

4.17 Tribal Cultural Resources

This section describes the existing tribal cultural resources (TCRs) conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project. In addition to the documents listed in Section 4.17.8, References, information presented in this section is based on the following:

- **Appendix D:** Cultural Resources Inventory and Evaluation Report, Irvine Gateway Project, City of Irvine, California (Cultural Resources Report); prepared by Dudek; dated March 2025

4.17.1 Existing Conditions

The project site is located at the northeast corner of Portola Parkway and Jeffrey Road and is bounded by Portola Parkway to the south, Jeffrey Road/Hicks Haul Road to the west, and Bee Canyon Access Road to the east. Hicks Canyon Wash is the project site's northern boundary. The project site consists primarily of active agricultural fields, with equipment storage and laydown areas in the northern portion of the site. Adjacent land uses include agricultural (Irvine Ranch Conservancy Native Seed Farm) and industrial (the closed All American Asphalt plant) to the north and residential development to the south and west. The project site is located in a Very High Fire Hazard Severity Zone (CAL FIRE 2025). The cultural study area includes the project site and a 0.5-mile radius around the project site and is referred to herein as the area of potential impacts (API).

Environmental Setting

Prehistoric Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period 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. To be more inclusive, 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 500–1769), and Ethnohistoric (post-AD 1769). See Appendix D, Cultural Resources Inventory and Evaluation, to this Draft EIR for more information.

Ethnohistoric Context

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000; White 1963). The principal intent of these researchers was to record the pre-contact culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization

and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about Native American life before European immigration, a significantly large proportion of these informants were born after 1850; therefore, the documentation of pre-contact aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. This is an important issue to note when examining these ethnographies, because considerable culture change had undoubtedly occurred by 1850 among the Native American survivors in California.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007). Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007). A large amount of variation within the language of a group represents a greater time depth than a group’s language with less internal diversity. One method that Golla has employed is drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the “absolute chronology of the internal diversification within a language family” can be correlated with archaeological dates (2007). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The Native American inhabitants of the region would have generally spoken Luiseño–Juaneño (Acjachemen) and Gabrieleño (or Tongva) varieties of Takic, which may be assigned to the larger Uto–Aztecan family (Golla 2007). 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 circa 2600 BC–AD 1, which was later followed by the diversification within the Takic-speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010). The Luiseño–Juaneño (Acjachemen) and Gabrieleño (or Tongva) 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 Gabrieleño 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 Uto–Aztecan inhabitants of the region were called Juaneño and Gabrieleño by the Franciscan friars who established the Missions San Juan Capistrano and San Gabriel Arcángel in the traditional territory of these two respective tribes. The project area is east of Aliso Creek, which is considered by Kroeber (1925) to be the ethnographic boundary marker between the Gabrieleño (or Tongva) (west of the Aliso Creek) and Juaneño (east of the Aliso Creek). A brief description of both ethnographic groups is provided in the following text.

The Gabrieleño may have numbered as many as 5,000 people during their peak in the pre-contact period; however, population estimates are difficult due to the gradual process of missionization (Kroeber 1925). The Gabrieleño territory included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south, Topanga Canyon

in the north, the four southern Channel Islands, and the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. At the time of European contact, the Gabrieleño were actively involved in trade using shell and beads as currency. The Gabrieleño 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, or Acjachemen, territory was bounded to the north by Aliso Creek, to the east by the crest of the Santa Ana Mountains, to the south by San Onofre Creek, and to the west by the Pacific Ocean (Kroeber 1925). Ethnographic, linguistic, and archaeological evidence indicates that the 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 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, composed of 25–30 people, centered on a chief (Kroeber 1925). Each clan or band had its 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. Marriages were generally arranged by parents or guardians. Free and widowed women had the option to choose their partner. Polygamy occurred but 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 were thought to be related to the power of an individual, and wastes such as fluids, hair, and nails were discarded with intent. People often carefully collected and buried hair once it was cut to avoid being affected negatively or controlled by someone who wishes them harm. Some locations and natural resources were of cultural significance. Springs and other water-related features were thought to be related to 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 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 Juaneño and Gabrieleño 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 Juaneño 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.

