C.–A.D. 650, or 3,000–1,350 years ago)
- Late Prehistoric Period (A.D. 650–about A.D. 1800, or 1,350–200 years ago)

Around 6,000 years BP, a shift in focus from hunting toward a greater reliance on vegetal resources occurred. Archaeological evidence of this trend consists of a much greater number of milling tools (e.g., metates and manos) for processing seeds and other vegetable matter (Wallace 1978). This period, traditionally described as the Millingstone Period, was a long cultural phase characterized by small, mobile groups that likely relied on a seasonal round of settlements that included both inland and coastal residential bases. Seeds from sage and grasses, rather than acorns, provided calories and carbohydrates. Faunal remains from sites dating to this period indicate that similar animals to those in the prior period were hunted. Inland Millingstone sites are characterized by numerous manos, metates, and hammerstones. Shell middens are common at coastal Millingstone sites. Coarse-grained lithic materials, such as quartzite and rhyolite, are more common than fine-grained materials in flaked stone tools from this time. Projectile points are found in archaeological sites from this period, but they are far fewer in number than from sites dating to before 6,000 years BP. An increase in the size of groups and the stability of settlements is indicated by deep, extensive middens at some sites from this period (Wallace 1978). More recently, this period has been subject to interpretive refinement and revised terminologies to further explicate the archaeological record.



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Based on research by Sutton and Gardner (2010) Orange County, and nearby regions, are better defined as being part of several phases of the Topanga Pattern. In this terminology, Pattern replaces Period, but the general organizing principles remain. Phase I (or Topanga I) of the Topanga Pattern is characterized by the presence of numerous manos and metates, abundant core tools (scraper planes, choppers, and hammerstones), a few mortars and pestles, relatively few large, leaf-shaped projectile points, cogged stones, and early discoids. Topanga I components have been dated between about 8,500 and 5,000 BP (Sutton and Gardner 2010). Within Orange County, the most prominent site within this Phase is CA-ORA-83, known as the "Cogged Stone Site," located on Bolsa Chica Mesa in Huntington Beach and radiocarbon dated to at least 9,000 BP (Sutton and Gardner 2010). At CA-ORA-64, another Topanga I site located in Irvine, extensive Early Holocene trade networks were indicated by the presence of obsidian lithic materials representing several sources, including one in northeastern California (Sutton and Gardner 2010).

The subsequent Topanga II phase (correlative to the previously described Intermediate Period) is defined by changes in mortuary patterns, from secondary inhumations placed under cairns and south-facing extended inhumations during Phase I, to flexed inhumations becoming common, with reburials, some beneath inverted metates, continuing, and changes in technology with the adoption of the mortar and pestle being used alongside manos, metates, scrapers, core tools, discoids, charmstones, cogged stones, and a greater number of projectile points than in the previous period (Sutton and Gardner 2010). Within Orange County, Topanga II localities, of which several major occupations have been dated between 5,500 and 3,000 BP, are sometimes considered to be part of "an expansion of settlement to take advantage of new habitats [kelp beds and estuaries] and resources [shellfish and fish] that became available as sea levels stabilized between about six and five thousand years ago" (Mason et al. 1997:58; Masters and Aiello 2007, cited in Sutton and Gardner 2010). Also, during this Phase, trade networks apparently intensified and there appears to be a coalescence of trade between southern California and the northwestern Great Basin, termed the Western Nexus. This interaction sphere developed between about 5,100 and 4,500 BP and largely revolved around the distribution of Olivella grooved rectangle (OGR) beads, large bifaces, stone balls, and lozenge stones (Sutton and Gardner 2010).

Sutton and Gardner (2010) suggest that Topanga III (correlative to the previously termed Late Prehistoric) is representative of a "relic" Topanga II populations that became isolated by the movement of Takic peoples from the north into coastal Los Angeles and Orange counties about 3,500 BP. These "surviving" Topanga II groups became Topanga III as a result of their isolation from other (e.g., Greven Knoll III [Encinitas Tradition]) groups when Takic-speaking groups expanded into the area (i.e., the Shoshonean wedge [Kroeber 1925]). Remnant Topanga III populations are believed to have persisted until about 2,000 BP, at which time they were incorporated or replaced by the Gabrielino or Chumash (e.g., Sutton 2009, cited in Sutton and Gardner 2010).

In sites post-dating roughly 3,000 years BP, archaeological evidence indicates the reliance on both plant gathering and hunting continued but was more specialized and locally adapted to particular environments. Mortars and pestles, previously introduced during Phase II of the Topanga Pattern, become more prominent and augment metates and manos for grinding seeds and other vegetable material. Chipped-stone tools became more refined and specialized, and bone tools appeared to be more common. During this period, population densities were higher than before; and settlement became concentrated in villages and communities along the coast and interior valleys (Erlandson 1994; McCawley 1996). The dietary inclusion of the acorn – a high-calorie, storable food source – probably facilitated greater sedentism and increased social organization. The semi-sedentary settlement pattern characteristic of the Late Prehistoric Period may have begun during the Topanga II phase (Intermediate Period), and regional subcultures appear to have developed, each with its own geographical territory and language or dialect (Kroeber 1925; McCawley 1996; Moratto 1984). These were most likely the basis for the groups encountered by the first Europeans during the eighteenth century (Wallace 1978). Despite the regional differences, many material culture traits were shared among groups, indicating a great deal of interaction (Erlandson 1994). In general, the Late Prehistoric Period is better understood than earlier periods largely through ethnographic analogy made possible by ethnographic and anthropological research of the descendants of these groups in the late nineteenth and early twentieth centuries.



