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GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
COMMUNITY
DEVELOPMENT

OCT 09 2018



KEN ALEX
DIRECTOR

October 2, 2018

CITY OF
NEWPORT BEACH

Makana Nova
City of Newport Beach
100 Civic Center Dr
Newport Beach, CA 92660

Subject: Big Canyon Coastal Habitat Restoration and Adaptation - Phase 2A
SCH#: 2018081098

Dear Makana Nova:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on October 1, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Document Details Report

State Clearinghouse Data Base

SCH# 2018081098
Project Title Big Canyon Coastal Habitat Restoration and Adaptation - Phase 2A
Lead Agency Newport Beach, City of

Type MND Mitigated Negative Declaration

Description A coastal development permit and mitigated negative declaration for the Phase 2A habitat restoration at an 11.3-acre site located at the mouth of Big Canyon. The city of Newport and the Newport Bay Conservancy propose to restore historic riparian habitat by removing non-native vegetation and replanting native species, creating a mosaic of native and sustainable habitats, stabilizing the creek and floodplain with erosion control measures, and enhancing public access and education within the Big Canyon Nature Park with improved trails and closure of illegal trails. The project also includes maintenance of the restored habitat area and erosion quality measures to ensure that the plants are established and erosion features function as designed.

Lead Agency Contact

Name Makana Nova
Agency City of Newport Beach
Phone (949) 644-3249 **Fax**
email
Address 100 Civic Center Dr
City Newport Beach **State** CA **Zip** 92660

Project Location

County Orange
City Newport Beach
Region
Lat / Long 33° 37' 49" N / 117° 52' 49." W
Cross Streets Back Bay Dr, Amigos Way, Jamboree Rd, and Park Newport Dr
Parcel No. 440-092-79
Township **Range** **Section** **Base**

Proximity to:

Highways 1
Airports
Railways
Waterways Newport Back Bay
Schools Our Lady Queen of An
Land Use passive park/OS/OS

Project Issues Biological Resources; Vegetation; Wetland/Riparian; Tribal Cultural Resources; Noise

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 12; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; State Lands Commission

Date Received 08/31/2018 **Start of Review** 08/31/2018 **End of Review** 10/01/2018

BIG CANYON COASTAL HABITAT RESTORATION AND ADAPTATION PROJECT – PHASE 2A

Mitigation Monitoring and Reporting Program

Prepared for
City of Newport Beach
Public Works Department

October 2018



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Introduction

The following is a Mitigation Monitoring and Reporting Program (MMRP) for the Big Canyon Coastal Habitat Restoration and Adaptation Project – Phase 2A, which has been prepared pursuant to Section 15097 of the CEQA Guidelines and Section 21081.6 of the Public Resources Code. This MMRP lists all applicable mitigation measures from the Initial Study and Mitigated Negative Declaration (IS/MND). The appropriate timing of implementation and responsible party are identified to ensure proper enforcement of the mitigation measures from the IS/MND to reduce project impacts to less than significant levels.

Project Description

The proposed project is located within the City of Newport Beach, on a site in the eastern portion of the 60-acre Big Canyon Nature Park. The proposed project encompasses 11.32 acres and includes the following: (1) restore historic riparian habitat by removing non-native vegetation and replanting native species, (2) create a mosaic of native and sustainable habitats, (3) stabilize the creek and floodplain with erosion control measures, and (4) enhance public access within the Big Canyon Nature Park by improving existing trails and closing illegal trails. The project also includes maintenance of the restored habitat area and erosion quality measures to ensure that the plants are established and erosion features function as designed.

Mitigation Monitoring and Reporting Program

The following table will be used by the City of Newport Beach and the Newport Bay Conservancy to enforce mitigation measures during each phase of the project pursuant to Section 15097 of the State CEQA Statutes and Guidelines and Public Resources Code Section 21081.6. The City of Newport Beach and the Newport Bay Conservancy will be responsible for the implementation for all the mitigation measures listed in Table 1 below and shall maintain monitoring documentation on each measure within the City of Newport Beach files at the addressed listed below. The entity responsible for monitoring will change based on the specific requirements identified in each mitigation measure. The timing of the implementation is also listed. When compliance with a mitigation measure for each project phase has been demonstrated, documentation on the verification date column is provided and monitoring of the measure will be deemed to be satisfied. No further monitoring will be required for the completed mitigation measure. For measures that require monitoring during operation of the project, annual documentation on the verification date column or a separate letter/memorandum shall be provided in the monitoring file that is kept at the City of Newport Beach.

