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## **APPENDIX B**

### **CULTURAL RESOURCES SURVEY**

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**Cultural Resources Survey  
for the Ganahl Lumber Project  
San Juan Capistrano,  
Orange County, California**

*Prepared for:*

**GANAHL CONSTRUCTION  
1220 East Ball Road  
Anaheim, California 92805**

*Prepared by:*

**Roger D. Mason, Ph.D., RPA**

**ECORP CONSULTING, INC.  
1801 Park Court Place, B-103  
Santa Ana, California 92701**

**October 2017  
Revised January 2019**

***U.S. Geological Survey 7.5-minute Quadrangle:***

Dana Point, California (1968, photorevised 1975)

***Area Surveyed:*** Approximately 16 acres

***Keywords:*** Cultural Resources Survey, San Juan Capistrano,  
Orange County

***Cultural Resources Identified:***

None

## **MANAGEMENT SUMMARY**

A cultural resources survey was conducted for a 16-acre parcel of land in San Juan Capistrano, Orange County, where Ganahl Lumber Company plans to construct a retail lumber facility. The survey was completed September 29, 2017 by ECORP Consulting, Inc. under contract to Ganahl Lumber Company. The purpose of the investigation was to identify cultural resources that could be affected by the proposed commercial development project, pursuant to regulations implementing the California Environmental Quality Act (CEQA).

To identify previously recorded cultural resources that could be affected by the proposed project, a cultural resources records search was conducted at the South Central Coastal Archaeological Information Center (SCCIC) and a search of the Sacred Lands File of the Native American Heritage Commission was requested.

The records search results indicate that no cultural resources have been previously recorded within the project area. Fourteen cultural resources have been previously recorded within 0.5-mile of the project area.

No cultural resources were identified as a result of the records search and the field survey completed for the Ganahl Lumber San Juan Capistrano property. Therefore, no known Historical Resources, as defined by CEQA, will be impacted by the proposed Ganahl Lumber commercial development project.

The archaeological sensitivity of the project vicinity is high and monitoring by an archaeologist and a Native American is recommended during ground-disturbing activities.

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## **1.0 INTRODUCTION**

A cultural resources investigation was conducted for a 16-acre parcel of land in the southern part of the City of San Juan Capistrano where Ganahl Lumber Company plans to construct a new Ganahl Lumber facility and entitle a commercial development (restaurant), self-storage facility, and automobile storage on the parcel.

The study was completed by ECORP Consulting, Inc. (ECORP) under contract to Ganahl Lumber Company to identify cultural resources that could be affected by the proposed commercial development project, as required by regulations implementing the California Environmental Quality Act (CEQA). A cultural resources records search, a search of the Sacred Lands File, and a field survey were conducted for the project. Results of these investigations are provided in this report, along with management recommendations.

## **2.0 LOCATION AND SETTING**

The project property is located in a commercial area in the southern part of the City of San Juan Capistrano (Figure 1) at 33750 Stonehill Drive. The site is surrounded by San Juan Creek to the west, a mobile home park to the north, a rail line and auto dealerships and commercial development to the east, and industrial/commercial development across Stonehill Drive to the south. The property is currently being used for car storage by the auto dealerships to the east along Camino Capistrano. As shown on the U.S. Geological Survey (USGS) 7.5-minute Dana Point, California topographic quadrangle map (1968, photo-revised 1975), the project area is located in the unsectioned Boca de la Playa land grant in Township 8 South, Range 8 West, SBBM (Figure 2).

The project area is on a stream terrace on the east side of San Juan Creek about one mile from its mouth at the Pacific Ocean. There is a hill adjacent to the east with an elevation of over 100 feet. The southern two-thirds of the project area contains large raised pads used for car storage. The northern third remains undeveloped with grasses and other ruderal vegetation. Before construction of the pads, elevation ranged from 25 to 37 feet.

## **3.0 CULTURAL SETTING**

### **3.1 Southern California Prehistory**

#### ***3.1.1 Paleo-Indian Period/Terminal Pleistocene (12,000 to 10,000 B.P.)***

The first inhabitants of southern California were big game hunters and gatherers exploiting extinct species of Pleistocene megafauna (e.g., mammoth and other Rancholabrean fauna). Local "fluted point" assemblages comprised of large spear points or knives are stylistically and technologically similar to the Clovis Paleo-Indian cultural tradition dated to this period elsewhere in North America (Moratto 1984). Archaeological evidence for this period in southern California is limited to a few small temporary camps with fluted points found around late Pleistocene lake margins in the Mojave Desert and around Tulare Lake in the southern San Joaquin Valley. Single points are reported from Ocotillo Wells and Cuyamaca Pass in eastern San Diego County and from the Yuha Desert in Imperial County (Rondeau, Cassidy, and Jones 2007).



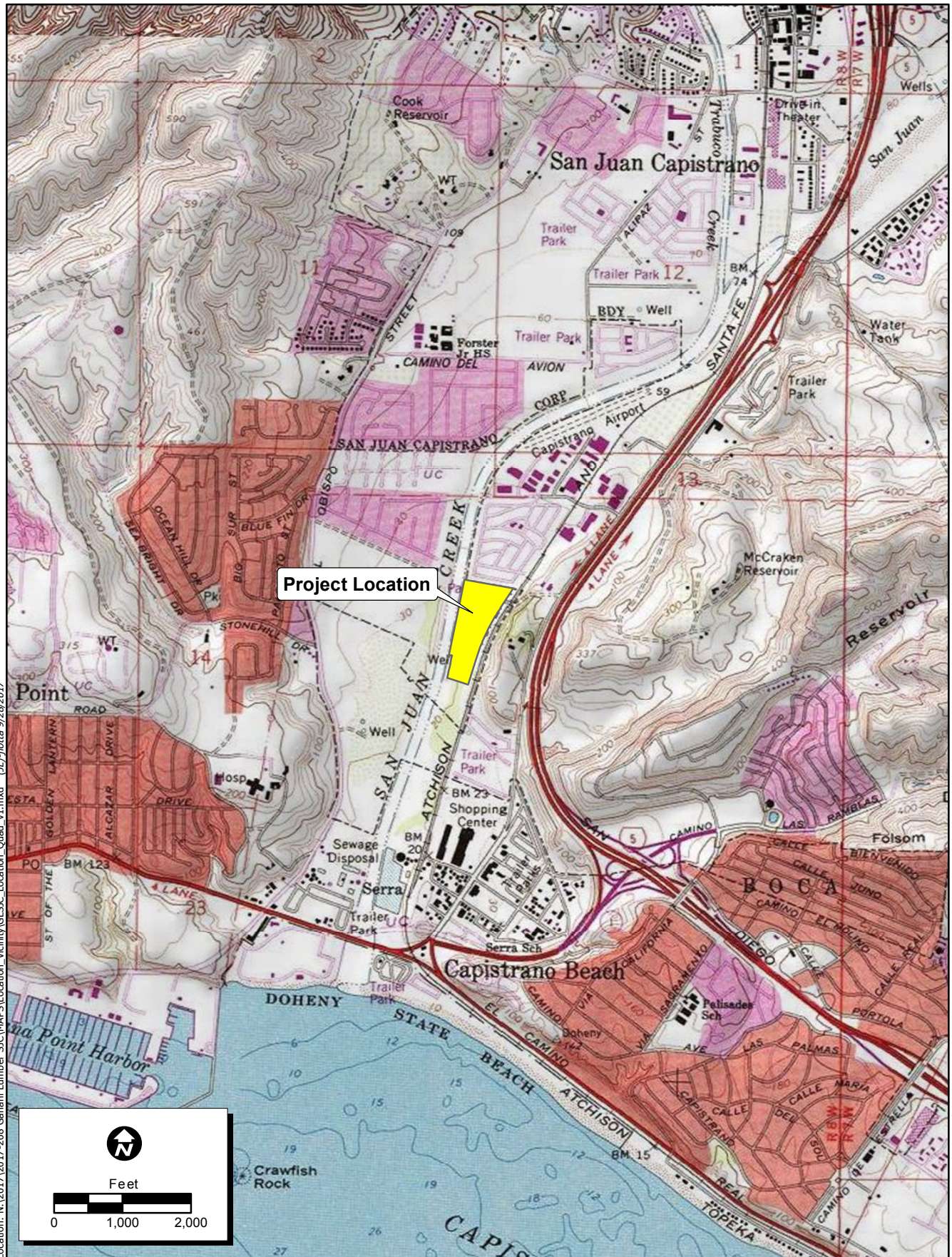
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**Figure 1. Project Vicinity**