The staple food of the Native American inhabitants of this region during the Ethnohistoric period was acorns (Sparkman 1908). Of the six or more oak species (*Quercus* spp.) within this traditional territory, the most desirable of these was the black oak (*Quercus kelloggii*) because of 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. The acorn meal was most commonly leached with hot water using a rush basket; however, there are also accounts of placing meal into excavated sand and gravel pits to allow the water to drain

naturally. The acorn meal was then prepared in a variety of ways, though often with the use of an earthen vessel (Sparkman 1908). Other edible and medicinal plants of common use included wild plums (*Prunus americana*), choke cherries (*Prunus virginiana*), Christmas berry (*Heteromeles arbutifolia*), gooseberry (*Ribes* spp.), elderberry (*Sambucus nigra*), willow (*Salix* spp.), *Juncus*, buckwheat (*Eriogonum fasciculatum*), lemonade berry (*Rhus integrifolia*), sugarbush (*Rhus ovata*), sagebrush (*Artemisia californica*), currants (*Ribes* spp.), wild grapes (*Vitis* spp.), prickly pear (*Opuntia* spp.), watercress (*Nasturtium officinale*), wild oats (*Avena* spp.), and other plants. More arid plants such as *Yucca*, Agave, mesquite (*Neltuma* spp., *Prosopis* spp.), chia (*Salvia columbariae*), bird-claw fern (*Pellaea mucronata*), *Datura*, yerba santa (*Eriodictyon* spp.), *Ephedra*, and cholla (*Cylindropuntia* spp.) were also of common use by some Juaneño and Gabrieleño populations. A number of mammals were commonly eaten. Game animals included black-tailed deer (*Odocoileus hemionus hemionus*), antelope (*Antilocapra americana*), rabbits (*Sylvilagus* spp.), hares (*Lepus* spp.), birds, ground squirrels (*Xerospermophilus* spp.), woodrats (*Neotoma* spp.), bears (*Ursus americanus*), mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), coyotes (*Canis lupus*), and others. In lesser numbers, reptiles and amphibians may have been consumed. Fish and marine resources provided some portion of many tribal communities' diet, 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. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals.

Areas or regions, identified by known physical landmarks, could be recognized as band-specific territories that might be violently defended. Other areas or resources, such as water sources and other locations that were rich in natural resources, were generally understood as communal land to be shared. The coastal Juaneño and Gabrieleño exchanged a number of local goods, such as seafood, coastal plants, and various types of shell, for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Shellfish would have been procured from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pignuolo 2005; Warren 1964). Shellfish from sandy environments included *Donax*, *Saxidomus*, *Tivela*, and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama*, *Megastrea*, *Saxidomus*, *Protothaca*, *Megathura*, *Mytilus*, and others. Lastly, the bay environment would have provided *Argopecten*, *Chione*, *Ostrea*, *Neverita*, *Macoma*, *Tagelus*, and others. While marine resources were obviously consumed, terrestrial animals and other resources likely provided a large portion of sustenance.

A number of local plants were used for food and medicine. These were exploited seasonally, and were both traded between regional groups and gathered as a single triblet moved between habitation areas. Some of the more common of these that might have been procured locally, or as higher-elevation varieties, would have included buckwheat, Agave, *Yucca*, lemonade berry, sugarbush, sagebrush, yerba santa, sage (*Salvia* spp.), *Ephedra*, prickly pear, mulefat (*Baccharis salicifolia*), chamise (*Adenostoma fasciculatum*), elderberry, oak, willows, and *Juncus* grass, among many others (Wilken 2012).

Records Search

South Coastal Information Center Records Search Results

As described in Section 4.5, Cultural Resources, of this Draft EIR, a records search of the California Historical Resources Information System (CHRIS) was completed for the current project site and a 0.5-mile radius by Dudek at the South Coastal Information Center (SCCIC) on December 9, 2024. This CHRIS search included a review of their collection of mapped prehistoric, historical, and built-environment resources, California Department of Parks

and Recreation (DPR) 523 Series Forms (DPR site records), technical reports, historical maps, and local inventories. Additional consulted sources included the National Register of Historic Places (NRHP), California Inventory of Historical Resources/CRHR and listed Office of Historic Preservation Archaeological Determinations of Eligibility, California Points of Historical Interest, and California Historical Landmarks. The results of the records search are presented in Appendix D.