The Mitigation Monitoring and Reporting Program will be kept on file at the following address:

City of Newport Beach, Public Works Department
100 Civic Center Drive
Newport Beach, CA 92660

TABLE 1
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Timing for Implementation	Responsible Party	Verification Date
Biological Resources (BIO)			
BIO-1: Special-Status Plants Special-Status Plants. Impacts to special-status plants would be avoided by implementing the following: - Within two weeks prior to construction activities, preconstruction surveys shall be conducted by a qualified Project Biologist to confirm presence/absence of special-status plant species within the project site. The locations of any special-status plant species identified during the pre-construction botanical survey, including those with a CRPR of 1, 2, or 3 shall be flagged (or otherwise delineated and marked) by a biologist and shall be avoided. To verify avoidance during construction, a qualified biologist shall be onsite during any ground disturbing activities within 10 feet of a special-status plant species population. - If special-status plant species are observed during the preconstruction surveys within the portion of the project site proposed for restoration and if avoidance of the special-status plant species is not feasible, coordination with USFWS and/or CDFW will be required to confirm suitable mitigation prior to ground-disturbing activities. The mitigation strategy may include on-site or off-site restoration, translocation, and/or seed collection, and shall be outlined in a restoration/revegetation plan to be approved by USFWS and/or CDFW. At a minimum, the plan shall include a description of the existing conditions, site selection criteria, site preparation and planting methods, maintenance and monitoring schedule, performance standards, adaptive management strategies, and identification of responsible parties.	Prior to construction	Newport Bay Conservancy and City of Newport Beach	
BIO-2: Nesting Birds. Impacts to nesting birds would be avoided by conducting all grading and construction activities outside of the bird breeding season (February 15 to August 31; January 15 to August 31 for raptors). If breeding season cannot be avoided, the following measures would be followed. - During the avian breeding season, a qualified Project Biologist shall conduct a preconstruction avian nesting survey no more than 3 days prior to vegetation disturbance or site clearing. If grading or other construction activity begins in the non-breeding season and proceeds continuously into the breeding season, no surveys shall be required. However, if there is a break of 3 days or more in grading or construction activities during the breeding season, a new nesting bird survey shall be conducted before these activities begin again. - The nest survey shall cover all reasonably potential nesting locations on and within 300 feet of the proposed areas where construction activities will occur. - If an active nest is found during an avian nest survey, a qualified Project Biologist shall implement a 300-foot minimum avoidance buffer for special-status species	Prior to construction Grading and construction activities should be conducted September 1–February 14 (outside of bird breeding season) to avoid impacts to nesting birds. If unavoidable, preconstruction survey shall be conducted no more than 3 days prior to vegetation disturbance or site clearing.	Newport Bay Conservancy and City of Newport Beach	