2017-208 Ganahl Lumber SJC





Map Date: 9/28/2017  
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**Figure 2. Project Location**

2017-208 Ganahl Lumber SJC



### ***3.1.2 Early Archaic Period/Early Holocene (10,000 to 8,500 B.P.)***

Approximately 10,000 years ago at the beginning of the Holocene, warming temperatures, and the extinction of the megafauna resulted in changing subsistence strategies with an emphasis hunting smaller game and increasing reliance on plant gathering. Previously, Early Holocene sites were represented by only a few sites and isolates from the Lake Mojave and San Dieguito Complexes found along former lakebeds and grasslands of the Mojave Desert and in inland San Diego County. More recently, southern California Early Holocene sites have been found along the Santa Barbara Channel (Erlandson 1994), in western Riverside County (Grenda 1997; Goldberg 2001), and along the San Diego County coast (Gallegos 1991; Koerper, Langenwaller, and Schroth 1991; Warren 1967).

The San Dieguito Complex was defined based on material found at the Harris site (CA-SDI-149) on the San Dieguito River near Lake Hodges in San Diego County. San Dieguito artifacts include large leaf-shaped points; leaf-shaped knives; large ovoid, domed, and rectangular end and side scrapers; engraving tools; and crescentics (Koerper, Langenwaller, and Schroth 1991). The San Dieguito Complex at the Harris site dates to 9,000 to 7,500 B.P. (Gallegos 1991:Figure 3.9). However, sites from this time period in coastal San Diego County have yielded artifacts and subsistence remains characteristic of the succeeding Encinitas Tradition, including manos, metates, core-cobble tools, and marine shell (Gallegos 1991; Koerper, Langenwaller, and Schroth 1991).

### ***3.1.3 Encinitas Tradition or Milling Stone Period/Middle Holocene (8,500 to 3,500 B.P.)***

The Encinitas Tradition (Warren 1968) and the Milling Stone Period (Wallace 1955) refer to a long period of time during which small mobile bands of people who spoke an early Hokan language (possibly proto-Yuman) foraged for a wide variety of resources including hard seeds, berries, and roots/tubers (yucca in inland areas), rabbits and other small animals, and shellfish and fish in coastal areas. Sites from the Encinitas Tradition consist of residential bases and resource acquisition locations with no evidence for overnight stays. Residential bases have hearths and fire-affected rock indicating overnight stays and food preparation. Residential bases along the coast have large amounts of shell and are often termed shell middens.

The Encinitas Tradition as originally defined (Warren 1968) applied to all of the non-desert areas of southern California. Recently, two patterns within the Encinitas Tradition have been proposed which apply to different regions of southern California (Sutton and Gardner 2010). The Topanga Pattern includes archaeological material from the Los Angeles Basin and Orange County. The Greven Knoll Pattern pertains to southwestern San Bernardino County and western Riverside County (Sutton and Gardner 2010). Each of the patterns is divided into temporal phases. The Topanga I phase extends from 8,500 to 5,000 B.P. and Topanga II runs from 5,000 B.P. to 3,500 B.P. The Topanga Pattern ended about 3,500 B.P. with the arrival of Takic speakers, except in the Santa Monica Mountains where the Topanga III phase lasted until about 2,000 B.P.

The Encinitas Tradition lasted longer in inland areas because Takic speakers did not move east into these areas until circa 1,000 B.P. Greven Knoll III (3,000-1,000 B.P.) is present at the Liberty Grove site in Cucamonga (Salls 1983) and at sites in Cajon Pass that were defined as part of the Sayles Complex (Kowta 1969). Greven Knoll III sites have a large proportion of

manos and metates and core tools as well as scraper planes. Kowta (1969) suggested the scraper planes may have been used to process yucca and agave. The faunal assemblage consists of large quantities of lagomorphs (rabbits and hares) and lesser quantities of deer, rodents, birds, carnivores, and reptiles.

### ***3.1.4 Del Rey Tradition/Late Holocene (3,500 to 150 B.P.)***

The native people of southern California (north of a line from Agua Hedionda to Lake Henshaw in San Diego County) spoke Takic languages which form a branch or subfamily of the Uto-Aztecan language family. The Takic languages are divided into the Gabrielino-Fernandeño language, the Serrano-Kitanemuk group (the Serrano [includes the Vanyume dialect] and Kitanemuk languages), the Tataviam language, and the Cupan group (the Luiseño-Juaneño language, the Cahuilla Language, and the Cupeño language) (Golla 2011). According to Sutton (2009), Takic speakers occupied the southern San Joaquin Valley before 3,500 B.P. Perhaps as a result of the arrival of Yokutsan speakers (a language in the Penutian language family) from the north, Takic speakers moved southeast. The ancestors of the Kitanemuk moved into the Tehachapi Mountains and the ancestors of the Tataviam moved into the upper Santa Clara River drainage. The ancestors of the Gabrielino (Tongva) moved into the Los Angeles Basin about 3,500 B.P. replacing the native proto-Yuman (Hokan) speakers. Speakers of proto-Gabrielino reached the southern Channel Islands by 3,200 B.P. (Sutton 2009) and moved as far south as Aliso Creek in Orange County by 3,000 B.P.