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Ethnographic Overview

The Project site lies within a transitional area historically occupied by the Juaneño, so called after their historic-period association with Mission San Juan Capistrano, and the Gabrielino, named after their association with the Mission San Gabriel Arcángel.

Juaneño/Acjachemen

The Juaneño, or Acjachemen, are members of the Takic-speaking group that includes Gabrielino, Luiseño, Cupan, and Cahuilla, among others, and are named after the Spanish mission at San Juan Capistrano (Bean and Shipek 1978). The degree to which the Acjachemen are related to their Gabrielino neighbors to the north, or to their Luiseño neighbors to the south and east is debated. Bean and Shipek (1978) essentially subsume the Juaneño within the greater Luiseño discussion, while others (e.g., Kroeber 1925, Harrington, n.d., cited in Koerper and Mason 2004) suggest affinity with the Gabrielino. Nevertheless, Juaneño or Acjachemen territory generally ranged between Las Flores creek in the south, to Aliso Creek in the north, and from the coast, across the Santa Ana Mountains, to Temescal Valley in the east.

The Acjachemen practiced a semi-sedentary hunting and gathering subsistence strategy, with a focus on well-watered drainage systems that allowed seasonally available resources (Koerper and Mason 2004). One of the most important food resources for the group were hard seeds. Availability of seed as a staple may have been a determinant as to when the group moved or split apart into smaller units in other parts of the territory (Koerper and Mason 2004). Additionally, acorns were gathered from oak groves in canyons, drainages, and foothills. Acorns were ground into flour using mortars and pestles. Protein was supplemented through the meat of deer, rabbits, and other animals, hunted with the bow and arrow, or trapped. Shellfish was collected and eaten, and the shell was then used to make hooks for fishing, beads, and other ornaments (Bean and Shipek 1978).

Accurate population figures remain elusive; however, villages may have contained up to 300 people at certain times of the year. These tended to be located near permanent water and a variety of food sources. The San Juan Basin was densely populated, and villages were closely spaced because of the year-round availability of fresh water in San Juan Creek. Each village was typically located in the center of an established area from which resources for the group were gathered, usually within a day's journey. Subsequently, small groups would leave the village for a short time to hunt fish or gather plant materials (Bean and Shipek 1978).

Gabrielino

The Gabrielino (sometimes spelled Gabrieliño, Gabrieleno or Gabrieleño), are Cupan speakers. The Cupan languages are part of the Takic family, which is part of the Uto-Aztecan linguistic stock. Their tribal territory included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, all of the Los Angeles Basin, the coast from Aliso Creek in the south to Topanga Creek in the north, and the islands of San Clemente, San Nicholas, and Santa Catalina. Villages or triblets were politically autonomous and made up of different lineages. Each lineage had its own leader and would seasonally leave the village to collect resource items (Bean and Smith 1978). Tribal boundaries were not fixed and overlapped with neighboring people, including Chumash (Barbareño, Ventureño, Purisimeño, Obispeño, Ineseño, Cruzeño, Emigdiano, and the Cuyama Chumash), Fernandeseño Tataviam, Serrano, Cahuilla, Acjachemen (Juaneño), and Luiseño cultural groups. These overlaps historically have been a source of confusion, contest, conflict, and opportunity, which has persisted to this day.

Gabrielino material culture incorporates a variety of tools, including saws made from deer scapulae, bone or shell needles, fishhooks and awls, scrapers, flakers (of bone or shell), wedges, hafted or unhafted lithic or cane knives, and lithic drills. Food preparation items included bedrock and portable mortars, metates, mullers, shell spoons, and mealing brushes. Wooden items include stirrers, paddles, bark platters, wooden bowls (often inlaid with Haliotis shell). Pottery vessels were made by coiling technique and paddle and anvil (Blackburn 1962-1963). The Gabrielino were noted for their objects made of steatite, usually obtained from Santa Catalina Islands, where a veritable steatite industry flourished, either in raw or finished form. The steatite was used in making animal carvings, pipes, "ritual" objects, ornaments, and cooking utensils. Utilitarian items were frequently decorated with shell inlaid in asphaltum, rare



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minerals, carvings, and painting, and comparable in quality and excellence to that of the Chumash (Bean and Smith 1978).

Baskets were made by the women from the stems of rushes (*funcus* sp.), grass (*Muhlenbergia rigens*), and squawbush (*Rhus trilobata*) with a three-color patterned decoration (Harrington 1942). Coiled wares included mortar hoppers; flat baskets used as plates, trays, winnowers, shallow carrying or serving baskets; storage baskets; and small globular baskets used to keep trinkets in.

Weapons included three forms of wooden war clubs, self- and sinew-backed bows, tipped (stone or bone) and untipped cane arrows (simple or compound), wooden sabers, throwing clubs, and slings used for hunting birds and small game (Blackburn 1962-1963).

Houses were domed, circular structures thatched with tule, fern, or carrizo, and in some cases, "so spacious that each will hold fifty people" (Johnston 1962), capable of supporting three or four families living in each one (Costansó 1911). For groups located near the sea, the doorways opened seaward, to avoid the north wind (Harrington 1942). Other structures commonly found in villages included sweathouses (small, semicircular, earth-covered buildings used for pleasure and as a clubhouse or meeting place for adult males), menstrual huts, and a ceremonial enclosure, the *yuva'r*. *Ayuva'r* was built near the chief's house and was essentially an open-air enclosure, oval in plan, made with willows inserted wicker fashion among willow stakes, decorated with eagle and raven feathers, skins, and flowers, and containing inside the enclosure painted and decorated poles. Consecrated anew before every ceremony, these ceremonial enclosures were the centers for activities relating to the Chingichngish cult. The religious beliefs and rituals of the cult originated in the Gabrielino territory and found its way to, and significantly influenced, non-Gabrielino groups (Bean and Smith 1978).

