Appendix C
Cultural Resources Inventory Report

DRAFT

Cultural Resources Inventory Report

Talbert Regional Park Master Plan Project

NOVEMBER 2025

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National Archaeological Database (NADB) Information

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Acreage:	182 acres
Keywords:	OC Parks; Negative; Talbert Regional Park; Phase I Inventory

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
County	County of Orange
CRHR	California Register of Historical Resources
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
OC Parks	Orange County Parks Department
OCPW	Orange County Department of Public Works
Park	Talbert Regional Park
PRC	California Public Resources Code
Project	Talbert Regional Park Master Plan Update
SLF	Sacred Lands File
SCCIC	South Central Coastal Information Center
USGS	United States Geological Survey

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Management Summary

This report presents the results of Dudek's cultural resources inventory efforts conducted for the Talbert Regional Park Master Plan Update Project (Project), located in the City of Costa Mesa, California. The Project falls within an unsectioned portion of Township 6 South and Range 10 West of the *Newport Beach, California* United States Geological Survey (USGS) 7.5 Minute Series Quadrangle (Figure 1, Project Location). The Project proposes key improvements, infrastructure improvements, and habitat restoration improvements to the 182-acre Talbert Regional Park as established by the 2025 Master Plan (Figure 2, Project Area).

The Orange County Department of Public Works Development Services (OCPW) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). Dudek performed a Phase I cultural resources inventory that included a records search, a literature review, an archival information review, a review of the geomorphological context of the Project area, a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, a pedestrian survey of the Project area, and the preparation of this cultural resources inventory report.

Dudek conducted a California Historical Resources Information System (CHRIS) records search of the Project area and surrounding 0.5-mile radius at the South Central Coastal Information Center (SCCIC). The records search identified six (6) previously recorded prehistoric archaeological resources, two (2) historic-era built environment resources, one (1) historic-era archaeological resource, and one (1) multicomponent archaeological resource within 0.5 miles of the Project area, none of which intersect with the Project area. Notably, P-30-000165 (CA-ORA-165), characterized as the archaeologically and tribally significant ethnohistoric Gabrielino village site of *Lukup*, is located directly adjacent to the eastern boundary of the Project area. *Lukup* likely referred to the broader area along the Santa Ana River that encompassed the six (6) prehistoric archaeological resources and the one (1) multicomponent archaeological resource identified in the SCCIC records search.

A NAHC SLF search was also requested for the Project, and results were positive for Native American cultural resources within 0.5 miles of the Project area, though the NAHC did not provide details on what the resource(s) are or where they are located. Additionally, a review of historical aerial photographs and topographic maps indicates that the Project area has remained largely undeveloped and undisturbed, aside from limited disturbances associated with the channelization of the Santa Ana River and Banning Channel along the western boundary of the Project area.

Dudek archaeologists conducted an intensive-level cultural resources pedestrian survey of the Project area on November 22, 2019, and an updated reconnaissance-level pedestrian survey of the Project area on October 29, 2025. Though no cultural resources were identified during either survey, dense vegetation obscured approximately 85 percent of the ground surface, significantly limiting surface visibility.

Based on the presence of significant archaeological resources adjacent to the Project area, and in consideration of the broader pattern of prehistoric use along the coast and near the Santa Ana River, there is a moderate potential for the inadvertent discovery of archaeological resources during Project implementation. Dudek recommends archaeological and Native American monitoring during initial ground disturbing activities for the Project. If disturbed sediments (e.g., fill) or other sediments and formations are identified that do not have the potential to contain significant archaeological resources as defined by CEQA, then monitoring may be reduced or terminated. The requirement for Native American monitoring, while recommended, shall be determined by the lead agency in consultation with the traditionally culturally affiliated tribes with geographic ties to the Project area. Management

recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during construction activities are provided in the Summary and Management Recommendations section of this report.

1 Introduction

Dudek conducted a cultural resources inventory for the Talbert Regional Park Master Plan Update Project (Project) located in the City of Costa Mesa, California. The Orange County Department of Public Works Development Services (OCPW) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). Dudek performed a Phase I cultural resources inventory that included a records search, a literature review, an archival information review, a review of the geomorphological context of the Project area, a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, a pedestrian survey of the Project area, and the preparation of this cultural resources technical report.

1.1 Project Location and Description

The Project is proposed by Orange County Parks Department (OC Parks) in conjunction with the OCPW to install trail, infrastructure, and access improvements within an approximately 182-acre area located both north and south of Victoria Street in the City of Costa Mesa, California (Figure 1, Project Location). The Project falls within an unsectioned portion of Township 6 South and Range 10 West of the *Newport Beach, California* United States Geological Survey (USGS) 7.5 Minute Series Quadrangle (Figure 1, Project Location). The 92.5 acres north of Victoria Street is known as North Talbert, while the 88.5 acres south of Victoria Street is known as South Talbert (collectively called the "Project area" herein).

The Project proposes key improvements, infrastructure improvements, and habitat restoration improvements to Talbert Regional Park as established by the 2025 Master Plan. The proposed key improvement areas are the Nature Center, the Balboa Boulevard Entrance, and Infrastructure Improvements. Specifically, proposed infrastructure improvements include enhancements to the interior circulation system to provide improved multi-modal trails to enhance user experience. The Master Plan also calls for the continuation of existing, permitted restoration practices including the removal of non-native vegetation throughout South Talbert, and at the Placentia Drain within North Talbert. Planting of native coastal sage and riparian tree species is also planned within South Talbert to expand the existing mitigation/restoration areas.