The material culture of the ancestors of the Gabrielino is termed the Del Rey Tradition (3,500 to 150 B.P.) (Sutton 2010). With the arrival of the Takic speakers, settlement and subsistence systems changed. Mobility was greatly decreased compared to the Encinitas Tradition and small groups of related people lived in semi-permanent residential bases near a water source. Subsistence changed from a mobile foraging pattern to a collector pattern (Binford 1980). People collected resources and brought them back to the residential base. When away from the residential base people stayed overnight in temporary camps.

Six phases have been defined on the mainland (Angeles I – Angeles VI) and four phases (Island I – Island IV) have been defined on the southern Channel Islands for the Del Rey Tradition (Sutton 2010). Angeles I, II, and III (3,500 – 1,250 B.P.) correspond with the Intermediate Horizon first defined by Wallace (1955). During this period mortars and pestles were first used which probably indicates the beginning of acorn exploitation. Acorns required greater processing time, but were storable and contributed to a greater degree of sedentism. Lithic technology was more focused on making flake tools, rather than core tools, as in the previous Encinitas Tradition. Large projectile points, including Elko points, indicate that hunting was probably still accomplished with the *atlatl* or spear thrower.

Angeles IV, V, and VI (1,250 – 150 B.P.) correspond with the Late Prehistoric Horizon as originally defined by Wallace (1955). The complex hunter-gatherer cultures encountered by the Spaniards in southern California developed during the Late Prehistoric Horizon. People lived in villages of up to 250 people located near permanent water and a variety of food sources. Each village was typically located at the center of a defended territory from which resources for the group were gathered. Small groups left the village for short periods of time to hunt, fish, and gather plant foods. While away from the village, they established temporary camps and created locations where food and other materials were processed. Archaeologically, such locations are evidenced by manos and metates for seed grinding, bedrock mortars for acorn pulverizing, and

lithic scatters indicating manufacturing or maintenance of stone tools (usually made of chert) used in hunting or butchering. Overnight stays in field camps are evidenced by fire-affected rock used in hearths.

The beginning of Angeles IV is marked by the introduction of the bow and arrow, which made deer hunting more efficient. The bow and arrow was also used in wars for territorial defense. One of the most important food resources was acorns gathered from oak groves in canyons, drainages, and foothills. Acorn processing was labor intensive, requiring grinding in a mortar and leaching with water to remove tannic acid (Basgall 1987). Many of the mortars are bedrock mortars. Seeds from sage, grasses, goosefoot, and California buckwheat were collected and ground into meal with manos and metates. Seeds were used as the storable staple in areas which lacked acorn-producing oak groves. Protein was supplied through the meat of deer, rabbits, and other animals, hunted with bow and arrow or trapped using snares, nets, and deadfalls. On the coast fish were obtained using shell fishhooks and nets.

Trade among local groups and inland and coastal groups was important as a means of obtaining resources from outside the local group's territory. Items traded over long distances included obsidian from the Obsidian Butte source in Imperial County and from the Coso source in Inyo County, steatite bowls and ornaments from Catalina Island, shell beads and ornaments from the Santa Barbara Channel area, rabbit skins and deer hides from the interior, and dried fish and shellfish from the coast. Acorns, seeds, and other food resources were probably exchanged locally.

### **3.2 Juaneño Ethnography and Ethnohistory**

The project area formed part of the territory occupied by the Juaneño Native American group when the Spanish arrived in A.D. 1769. Ethnographic descriptions of the Juaneño are often given in terms of their neighbors to the south, the Luiseño (e.g., White 1963; Bean and Shippek 1978), but also point to a separate ethnic identity (Kroeber 1925; Strong 1929). Perhaps the most important account of Juaneño culture are the observations made by Gerónimo Boscana, friar at Mission San Juan Capistrano from 1812 to 1826 (Boscana 1933).

Juaneño settlement and subsistence systems may extend back in time to the beginning of the Angeles IV Phase about 1,250 B.P. when Takic speakers moved south beyond Aliso Creek. The Juaneño were semi-sedentary hunters and gatherers. One of the most important food resource for inland groups were acorns gathered from oak groves in canyons, drainages, and foothills. Acorns were ground into flour using mortars and pestles. Seeds from sage and grasses, goosefoot, and California buckwheat were collected and ground into meal with manos and metates. Protein was supplied through the meat of deer, rabbits, and other animals, hunted with the bow and arrow or trapped using snares, nets, and deadfalls. Coastal dwellers collected shellfish and used carved shell hooks for fishing in bay/estuary, nearshore, and kelp bed zones. Dried fish and shellfish were probably traded for inland products such as acorns and deer meat.

The Juaneño lived in villages of up to 250 people located near permanent water and a variety of food sources. Each village was typically located at the center of an established territory from which resources for the group were gathered. Small groups left the village for short periods of time to hunt, fish, and gather plant foods. While away from the village, they established temporary camps and created locations where food and other materials were processed. Archaeologically, such locations are evidenced by manos and metates for seed grinding,

bedrock mortars for acorn pulverizing, and lithic scatters indicating manufacturing or maintenance of stone tools (usually made of chert) used in hunting or butchering. Overnight stays in field camps are evidenced by fire-affected rock used in hearths.

The Juaneño village of *Toovannga* was located near the mouth of San Juan Creek (Earle and O'Neil 1994:Figure 2) and, therefore, near the project area.

### 3.3 History

Spanish explorers visited the California coast by ship in 1542 and 1602. Spanish colonization of California began with the Portolá land expedition in 1769. The expedition, led by Captain Gaspar de Portolá of the Spanish army and Father Junipero Serra, a Franciscan missionary, explored the California coast from San Diego to the Monterey Bay Area. As a result of this expedition, Spanish missions to convert the native population, *presidios* (forts), and towns were established. The Franciscan missionary friars established 21 missions in Alta California (the area north of Baja California) beginning with Mission San Diego in 1769 and ending with the mission in Sonoma established in 1823. The purpose of the missions and presidios was to establish Spanish economic, military, political, and religious control over the Alta California territory. Mission San Gabriel Archangel was founded in 1771 east of what is now Los Angeles to convert the *Tongva* or Gabrielino. Mission San Juan Capistrano was established in 1776 on San Juan Creek (in what is now southern Orange County) to convert the *Agjachemem* or Juaneño. Mission San Luis Rey was established in 1798 on the San Luis Rey River (in what is now northern San Diego County) to convert the Luiseño (Castillo 1978:100).

After Mexico became independent from Spain in 1821, what is now California became the Mexican province of Alta California. The Mexican government closed the missions in the 1830s and former mission lands were granted to retired soldiers and other Mexican citizens for use as cattle ranches. Much of the land along the coast and in the interior valleys became part of Mexican land grants or "ranchos" (Robinson 1948). The project area was in the Mexican land grant known as Rancho Boca de la Playa, granted by Pio Pico, the Mexican Governor of Alta California to Emigdio Vejar in 1846 (Olvera 2014a). During the Mexican period there were small towns at San Diego (near the presidio), San Juan Capistrano (around the mission), and Los Angeles. The rancho owners lived in one of the towns or in an adobe house on the rancho. The Mexican period includes the years 1821 to 1848.