Mitigation Measure	Timing for Implementation	Responsible Party	Verification Date
(e.g., coastal California gnatcatcher, least Bell's vireo); a 500-foot minimum avoidance buffer for all raptor species; and 300-foot minimum avoidance buffer (or other buffer as determined appropriate by the Project Biologist) for other passerine birds. Buffer distances for other species will be determined by the Project Biologist based on the species and its breeding or nesting requirements. The nest site area shall not be disturbed until the nest becomes inactive or the young have fledged.			
BIO-3: Special-Status Bats. Impacts to special-status bat species would be avoided by conducting all grading and construction activities outside of the maternity roosting season (mid-March through August). If maternity roosting season cannot be avoided, the following measures would be followed. a. If grading/construction activities must occur during the maternity season, a qualified biologist shall conduct a pre-construction survey to identify potential active roosts. The pre-construction survey shall occur the night before grading/construction activities to observe if any bats are exiting suitable habitat within 100 feet of the proposed work area. The pre-construction survey will be conducted at sunset for 90 minutes by a qualified biologist with the use of a thermal imaging camera to observe and record any bats. If no bats are observed, work may proceed in the proposed work area the following day and will remain cleared for the duration of the work activity. If active roosts are observed, no grading/construction activities may take place in the proposed work area the following day and not until it can be verified with thermal imaging that bats have left the area or the maternity roosting season is over. b. Additional pre-construction surveys will be required in new work areas located more than 100 feet away from the previously surveyed work area.	Prior to construction Grading and construction activities should be conducted Mid-March – August (outside of maternity roosting season) to avoid impacts to special-status bats. If unavoidable, preconstruction survey shall be conducted no more the night before grading/construction activities	Newport Bay Conservancy and City of Newport Beach	
Cultural Resources (CR)			
CR-1: Archaeological Monitoring. An archaeological monitor (working under the direct supervision of a Secretary of the Interior-qualified archaeologist [USDl, 2008]) shall be retained to observe all ground-disturbing activities, including but not limited to brush clearance, vegetation removal, grubbing, grading, and excavation. Prior to start of ground-disturbing activities, the archaeologist shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The City shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site. The	Prior to construction; During construction;	Newport Bay Conservancy and City of Newport Beach	

Mitigation Measure	Timing for Implementation	Responsible Party	Verification Date
qualified archaeologist, in coordination with the City, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. The archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment. The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the City, the Corps, and any Native American groups who request a copy. A copy of the final report shall be filed at the SCCIC. If archaeological resources are encountered during monitoring, and if it is determined that the discovered archaeological resource constitutes a historic property under Section 106 of the National Historic Preservation Act (NHPA) or a historical resource under CEQA, avoidance and preservation in place is the preferred manner of treatment. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan would be prepared and implemented by a qualified archaeologist in consultation with the Corps and the City. The plan will provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The Corps and the City shall be required to consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.			
CR-2: Native American Monitoring. The City shall retain a Native American monitor to observe all ground-disturbing activities, including but not limited to brush clearance, vegetation removal, grubbing, grading, and excavation. The Native American monitor shall be selected from amongst the Native American groups identified by the NAHC as having affiliation with the project area. The Native American representative shall be allowed to participate in the cultural resources sensitivity training, discusses in Mitigation Measure CR-1, and all authorities ascribed to the archaeological monitor, including the authority to stop work in the event of the discovery of cultural resources, shall also apply to the Native American monitor. In the event that archaeological	Prior and during construction	Newport Bay Conservancy and City of Newport Beach	

Mitigation Measure	Timing for Implementation	Responsible Party	Verification Date
materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.			
CR-3: Paleontological Monitoring. A qualified paleontologist meeting the Society for Vertebrate Paleontology (SVP) guidelines for professional paleontologist (SVP, 2010) shall be retained to oversee all mitigation measures related to paleontological resources. That said, both the paleontological and archaeological monitoring could be carried out by the same person, presuming the monitor is qualified in both disciplines. During ground disturbing activity, the qualified paleontologist or paleontological monitor shall conduct spot-checks of exposed sediments. The purpose would be to determine whether the project would impact the paleontologically sensitive Monterey Formation. The qualified paleontologist may institute paleontological monitoring if, based on observations of subsurface stratigraphy or other factors, he or she determines that the possibility of encountering fossiliferous deposits is high. Paleontological monitoring would be conducted by a paleontological monitor working under the supervision of the qualified paleontologist. In the event that monitoring is required, the monitor shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens and shall complete daily monitoring logs outlining the day's activities. The qualified paleontologist shall prepare a final monitoring report to be submitted to the City and filed with the local repository, along with any fossils recovered during construction. The qualified paleontologist shall also contribute to any construction worker cultural resources sensitivity training (see Mitigation Measure CR-1) either in person or via a training module provided to the qualified archaeologist. The training shall include information of the types of paleontological resources that may be encountered, and the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources. In the event of unanticipated discovery of paleontological resources, the City shall cease ground-disturbing activities within 100 feet of the find until it can be assessed by the qualified paleontologist. The qualified paleontologist shall assess the find, implement recovery measures if necessary, and determine if paleontological monitoring is warranted once work resumes.	During construction	Newport Bay Conservancy and City of Newport Beach	
Noise (NOI)			
NOI-1: The construction contractor shall ensure proper maintenance and working order of equipment and vehicles and that all construction equipment is equipped with manufacturers approved mufflers and baffles.	During construction	Construction Contractor, Newport Bay Conservancy and City of Newport Beach	
NOI-2: The construction contractor(s) shall endeavor to use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), when feasible. Noisy equipment shall be switched off when not in use.	During construction	Construction Contractor, Newport Bay Conservancy and City of Newport Beach	