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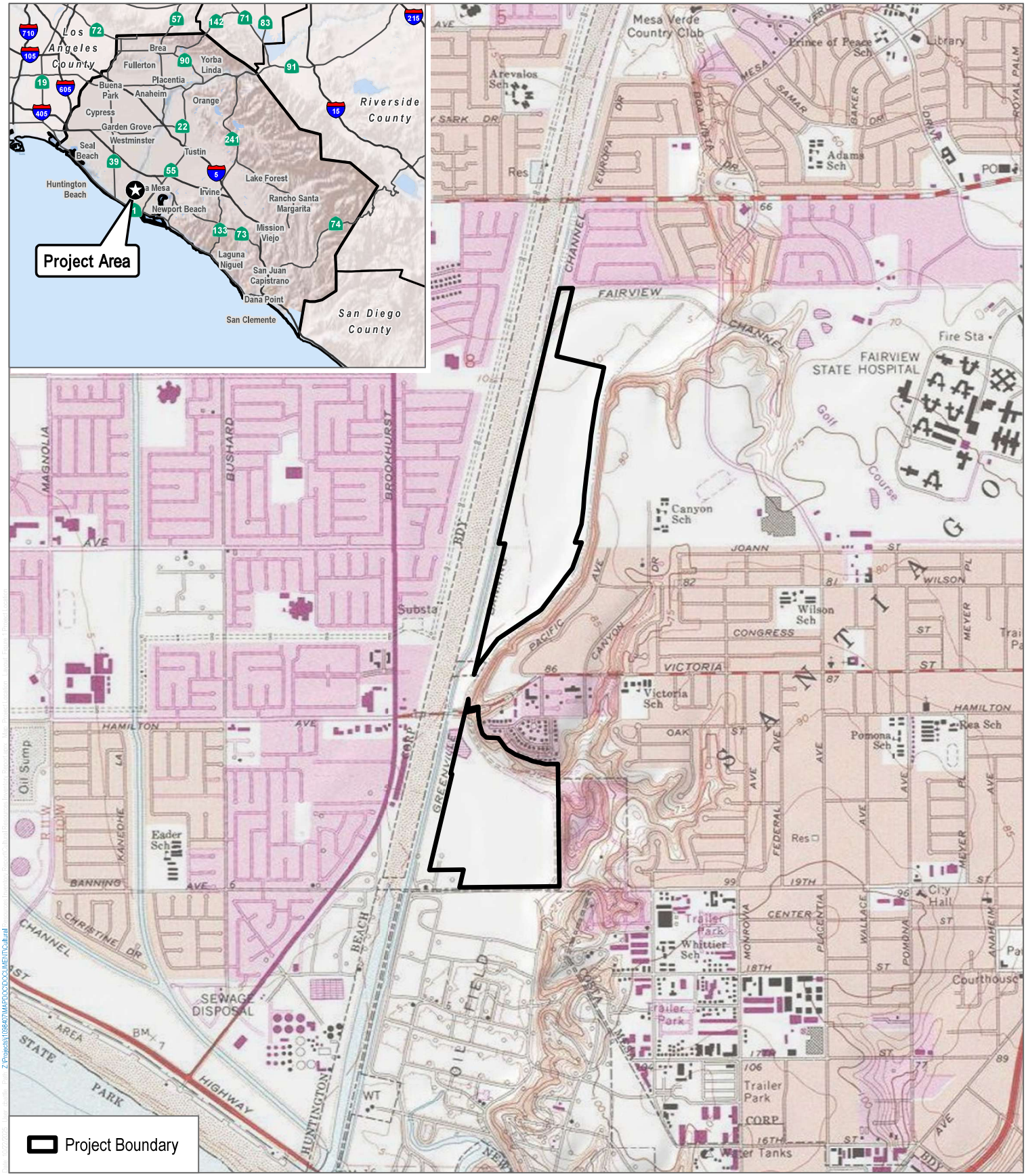

SOURCE: USGS 7.5-Minute Series Newport Beach Quadrangle

DUDEK

0 1,000 2,000 Feet
0 250 500 Meters
1:24,000

FIGURE 1

Project Location

Talbert Regional Park Master Plan Project

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SOURCE: County of Orange; Open Street Maps 2019; DigitalGlobe Accessed 2022

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0 380 760 Feet

FIGURE 2
Project Area
Talbert Regional Park Master Plan Project

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1.2 Regulatory Framework

The Project is subject to compliance with CEQA and local regulatory conditions. No federal nexus is presently anticipated.

1.2.1 California Register of Historic Resources

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Place (NRHP), enumerated as follows: According to California Public Resources Code (PRC) Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity" and (ii) meets at least one of the following criteria:

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

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

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

1.2.2 California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and Tribal Cultural Resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the

significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.

- PRC Section 21074(a) defines "Tribal Cultural Resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14-CCR 15064.5[b]).

A "substantial adverse change in the significance of an historical resource," reflecting a significant effect under CEQA, 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" (14- CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

1. 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 [CRHR]; or
2. 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 PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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
3. 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 as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project area contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as 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 (PRC Section 21083.2[g]):

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

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

1.2.3 Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to one year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

1.2.4 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

1.2.5 California Health and Safety Code section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

1.2.6 Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended 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 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

1.2.7 Guidelines for Determining Significance

According to CEQA (§15064.5b), a project with an effect 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. CEQA defines a substantial adverse change:

> 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.

The significance of an historical resource is materially impaired when a project:

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

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- 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. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
2. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code section 21083.2). A "unique archaeological resource" is defined as:

[A]n 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:

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

(California Public Resources Code section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of "unique archaeological resources." For example, "[i]f it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. Planning construction to avoid archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites." (Pub. Resources Code section 21083.2(b)(1)-(4).)

Public Resources Code section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

The rules for mitigating impacts to archaeological resources to qualify as "historical resources" are slightly different. According to CEQA Guidelines section 15126.4(b), "[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archaeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
    4. Deeding the site into a permanent conservation easement.

Thus, although Section 21083.2 of the Public Resources Code, in addressing "unique archaeological sites," provides for specific mitigation options "in no order of preference," CEQA Guidelines section 15126.4(b), in addressing "historical resources of an archaeological nature," provides that "[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites."

Under CEQA, "[w]hen data recovery through excavation is the only feasible mitigation," the lead agency may cause to be prepared and adopt a "data recovery plan," prior to any excavation being undertaken. The data recovery plan must make "provision for adequately recovering the scientifically consequential information from and about the historic resource." (CEQA Guidelines section 15126.4(b)(3)(C).) The data recovery plan also "must be deposited with the California Historical Resources Regional Information Center." (*Ibid*.) Further, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation." (*Ibid*.)

However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center." (CEQA Guidelines Section 15126.4(b)(3)(D).).

1.2.7 County of Orange General Plan Resources Element

Chapter VI, Resources Element, of the Orange County General Plan contains a Cultural-Historic Resources component that includes the following applicable goals, objectives, and policies relevant to cultural resources (County of Orange 2010).

Goal 1: To raise awareness and appreciation of Orange County's cultural and historic heritage.

Objective 1.1: Facilitate and participate in activities that inform people about the social, cultural, economic, and scientific values of Orange County's heritage.

Objective 1.2: Work through the Orange County Historical Commission in the areas of history, paleontology, archaeology, and historical preservation.

Policy 1.1: To stimulate and encourage financial support for projects in the public and private sector.

Policy 1.2: To coordinate countywide programs and be the liaison for local organizations.

Policy 1.3: To advise and aid the public and private sectors in meeting museum needs and finding funding sources for same.

Policy 1.4: To stimulate and encourage research, writing, and publication of articles on Orange County subjects.

Policy 1.5: To develop and maintain a County archive for historically valuable records.

Policy 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.

Objective 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.

Objective 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.

Objective 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.

Objective 2.4: Provide assistance to County agencies in evaluating the cultural environmental impact of proposed projects and reviewing Environmental Impact Reports.

Objective 2.5: Provide incentives to encourage greater private sector participation in historic preservation.

Goal 3: To preserve and enhance buildings structures, objects, sites, and districts of cultural and historic significance.

Objective 3.1: Undertake actions to identify, preserve, and develop unique and significant cultural and historic resources.

Objective 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.

Policy 3.1: To pursue grants and innovative funding strategies for acquisition or development of significant properties.

Policy 3.2: To develop, utilize, and promote effective technical conservation and restoration strategies.

Policy 3.3: To appraise, collect, organize, describe, preserve, and make available County of Orange records of permanent, historical value.