The American period began when the Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848. As a result of the treaty, Alta California became part of the United States as the territory of California. Rapid population increase occasioned by the Gold Rush of 1849 allowed California to become a state in 1850. Most Mexican land grants were confirmed to the grantees by U.S. courts, but usually with more restricted boundaries which were surveyed by the U.S. Surveyor General's office. Land that was not part of a land grant was owned by the U.S. government until it was acquired by individuals through purchase or homesteading (Robinson 1948). Floods and drought in the 1860s greatly reduced the cattle herds on the ranchos, making it difficult to pay the new American taxes on the thousands of acres they owned. Many Mexican-American cattle ranchers borrowed money at usurious rates from newly arrived Anglo-Americans. The resulting foreclosures and land sales transferred most of the land grants into the hands of Anglo-Americans (Cleland 1941:137-138).



Emigdio Vejar sold Rancho Boca de la Playa to Juan Avila, the grantee of Rancho Niguel, for \$6,000 on August 15, 1860. The land was then transferred to Avila's son-in-law Pablo Pryor and his wife Rosa in 1864 for \$1,500. Pryor and his family lived in an adobe house on Rancho Boca de la Playa. After the death of Pryor in 1878, the Rancho was sold to Marcus A. Forster for \$29,500 in 1886. Marcus Forster was the son of Juan Forster who owned other land grants around San Juan Capistrano. Forster had married Rosa Pryor's sister. The Pryor family continued to live in the adobe. Prior to being occupied by the Pryor family, the adobe building built circa 1790, was used to store cattle hides from the herds of Mission San Juan Capistrano until they could be sold to trading ships when they arrived in Dana Cove (Olvera 2014a). This adobe building is still standing near the project area on Camino Capistrano south of the Residence Inn. By 1889 the Rancho Boca de la Playa was reduced to 463 acres with most of the holdings being sold off to pay debts. By the mid-twentieth century the rest of the Rancho lands had been sold (Diss and Connolly 2016).

The California Central Railway Company, a subsidiary of the Atchison, Topeka, & Santa Fe Railway (AT&SF), built a railroad through the Rancho Boca de la Playa in 1888. The railroad connected Los Angeles with Oceanside through San Juan Capistrano (Robertson 1998). The railroad ran through inland Orange County and then first reached the coast near the mouth of San Juan Creek where a beach resort community, known as San Juan By-the-Sea, developed near the railroad stop known as Serra. Development of Capistrano Beach started in 1926 when developers purchased part of Rancho Boca de la Playa. Homes were built on the bluff and the Capistrano Beach Club was built along the shore. In 1929, the Petroleum Securities Company (owned by Edward L. Doheny) became the new owners of the Capistrano Beach development and, in 1931, Doheny donated over 40 acres of beach to the state, which became Doheny State Beach (Olvera 2014b). The commercial area between Camino Capistrano and the railroad in south San Juan Capistrano began to develop in the 1970s and 1980s (USGS 1975).

## **4.0 METHODS**

### **4.1 Project Personnel**

The Principal Investigator and report author is Roger Mason, Ph.D., RPA. He is a Registered Professional Archaeologist (RPA #10344) and an Orange County Certified Archaeologist. Dr. Mason has over 30 years of experience in southern California cultural resources management and is the author of over 200 reports dealing with cultural resource surveys, evaluations, and mitigation programs in all southern California counties. The field survey was completed by Mark Deering. He has a B.A. and M.A. and over 20 years of experience in southern California cultural resources management.

### **4.2 Records Search Methods**

A cultural resources records search was conducted on September 26, 2017 at the South Central Coastal Archaeological Information Center (SCCIC), located at California State University, Fullerton. The purpose of the records search was to determine the extent of previous cultural resources investigations within a 0.5-mile (800-meter) radius of the project area, and whether any previously recorded archaeological sites or other historic resources exist within or near the project area. Materials reviewed included reports of previous cultural resources investigations, archaeological site records, historical maps, and listings of resources on the National Register of

Historic Places (NRHP), California Register of Historical Resources (CRHR), California Points of Historical Interest, California Landmarks, and National Historic Landmarks.

### **4.3 Native American Coordination Methods**

A search of the Sacred Lands File was conducted by the Native American Heritage Commission (NAHC) in Sacramento, California. The search was requested to determine whether there are sensitive or sacred Native American resources in the vicinity of the project area that could be affected by the proposed project. This does not constitute compliance with AB 52 which is the responsibility of the CEQA lead agency.

### **4.4 Field Survey Methods**

A cultural resources survey of the project area was completed by ECORP Archaeologist Mark Deering on September 29, 2017. Much of the property has large raised pads covered with gravel where cars from the nearby auto dealers are stored. These car storage areas were not surveyed. The remainder of the property was surveyed using pedestrian transects. Most of the property was surveyed by walking transects 5 meters apart. Where surface visibility was very low (less than 15%), transects spaced 10 meters apart were walked. All open patches of ground were examined. Embankments where weathering might have uncovered artifacts were also examined.

## **5.0 RESULTS**

### **5.1 Records Search Results**

The records search indicated 49 cultural resources investigations have been conducted within the 0.5-mile records search radius between 1978 and 2012 (Appendix A). In addition, there is a list of "Indian Campsites" by John Romero from 1935. Approximately 75 percent of the area in the records search radius has been previously surveyed. One small area survey (OR-1506) extends into the southern part of the project area. The rest of the project area has not been previously surveyed.

The records search results indicated that no previously recorded cultural resources have been recorded within the project area and 14 resources have been recorded within 0.5-mile of the project area (Table 1).

Resources within the records search radius consist of prehistoric archaeological sites and isolates and historic period buildings, a railroad, and a road. The prehistoric sites (and the Pryor Adobe) are located in the strip of land between Camino Capistrano and the railroad. None are located between the railroad and San Juan Creek where the project area is located. This distribution of sites may reflect avoidance of areas along the creek that were likely to flood. It is possible that CA-ORA-21, identified as a "burial ground" in 1949, may represent the location of the village of *Toovannga*. The area where CA-ORA-21 was located was destroyed by development prior to passage of cultural resources management laws.