The SCCIC records search indicates that seven previously recorded cultural resources are located within a 0.5-mile radius of the API and one of these intersects the API. The overlapping resource, P-30-176748, or the Highline Canal, is characterized as a historic-era built environment resource and is addressed in Appendix D as Map ID 2. Of the seven resources within the 0.5-mile radius, four are prehistoric sites, two are historic-era built environment resources, and one is a multicomponent site containing both prehistoric and historic-era components (Appendix D).

Native American Heritage Commission and Tribal Correspondence

As described in Section 4.5 of this Draft EIR, a search of the Native American Heritage Commission (NAHC) Sacred Lands File for the project site was requested on August 9, 2024. The Sacred Lands File consists of a database of known Native American cultural resources. These resources may not be included in the SCCIC database. The NAHC replied via email on August 21, 2024, stating that the Sacred Lands File search was completed with negative results (no records were found). Additionally, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations to the project site that might have knowledge of cultural resources in the area. Outreach letters to the Native American contacts provided by the NAHC were mailed to all Native American group representatives included on the NAHC contact list (Appendix D). Outreach letters for Assembly Bill (AB) 52 were mailed November 1, 2024, and letters for Senate Bill (SB) 18 were mailed November 5, 2024. These letters attempted to solicit additional information relating to Native American resources that may be impacted by the project. See Appendix B of Appendix D for complete documentation of Sacred Lands File search results.

The project is subject to compliance with AB 52 (California Public Resources Code [PRC], Section 21074) and SB 18 (Section 65351 of the California Government Code), which requires that the lead agency conduct Native American consultation. As mentioned above, the City sent letters to all tribes included on the previously referenced NAHC list notifying them of the project and inquiring whether the tribal representative sought consultation under AB 52 or SB 18. The letters contained the following information: a project description and location description, a request for input relative to tribal cultural resources in the area, an outline of timing relative to both the AB 52 and SB 18 process, an opportunity for consultation, and contact information for the appropriate tribal representative. To date, two responses have been received by the City. Table 4.17-1 summarizes the results of the AB 52 process for the project.

Table 4.17-1. AB 52 and SB 18 NAHC Listed Native American Contacts

Native American Tribal Representatives	Response Received
Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation)	November 8, 2024 AB 52 letter sent by City to Tribe. November 8, 2024 SB 18 letter sent by City to Tribe. November 8, 2024 Email from Mr. Salas requesting consultation because the project is within their Ancestral Tribal Territory.

Table 4.17-1. AB 52 and SB 18 NAHC Listed Native American Contacts

Native American Tribal Representatives	Response Received
	February 13, 2025 Kizh Nation sent information about their Ancestral Tribal Territory and draft mitigation measures to the City to review and consider during consultation. May 28, 2025 After review and consideration of the Kizh Nation information, the City responded to the Kizh Nation email with proposed standard conditions and mitigation measures for the Kizh Nation's consideration. June 6, 2025 Kizh Nation sent correspondence disagreeing with the standard conditions and mitigation measures and provided revisions. July 7, 2025 After review and consideration of Kizh Nation's suggested revisions, the City responded and provided clarification that the conditions and mitigation measures supplied were not novel in nature and have been used for past projects. July 18, 2025 Kizh Nation sent correspondence requesting further clarification and a written explanation of the City's approach to the mitigation measures. August 11, 2025 The City sent a letter to Kizh Nation providing the requested clarification and mitigation measures, and closed the consultation. August 12, 2025 Kizh Nation sent correspondence objecting to the closing of consultation and requested that consultation remain open. August 21, 2025 The City sent correspondence thanking the Tribe for their engagement throughout the process and confirmed that consultation had closed.
Shasta Gaughen, Tribal Historic Preservation Officer, Pala Band of Mission Indians	November 8, 2024 AB 52 letter sent by City to Tribe. November 8, 2024 SB 18 letter sent by City to Tribe. November 26, 2024 Declined AB 52 consultation at this time. The project site is not within the tribal boundaries but it is within the boundaries that the Tribe considers its Traditional Use Area or in close proximity to the Reservation.
BobbyRay Esparza, Cultural Director, Cahuilla Band of Indians	No response.
Erica Schenk, Chairperson, Cahuilla Band of Indians	No response.
Anthony Madrigal, Tribal Historic Preservation Officer, Cahuilla Band of Indians	No response.