Policy 3.4: To serve as a research center for the study of County history.

General Policies:

1. dentification of resources shall be completed at the earliest stage of project planning and review such as general plan amendment or zone change.
2. 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.
3. 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:
   - Maintaining them in an undisturbed condition, or
   - Excavating and salvaging materials and information in a scientific manner.

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2 Environmental and Cultural Setting

2.1 Environmental Setting

The Project area is located within the coastal plain, less than one mile from the Pacific Ocean. It is in a Mediterranean climate characterized by mild, dry summers and wet winters. Average temperatures near Newport Beach range from approximately 55°F to 68°F, and the area generally receives an average rainfall of less than 11 inches per year (WRCC 2019).

The topography within the Project area is relatively flat and varies from approximately 5 feet above mean sea level in the southern portion, to approximately 16 feet above mean sea level in the northern portion. The eastern portion of the Project area is bordered by a mesa that is approximately 50 to 80 feet above mean sea level, and the western portion of the Project area is bordered by the concrete-lined Santa Ana River and Banning Channel. The Project area was historically part of the Santa Ana River floodplain prior to channelization of the Santa Ana River and is currently indirectly connected to the Santa Ana River through groundwater sources.

The Project area is adjacent to residential development to the east and north, the Banning Ranch property to the south, and the Santa Ana River and Banning Channel to the immediate west followed by additional residential development further to the west. The Project area is bisected by Victoria Street, which divides the Project area into North Talbert and South Talbert.

2.2 Cultural Setting

Evidence for continuous human occupation in the region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750).

2.2.1 Paleoindian (pre-5500 BC)

Evidence for Paleoindian occupation in the region is tenuous; the knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego through the Mojave Desert and beyond. One of the earliest dated archaeological assemblages in this area (excluding the Channel Islands) derives from SDI-4669/W-12, in La Jolla, San Diego County. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4 percent probability) (Hector 2006). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of groundstone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of groundstone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers

of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679), a multicomponent fluted point site, and MNO-680, a single component Great Basined stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare, while finely made projectile points were common.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the Southern California region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site, located in the area now occupied by City of Escondido, are qualitatively distinct from most others in the region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, are very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with the general trends in Southern California deserts, wherein hunting-related tools are replaced by processing tools during the early Holocene (Basgall and Hall 1990).

2.2.2 Archaic (8000 BC–AD 500)

The more than 1500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the region. If San Dieguito is the only recognized Paleoindian component in the region, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (Hale 2001, 2009).

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region, with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is adopted at around AD 500,

as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities, and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decrease in proportion relative to expedient, unshaped groundstone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complimented only by the addition of the bow and ceramics.

2.2.3 Late Prehistoric (AD 500–1750)

The period following the Archaic and prior to Ethnohistoric times (AD 1750) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004). However, several other subdivisions continue to be used to describe various shifts in assemblage composition, including the addition of ceramics and cremation practices. The post-AD 1450 period is called the San Luis Rey complex (Meighan and True 1977). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics. Despite these regional complexes, each is defined by the addition of arrow points and ceramics and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey complex difficult. For this reason, the term Late Prehistoric is well suited to describe the last 1,500 years of prehistory in the region.

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. While steatite was commonly the material of choice for vessel production, it was generally replaced near the time of missionization by locally procured clay to produce ceramic vessels. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn processing and ceramic use in the region did not occur until the San Luis Rey pattern emerged after approximately AD 1450.

2.2.4 Ethnohistoric (post-AD 1750)

The Native American inhabitants affiliated with the Project area would have generally spoken Luiseño-Juaneño (Acjachemen) and the Gabrielino (Kizh) varieties of Takic, which may be assigned to the larger Uto-Aztecan family (Golla 2007, p. 74). Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto-Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic-speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2000). The Luiseño-Juaneño and Gabrielino represent the descendants of local Late Prehistoric populations. They are generally considered to have migrated into the area from the Mojave Desert, possibly displacing the prehistoric ancestors of the Yuman-speaking Kumeyaay (Ipai-Tipai) that lived to the south during Ethnohistoric times. The Luiseño-Juaneño shared boundaries with the Gabrielino and Serrano to the west and northwest, the Cahuilla to the east, the Cupeño to the southeast, and the Kumeyaay to the south (Bean and Shipek 1978; Kroeber 1925). Southern Native American tribal groups of the San Diego and southern Imperial region have traditionally spoken Yuman languages, a subgroup of the Hokan Phylum.

The Gabrielino territory included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south, and Topanga Canyon in the north; the four southern Channel Islands; and watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. At the time of European contact, the Gabrielino were actively involved in trade using shell and beads as currency. The Gabrielino produced pipes, ornaments, cooking implements, inlay work, and basketry. Dwellings were constructed of tule mats on a framework of poles, but size and shape have not been recorded (Kroeber 1925). Basketry and steatite vessels were used rather than ceramics until near the end of the mission period in the nineteenth century (Garcia et al. 2011).

The Juaneño (Acjachemen) territory was bounded to the north by Aliso Creek, the east by the crest of the Santa Ana Mountains, the south by San Onofre Creek, and west by the Pacific Ocean (Kroeber 1925:, p. 636). Ethnographic, linguistic, and archaeological evidence indicate that Juaneño and Luiseño are one cultural/tribal group. There is no existing record of the Juaneño population during the pre-contact period. Records indicated that approximately 1,300 individuals culturally affiliated with the Juaneño resided at Mission San Juan Capistrano in the year 1800 (Engelhardt 1922). The mission death register shows as many as 4,000 native burials in the mission cemetery (White 1963). It is clear from that the arrival of the Spanish decimated Native peoples through disease and changed living conditions (Bean and Shipek 1978).

The tribes of the region were organized into patrilineal clans or bands centered on a chief, composed of 25 to 30 people (Kroeber 1925), each of which had their own territorial land or range where food and other resources were collected at different locations throughout the year (Sparkman 1908). The title of chief was heritable along family lines. Inter-band conflict was most common over trespassing. Sparkman observed that “when questioned as to when or how the land was divided and subdivided, the Indians say they cannot tell, that their fathers told them that it had always been thus” (1908). Place names were assigned to each territory, often reflecting common animals, plants, physical landmarks, or cosmological elements that were understood as being related to that location. Lukup, recorded immediately outside, to the east of the Project area, is one such place named village. Marriages were generally arranged by parents or guardians. Free and widowed women had the option to choose their partner. Polygamy occurred though was not common, often with a single man marrying a number of sisters and wives. Shamanism was a major component in tribal life. The physical body and its components was thought to be related to the power of an individual, and wastes such as fluids, hair, and nails were discarded with intent. Hair, once cut, was often carefully collected and buried to avoid being affected negatively or controlled by someone who wished them harm. Some locations and natural resources were of cultural significance. Springs and other water-related features were thought to be related with spirits. These resources, often a component of origin stories, had power that came with a variety of risks and properties to those who became affected. Puberty ceremonies for both boys and girls were complex and rigorous. Mourning ceremonies were similar throughout the region, generally involving cutting of the hair, burning the deceased’s clothes a year after death, and redistributing personal items to individuals outside of the immediate tribal group (Sparkman 1908; Kroeber 1925). The center of the Gabrielino religion was *Chinigchinich*, the last of a series of heroic mythological figures. The heroes were originally from the stars and the sagas told of them formed the religious beliefs. The most obvious expression of the religion was the *Wankech*, a brush-enclosed area where religious observances were performed. The *Wankech* contained an inner enclosure housing a representation of *Chinigchinich*, a coyote skin stuffed with feathers, claws, beaks, and arrows. Interestingly, early American ethnographers recorded a Gabrielino man named Salvador Cuevas who sang a song called “Song of To-mami-yo-wit” that was given by Chung-itch-nish at the location of the village of Lukup, just outside the Project area (Gray and Schupman Jr. 1909, pg. 209).