**Table 1. Previously Recorded Cultural Resources within 0.5-Mile of the project area**

<b>Trinomial CA-ORA-</b>	<b>Primary Number</b>	<b>Period of Resource</b>	<b>Description</b>	<b>Recorded By</b>	<b>Within project area?</b>
21	P30-000021	Prehistoric	"Burial Grounds"	Romero. 1949	No
484	P30-000484	Prehistoric	Residential base with hearths, mortar, choppers, scrapers, debitage, and shell	T. Cooley and M. Cottrell 1975	No
835	P30-000835	Prehistoric	Temporary camp with manos and debitage	W. Wallace 1958	No
836	P30-000836	Prehistoric	Manos and hammerstone	W. Wallace 1958	No
837	P30-000837	Prehistoric	Manos and hammerstones	W. Wallace 1958	No
838	P30-000838	Prehistoric	Manos and hammerstones	W. Wallace 1958	No
1107	P30-001107	Prehistoric	Manos, metates, debitage, and marine shell	S. Dibble 1986	No
N/A	P30-001337	Historic	Serra railroad station (site)	S. Van Wormer 1985	No
1761H	P30-001761	Historic	Road segment	M. Diss and M. Connolly 2016	No
N/A	P30-100159	Prehistoric	Isolated felsite flake	K. Becker 1989	No
N/A	P30-100160	Prehistoric	Isolated mano	K. Becker 1989	No
N/A	P30-176486	Historic	Vejar-Pryor Adobe	S. Van Wormer (1986), M. Diss and M. Connolly 2016	No
N/A	P30-176663	Historic	Atchison, Topeka and Santa Fe (AT&SF) Railway	D. Ballester and B. Tang 2002	No
N/A	P30-176586	Historic	Store building in Capistrano Beach	J. Wright and M. Stoddard 1997	No

The U.S. Geological Survey (USGS) Capistrano, California topographic quadrangle map (1:125,000) of 1906 shows the Southern California Railroad, the Boca de la Playa land grant boundaries, and a few buildings labeled as San Juan in the area that is now Capistrano Beach. No buildings are shown in the project area. The USGS 7.5-minute Dana Point quad (1948) shows the AT&SF Railroad, Highway 101 (now Camino Capistrano), and buildings in the

communities of Serra and Capistrano Beach south of the project area. Three buildings are shown in a citrus orchard on a low hill east of the project area and east of the railroad. The Pryor adobe is shown on the south slope of the hill. No buildings are shown in the project area. The USGS 7.5-minute Dana Point quad (1968) shows the same three buildings on the hill east of the project area. A dirt road is shown leading to an outbuilding (possibly a well) in the northern part of the project area. San Juan Creek has been straightened and channelized. More buildings, including a shopping center and trailer parks, are shown in Serra and Capistrano Beach. The USGS 7.5-minute Dana Point quad (1968, photo-revised 1975) shows that a trailer park was built directly north of the project area with commercial buildings north and northeast of the trailer park.

The same information is shown on historic aerial photographs from 1938, 1946, 1952, and 1967. The 1967 aerial photograph shows the road to the well in the project area and suggests that the northern part of the project area was being cultivated, perhaps by the owners of the citrus grove on the hill to the east (NETRONLINE 2017).

The NAHC reports that a search of the Sacred Lands File failed to indicate the presence of Native American traditional sites or places in or near the project area (Appendix B). It is assumed that consultation with Native Americans under AB 52 will be conducted by the City.

## **5.2 Field Survey Results**

The southern part of the project area consists of car storage areas on raised and levelled fill pads that are paved with gravel. To the north of the car storage area, the north part of the project area consists of relatively level ground that appears to have been graded. About a third of this northern graded area has been covered by gravel. The remaining portion of the survey area has not been recently graded, but may have been at some time in the past. This part of the project area is mostly covered by dry matted grass and weeds. Some larger willow trees occur in the project area near the concrete embankments for San Juan Creek along the western boundary of the project area.

The car storage areas, on top of raised fill and covered with gravel, could not be surveyed. However, the recently graded area north of the car storage area was surveyed and, except where covered by gravel, had nearly 100-percent surface visibility. The area not recently graded had only 15- to 25-percent surface visibility due to the presence of matted dry grass and weeds. However, there were occasional small areas with visibility up to 90 percent. Around the larger trees, visibility was mostly reduced to 10 to 15 percent due to the presence of debris, recent trash, dead wood, and dry matted grass and weeds.

No cultural material, other than recent trash and debris, was identified in the survey area. Most, if not all, of the survey area appears to have been covered by graded fill at some point in the past, as indicated by the following:

- Fill was observed in recent boreholes down to a depth of around 30 centimeters and possibly deeper.
- Areas with elevations higher than the surrounding terrain.
- Presence of broken brick, concrete, tile and plastic debris mixed with much of the visible soil.
- Presence of fragments of non-native rock in the soil/fill.



- The generally poorly sorted quality of the sediments which include mostly angular clasts and which is thereby atypical for what should be a flood-plain area near San Juan Creek.
- The bases of the trees are lower than the surrounding terrain as if fill was piled around them, together with the presence of concrete rubble contacting the bases of these trees.

## **6.0 CEQA AND CITY CULTURAL RESOURCES GUIDELINES**

### **6.1 CEQA Guidelines**

The CEQA Guidelines for cultural resources state that 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 [CCR Title 14, Section 15064.5(b)]. The CEQA Guidelines [CCR Title 14, Section 15064.5(a)] define a Historical Resource as follows:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

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

## **6.2 City Guidelines**

The City of San Juan Capistrano's guidance for Archaeologists and Cultural Resource Consultants states that "development projects, landscape improvements and new infrastructure in culturally sensitive areas ranging from utility and retaining wall trenching to major new commercial or residential developments are required to include archaeological, paleontological and/or Native American monitoring during grading and construction" (City of San Juan Capistrano 2017a).

## **7.0 SUMMARY AND RECOMMENDATIONS**

No cultural resources were identified as a result of the records search and the field survey completed for the Ganahl Lumber San Juan Capistrano property. Therefore, no known Historical Resources, as defined by CEQA (see Section 6.0), will be affected by the proposed Ganahl Lumber commercial development project.

The archaeological sensitivity of the project vicinity is high, as indicated by the presence of numerous prehistoric archaeological sites along the east bank of San Juan Creek. However, these sites are at a higher elevation than the project area itself, which is on a low terrace directly adjacent to San Juan Creek.

As noted above, the City of San Juan Capistrano requires monitoring for development projects in in culturally sensitive areas. For this project monitoring of ground-disturbing activities should be conducted by an archaeological monitor under the supervision of an Orange County Certified Archaeologist and by a Native American monitor from one of the Juaneño groups recognized by the NAHC. A monitoring plan should be prepared by the Archaeologist and implemented upon approval by the City. Monitoring will be conducted in accord with City of San Juan Capistrano's Council Policy 601 on historic, archaeological, and paleontological resource management (City of San Juan Capistrano 2017b). Any archaeological material found during monitoring should be evaluated by the archaeologist using CRHR eligibility criteria. If eligible, and, therefore a Historical Resource as defined by CEQA, mitigation will be necessary.