Table 4.17-1. AB 52 and SB 18 NAHC Listed Native American Contacts

Native American Tribal Representatives	Response Received
Christina Swindall Martinez, Secretary, Gabrieleño Band of Mission Indians – Kizh Nation	No response.
Anthony Morales, Chairperson, Gabrieleño/Tongva San Gabriel Band of Mission Indians	No response.
Robert Dorame, Chairperson, Gabrieleño Tongva Indians of California Council	No response.
Christina Conley, Cultural Resources Administrator, Gabrieleño Tongva Indians of California Tribal Council	No response.
Sandonne Goad, Chairperson, Gabrieleño/Tongva Nation	No response.
Sam Dunlap, Cultural Resource Director, Gabrieleño–Tongva Tribe	No response.
Charles Alvarez, Chairperson, Gabrieleño Tongva Tribe	No response.
Joyce Perry, Cultural Resource Director, Juaneño Band of Mission Indians Acjachemen Nation – Bellardes	No response.
Heidi Lucero, Chairperson, Tribal Historic Preservation Officer, Juaneño Band of Mission Indians Acjachemen Nation	No response.
Christopher Nejo, Legal Analyst/Researcher, Pala Band of Mission Indians	No response.
Alexis Wallick, Assistant Tribal Historic Preservation Office, Pala Band of Mission Indians	No response.
Steven Estrada, Tribal Chairman, Santa Rosa Band of Cahuilla Indians	No response.
Vanessa Minott, Tribal Administrator, Santa Rosa Band of Cahuilla Indians	No response.

Table 4.17-1. AB 52 and SB 18 NAHC Listed Native American Contacts

Native American Tribal Representatives	Response Received
Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseño Indians	No response.
Jessica Valdez, Cultural Resource Specialist, Soboba Band of Luiseño Indians	No response.

Notes: AB = Assembly Bill; SB = Senate Bill; NAHC = Native American Heritage Commission; City = City of Irvine.

Intensive Pedestrian Survey

Dudek cultural resources specialists Roshanne Bakhtiary and David Alexander conducted an intensive-level pedestrian survey of the API on January 21, 2025. The API consists of two pieces of land bisected by Bee Canyon Access Road, totaling an area of 109.88 acres. The topography is a mixture of flat landscape along the western portion of the API, a flat terrace in the central portion of the API, and hilly terrain throughout the eastern and southern portions of the API. Nearly the entire western half of the API is currently used for agricultural operations, while the northwestern and central portions of the API are in use as construction laydown and haul-out yards. While the majority (65%) of the API appears have been disturbed by development and grading, the eastern, southeastern, and southern portions of the API remain heavily vegetated and undeveloped.

4.17.2 Relevant Plans, Policies, and Ordinances

Federal

National Historic Preservation Act

The National Historic Preservation Act (16 USC 470 et seq.) establishes the federal policy for preservation of historical resources, including archaeological sites, and sets in place a program for the preservation of historic properties by requiring federal agencies to consider effects to significant cultural resources (e.g., historic properties) prior to any undertaking.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of projects on historic properties (resources included in or eligible for the NRHP). It also gives the Advisory Council on Historic Preservation and the State Historic Preservation Officer an opportunity to consult.

Executive Order 11593, Protection and Enhancement of the Cultural Environment

Executive Order 11593 (36 FR 8921) (1) orders the protection and enhancement of the cultural environment by requiring federal agencies to administer cultural properties under their control in a spirit of stewardship and trusteeship for future generations; (2) initiates measures necessary to direct their policies, plans, and programs in such a way that federally owned sites, structures, and objects of historical, architectural, or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the people; and (3) in consultation with the Advisory Council on Historic Preservation, institutes procedures to assure that federal plans and programs contribute to the preservation and enhancement of non-federally owned sites, structures, and objects of historical, architectural, or archaeological significance (16 USC 470-1).