Acorns were the staple food of the Native American inhabitants of this region during the Ethnohistoric period (Sparkman 1908). Of the six or more oak species within this traditional territory, the most desirable of these was

the black oak (*Quercus kelloggii*), due to its ease of processing, protein content, and digestibility. Acorns were stored in granaries to be removed and used as needed. The acorns were generally processed into flour using a mortar and pestle. Other edible and medicinal plants of common use included wild plums, choke cherries, Christmas berry, gooseberry, elderberry (*Sambucus nigra*), willow (*Salix*), Juncus grass, buckwheat (*Eriogonum fasciculatum*), lemonade berry (*Rhus integrifolia*), sugar bush (*Rhus ovata*), sage scrub (*Artemisia californica*), currents, wild grapes, prickly pear (*Opuntia*), watercress, wild oats, and other plants. More arid plants such as Yucca, Agave, mesquite, chia, bird-claw fern, Datura, yerba santa (*Eriodictyon*), Ephedra, and cholla were also of common use by some Juaneño and Gabrielino populations. A number of mammals were commonly eaten. Game animals included black-tailed deer, antelope, rabbits, hares (*Leporidae*), birds, ground squirrels, woodrats (*Neotoma*), bears, mountain lions (*Puma concolor*), bobcats (*Lynx rufus)*, coyotes (*Canus latrans*), and others. In lesser numbers, reptiles and amphibians may have been consumed. Fish and marine resources provided some portion of many tribal communities' food sources, though most notably those nearest the coast. Shellfish would have been procured and transported inland from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast.

2.2.5 Historic Period (Post 1542)

European activity in the region began as early as AD 1542, when Juan Rodríguez Cabrillo landed in San Diego Bay. Sebastián Vizcaíno returned in 1602, and it is possible that there were subsequent contacts that went unrecorded. These brief encounters made the local native people aware of the existence of other cultures that were technologically more complex than their own. Epidemic diseases may also have been introduced into the region at an early date, either by direct contacts with the infrequent European visitors or through waves of diffusion emanating from native peoples farther to the east or south. Father Juan Crespí, a member of the 1769 Spanish Portolá expedition, authored the first written account of interaction between Europeans and the indigenous population in the region that makes up Orange County today. It is possible, but as yet unproven, that the precipitous demographic decline of native peoples had already begun prior to the arrival of Gaspar de Portolá and Junípero Serra in 1769.

Spanish colonial settlement was initiated in 1769, when multiple expeditions arrived in San Diego by land and sea, and then continued northward through the coastal plain toward Monterey. A military presidio and a mission were soon firmly established at San Diego, despite violent resistance to them from a coalition of native communities in 1776. Mission San Juan Capistrano was established this same year, on November 1. Private ranchos subsequently established by Spanish and Mexican soldiers, as well as other non-natives, appropriated much of the remaining coastal or near-coastal locations (Pourade 1960–1967).

Locally, and less than 0.5 mile north of the Project area, the Diego Sepulveda Adobe was built sometime between 1817 and 1820 as a way station affiliated with Mission San Juan Capistrano as housing for local herdsman, and as headquarters for Diego Sepulveda (Earle 2007). The adobe became an estancia by 1820 to facilitate conversion of local Native Americans to the Christian Faith. This is not surprising given the adobe's immediate proximity to the Gabrielino village of Lukup just to the south.

Mexico's separation from the Spanish empire in 1821 and the secularization of the California missions in the 1830s caused further disruptions to native populations. Some former mission neophytes were absorbed into the work forces on the ranchos, while others drifted toward the urban centers at San Diego and Los Angeles or moved to the eastern portions of the county where they were able to join still largely autonomous native communities. United States conquest and annexation, marked by the Mexican-American war and California Sur's ceding to the

United States in 1851, together with the gold rush in Northern California, brought many additional outsiders into the region. Development during the following decades was fitful, undergoing cycles of boom and bust. With rising populations in the nineteenth century throughout the Southern California region, there were increased demands for important commodities such as salt.

3 Methods and Results

3.1 Records Search

On October 22, 2019, Dudek archaeologist Kira Archipov conducted a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), located on the campus of the California State University, Fullerton. An update to the original records search was conducted by Dudek archaeologist Brenda Rogers on October 14, 2025. The records search encompassed the entire Project area and 0.5-mile search radius. The purpose of the records search is to identify any previously recorded cultural resources that may be located in or adjacent to the Project area and to identify previous studies in the Project vicinity. In addition to a review of previously prepared site records and reports, the records search also included a review of historical maps of the Project area, ethnographies, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility.

3.1.1 Previous Cultural Resources Studies

The SCCIC records search indicates that 56 previous cultural resource studies have been conducted within the 0.5-mile search radius of the Project area. Of these, five (5) overlap with the Project area (Table 1). These include three (3) archaeological resources inventories, one (1) archival information review, and one (1) cultural resources inventory and evaluation. Reports relevant to the Project area are discussed in further detail below Table 1. Approximately 30 percent of the Project area has been subject to past cultural resources investigations. See Appendix A for the complete SCCIC records search results and associated documentation.

Table 1. Previous Cultural Resources Studies Overlapping the Project Area

Report Number	Year	Author	Title
Overlapping Project Area			
OR-00270	1975	Leonard, Nelson N. III and Mathew C. Hall	Description and Evaluation of Cultural Resources within the US Army Corps of Engineers' Santa Ana River Project
OR-00299	1978	Van Horn, David M.	A Compilation of Archaeological, Historical and Paleontological Data for the City of Costa Mesa
OR-00801	1985	Langenwalter, Paul E. and James Brock	Phase II Archaeological Studies Prado Basin and the Lower Santa Ana River
OR-03497	2007	McKenna, Jeanette A.	A Section 106 Evaluation of the Proposed Fairview Park Bike Trail, Approximately 0.75 Linear Miles within the Existing Park in Costa Mesa, Orange County, California
OR-04593	2017	Wilson, Zach	Archaeological Survey Report for Southern California Edison's (SCE) Deteriorated Pole Project on the Huntington Beach-Lafayette 66 kV Sub-Transmission Line (TD1260603), Orange County, California

LA-00801

Phase II Archaeological Studies Prado Basin and the Lower Santa Ana River (Langenwalter and Brock 1985) documents the inventory and evaluation of numerous cultural resources within the Prado Basin and Lower Santa Ana River, encompassing portions of Orange, Riverside, and San Bernardino Counties. The study included a records search, archival research, pedestrian survey, an inventory of 23 prehistoric resources and 164 historic-era resources, test excavations, and significance evaluations for 23 prehistoric and 27 historic-era resources. Of these, 27 cultural resources were recommended eligible for inclusion in the NRHP. Overall, the study overlaps with approximately 20 percent of the Project area. No cultural resources identified in this study overlap with the currently proposed Project area.