If human remains of any kind are found during construction, the requirements of CEQA Guidelines Section 15064.5(e) and AB 2641 shall be followed. According to these requirements, all construction activities must cease immediately and the Orange County Coroner and a qualified archaeologist must be notified. The Coroner will examine the remains and determine the next appropriate action based on his or her findings. If the coroner determines the remains to be of Native American origin, he or she will notify the NAHC. The NAHC will then identify the most likely descendants (MLD) to be consulted regarding treatment and/or reburial of the remains. If an MLD cannot be identified, or the MLD fails to make a recommendation regarding the treatment of the remains within 48 hours after gaining access to them, the Native American human remains and associated grave goods shall be buried with appropriate dignity on the property in a location not subject to further subsurface disturbance.

## 7.0 REFERENCES

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City of San Juan Capistrano

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- 2017b Council Policy 601. Available online at [http://sanjuancapistrano.org/Portals/0/CouncilPolicy601\\_1.pdf](http://sanjuancapistrano.org/Portals/0/CouncilPolicy601_1.pdf)

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- 2014b Its History: A Lost Beachfront Treasure. *Dana Point Times*, July 5, 2014. <http://www.danapointtimes.com/its-history-a-lost-beachfront-treasure/>



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## **8.0 REPORT AND FIELD PERSONNEL**

### **8.1 Report Preparers**

Roger D. Mason, Author

1980 Ph.D., Anthropology, University of Texas, Austin

1971 B.A., Anthropology, University of Washington

Years of experience: 34

### **8.2 Field Personnel**

Mark Deering, Archaeologist

M.A., Philosophy, University of California, Irvine

B.A., Philosophy and English Writing, Pennsylvania State University

Years of experience: 20

**APPENDIX A**  
**LIST OF REPORTS FROM THE SCCIC**  
**RECORDS SEARCH**

## Report List

Ganahl Lumber SJC

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-00248		1978	Breece, William H.	Archaeological Survey of San Juan-gpa 78-1, City of San Juan Capistrano, Orange County, California	Westec Services, Inc.	
OR-00378		1979	Magalousis, Nicholas M.	Archaeological Survey of the San Juan Capistrano Airport Area	Interdisciplinary Research Group	
OR-00449		1979	Van Horn, David M.	Archaeological Survey Report: the 185+ Acre Alta Vista Golf Club in Placentia, Orange County, Ca.	Archaeological Associates, Ltd.	
OR-00454		1979	Zahniser, Jack L.	Cultural Resources Reconnaissance of Tentative Tract Number 6038	Chambers Group, Inc.	30-000001, 30-000002, 30-000003, 30-000004, 30-000005, 30-000006, 30-000007, 30-000008, 30-000009, 30-000010, 30-000011, 30-000012, 30-000013, 30-000014, 30-000015, 30-000016, 30-000017, 30-000018, 30-000019, 30-000020, 30-000021, 30-000022, 30-000023, 30-000024, 30-000025, 30-000026, 30-000027, 30-000028, 30-000029, 30-000030, 30-000280
OR-00512		1935	Romero, John B.	Orange County, California, Indian Campsites		
OR-00535		1980	Van Horn, David M.	Archaeological Survey Report: a Ca.500 Acre Tract of Land in the Vicinity of McCraken Reservoir and Forster Canyon in the City of San Juan Capistrano		30-000923, 30-000924
OR-00536			Drover, Christopher E.	City of San Jaun Capistrano, General Plan Program, Historic/Archaeological Element		30-000023, 30-000243, 30-000248
OR-00626	Paleo -	1981	Whitney-Desautels, Nancy A.	Historical/paleontological Survey Report on a 10 Acre Parcel Located in the Dana Point Area, County of Orange	Scientific Resource Surveys, Inc.	
OR-00636		1981	Desautels, Roger J.	Cultural Resources Report on the Proposed Extension of Stonehill Drive, San Juan Capistrano, County of Orange	Scientific Resource Surveys, Inc.	
OR-00833		1986	Whitney-Desautels, Nancy A.	Archaeological Assessment of the Price Club Development Near San Juan Capistrano, Orange County, California	Scientific Resource Surveys, Inc.	
OR-00958	Paleo -	1989	McKenna, Jeanette and Roger Hatheway	Historical, Archaeological, and Paleontological Investigations of the Forster Canyon Planned Development, San Juan Capistrano	Hatheway and McKenna	30-000923, 30-000924

## Report List

Ganahl Lumber SJC

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-00973	Paleo -	1989	Cooper, John and Mason, Vicki	Cultural Resources and Paleontological Surveys of Hampton Hills, Tract 13785 Dana Point, Orange County, California	Chambers Group, Inc.	
OR-00995		1989	Becker, Kenneth M.	Cultural Resources Reconnaissance of the Rosan Ranch Property, San Juan Capistrano	RMW Paleo Associates, Inc.	30-001107
OR-01011		1990	Sorensen, Jerrell H.	Archival Research for Interstate 5, From the Confluence With I 405 to Route 1, Capistrano	Greenwood and Associates	30-000016, 30-000021, 30-000023, 30-000024, 30-000188, 30-000248, 30-000354, 30-000355, 30-000375, 30-000394, 30-000426, 30-000432, 30-000464, 30-000465, 30-000473, 30-000474, 30-000515, 30-000538, 30-000551, 30-000579, 30-000598, 30-000600, 30-000602, 30-000627, 30-000769, 30-000834, 30-000835, 30-000836, 30-000837, 30-000838, 30-000841, 30-000856, 30-000923, 30-000963, 30-000964, 30-001035, 30-001040, 30-001107, 30-001109, 30-001110, 30-001154, 30-001190, 30-001191, 30-001215
OR-01090		1991	Bissell, Ronald M.	Cultural Resources Reconnaissance of the Rosan Ranch Property and Test Excavation of a Portion of Archaeological Site CA-ora1107, San Juan Capistrano, Orange County, California	RMW Paleo Associates, Inc.	30-001107
OR-01113		1991	Brown, Joan C.	Cultural Resources Literature Review for the San Juan Creek Levee Project in San Juan Capistrano, Orange County, California	RMW Paleo Associates, Inc.	
OR-01178		1991	Demcak, Carol R.	Boundaries of the Ari Survey in 1975.	ARMC	30-000021, 30-000484, 30-001107
OR-01204		1987	Demcak, Carol and Stephen R. Van Wormer	Archaeological Investigations at CA-ORA-27a, CA-ORA-882, CA-ORA-1042, and CA-ORA-870: Chiquita Canyon Water Reclamation Plant Project, South Orange County, California Appendix A: Historic Resources Survey for the Chiquita Land Outfall Pipeline	ARMC	30-000027, 30-000870, 30-000882, 30-001042
OR-01260		1993	Shinn, Juanita R.	Cultural Resource Assessment for the Capistrano Beach Water Facility, Capistrano Beach, California	RMW Paleo Associates, Inc.	30-000021, 30-001337