Typically, men hunted, fished, assisted in some gathering activities, and conducted most trading ventures. Large land mammals were hunted with bow and arrow, while smaller game was taken with deadfalls, snares, and traps, or in communal hunts with nets, bow and arrows, and throwing clubs (Blackburn 1962-1963). Along the coast harpoons, spear throwers, and clubs were used. Fishing, typically, took place along shore or along rivers, streams, and creeks with the use of hook and line, nets, basketry traps, spears, bow and arrow, and vegetal poisons. Deep-sea fishing and trading expeditions also occurred between island and mainland groups and were undertaken from boats made of wooden planks lashed and asphalted together. Women were involved mainly in collecting and preparing most floral and some animal food resources, as well as the production of baskets, pots, and clothing (Bean and Smith 1978).

The Gabrielino established a broad, and deep, trade network, ranging between the Channel Islands and the interior California deserts and Southwest regions. Nearby Serrano people exchanged acorns, seeds, obsidian, and deerskins in exchange for shell beads, dried fish, sea otter pelts, shells, possibly salt, and steatite. Colorado River oriented middlemen, such as Cahuilla, Chemehuevi, Mohave, allowed access to items such as Cibola White Ware, while they accepted shell and steatite which was traded to Pueblo dwelling populations. These trading networks to the Southwest may have been in place as early as A.D. 600-800 (Ruby 1970). The principal trade item, however, was steatite. This material, acquired from Santa Catalina Island, was traded, in rough or finished form, to many groups, such as the Chumash, Yokuts, Ipai-Tipai (Diegueño), Luiseño, and the Serrano. Most of the steatite was used to make palettes, arrow straighteners, ornaments, and carvings of animal or animal-like beings (Bean and Smith 1978).

During the Spanish missionization period people from greater area would have been incorporated into the San Gabriel mission. Whether they were Serrano, Cahuilla, Fernandeano Tataviam, Chumash or local Gabrielino, all would have been identified as Gabrielino, or as belonging to Mission San Gabriel. Indeed, even Fernandeano people have been collectively grouped within Gabrielino ethnographic treatments. Today, Fernandeano Tataviam, Gabrieleño Band of Mission Indians-Kihz Nation, and the Gabrielino-Tongva Indian Tribe identify as individual groups.



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Historic Overview

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848– present). Briefly, and in very general terms, the Spanish Period encompassed the earliest historic-period explorations of the West, colonization, missionization and proselytization across the western frontier, the establishment of major centers such as Los Angeles and Monterey and a line of missions and presidios with attendant satellite communities, minor prospecting, and a foundational economic structure based on the rancho system. The Mexican Period initiated with a continuation of the same structures; however, commensurate with the political changes that led to the establishment of the Mexican state the missions and presidios were secularized, the lands parceled, and Indian laborers released. Increased global trade introduced both foreign and American actors into the Mexican economic and political sphere, and both coincidentally, and purposefully, smoothing the transition to the American Period. The American Period was ushered in with a momentous influx of people seeking fortune in the Sierra foothills where gold was “discovered” in 1848. By the early 1850s people from all over the globe had made their way to California. Expansive industries were required to supply the early mining operations, such as forestry products, food networks such as grains, poultry, cattle, water systems, which intensified the early Mexican Period systems of ranches and supply chains, as well as the development and expansion of port cities to supply hard goods and clothes, animals, and people along improved trail and road networks. California cycled through boom and bust for several decades until World War I when the Department of the Navy began porting war ships along the west coast. Subsequently, California has grown, and contracted, predominantly around military policy along the west coast, and the Pacific Ocean. Following the industrial expansion related to World War II and the Cold War, technology and systems associated have come to fore as economic drivers.

City of Santa Ana

Orange county was officially formed on August 1, 1889, with Santa Ana voted as the county seat, after two decades of effort to break from Los Angeles County. The county name was not selected due to the prominence of the fruit within the new county, but for the imagery it was supposed to effect – that of a semi-tropical paradise, an American “Mediterranean coast.” While it was understood that orange trees thrived in the region, it was not until after 1900 that citrus became the area’s dominant crop (Brigandi 2010).

Currently, Santa Ana is a city of over twenty-seven square miles with a population of approximately 325,000, located thirty-three miles south of Los Angeles. The city was incorporated within the former Rancho Santiago de Santa Ana, granted to José Antonio Yorba in 1810, and a portion of Rancho Las Bolsas, which itself was part of the larger, former Rancho Los Nietos, granted to Manuel Nieto in 1784 – Las Bolsas was conferred to Maria Catarina Ruiz, widow of Jose Antonio Nieto, son of Manuel Nieto, in 1834 (Westfall 2003).

Rancho Santiago de Santa Ana, comprising some 62,516 acres, extended along the east bank of the Santa Ana River from the mountains to the sea, eventually supporting at least 33 historic adobes across its expanse, and was the home of two of the oldest families in California, the Yorbos and the Peraltas. Rancho Santiago de Santa Ana comes from the two camp sites the July 1769 Portola expedition utilized on its way to found Monterey (Santa Ana Historical Preservation Society 2025). Family interest in the rancho was conferred to Don Jose Andres Sepulveda, owner of Rancho San Joaquin. Sepulveda, who had spent considerable time and money proving his land claims before California State Lands Commission, went into debt, borrowing money at huge interest rates. Ultimately, Sepulveda was unable to keep up the payments on his mortgage due in large part to floods in 1861-62, and a whipsaw drought of 1863-64. Sepulveda was forced to sell off his vast holdings on the Rancho San Joaquin, which had incorporated the Rancho Santa Ana, to James Irvine, Llewellyn Bixby, and Thomas Flint (Santa Ana Historical Preservation Society 2025).