3.1.2 Previously Recorded Cultural Resources

The SCCIC records search identified 10 previously recorded cultural resources within a 0.5-mile radius of the Project area, none of which are located within the Project area. These include six (6) prehistoric archaeological resources, two (2) historic-era built environment resources, one (1) historic-era archaeological resource, and one (1) multicomponent archaeological resource. See Appendix A for the complete SCCIC records search results and associated documentation, and below Table 2 for a summary of the significant archaeological resources located within the Project vicinity.

Table 2. Previously Recorded Cultural Resources within One Mile of Project Area

Primary Number	Trinomial	Age	Resource Description	Eligibility for CRHR/NRHP
Outside Project Area				
P-30-000058	CA-ORA-58	Prehistoric	Complex habitation site with numerous burials	Eligible for the CRHR; Listed on the NRHP
P-30-000165	CA-ORA-165	Prehistoric	Contact period artifact scatter	Eligible for the CRHR and NRHP
P-30-000506	CA-ORA-506	Multicomponent	Prehistoric shell midden and historic-era trash deposit	Recommended eligible for the CRHR and NRHP
P-30-000839	—	Prehistoric	Prehistoric midden with associated artifacts	Recommended eligible for the CRHR and NRHP
P-30-000845	CA-ORA-845	Prehistoric	Prehistoric shell midden	Unknown
P-30-000906	—	Prehistoric	Prehistoric shell midden	Unknown
P-30-001667	—	Prehistoric	Redeposited prehistoric shell midden	Unevaluated
P-30-001740	CA-ORA-1740H	Historic-era	Two historic-era trash scatters	Unknown
P-30-177464	—	Historic-era	Transmission Tower	Recommended ineligible for the NRHP
P-30-177612	—	Historic-era	Transmission Tower	Recommended in ineligible for the NRHP

A number of significant archaeological resources lie adjacent to the Project area. P-30-000165 (CA-ORA-165) is the recorded location of the ethnohistoric Gabrielino village of *Lukup*. This site is mentioned frequently in anthropological literature and has direct ethnohistoric links. The "Federal Cylinder Project" includes voice recordings of a Native American man named Salvador Cuevas who sang a song that originated from this village. The Federal Cylinder Project records the following information from Salvador Cuevas: "Song of To-mami-yo-wit. No one composed it, but it was given by Chung-itch-nish himself. This is in the old dead language of the coast. Loo-coop was large rancheria S. of Santa Anna near the ocean. This came from there" (Gray and Schupman Jr. 1990, pg. 209).

The concept of a village being a precise location of settlement is not accurate for all place named areas (Kroeber 1925). Hunter-gatherer settlement may have focused on specific landforms that convey a singular place, while at other times settlement occurred over a broader area that shared a single name. The village of *Lukup* likely referred to a broader area covering the bluffs and banks of the Santa Ana River and included the prehistoric and multicomponent resources identified in the SCCIC records search results. Archaeologically, deciphering the sites that can be associated with the ethnohistoric village requires definition of temporally consistent archaeological deposits that date to the pre- and post-Mission historic period (i.e., post AD 1769). For the purposes of this report, a conservative approach tentatively links all the identified prehistoric resources into the broader village concept associated with the place name *Lukup*.

Archaeological research at the sites identified in the SCCIC records search has focused primarily on P-30-000058 (CA-ORA-58), the Banning/Norris Site (Fairview Site), located on the bluff just outside the eastern boundary of the Project area and within Fairview Park (Koerper and Desautels 1996). First recorded in 1949, the site has undergone many excavation efforts and is considered one of the most important such sites in Southern California, having numerous burials and many unique and/or diagnostic artifacts (Eberhart and Eberhart 1949). The site contains evidence of long-distance trade with Classic period Hohokam of the Sonoran Desert and was likely an important political and trade center during the Late Prehistoric period. The prehistoric resources identified in the SCCIC records search are located primarily on top of bluffs located east of the current Project area. However, the distribution of sites is more likely related to the focus of archaeological research in those areas. No focused, subsurface archaeological exploration has occurred in the low-lying floodplain of the Santa Ana River to the west and inside of the Project area.

3.2 Review of Historic Aerials and Topographic Maps

Dudek consulted historic topographic maps and aerial photographs to understand development of the Project area and surrounding properties. Historic topographic maps are available for the years 1896, 1899, 1901, 1907, 1915, 1925, 1932, 1935, 1943, 1945, 1951, 1958, 1968, 1975, 1977, 1981, 1982, 2012, 2015, and 2018. Historic aerials are available for the years 1938, 1953, 1963, 1972, 1994, 2002, 2003, 2004, 2009, 2010, 2012, 2014, and 2016 (NETR 2025).

The first USGS topographic map showing the Project area dates to 1896, and depicts the braided, natural channel of the Santa Ana River and the unimproved, natural landforms surrounding the mouth of the river. The Project area is undeveloped at that time, though a few structures and roads are visible to the northeast. No changes are apparent on the topographic maps until the year 1932, when the Santa Ana River appears as the channelized alignment it is today. In addition, a few additional roads are visible around the Project area. By 1951, a small two-track road is visible extending along the western boundary of the Project area. The 1958 map shows additional

development. By 1968, the area surrounding Talbert Regional Park is largely developed and subdivided. No other major changes are visible on the maps up to the current day (NETR 2025).

The first historic aerial showing the Project area dates to 1938 and shows that at this time the Project area was entirely undeveloped and braided with remnant channels of the Santa Ana River. By 1953, the landform appears to have undergone some sort of alteration as three distinct vegetation zones are visible. The 1963 aerial depicts increased development surrounding Talbert Regional Park. The 1972 aerial shows the former agricultural land west of the Santa Ana River as largely developed, as residential neighborhoods are now observed. By 1994, the area looks much as it appears today. Within the reserve, it appears that minor surface grading occurred after the year 2000, likely for habitat restoration (NETR 2025).

3.3 Review of Geomorphological Context

According to U.S. Department of Agriculture Natural Resources Conservation Services, there are five soil types mapped within the Project area: Bolsa silt loam; Hueneme fine sandy loam; Hueneme fine sandy loam, drained; Myford sandy loam, 9 to 30 percent slopes, eroded; and Metz loamy sand, moderately fine substratum (USDA 2019).