National Register of Historic Places

The NRHP is the nation's official list of historic places. The NRHP is overseen by the National Park Service and requires that a property or resource eligible for listing in the NRHP meet at least one of the following criteria at the national, state, or local level to ensure integrity and obtain official designation:

- The property is associated with events that made a significant contribution to the broad patterns of our history.
- The property is associated with the lives of persons significant to our past. Eligible properties based on this criterion are generally those associated with the productive life of the individual in the field in which the person achieved significance.
- The property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic value, or represents a significant and distinguishable entity whose components lack individual distinction.
- The property has yielded, or is likely to yield, information important to prehistory or history.

In addition to meeting at least one of these four criteria, listed properties must also retain sufficient physical integrity of those features necessary to convey historical significance. The NRHP has identified the following seven aspects of integrity: (1) location, (2) design, (3) setting, (4) materials, (5) workmanship, (6) feeling, and (7) association.

Properties are nominated to the NRHP by the State Historic Preservation Officer, the federal preservation officer for properties under federal ownership or control, or the tribal preservation officer if on tribal lands. Listing in the NRHP provides formal recognition of a property's historic, architectural, or archaeological significance based on national standards used by every state. Once a property is listed in the NRHP, it becomes searchable in the NRHP database of research information. Documentation of a property's historic significance helps encourage preservation of the resource.

State

California Register of Historical Resources

Under the California Environmental Quality Act (CEQA), 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 CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. Properties listed or formally designated as eligible for listing on the NRHP are automatically listed on 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. The State Historic Preservation Officer maintains the CRHR.

A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria (PRC Section 5024.1[c]):

- Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Associated with the lives of persons important in our past.
- Embodies 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.
- Has yielded, or may be likely to yield, information important in prehistory or history.

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

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological and historic resources:

1. PRC Section 21083.2(g): Defines “unique archaeological resource.”
2. PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a): Define 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.
3. PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) establish standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. PRC Sections 21083.2(b)–(c) and CEQA Guidelines Section 15126.4 establish the framework for mitigation related to archaeological and historic resources, including options 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 also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

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]). If a site is either listed or eligible for listing in the CRHR, it is a historical resource. If it is included in a local register of historical resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]), unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]).

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:

1. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; 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 a historical resources survey meeting the requirements of PRC section 5024.1(g), 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.

Native American Historic Cultural Sites (PRC Section 5097 et seq.)

PRC Sections 5097 et seq. classify the unauthorized disturbance or removal of archaeological or historical resources located on public lands as a misdemeanor. They prohibit the knowing destruction of objects of antiquity without a permit (express permission) on public lands, and provide for criminal sanctions. This section was amended in 1987 to require consultation with the NAHC whenever Native American graves are found. Violations that involve taking or possessing remains or artifacts are felonies.

PRC Section 5097.5 states that “no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historic feature situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.”

Assembly Bill 52

AB 52, which took effect July 1, 2015, establishes a consultation process between California Native American tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to TCRs. PRC Section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either:

1. Listed or eligible for listing in the CRHR or a local register of historical resources, or
2. Determined by a lead agency to be a TCR.

California State Senate Bill 18

SB 18, which took effect on March 1, 2005, requires local (city and county) governments to consult with California Native American tribes identified by the NAHC for the purpose of protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans (California Government Code 65352.3).

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act) (25 USC, Chapter 32), enacted in 2001, requires 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.

California Health and Safety Code Section 7050.5 and PRC 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 PRC 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 PRC 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.

Local

City of Irvine General Plan

The Cultural Resources Element of the City of Irvine's General Plan, adopted in 1973, contains the following goal, objectives and policies relating to protection of cultural resources (City of Irvine 1973):

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

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

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

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

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

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

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

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

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

Policy (h). Determine the proper disposition of each historical site prior to approval of zoning or discretionary development applications. Disposition determinations shall be based upon a detailed historical report, including an inventory form, a written evaluation, and slides documenting the building and its location. This information shall be reviewed by staff and the approval authority for discretionary development cases. Each historical report shall be filed at the Irvine Historical Museum and the City of Irvine Community Development Department.