On October 27, 1869, William Spurgeon paid \$594 for 74.25 acres of the former Rancho, and hired George Wright of Los Angeles to lay out the 24-square-block townsite that became Santa Ana. The townsite was plotted on December 13, 1870, and bounded by First Street on the south, Seventh Street on the north, West (now Broadway) Street on the west, and Spurgeon Street on the east (Santa Ana Historical Preservation Society 2025). Santa Ana was incorporated as a city in 1886, and in 1889 became the seat of the newly formed Orange County.



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In 1887 and Santa Ana became the terminus for the Southern Pacific Railroad due in large part to Orange County crop yields. At the same time the Santa Fe Railroad established a line through Santa Ana, continuing south to San Diego (Santa Ana Historical Preservation Society 2025). Santa Ana's most significant development has been during the post-war period. World War II necessitated development of major military installations, such as the Santa Ana Army Air Base, which brought thousands of Americans through Santa Ana, many of whom returned to settle in California cities like Santa Ana. Due to its former association with War-era military structures, Santa Ana continued its development of defense related industries in the Postwar and Cold War era (Santa Ana Historical Preservation Society 2025).

Methods of Review

Records Searches

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South-Central Coastal Information Center (SCCIC) at California State University, Fullerton, on May 30, 2025. A study area with a half-mile radius of the Project site was requested to provide additional context to the Project site and surrounding area and more information on which to base this review. The SCCIC returned the records search results on June 26, 2025, providing information on all documented cultural resources and previous archaeological investigations within a half-mile radius of the Project site. Resources consulted during the records search conducted by the SCCIC included the NRHP, California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historical photographs, maps, and aerial imagery. The study also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. In addition, Chambers Group submitted a request to the Native American Heritage Commission (NAHC) for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity. Results of the NACH SLF records search and additional outreach are detailed below and included in Attachment A. The results of the SCCIC records search are also detailed below and included in confidential Attachment B.

Chambers Group requested a paleontological records search from the Natural History Museum of Los Angeles County (NHMLA) on May 30, 2025. This information was requested with the intent to provide further context related to the paleontological sensitivity of the area based on known fossil locations identified within the Project site and the requested half-mile search radius. The paleontological records provide insight into what associated geological formations are most likely to contain fossils as well as the associated depths and placement of the known fossil locals relative to the geological formations in the area. On June 8, 2025, Chambers Group received the results of the paleontological records search. These results are detailed below.

Background Research

In addition to the records search review, Chambers Group archaeologists completed further background research to determine if any additional historic properties, landmarks, bridges, or other potentially significant or listed properties are located within the Project site or within the half-mile study area. This background research included, but was not limited to, the NRHP, California State Historic Property Data Files, California State Historical Landmarks, California Points of Historical Interest, Office of Historic Preservation Archaeological Determinations of Eligibility, historic aerial imagery accessed via NETR Online or other aerial services, Historic U.S. Geological Survey topographic maps, General Land Office (GLO) survey plat maps, Built Environment Resource Directory (BERD), and Caltrans, and State and local bridge surveys. Additionally, Chambers Group archaeologists reviewed the Orange County Historical Landmarks inventory designated by the County of Orange.

Field Survey Methods

This assessment also included a field survey of the entire proposed Project site. The survey consisted of a systematic surface inspection site transected at no more than 15-meter intervals to ensure that any evidence of surface-exposed cultural materials and/or evidence of paleontological resources could be identified.



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Chambers Group examined the ground surface for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools) or features (e.g., milling features, hearths, stone circles), historical artifacts (e.g., metal, glass, ceramics) or features (agricultural installations, irrigation systems), sediment discoloration that might indicate the presence of a cultural midden, roads and trails, and depressions and other features that might indicate the former presence of prehistoric or historic structures or buildings (e.g., post holes, foundations).

All field notes, photographs, and records related to the current study are on file at the Chambers Group Costa Mesa office.

Project Personnel

Chambers Group Cultural Resources Department Lead Lucas Tutschulte managed the Cultural Resources related tasks. Chambers Group cultural resources principal investigator, Richard Shultz, MA, RPA, completed the pedestrian survey, conducted background research, and authored the report. Additional support and initial research were conducted by Chambers Group cultural resources specialist Efrain Arroyo, MA, RPA. Lucas Tutschulte performed quality control for the report.

Results

Cultural Resources Reports within the Study Area

Based on the records search conducted by the SCCIC, nine cultural resource studies have previously been completed within the half-mile records search radius. Table 1 provides further details of these studies. None of the previous studies include the Project site. A map (Figure 2) of the record search results is included in confidential Attachment B.