Bolsa silt loam is a poorly drained soil that is derived from mixed alluvium and contains silt loam and silty clay loam. Hueneme fine sandy loam is comprised of fine sandy loam and stratified sand to silt loam. Myford sandy loam, 9 to 30 percent slopes, eroded, is similar to the previous description but often very shallow because of erosion. Metz loamy sand is deep, excessively drained soil formed in alluvial material from mixed, but dominantly sedimentary rocks (USDA 2019).

3.4 Sensitivity Analysis

Examination of the historic topographic maps, aerial photographs, and geomorphological context indicates that the Project area remains largely undeveloped, undisturbed, and underlain by native alluvial soils. The channelization of the Santa Ana River and development of the Banning Channel impacted the western margin of the Project area. Minor agricultural activity and habitat restoration after channelization likely only affected the top 1 to 2 feet of sediments. This suggests that the Project area retains subsurface integrity. Additionally, the USDA's soil types mapped within the Project area demonstrate that alluvial soils are present, which generally have moderate potential to contain subsurface archaeological deposits.

Extensive archaeological deposits, most of which are likely related to the ethnohistoric village of *Lukup*, border the eastern margin of the Project area, lining the bluffs. These deposits have archaeological and tribal significance. The density of aboriginal occupation on the bluffs is a strong predictor of adjacent buried archaeological deposits in the Santa Ana flood plain east of the river channel. Floodplains next to major waterways, including marshes, in Southern California have been frequently demonstrated to contain significant, buried archaeological deposits, such as those found at Bolsa Chica (see Couch et al. 2009). For these reasons, the Project area is characterized as moderately sensitive for archaeological resources.

3.5 Native American Heritage Commission Sacred Lands File Search

Dudek requested an NAHC search of the SLF for the Project area and a 0.5-mile radius on October 9, 2019, and on October 9, 2025. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on October 23, 2019, and October 15, 2025, respectively, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within 0.5 miles of the Project area, and not necessarily directly within the Project area. The NAHC did not provide details on what the resource(s) are or where they are located. Additionally, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. To date, Dudek has not sent outreach letters to the any of the tribes listed by the NAHC. See Appendix B for complete documentation of SLF search results and tribal correspondence.

In compliance with AB 52, OCPW, as lead agency, is responsible for conducting AB 52 government-to-government consultation with tribal entities.

3.6 Pedestrian Survey

Dudek Archaeologists Loukas Barton, Patrick Hadel, and Ted Roberts conducted an intensive-level archaeological resources pedestrian survey of the Project area on November 22, 2019. To assess current site conditions, Dudek archaeologist Roshanne Bakhtiary conducted an updated reconnaissance-level archaeological resources pedestrian survey of the Project area on October 29, 2025. Standard archaeological procedures and techniques consistent with the Secretary of the Interior's Standards and Guidelines for a cultural resources inventory were employed during the survey. When possible, 10-meter interval survey transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic-era artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows and backdirt piles, cut banks, and drainages were also visually inspected for exposed subsurface materials. During the reconnaissance-level pedestrian survey, exposed ground surfaces, cut banks and drainages, rodent/reptile burrows and backdirt piles, and other areas of increased ground visibility were opportunistically inspected for observable cultural materials or features.

The majority of the 182-acre Project area is characterized by dense vegetation interspersed with informal dirt roadways, pedestrian trails, and narrow bike tracks. South Talbert consists primarily of coastal salt-marsh habitat and includes plant species such as Pacific glasswort (*Salicornia pacifica*) and saltgrass (*Distichlis spicata*). In contrast, North Talbert supports plant species such as California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), mallow (*Malva* spp.), and coastal goldenbush (*Isocoma menziesii*), and also contains sycamore groves and landscaped lawns.

Ground surface visibility was non-existent (0 percent) within areas of dense vegetation, which accounted for approximately 85 percent of the Project area (Exhibit 1). Within dirt roadways, pedestrian trails, and narrow bike tracks, ground visibility was excellent (80 to 100 percent); this accounted for the remainder of the Project area

(Exhibit 2). Disturbances observed during the survey include weather-related erosion in several areas, trail cutting and maintenance, evidence of vehicle overland travel, and bike use. No cultural resources were identified within the Project area during the 2019 and 2025 pedestrian surveys.

Exhibit 1. Example of non-existent ground surface visibility, view facing west.

Exhibit 2. Example of excellent ground surface visibility, view facing north.

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4 Summary and Management Recommendations

Dudek's cultural resources inventory in support of the Project suggests that there is a moderate potential for the inadvertent discovery of archaeological resources during Project implementation. Dudek conducted a records search of the Project area and surround 0.5-mile radius. The records search identified six (6) previously recorded prehistoric archaeological resources, two (2) historic-era built environment resources, one (1) historic-era archaeological resource, and one (1) multicomponent archaeological resource within 0.5 mile of the Project area, one of which is adjacent to, but outside the Project area (P-30-000165 or *Lukup*). The ethnohistoric Gabrielino village site of *Lukup*, recognized as archaeologically and tribally significant, likely corresponds to the broader Santa Ana River area encompassing the six (6) prehistoric archaeological resources and the one (1) multicomponent archaeological resource documented in the SCCIC records search.

A NAHC SLF search was also requested for the Project, and results were positive for Native American cultural resources within 0.5-miles mile of the Project area. Additionally, a review of historical aerial photographs and topographic maps indicates that the Project area has remained largely undeveloped and undisturbed, aside from limited disturbances associated with the channelization of the Santa Ana River and Banning Channel.

Dudek archaeologists conducted an intensive-level cultural resources pedestrian survey of the Project area on November 22, 2019, and an updated reconnaissance-level pedestrian survey of the Project area on October 29, 2025. Though no cultural resources were identified during either survey, dense vegetation obscured roughly 85 percent of the ground surface, significantly limiting surface visibility.

Based on the presence of significant archaeological resources adjacent to the Project area, and in consideration of the broader pattern of prehistoric use along the coast and near the Santa Ana River, there is a moderate potential for the inadvertent discovery of archaeological resources during Project implementation. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during construction activities are provided below.

Worker Environmental Awareness Program. Prior to commencement of construction activities for all phases of Project implementation, The Orange County Department of Public Works Development Services (OCPW) shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the OCPW for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the proposed Project about the archaeological sensitivity of the area, to provide specific details on the kinds of archaeological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant archaeological resources, and to outline the actions to be taken in the event of a discovery of cultural resources. The WEAP shall define "tribal cultural resources" and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

Cultural Resources Monitoring and Inadvertent Discovery Protocols. A monitoring plan should be prepared by an archaeological principal investigator, meeting the Secretary of the Interior's Standards, and implemented upon approval by OCPW. It is also recommended that an archaeological monitor be present during all initial ground-disturbing activities for the Project. Archaeological monitoring may be adjusted (increase, decreased, or discontinued) at the recommendation of the archaeological principal investigator and based on inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. The archaeological monitor shall be provided a copy of this technical report and its pertinent appendices to inform their monitoring efforts. The archaeological monitor shall have the authority to temporarily halt work to inspect areas for potential cultural material or deposits.