Policy (i). Buffer and protect the integrity of an historic site and/or resources contained therein, if the Planning Commission, during review of a discretionary development case, determines preservation is required.

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

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

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

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

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

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

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

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

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

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

4.17.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to tribal cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to tribal cultural resources would occur if the project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
 - ii. 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 Public Resources Code Section 5024.1.

In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.17.4 Impacts Analysis

1. ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

- i. ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?***

Less-Than-Significant Impact. Under AB 52, TCRs are defined as archaeological resources that are eligible for or listed in the CRHR, or resources that the lead agency determines to be a TCR with a substantial burden of evidence. To date, no TCRs have been identified that would be impacted by project implementation. The SCCIC records search did not identify any resources within the project API and a search of the NAHC Sacred Land File produced negative results. Although the archival review indicates the API has been subject to past disturbances associated with the development of agricultural fields, the California Labor Camp, and El Modena Nursery throughout the mid- and late-twentieth century, alluvial soils are present throughout the API, which generally have a moderate potential to contain intact archaeological deposits. Archaeologists conducted an intensive-level pedestrian survey of the project API on January 21, 2025. Although no archaeological resources were identified within the API during the survey, approximately 40% of the ground surface was heavily obscured by dense vegetation, hardscape, and fill.

As a result of the City's AB 52 and SB 18 notification efforts, one tribal entity requested consultation on the project: the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation).

Kizh Nation responded to the project notification with a request for consultation. Through a series of emails in lieu of in-person or virtual meetings, Mr. Salas, on behalf of the Kizh Nation, indicated that the project is within Kizh Nation's Ancestral Tribal Territory. In an email to the City, Kizh Nation sent information about their Ancestral Tribal Territory and draft mitigation measures to the City to review and consider during consultation. After review and consideration of the Kizh Nation information, the City responded to the Kizh Nation email with proposed standard conditions and mitigation measures for the Kizh Nation's consideration. Kizh Nation sent correspondence disagreeing with the standard conditions and mitigation measures and provided revisions. After review and consideration of Kizh Nation's suggested revisions, the City responded and provided clarification that the conditions and mitigation measures supplied were not novel in nature and have been used for past projects. Kizh Nation sent correspondence requesting further clarification and a written explanation of the City's approach to the mitigation measures. The City sent a letter to Kizh Nation on August 11, 2025, providing the requested clarification and mitigation measures, and closed the consultation. Kizh Nation provided correspondence objecting to the closing of consultation and requested that consultation remain open. On August 21,

2025, the City provided correspondence thanking the Tribe for their engagement throughout the process and confirmed that consultation had closed.

Through consultation efforts conducted by the City, no additional information has been provided to support the presence of specific, geographically defined TCRs that could be affected by project-related construction or operation. No known cultural resources of Native American origin or association have been identified within the areas that would be affected by the project. Although the City acknowledges that the landscape surrounding the project site was traditionally used by indigenous peoples, no substantial evidence was presented demonstrating that the project has the potential for affecting known TCRs, as defined by PCR Section 21074(a). Impacts would be less than significant.

- ii. ***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 Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less-Than-Significant Impact with Mitigation Incorporated. No known TCRs have been identified through consultation that would be impacted by the project, and the City has not identified any resource on site as significant. However, the unanticipated discovery of unknown TCRs during project construction is a possibility. Although the records search, NAHC Sacred Lands File search, and pedestrian survey did not identify any TCRs within the API, the API would have likely been used by indigenous Native American inhabitants prior to Euro-American contact. The City's Mitigation Measure (MM) TCR-1 (Tribal Cultural Resources Monitoring) requires a Native American monitor to be present during grading and excavation activities. See Section 4.17.5 for the text of MM-TCR-1. Implementation of MM-TCR-1 would ensure the proper treatment of unknown TCRs in the event of unanticipated discovery and would reduce impacts from the proposed project to less than significant with mitigation incorporated.