Table 1: Previous Cultural Resources Studies within a Half-Mile Radius of the Project Site

Report Number	Year	Author	Title	Within Project Site?
OR-01703	1994	Macko, Michael E.; Macko Archaeological Consulting	Results of an Archaeological Resource Literature Review, Field Survey, and Report for the AT&T Anaheim to Mission Viejo Lightguide System, Santa Ana P.O.P. Diversity	No
OR-02483	2002	Duke, Curt; LSA Associates, Inc.	Cultural Resource Assessment AT&T Wireless Services Facility No. 13316 Orange County, California	No
OR-03189	2004	Bonner, Wayne H.; Michael Brandman Associates	Cultural Resource Records Search and Site Visit Results for Cingular Telecommunications Facility Candidate SC-451-03 (Madison Park) Edinger Avenue at Standard Avenue, Santa Ana, Orange County, California	No
OR-03284	2006	Fulton, Terri, and McLean; Deborah LSA Associates, Inc.	Cultural Resources Assessment for the Santa Ana West and East Pump Stations Project City of Santa Ana, County of Orange, California	No
OR-03556	2009	Wlodarski, Robert J.; Cellular Archaeological Resource Evaluations	Field Reconnaissance for the Proposed Bechtel Wireless Telecommunications Site, OC0167A, Ingardia Brothers, Santa Ana, California	No



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Table 1: Previous Cultural Resources Studies within a Half-Mile Radius of the Project Site

Report Number	Year	Author	Title	Within Project Site?
OR-03676	2007	Bonner, Wayne H.; Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA12867B (Santa Ana Combined Facility), 1444 McFadden Avenue, Santa Ana, Orange County, California	No
OR-03797	2009	Bonner, Wayne H.; Michael Brandman Associates	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33837D (Envelopments), 1209 East Wakeham, Santa Ana, Orange County, California	No
OR-04290	2013	Fulton, Phil; LSA Associates	Cultural Resources Assessment Class I Inventory, Verizon Wireless Services Wakeham Facility City of Santa Ana, Orange County, California	No
OR-04579	2016	Roland, Jennifer; NWB Environmental Services, LLC	Phase I Investigation for the Crown Castle LA2867 SCE Sana Comb Faci Antenna Installation Project, Santa Ana, Orange County, California	No

Previously Recorded Cultural Resources within the Study Area

Based upon the records search conducted by the SCCIC, one previously recorded cultural resource is recorded within the half-mile records search radius (Table 2). None are located within the Project site. A map (Figure 2) of the record search results is included in confidential Attachment B.

Table 2: Previously Recorded Cultural Resources within a Half-Mile Radius of the Project Site

Primary Number	Trinomial	Site Description	Within Project Site?
P-30-176663	N/A	Atchison, Topeka & Santa Fe RR, Burlington Northern Santa Fe RR	No

Background Research Results

As a result of the records search review and archival research, no previously recorded resources or any other listed or potentially significant properties are located within the Project site. Additionally, a review of the Orange County BERD revealed no recorded built environment resources within the study area or Project site.

A search of GLO Records identified no survey plat maps that cover the Project site, as it is located within the unsectioned lands of the Rancho Santiago de Santa Ana, a historic Spanish land grant, and thus not part of the Public Land Survey System (PLSS).

The oldest available USGS topographic map is the 1896 edition of the *Santa Ana*, California 15-minute quadrangle (USGS 2025). This map depicts no features within the Project site; the "Newport Rail Road" alignment is noted adjacent to the western margin of the Project parcel, and remains to this day as part of the Southern Pacific line, and a road alignment



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that is now South Grand Avenue fronts the eastern margin of the Project site. The 15-minute series continued to be issued, without notable changes to the area of interest, until 1902.

The 1901 *Santa Ana*, California 15-minute quadrangle (USGS 2025) also contains no notable features within the Project site. This map series was issued until 1945, though the *Tustin*, California 7.5-minute series (1:31,680 scale) was first issued in 1932.

The 1932 *Tustin* quadrangle series (USGS 2025) depicts two buildings along what was then Mc Clay Street, located along the middle of the eastern margin of the Project site. This 7.5-minute series was issued until 1945, three years after a new *Santa Ana*, California 15-minute series began.

The 1942 *Santa Ana* 15-minute quadrangle (USGS 2025) shows a short access road bisecting a collection of three buildings in the area seen in the 1932 *Tustin* series. In addition, the Project site landscape is indicated as being in orchard grove configuration. The 15-minute series was issued until 1948, when a new *Tustin*, California 7.5-minute series (1:2400 scale) began to be issued.

The 1948 *Tustin* 15-minute quadrangle (USGS 2025) returns to illustrating two buildings within the Project site, and excludes the road indicated in the 1942 series. Similarly, the area is also shown in extensive orchard conditions, and no changes are noted in the last of the series issued in 1962.

A 1967 edition of the 1965 *Tustin* 7.5-minute quadrangle (USGS 2025) shows a well where one of the buildings had been previously depicted, and the Project site still in orchard configuration. By this time, Mc Clay Street had been renamed to Grand Avenue.

The 1972 and 1982 editions of the 1965 *Tustin* 7.5-minute quadrangle (USGS 2025) illustrate many new buildings in the area (photorevised), including three of the main buildings adjacent to the northeastern portion of the Project site. The area to the southwest, including the Project site, is depicted in orchard condition. The last of the buildings first noted in 1932 is still depicted, in an area near the southern end of the photovoltaic array currently located in the project area.

Aerial photographs between 1931 and 1991 indicate changes in land use over that period, ranging from orchard production to ranching, to commercial/industrial development, resulting in the current configuration of the Project site and immediately adjacent areas. The earliest aerial photograph dates to 1931 (UCSB 2025a) and indicates that the Project parcel has been developed for orchard agriculture, and two ranch houses are located on the eastern margin, adjacent to Mc Clay/Grand Avenue, which appears to be unpaved at this time. The 1960 aerial (UCSB 2025b) indicates the same configuration, as does the 1965 aerial (UCSB 2025c). The first of the currently existing buildings is seen on the 1970 aerial (UCSB 2025d), which also shows that both ranch houses, and some orchard have been removed. By 1975 two of the existing buildings have been constructed, with the third being prepared. Remaining areas property are shown under parking lot, or use as construction laydown yards, with the remainder still in orchard (UCSB 2025e). By 1976 the third building under construction in the 1975 aerial (UCSB 2025f) had been completed. The 1981 aerial (UCSB 2025g) indicates that the remaining orchard had been cleared and by 1991 both the John F. Kennedy Elementary School had been built, and the fourth main building, along the southern parcel boundary, was under construction (UCSB 2025h). The undeveloped field, which forms the bulk of the current Project site, has been graded, disced, and cleared of vegetation (mowed) on a regular basis (Google Earth 2025).