Mitigation Measure	Timing for Implementation	Responsible Party	Verification Date
NOI-3: Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels, to the extent feasible.	During construction	Construction Contractor, Newport Bay Conservancy and City of Newport Beach	
NOI-4: The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.	During construction	Construction Contractor, Newport Bay Conservancy and City of Newport Beach	



October 10, 2018

Makana Nova, AICP
Associate Planner
Community Development Department
City of Newport Beach
100 Civic Center Drive
Newport Beach, CA 92660

Subject: Errata/Revisions to the Initial Study/Mitigated Negative Declaration for the Big Canyon Coastal Habitat Restoration and Adaptation Project - Phase 2A

Dear Ms. Nova, AICP:

The IS/MND for the Big Canyon Coastal Habitat Restoration and Adaptation Project – Phase 2A was circulated for public review from September 4, 2018 to October 5, 2018. The City of Newport Beach received four comment letters, one email and one phone message that included a map.

The following provides the corrections and additions to the sections of the Initial Study/Mitigated Negative Declaration. The corrections and additions are organized by page number. Additional text is shown in underline, and deleted text is shown in ~~strike through~~ format.



Ms. Nova, AICP
October 10, 2018
Page 2

Page 1, IS/MND

The first sentence in the second paragraph on page 1 of Chapter 1, Introduction of the IS/MND is revised as follows:

Phase 2A is considered a separate project from other identified phases (i.e. Phase 1, Phase 2B, and Phase 2C) ~~because where~~ specific grant funding was provided to the project applicant, The Newport Bay Conservancy, to provide a restoration design for the 11.32-acre project site (Phase 2A).

Page 42, IS/MND

The following correction was required to clarify that the vegetation that is currently infested with the Polyphagous Shot Hole Borer (PSHB) is some of the existing willow trees. The second paragraph on page 42 of the IS/MND is revised as follows:

Furthermore, the proposed project includes the removal of the existing Brazilian pepper trees that are approximately 20 to 30 feet in height, non-native and evergreen. ~~Although these tree species could provide a visually pleasing view, these species are infested with PSHB that will eventually destroy the trees.~~ The proposed removal of these non-native evergreen species as well as other exotics and invasive species would alter distant views from Back Bay Drive and limited views from Jamboree Road, as well as distant eastern views from the nearest public viewpoint located approximately 600 feet west of the project site within the western portion of Big Canyon Park. ~~Although these current views would be altered, the proposed vegetation would provide views of native habitat that can be visually pleasing, the presence of PSHB will result in the ultimate destruction of the existing pepper trees and the visually pleasing resource will be naturally affected.~~ Therefore, ~~t~~The proposed restoration of the project site with alkali wet and high meadow communities with vegetation heights of two to three feet would include more sustainable natural plant species. The final project plantings would continue to provide natural and visually pleasing vegetation as viewed from Back Bay Drive and Jamboree Road. Although the proposed restoration would alter views from Jamboree Road, Back Bay Drive, as well as the public viewpoint west of the project site, views of the project site would remain aesthetically pleasing and impacts to the scenic quality of the project area would be less than significant.