In the event that unanticipated archaeological deposits or features are exposed during construction activities, all construction work occurring within 50 feet of the find shall immediately stop until the archaeological principal investigator is provided access to the Project area and can assess the significance of the find and determine whether or not additional study is warranted. The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the archaeological principal investigator. Should it be required, temporary flagging shall be installed around this resource in order to avoid any disturbances from construction equipment. The potential for avoidance should be the primary consideration of this initial process. Significance of the find shall be assessed as outlined by CEQA (14 CCR 15064.5[f]; PRC Section 21082). If the archaeological principal investigator observes the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, may be warranted prior to allowing construction to proceed in this area.

Daily monitoring logs shall be completed by the on-site archaeological monitor. Within 60 days following completion of construction, the archaeological principal investigator shall provide an archaeological monitoring report to OCPW. This report shall include the results of the cultural monitoring program (even if negative), including a summary of any findings or evaluation/data recovery efforts, and supporting documentation that demonstrates all mitigation measures defined in the environmental document were appropriately met. Appendices shall include archaeological monitoring logs and documentation relating to any newly identified or updated cultural resources. This report shall be submitted to the SCCIC once considered final.

While recommended, the requirement to include a Native American Monitor should be determined by OCPW, having reviewed cultural resources technical findings, through government-to-government consultation with the traditionally culturally affiliated tribes with geographic ties to the Project area and in review of the present report findings. If appropriate, Tribal Cultural Resources, as a separate resource category under CEQA, should be subject to separate management strategies, while taking into account and working in tandem with the present cultural resources mitigation.

Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County of Orange (County) Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with

CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the OCPW shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, OCPW, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

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5 References

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Confidential Appendix A

SCCIC Records Search Results

Appendix B
NAHC SLF Search Results

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov

October 23, 2019

Ted Roberts
Dudek

VIA Email to: troberts@dudek.com

RE: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Talbert Regional Park Master Plan Project, Orange County

Dear Mr. Roberts:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

> Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

   - A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;

   - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;

   - Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and

   - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

   - Any report that may contain site forms, site significance, and suggested mitigation measures.

     All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the NAHC was positive. Please contact the Juaneno Band of Mission Indians, the Juaneno Band of Mission Indians Acjachemen Nation, the Gabrieleno Band of Mission Indians – Kizh Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians on the attached list for more information.
4. Any ethnographic studies conducted for any area including all or part of the APE; and
5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

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 consultation list remains current.

If you have any questions, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

Steven Quinn

Steven Quinn
Associate Governmental Program Analyst

Attachment

Native American Heritage Commission
Tribal Consultation List
Orange County
10/23/2019

Agua Caliente Band of Cahuilla Indians
Jeff Grubbe, Chairperson
5401 Dinah Shore Drive
Palm Springs, CA, 92264
Phone: (760) 699 - 6800
Fax: (760) 699-6919
Cahuilla

Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org
Gabrieleno

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com
Gabrieleno

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com
Gabrielino

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com
Gabrielino

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com
Gabrielino

Juaneno Band of Mission Indians
Sonia Johnston, Chairperson
P.O. Box 25628
Santa Ana, CA, 92799
sonia.johnston@sbcglobal.net
Juaneno

Juaneno Band of Mission Indians Acjachemen Nation - Belardes
Matias Belardes, Chairperson
32161 Avenida Los Amigos
San Juan Capisttrano, CA, 92675
Phone: (949) 293 - 8522
kaamalam@gmail.com
Juaneno

Juaneno Band of Mission Indians Acjachemen Nation - Romero
Teresa Romero, Chairperson
31411-A La Matanza Street
San Juan Capistrano, CA, 92675
Phone: (949) 488 - 3484
Fax: (949) 488-3294
tromero@juaneno.com
Juaneno

La Jolla Band of Luiseno Indians
Fred Nelson, Chairperson
22000 Highway 76
Pauma Valley, CA, 92061
Phone: (760) 742 - 3771
Luiseno

Pala Band of Mission Indians
Shasta Gaughen, Tribal Historic Preservation Officer
PMB 50, 35008 Pala Temecula Rd.
Pala, CA, 92059
Phone: (760) 891 - 3515
Fax: (760) 742-3189
sgaughen@palatribe.com
Cupeno
Luiseno

Pauma Band of Luiseno Indians
Temet Aguilar, Chairperson
P.O. Box 369
Pauma Valley, CA, 92061
Phone: (760) 742 - 1289
Fax: (760) 742-3422
bennaecalac@aol.com
Luiseno

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Talbert Regional Park Master Plan Project, Orange County.

Pechanga Band of Luiseno Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6000
Fax: (951) 695-1778
epreston@pechanga-nsn.gov

Rincon Band of Luiseno Indians
Jim McPherson, Tribal Historic Preservation Officer
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
vwhipple@rincontribe.org

Rincon Band of Luiseno Indians
Bo Mazzetti, Chairperson
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
bomazzetti@aol.com

San Luis Rey Band of Mission Indians
San Luis Rey, Tribal Council
1889 Sunset Drive Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

Soboba Band of Luiseno Indians
Scott Cozart, Chairperson
P. O. Box 487 Cahuilla
San Jacinto, CA, 92583 Luiseno
Phone: (951) 654 - 2765
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Talbert Regional Park Master Plan Project, Orange County.

Roshanne Bakhtiary

From: Roshanne Bakhtiary
Sent: Thursday, October 9, 2025 9:17 AM
To: NAHC@NAHC
Subject: DUDEK PN 13230.70 NAHC SLF Search Request
Attachments: DUDEK_13230.70_NAHC_SLF_Request.pdf

Dear NAHC,

Please find attached to this email the NAHC Sacred Lands File search request with project location map for DUDEK PN 13230.70, located in the City of Costa Mesa, Orange County, California. Dudek is requesting an NAHC Sacred Lands File Search for any sacred sites, tribal cultural resources, and other places of Native American community value that may fall within a half-mile radius of the proposed project location.

Please let me know if you have any questions regarding this project. You can email the results to me at: rbakhtiary@dudek.com.