Native American Heritage Commission Sacred Lands File Search

On May 30, 2025, Chambers Group requested that the NAHC conduct a search of its SLF to determine if sacred lands or resources important to Native Americans have been recorded in the Project site and surrounding half-mile radius. On June 26, 2025, Chambers Group received a response from the NAHC stating that their SLF search was positive. The NAHC specifically recommended that the Juaneño Band of Mission Indians and the Juaneño Band of Mission Indians Acjachemen Nation - Belardes be contacted due to the positive results. Chambers Group provided the results of the NAHC SLF records search to the County upon receipt, and they are included with this report in Attachment A.



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The NAHC provided a list of 24 Native American tribal contacts that may have knowledge of cultural resources near the Project site (Attachment A). The associated Native American contact list provided contacts from the Cahuilla Band of Indians, Gabrieleno Band of Mission Indians – Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Juaneño Band of Mission Indians, Juaneño Band of Mission Indians Acjachemen Nation – 84A, Juaneño Band of Mission Indians Acjachemen Nation – Belardes, Pala Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseno Indians.

AB 52 Consultation

As the CEQA lead agency, the County is responsible for conducting AB 52 consultation. Per updates from the County, AB 52 consultation notification letters were sent on August 21, 2025. For further AB 52 details, please refer to the environmental document prepared for the Project.

Paleontological Resources

Chambers Group requested a paleontological resource records search from the NHMLA on May 30, 2025. The results of the paleontological resource records search were received on June 8, 2025.

The records search results identified no fossil localities directly within the Project site. However, the results identified fossil localities nearby from the same sedimentary deposits that may occur in the Project site, either at the surface or at depth (Table 3) (Bell 2025). As such, there is potential to encounter potentially significant paleontological resources within these fossil bearing sedimentary deposits underlying the Project site, depending on the specific depth and locations of these sedimentary deposits and the related Project construction plans.

Table 3: NHMLA Documented Fossil Localities

Locality Number	Location	Formation	Taxa	Depth
LACM VP 1652	Rio Vista Avenue south of Lincoln Avenue	Alluvium (Pleistocene)	Sheep (<i>Ovis</i>)	Unknown (excavations for housing project)
LACM VP 7867	Former El Toro Marine Base	Unknown formation (Pleistocene)	Rodent (<i>Rodentia</i>)	25 feet bgs
LACM VP 7657 - 7659	Ellis Avenue & Patterson Lane, Huntington Beach	Unknown formation (Pleistocene; gray siltstone)	School shark (<i>Galeorhinus</i>), eagle ray (<i>Myliobatus</i>), goby (<i>Lepidogobius</i> , <i>Leptocottus</i>), midshipmen (<i>Porichthys</i>), croaker (<i>Seriphus</i>), flatfish (<i>Citharichthys</i>), cusk-eel (<i>Otophidium</i>), skate (<i>Raja</i>), angelshark (<i>Squatina</i>), sculpin (Cottidae)	150 - 350 feet bgs
LACM VP 4219	SW end of Newport Fwy between Santa Ana Isabel Ave & 23rd St	Palos Verdes Sand (coarse poorly sorted friable sand)	Camel family (Camelidae), sea turtle (Cheloniidae); uncatalogued fish and birds; invertebrates (<i>Entobia</i> , <i>Lottia</i> , <i>Caesia</i> , <i>Volvania</i> , <i>Ala</i> , <i>Eulithidium</i> , <i>Chama</i> , <i>Glossaulax</i> , <i>Agathistoma</i> , <i>Sinum</i> , <i>Chlorostoma</i> , <i>Calianax</i> , <i>Ophidi Dermella</i> , <i>Serpulorbis</i> , <i>Argopecten</i> , and others)	30 feet bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface



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Field Survey Results

Chambers Group principal investigator Richard Shultz conducted a pedestrian survey of the entire Project site on July 16, 2025. Open areas of the Project site were surveyed at no more than 15 meter (50 foot) transect intervals. The ground surface visibility was generally poor (<10 percent), obscured by dense vegetation. However, certain field characteristics were discernable (Photographs 1-4). On site sediments are generally compact, light gray, silty loam, with evidence of prior fill deposits of gravel-laden sediments, as well as concrete debris, and modern trash refuse that have been integrated across the open field. Numerous exposed rodent holes and subsurface sediments were inspected for artifacts and soil stratigraphy, with none observed (Photograph 2).

No evidence of cultural or paleontological resources was observed during the field survey.



Photograph 1: Project site overview to the north, from the southwestern margin of Project site.





Photograph 2: Animal burrowing activity, example of subsurface sediments exposed and examined.



Photograph 3: Proposed northern access road alignment. View to the north.



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Photograph 4: Proposed and existing eastern access road alignment. View to the east.

Discussion

As detailed above, Chambers Group conducted a Project site-specific study that included cultural resources records searches, literature review, and a pedestrian survey for the proposed Project in accordance CEQA, as well as the County's goals and policies regarding the protection of archaeological, tribal, historical, and paleontological resources outlined in their General Plan (County of Orange 2012). County of Orange Resources Element Goals 1-3 of their General Plan specifically direct the identification and protection of archaeological, paleontological, and historical resources within the County, and will be applicable if resources are encountered during the Project.