Summary of Impacts

Although the project would not have any impacts on known TCRs, there is potential for the inadvertent discovery of subsurface TCRs during project implementation. This impact would be potentially significant, absent mitigation.

4.17.5 Mitigation Measures

Implementation of the following mitigation measure would address the project's potentially significant impacts relating to discovery of yet unknown TCRs:

- MM-TCR-1 Tribal Cultural Resources Monitoring.** Prior to the issuance of grading permits, the applicant/developer shall retain a Native American monitor (tribal monitor), initially attempting to retain such tribal monitor from the Gabrieleño Band of Mission Indians–Kizh Nation. The applicant/developer shall allow 45 days from initial contact with the above-listed Tribe to enter into a contract with the Tribe for monitoring services. If the applicant/developer can demonstrate they were unable to secure an agreement from the above-referenced Tribe, or if the contracted Tribe

fails to fulfill its obligation under the contract terms, then the applicant/developer may retain an alternative qualified tribal monitor approved by the City. A copy of the executed contract(s) shall be submitted to the Irvine Community Development Department prior to the issuance of any permit necessary to commence ground-disturbing activities. A tribal monitor shall be present on a full-time basis during ground-disturbing activities, including mass grading of the site, and for any trenching or improvements when such activities extend below artificial fill deposits into native soils.

If determined necessary by the tribal monitor, further monitoring shall continue until grading and excavation is complete or until the tribal monitor determines, based on field observations, that there is no likelihood of encountering tribal cultural resources (TCRs). Alternatively, monitoring shall be reduced from full time to part time or spot-checking if determined appropriate by the tribal monitor based on monitoring results. The tribal monitor shall complete daily monitoring logs providing descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. If TCRs are discovered during grading or excavation, the construction contractor shall divert all earthmoving activity within and around the immediate area of discovery (within 100 feet) until the tribal monitor or Tribe has had a reasonable opportunity to assess the nature and significance of the find. Project personnel shall not collect or move any TCR materials until the find has been assessed and evaluated. Project personnel shall not collect or move any human remains, items of patrimony, or associated grave goods.

4.17.6 Level of Significance After Mitigation

Impacts relating to substantial adverse change to the significance of a TCR would be addressed by implementation of MM-TCR-1, which would reduce impacts to a less-than-significant level.

4.17.7 Cumulative Impacts

Cumulative impacts to TCRs include the project's impacts and those likely to occur as a result of other existing, proposed, and reasonably foreseeable projects (refer to Table 3-1 in Chapter 3). These projects have all involved or will involve grading or other excavation activities that have potential to impact TCRs. The geographic scope for cumulative projects was selected because the archaeological and historical resources within this area are expected to be similar to those that occur on the project site due to their proximity and because similar environments, landforms, and hydrology would result in similar land use and thus site types.

The project would not cause a substantial adverse change to the significance of a TCR listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k). This is because there are no known significant TCRs in the project area. All projects in the area would be required to undergo a site-specific AB 52 process. Additionally, as needed, projects would incorporate individual mitigation for site-specific TCRs present on each individual project site. Therefore, the project's impacts combined with those of nearby projects would not result in a cumulatively considerable or significant impact on TCRs. Therefore, the project would not result in a cumulatively considerable contribution to this impact.

The project would have the potential to cause a substantial adverse change in the significance of a TCR determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. There are no known TCRs in the project area. However, the potential for intact tribal cultural deposits to exist within native soils to the depths of assumed ground disturbance is unknown. Cumulative projects would be required to assess impacts to

TCRs through the environmental review (CEQA) process. As mentioned above, all projects in the area would be required to undergo the AB 52 process. Additionally, as needed, projects would incorporate individual mitigation for site-specific TCRs present on each individual project site. Furthermore, the proposed project does not include construction (including grading/excavation) or design features that could directly or indirectly contribute to an increase in a cumulative impact to TCRs, because the implementation of MM-TCR-1 would ensure that any significant TCRs uncovered during project excavations would be properly analyzed and salvaged by the tribal monitor, reducing any potentially significant impacts to less-than-significant levels. Therefore, the project would not result in cumulatively considerable impacts to TCRs.

4.17.8 References

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