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Ganahl Lumber SJC

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-01261		1993	Shinn, Juanita R.	Archaeological Literature and Records Review for the Capistrano Beach Water Facility, Capistrano Beach, California	RMW Paleo Associates, Inc.	30-000021
OR-01264		1991	Sundberg, Frederick A. and Whitney-Desautels, Nancy	Archaeological Reassessment of the Dana Bluff Development (tract 11711) Dana Point, California	Scientific Resource Surveys, Inc.	
OR-01298		1993	Shinn, Juanita R.	Addendum Report of Cultural Resource Assessment for the Capistrano Beach Water Facility, Capistrano Beach, California	RMW Paleo Associates, Inc.	30-000021, 30-000188, 30-000434, 30-000484, 30-000835, 30-000836, 30-000837, 30-000838, 30-001107
OR-01336		1986	Cottrell, Marie G., D.Stephen Dibble, Constance Cameron, and Stephen Van Wormer	Cultural Resources Assessment and Excavation for the Proposed Stonehill Drive Extension Located in Southwestern Orange County, California	ARMC	30-001107
OR-01434		1995	Maxon, Patrick O.	Archaeological Survey and Impact Assessment of the Proposed Upgrade to the Capistrano Beach Water District Waste Water Treatment Facility	RMW Paleo Associates, Inc.	30-000021
OR-01506		1996	LSA Associates, Inc.	Cultural Resources Assessment for the Home Depot - San Juan Capistrano Site	LSA Associates, Inc.	
OR-01602		1991	Petershagen, George F. and Judy D. Tordoff	Historic Study Report for Proposed Hov Lanes Along Interstate 5 in San Juan Capistrano, Orange County, California	Department of Transportation	30-001215
OR-01603		1991	Huey, Gene	Historic Property Survey Report for Interstate 5 (I-5) Improvements From State Route 1 in the City of San Juan Capistrano to Approximately 1,000 Feet North of El Toro Road in the Community of Lake Forest, Orange County, California	Caltrans	30-000016, 30-000837, 30-000838, 30-001215
OR-01604		1991	Huey, Gene	Archaeological Survey Report for Interstate 5 (I-5) Improvements From State Route 1 in the City of San Juan Capistrano to Approximately 1,000 Feet North of El Toro Road in the Community of Lake Forest, Orange County, California	Caltrans	30-000016, 30-000837, 30-000838, 30-001215
OR-01616		1997	Conkling, Steven W. and Deborah K. B. McLean	An Evaluation of the Dolph House, 34000 Capistrano by the Sea, Dana Point, Orange County, California	LSA Associates, Inc.	30-177499



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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-01684		1995	Maxon, Patrick O.	Archaeological Survey and Impact Assessment of the Capistrano Beach Water District Stonehill Road Right of Way Acquisition	RMW Paleo Associates, Inc.	
OR-01695		1998	Maxon, Patrick O.	Cultural Resources Reconnaissance and Impact Assessment of the Proposed Capistrano Beach Water District Grading and Flood Control Project.	RMW Paleo Associates, Inc.	30-001337
OR-01819	Paleo -	1997	Strudwick, Ivan H. and Conkling, Steven W.	Cultural and Paleontological Resources Assessment for Blue Sky Properties, San Juan Capistrano, Orange County, California	LSA Associates, Inc.	30-001107
OR-01820		1996	Cutrone, Daniel and McLean, Deborah	Cultural Resources Monitoring Report for the North R&D Site Interim Grading Project in San Juan Capistrano, County of Orange, California	LSA Associates, Inc.	
OR-01850	Paleo -	1998	Padon, Beth	Archaeological and Paleontological Archival Review for the Capistrano by the Sea Project	Discovery Works, Inc.	
OR-01869		1994	Bonner, Wayne H. and Hocking, David	Grading Monitoring Report Archaeology and History Mci Trenching Project, San Juan Capistrano, Orange County, California	Scientific Resource Surveys, Inc.	
OR-02054		2000	Bonifacio, Marco	Cultural Resources Monitoring of the Rosan Ranch Property, San Juan Capistrano, Orange County, California	RMW Paleo Associates, Inc.	30-001107
OR-02055		1987	Unknown	Stonehill Drive Extension Historical Property Survey Report and Request for Determination of Eligibility	Culbertson, Adams, and Associates, Inc.	30-000837, 30-000838, 30-001107
OR-02215		2001	Brown, Joan C.	Cultural Resources Literature and Record Review, and Reconnaissance for the Capistrano Valley Water District Domestic, Non-domestic, and Brackish Water Wells Project	RMW Paleo Associates, Inc.	30-001342
OR-02317		1976	Cottrell, Marie G.	Letter Report	Archaeological Research, Inc.	
OR-02566		2000	Delu, Antonina	Results of Archaeological Monitoring Blue Sky Properties, City of San Juan Capistrano Orange County, California	LSA Associates, Inc.	30-001107
OR-02873		2003	Mason, Roger D.	Cultural Resources Records Search and Reconnaissance Survey Report for the Dana Point Harbor Revitalization Project City of Dana Point, Orange County	Chambers Group, Inc.	

## Report List

Ganahl Lumber SJC

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-02922	Cellular -	2002	Duke, Curt	Cultural Resource Assessment Cingular Wireless Facility No. Cm 376-05 Orange County, California	LSA Associates, Inc.	30-100159
OR-03367		1977	Cottrell, Marie G.	Kato Property, San Juan Capistrano	Archaeological Research, Inc.	
OR-03373		2006	Arrington, Cindy and Nancy Sikes	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II	SWCA Environmental Consultants, Inc.	
OR-03390		2007	Price, Barry A. and Price, David H.	Cultural Resources Inventory for the Proposed Non-domestic/recycled Water Master Plan Update, City of San Juan Capistrano, Orange County, California	Applied EarthWorks, Inc.	30-000600, 30-000834, 30-000835, 30-000838, 30-000841, 30-000885, 30-000923, 30-001036, 30-001037, 30-001038, 30-001039, 30-001040, 30-001154, 30-001191, 30-001217, 30-001327, 30-001328, 30-001330, 30-001338, 30-001342
OR-03765		2009	Robert J. Lichtenstein, Barry A. Price, and David H. Price	Cultural Resources Inventory and Site Assessment for the Proposed San Juan Capistrano Non-Domestic/Recycled Water Master Plan Update, Orange County, California	Applied EarthWorks, Inc.	30-000248, 30-000600, 30-000834, 30-000835, 30-000923, 30-001040, 30-001154, 30-001191, 30-001271, 30-001327, 30-001328, 30-001330, 30-001338, 30-001342, 30-001688, 30-160128
OR-03826		2009	Demcak, Carol	Report of Cultural Resources Assessment for Two Proposed MNWD Pipelines, Component A (Mission Viejo) and Component B (Dana Point), South Orange County, California	Archaeological Resource Management Corporation	30-000434, 30-000484
OR-03969		2010	Tibbet, Casey, Cheryl Sinopoli, and Glenn G. Moser	Historic Property Survey Report for proposed widening of Interstate 5 (I-5) between Avenida Pico and San Juan Creek Road	LSA	30-000021, 30-000188, 30-000549, 30-000599, 30-000835, 30-000836, 30-000837, 30-000838, 30-000903, 30-000924, 30-001107, 30-001258, 30-001579, 30-001709, 30-100114, 30-100115, 30-176700, 30-177046, 30-177047, 30-177048, 30-177049, 30-177050, 30-177051, 30-177052, 30-177053, 30-177054, 30-177055, 30-177056, 30-177057, 30-177058, 30-177059, 30-177060, 30-177061
OR-04223		2011	Flynn, Chris	Notification of Finding of No Adverse Effect with Standard Conditions for the Bridge Deck Maintenance and Sealing at 30 Locations Throughout Orange County, California	Department of Transportation	