An archival records search through the CHRIS database at the SCCIC, background research of the Project site, and a field survey were conducted as part of this study. A paleontological records search was also conducted by the NHMLA. In addition, Chambers Group requested an SLF search from the NAHC to determine the presence or absence of data regarding any known sacred lands previously reported within the Project site or its half-mile radius.

The SCCIC records search identified no previous cultural resources study that included the Project site; no cultural resources have been recorded within the Project site. The paleontological record search resulted in no documented fossil localities within the Project site. However, the results also indicated fossils localities have been recorded within the half-mile radius search area in the same sedimentary deposits as those mapped underlying the Project site. The NAHC SLF search was positive for documented sacred lands important to the local Tribal groups in the Project site and/or surrounding area.

Based on the review of available historic maps and aerial imagery, Chambers Group archaeologists observed that the Project site was accessible by dirt road by 1896. The Project site was in use as orchard/agricultural land with small residential buildings associated by 1931, and continued in this arrangement until approximately 1970, when the first of the current buildings situated on Project parcels were developed. Subsequent development removed the remaining evidence of agricultural use by 1981.



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While no archaeological resources were apparent during the survey effort, there remains a potential for encountering buried cultural resources. Given the historic context, these are more likely to be historic-period materials associated with the prior use of the area for agricultural development such as agricultural equipment or related refuse. As the parcels associated with the Project site once supported at least two ranch houses and a well, it is possible that both infrastructure supporting and waste from the ranches could be encountered. Though not indicated during the survey, these items may take the form of refuse pits, foundations, building debris, or irrigation system items such as supply pipes, or drains.

During the field survey, no evidence of cultural or paleontological resources was observed. While there are no previously recorded cultural or paleontological resources in the Project site, there remains potential to uncover archaeological deposits during construction. Due to the mapped geologic formations underlying the Project site known to bear paleontological resources and the known fossil localities provided in the surrounding study area, there remains potential that new fossils could be exposed during the Project.

In summary, Chambers Group found no physical or archival evidence of cultural or paleontological resources within the Project site. While no surficial evidence of prehistoric or historic archaeological resources was observed, the ground surface visibility was limited due to dense vegetation in much of the Project site. Although the Project site has evidence of past disturbance and while the potential for encountering intact resources within the upper sediments is low, the possibility of buried resources being identified below surface disturbances is not diminished. Research indicates geologic units known to be fossil bearing underlay the Project site and could be encountered during Project-related ground-disturbing construction activities. Additionally, due to the surface nature of the previous disturbance and limited surface visibility during survey, there is potential that intact native soil formations, which have been known to bear cultural resources, underly the Project site. Thus, there remains potential that buried cultural resources could be encountered during the Project.

Recommendations

Per CEQA Guidelines the Project should be designed to avoid impacts to cultural resources within the Project site whenever feasible. In conformance with CEQA and the County of Orange General Plan Goals and Policies related to cultural and paleontological resources, Chambers Group recommends the following mitigation measures be implemented as part of Project approval to ensure that potential impacts to cultural and paleontological resources are less than significant.

MM CUL-1 The County shall retain the services of a Qualified Archaeologist, meeting the Secretary of the Interior Standards, and County requirements. The Qualified Archaeologist shall remain on-call throughout the Project. The Qualified Archaeologist or cultural resources specialist working under the direction of the Qualified Archaeologist, shall provide an initial cultural resources sensitivity training (which may be incorporated within a more comprehensive or multi-discipline Worker Environmental Awareness Program) to inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The cultural resources sensitivity training is necessary to inform the construction personnel of the potential to encounter buried cultural resources and provide examples of potential cultural materials that may be encountered. The training shall be held in conjunction with the Project's initial on-site safety meeting and shall explain the applicable protocols, procedures, and legal basis for the protection of significant archaeological resources.

In the event of an inadvertent discovery of potential cultural resources (artifacts or features) during ground-disturbing activities, construction activities within a 50-foot radius of the discovery shall be halted while the Qualified Archaeologist assesses the find. Additionally, all consulting Native American Tribal groups that requested notification of any inadvertent discovery of cultural resources on the Project shall be notified appropriately. If the resource is determined to be significant or unique through significance evaluation, and avoidance is not possible, appropriate mitigation or treatment shall be



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established and implemented. These might include a cultural resources mitigation and monitoring plan, treatment plans, or data recovery programs. All monitoring or associated plans would be prepared and implemented under the direction of the Qualified Archaeologist. All required close-out reporting or archaeological site records would be completed in accordance with the Office of Historic Preservation's guidelines and submitted to the appropriate CHRIS IC, as necessary.

MM PAL-1

Prior to the issuance of a grading permit, the County shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. The paleontologist selected must be approved by the County. Upon approval or request by the County, a paleontological mitigation plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the County for review and approval. The development and implementation of the PMP shall include consultations with the County's Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the County. If the County accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered.

MM-PAL-2

At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing any monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports and records for specific discoveries, as necessary.

HUMAN REMAINS – LEGAL REQUIREMENTS In the event that human remains are discovered during ground-disturbing activities, the proposed Project would be subject to California Health and Safety Code § 7050.5, CEQA Guidelines § 15064.5, and California PRC § 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code § 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC § 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the NAHC, which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials (National Park Service 1983).



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Chambers Group is available to assist with any further support or document preparation related to Cultural Resources, including tribal consultation. Please contact the cultural resources staff at the contact information below if you have any questions or comments regarding this report.