Thanks in advance,

Roshanne Bakhtiary
Archaeologist

DUDEK 45 Years of Impactful Projects

O: 949 373 8307 **C:** 760 557 0998
dudek.com

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Talbert Regional Park Master Plan Update Project PN 13230.70

County: Orange

USGS Quadrangle Name: Newport Beach

Township: 6S **Range:** 10W **Section(s):** 4, 5, 7, 8, 9, 16, 17, 18, 19, 20, 21

Company/Firm/Agency: DUDEK

Street Address: 27271 Las Ramblas Suite 340

City: Mission Viejo, CA **Zip:** 92691

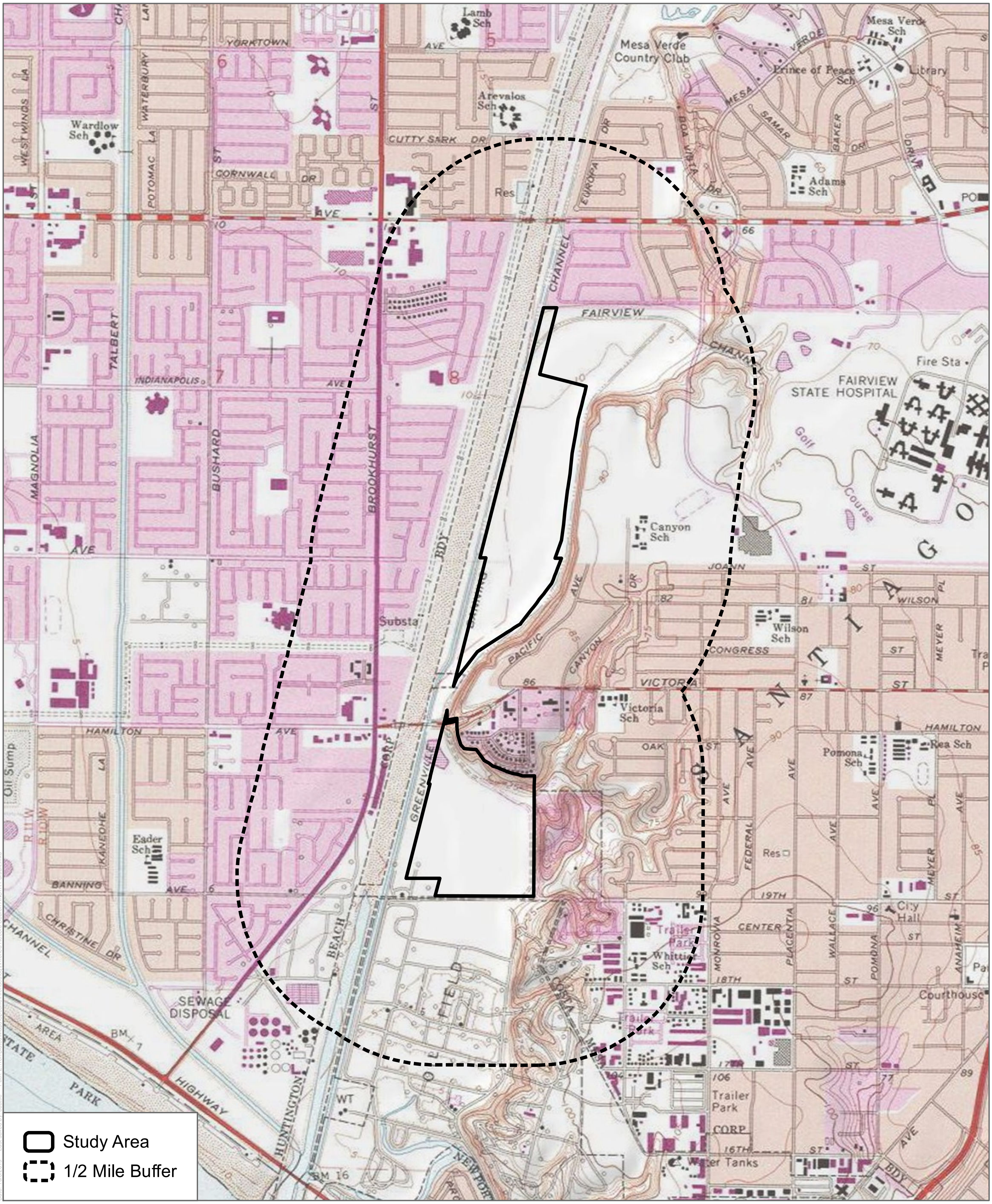
Phone: (760) 557-0998

Fax:

Email: rbakhtiary@dudek.com

Project Description:

Restoration of 160-acres of open space.



SOURCE: USGS 7.5-Minute Series Newport Beach Quadrangle
Township 6S; Range 10W; Sections 4, 5, 7, 8, 9, 16, 17, 18, 19, 20, 21

DUDEK

0 1,000 2,000 Feet
0 285 570 Meters
1:24,000

Records Search

Talbert Regional Park Master Plan

Roshanne Bakhtiary

From: Green, Andrew@NAHC <Andrew.Green@nahc.ca.gov>
Sent: Wednesday, October 15, 2025 3:41 PM
To: Roshanne Bakhtiary
Cc: Gabrieleno Administration; Gttribalcouncil; sonia.johnston@sbcglobal.net; kaamalam@gmail.com
Subject: Talbert Regional Park Master Plan Update Project
Attachments: SLF Yes Talbert Regional Park Master Plan Update Project 10.15.2025.pdf; Talbert Regional Park Master Plan Update Project 10.15.2025.xlsx

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Good afternoon,

Attached is the response to the project referenced above. If you have any additional questions, please feel free to contact me directly.

Regards,

Andrew Green
Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Andrew.Green@nahc.ca.gov
Direct Line: (916) 573-1072
Office: (916) 373-3710

NATIVE AMERICAN HERITAGE COMMISSION

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

October 15, 2025

Roshanne Bakhtiary
DUDEK

Via Email to: rbakhtiary@dudek.com

Re: Talbert Regional Park Master Plan Update Project, Orange County

To Whom It May Concern:

As requested, a 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 Gabrieleno Band of Mission Indians – Kizh Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Juaneno Band of Mission Indians, and the Juaneno Band of Mission Indians Acjachemen Nation - Belardes on the attached list for more information. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an 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 that are traditionally and culturally affiliated with the project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

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 inform 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) information center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

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

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Orange County
10/15/2025

Tribe Name	F/N	Contact Person	Contact Address	Phone	Email Address	Cultural Affiliation	Counties
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	besparza@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	anthonymad2002@gmail.com	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	chair@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761	christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura

Tribe Name	F/N	Contact Person	Contact Address	Phone	Email Address	Cultural Affiliation	Counties
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479	sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351	tongvatcr@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048	Chavez1956metro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Juaneno Band of Mission Indians	N	Sonia Johnston, Chairperson	P.O. Box 25628 Santa Ana, CA, 92799		sonia.johnston@sbcglobal.net	Juaneno	Orange, Riverside, San Diego
Juaneno Band of Mission Indians Acjachemen Nation - Belardes	N	Joyce Perry, Cultural Resource Director	4955 Paseo Segovia Irvine, CA, 92603	(949) 293-8522	kaamalam@gmail.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Shannon Wingfield, Secretary	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 488-3484		Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Heidi Lucero, THPO/MLD	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(562) 879-2884	thpo@jbmian.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Nathan Banda, Chairman	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(949) 426-8804	nbanda@jbmian.com	Juaneno	Los Angeles, Orange, Riverside, San Bernardino, San Diego

Tribe Name	F/N	Contact Person	Contact Address	Phone	Email Address	Cultural Affiliation	Counties
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564	cnejo@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537	awallick@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515	sgaughen@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	vminott@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Mercedes Estrada, Cultural Director	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	mestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	sestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Talbert Regional Park Master Plan Update Project, Orange County.