## Report List

Ganahl Lumber SJC

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
OR-04497		2012	Akyuz, Linda	Intermediate Draft Cultural Resources Phase I Assessment for the Avenida Columbo Storm Drain Project, City of San Clemente, Orange County, California	Archaeo Paleo Resource Management	

## **APPENDIX B**

### **NATIVE AMERICAN HERITAGE COMMISSION LETTER**

**NATIVE AMERICAN HERITAGE COMMISSION**

Environmental and Cultural Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
(916) 373-3710



September 28, 2017

Dr. Roger Mason  
ECORP Consulting, Inc.

Sent by E-mail: [rmason@ecorpconsulting.com](mailto:rmason@ecorpconsulting.com)

RE: Proposed Ganahl Lumber Project, Community of Capistrano Beach; Dana Point USGS Quadrangle, Orange County, California

Dear Dr. Mason:

A records search of the Native American Heritage Commission (NAHC) *Sacred Lands File* was completed for the area of potential project effect (APE) referenced above with negative results. Please note that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.

Attached is a list of tribes culturally affiliated to the project area. I suggest you contact all of the listed Tribes. If they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact via email: [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Gayle Totton".

Gayle Totton, M.A., PhD.  
Associate Governmental Program Analyst  
(916) 373-3714

**Native American Heritage Commission  
Native American Contact List  
Orange County  
9/29/2017**

**Campo Band of Mission Indians**

Ralph Goff, Chairperson  
36190 Church Road, Suite 1 Kumeyaay  
Campo, CA, 91906  
Phone: (619) 478 - 9046  
Fax: (619) 478-5818  
rgoff@campo-nsn.gov

**Ewilaapaayp Tribal Office**

Michael Garcia, Vice Chairperson  
4054 Willows Road Kumeyaay  
Alpine, CA, 91901  
Phone: (619) 445 - 6315  
Fax: (619) 445-9126  
michaelg@leaningrock.net

**Ewilaapaayp Tribal Office**

Robert Pinto, Chairperson  
4054 Willows Road Kumeyaay  
Alpine, CA, 91901  
Phone: (619) 445 - 6315  
Fax: (619) 445-9126

**Jamul Indian Village**

Erica Pinto, Chairperson  
P.O. Box 612 Kumeyaay  
Jamul, CA, 91935  
Phone: (619) 669 - 4785  
Fax: (619) 669-4817

**Juaneno Band of Mission  
Indians**

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

**Juaneno Band of Mission  
Indians Acjachemen Nation -  
Belardes**

Matias Belardes, Chairperson  
32161 Avenida Los Amigos Juaneno  
San Juan Capistrano, CA, 92675  
Phone: (949) 293 - 8522

**Juaneno Band of Mission  
Indians Acjachemen Nation -  
Belardes**

Joyce Perry, Tribal Manager  
4955 Paseo Segovia Juaneno  
Irvine, CA, 92603  
Phone: (949) 293 - 8522  
kaamalam@gmail.com

**Juaneno Band of Mission  
Indians Acjachemen Nation -  
Romero**

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

**La Posta Band of Mission  
Indians**

Javaughn Miller, Tribal  
Administrator  
8 Crestwood Road Kumeyaay  
Boulevard, CA, 91905  
Phone: (619) 478 - 2113  
Fax: (619) 478-2125  
jmiller@LPtribe.net

**La Posta Band of Mission  
Indians**

Gwendolyn Parada, Chairperson  
8 Crestwood Road Kumeyaay  
Boulevard, CA, 91905  
Phone: (619) 478 - 2113  
Fax: (619) 478-2125  
LP13boots@aol.com

**Manzanita Band of Kumeyaay  
Nation**

Angela Elliott Santos, Chairperson  
P.O. Box 1302 Kumeyaay  
Boulevard, CA, 91905  
Phone: (619) 766 - 4930  
Fax: (619) 766-4957

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Ganahl Lumber Project, Orange County.



**Native American Heritage Commission  
Native American Contact List  
Orange County  
9/29/2017**

**Manzanita Band of Kumeyaay  
Nation**

Nick Elliott, Cultural Resources  
Coordinator  
P. O. Box 1302  
Boulevard, CA, 91905  
Phone: (619) 766 - 4930  
Fax: (619) 766-4957  
nickmepa@yahoo.com

Kumeyaay

**Pauma Band of Luiseno Indians  
- Pauma & Yuima Reservation**

Temet Aguilar, Chairperson  
P.O. Box 369  
Pauma Valley, CA, 92061  
Phone: (760) 742 - 1289  
Fax: (760) 742-3422

Luiseno

**San Pasqual Band of Mission  
Indians**

John Flores, Environmental  
Coordinator  
P. O. Box 365  
Valley Center, CA, 92082  
Phone: (760) 749 - 3200  
Fax: (760) 749-3876  
johnf@sanpasqualtribe.org

Kumeyaay

**San Pasqual Band of Mission  
Indians**

Allen E. Lawson, Chairperson  
P.O. Box 365  
Valley Center, CA, 92082  
Phone: (760) 749 - 3200  
Fax: (760) 749-3876  
allenl@sanpasqualtribe.org

Kumeyaay

**Sycuan Band of the Kumeyaay  
Nation**

Cody J. Martinez, Chairperson  
1 Kwaaypaay Court  
El Cajon, CA, 92019  
Phone: (619) 445 - 2613  
Fax: (619) 445-1927  
ssilva@sycuan-nsn.gov

Kumeyaay

**Sycuan Band of the Kumeyaay  
Nation**

Lisa Haws, Cultural Resources  
Manager  
1 Kwaaypaay Court  
El Cajon, CA, 92019  
Phone: (619) 312 - 1935  
lhaws@sycuan-nsn.gov

Kumeyaay

**Viejas Band of Kumeyaay  
Indians**

Robert Welch, Chairperson  
1 Viejas Grade Road  
Alpine, CA, 91901  
Phone: (619) 445 - 3810  
Fax: (619) 445-5337  
jhagen@viejas-nsn.gov

Kumeyaay

**Viejas Band of Kumeyaay  
Indians**

Julie Hagen,  
1 Viejas Grade Road  
Alpine, CA, 91901  
Phone: (619) 445 - 3810  
Fax: (619) 445-5337  
jhagen@viejas-nsn.gov

Kumeyaay

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