Sincerely,

CHAMBERS GROUP, INC.

A handwritten signature in black ink, appearing to read "Richard Shultz", with a long, sweeping horizontal line extending from the end of the signature.

Richard Shultz MA, RPA

Cultural Resources Principal Investigator

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Attachments

Attachment A: NAHC SLF Records Search Results Letter

Attachment B (Confidential): Record Search Results



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- 2025d Flight AMI OC 70, Frame 5170, 2 January 1970. Courtesy of UCSB Library Geospatial Collection.
- 2025e Flight AMI OC 75, Frame 7414, 5 May 1975. Courtesy of UCSB Library Geospatial Collection.
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Orange County Public Works



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ATTACHMENT A – NAHC SLF RECORDS SEARCH RESULTS LETTER

Attachment A: NAHC SLF Records Search Results Letter



CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Paumotu-Yuimvut Band of
Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE
SECRETARY
Steven Quinn

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

STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

June 26, 2025

Efrain Arroyo
Chambers Group, Inc.

Via Email to: earroyo@chambersgroupinc.com

Re: New Fleet Facility at 1400 South Grand Avenue Project, Orange County

To Whom It May Concern:

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

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

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

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

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

Sincerely,

A handwritten signature in blue ink that reads 'Andrew Green'.

Andrew Green
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Native American Contact List
Orange County
6/26/2025**

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax#	Email Address	Cultural Affiliation	Counties	Last Updated
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Ariza, CA, 92539	(951) 590-0942	(951) 763-2808	chair@cahulla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	2/1/2024
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Ariza, CA, 92539	(951) 763-5549		anthony.madrigal@gmail.com	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	6/28/2023
Cahuilla Band of Indians	F	Bobbi Ray Espinoza, Cultural Director	52701 CA Highway 371 Ariza, CA, 92539	(951) 763-5549		bespinoza@cahulla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	6/28/2023
Gabrielino Band of Mission Indians - Kith Nation	N	Christina Sverdell Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielinolandians.org	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/18/2023
Gabrielino Band of Mission Indians - Kith Nation	N	Andrew Sales, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielinolandians.org	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	8/18/2023
Gabrielino Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 483 San Gabriel, CA, 91776	(626) 485-3564	(626) 286-1262	OTTribecouncil@aol.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	1/24/2023
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-4761		christina.martinez@simivalleycc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorante, Chairperson	P.O. Box 480 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	rgorant@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/16/2023
Gabrielino Tongva Nation	N	Sandrine Goad, Chairperson	108 1/2 Judge John Alsa St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	3/28/2023
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-8351		tdunlap@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	5/30/2023
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		charve1956netro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura	5/30/2023
Juaneño Band of Mission Indians	N	Sonia Johnston, Chairperson	P.O. Box 25623 Santa Ana, CA, 92799			sonia.johnston@coxglobal.net	Juaneño	Orange, Riverside, San Diego	
Juaneño Band of Mission Indians Aqachamen Nation - Botardes	N	Joyce Perry, Cultural Resource Director	4865 Paseo Serrano Irvine, CA, 92603	(949) 293-8522		ksandram@gmail.com	Juaneño	Los Angeles, Orange, Riverside, San Bernardino, San Diego	3/17/2023
Juaneño Band of Mission Indians Aqachamen Nation SAA	N	Held Lucero, THPO/MLD	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(952) 879-2894		thpo@milan.com	Juaneño	Los Angeles, Orange, Riverside, San Bernardino, San Diego	2/4/2025
Juaneño Band of Mission Indians Aqachamen Nation SAA	N	Nathan Bonds, Chairman	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 426-8804		nbonds@milan.com	Juaneño	Los Angeles, Orange, Riverside, San Bernardino, San Diego	2/4/2025
Juaneño Band of Mission Indians Aqachamen Nation SAA	N	Shannon Wingfield, Secretary	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 486-3484		vetermaster@milan.com	Juaneño	Los Angeles, Orange, Riverside, San Bernardino, San Diego	2/4/2025
Pala Band of Mission Indians	F	Shedra Oughen, Tribal Historic Preservation Officer	PMB 50, 35009 Pala Temecula Road Pala, CA, 92059	(760) 891-3515		soughen@palatribe.com	Cupeno Luiseño	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35009 Pala Temecula Road Pala, CA, 92059	(760) 891-3537		awallick@palatribe.com	Cupeno Luiseño	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35009 Pala Temecula Road Pala, CA, 92059	(760) 891-3554		cnejo@palatribe.com	Cupeno Luiseño	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 381620 Ariza, CA, 92539	(951) 659-2700	(951) 659-2228	vmnott@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	4/8/2024
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 381620 Ariza, CA, 92539	(951) 659-2700	(951) 659-2228	sestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	4/8/2024
Santa Rosa Band of Cahuilla Indians	F	Mercedes Estrada, Cultural Director	P.O. Box 381620 Ariza, CA, 92539	(951) 659-2700	(951) 659-2228	mestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	5/21/2025
Soboba Band of Luiseño Indians	F	Joseph Oriberos, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 863-5279	(951) 854-4188	joriberos@soboba-nsn.gov	Cahuilla Luiseño	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023
Soboba Band of Luiseño Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 863-6261	(951) 854-4188	jvaldez@soboba-nsn.gov	Cahuilla Luiseño	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.96 of the Public Resources Code.

Report: R03-2025-009426
Report Type: List of Tribes
County: Orange
NHAC Group: All

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed New Red Facility at 1400 South Grand Avenue Project, Orange County.