Page 28, IS/MND and Appendix C, Page 8

The following correction addresses the comment made by the California Department of Fish and Wildlife who addressed the need for clarification of vegetation disposal and information provided in third paragraph on page 28 of the IS/MND and page 8 in Appendix C, The Biological Resources Technical Report:

The stream corridor outside of the pepper trees groves is dominated by native willows that exhibited evidence of infestation by the Polyphagous Shot Hole Borer (PSHB) noted during field surveys conducted during Phase 1. The potential infested wood chips from the onsite willow trees would be treated through solarization at locations along the existing trail that are illustrated on Page 6 of the 60% Design Plans in Appendix A. The remaining wood chips as well as the dead and non-native vegetation would be disposed of at the Prima Deshecha Landfill. Subsequent to completing the habitat restoration, ~~t~~The proposed project will use long-term pest management techniques in consultation with experts from the University of California Riverside. Such techniques may include heavy pruning of the existing infested mature trees and application of soil

Ms. Nova, AICP
October 10, 2018
Page 3

amendments and tree injections to improve resilience of existing woody plants. ~~These areas also contain invasive plant species that will be removed selectively and replaced with native plants.~~ To further improve sustainability of the replanted native riparian vegetation, woody species and herbaceous plants that are not highly susceptible to PSHB infestation will be selected. Soil amendments will be also used to reduce salinity levels and improve biological activity in soils. Similarly, the planned re-vegetation after exotic removal along the creek channel will use a mixed palette of native vegetation that includes smaller stem plants that are less desirable to the PSHB. Without these management measures, the existing willow trees and proposed riparian habitat would be likely to be impacted by the PSHB infestation which eventually causes die off of large mature trees that would provide potentially suitable habitat for important wildlife, including, for example, the State and federally Endangered least Bell's vireo (*Vireo bellii pusillus*).

Page 126, IS/MND

At the end of the second paragraph on page 126 of the IS/MND, the following is revised to address the intended hours of operation for the Big Canyon Park with the implementation of the proposed project.

Thus, the construction activities associated with the proposed project would be required to adhere to the applicable permitted hours of operation established under the City of Newport Beach's Noise Ordinance. In addition, the City intends to change the hours of operation for Big Canyon Park to close from "dusk till dawn," which may require a future ordinance.

Page 141, IS/MND

The following text has been revised to address the landfilling of the chipped material from the project site. The second paragraph on page 141 of the IS/MND is revised as follows:

Project implementation would result in the need for disposal of vegetative debris from construction and maintenance activities. Solid waste removed from the project site would include dead or nonnative vegetation. Debris would be removed with construction equipment and transported to the landfill by haul trucks at the designated haul routes discussed above in Section 3.4.16, Impacts a) and d). The total estimated vegetation removal is approximately 7,500 cubic yards and the total estimated soil removal is approximately 1,500 cubic yards. It is anticipated that the project's generation of solid waste would be at its greatest during initial construction activities due to the primary removal of non-native habitat vegetation. Thereafter, the project would result in minimal removal of dead vegetation during operational maintenance activities. Chipped material totaling up to approximately 800 cubic yards may be used for top dressing within the replanted area as well as on the trail located along the northern boundary of the project site. A portion of the 800 cubic yards of chip material is anticipated to be infested by the PSHB. Only the potential infested wood chips which are anticipated to come from some of the onsite willow trees would be treated through solarization at locations along the existing trail that are illustrated on Page 6 of the 60% Design Plans in Appendix A. The remaining wood chips that are not infected as well as the dead and non-native vegetation that are also not infected would be disposed of at the Prima Deshecha Landfill. Given the project's scale, it is anticipated that the specified landfill would have the adequate capacity to accommodate the project's waste disposal needs. Therefore, the project would result in a less than significant impact to landfill capacity.



Ms. Nova, AICP
October 10, 2018
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Appendix D, Page 7

Appendix D, Phase 1 Cultural Resources / Archeological Research Plan, is modified to reflect the correct date for earliest human occupation. The first sentence of the second paragraph on page 7 as well as the first sentence of the third paragraph of page 7 of Appendix D in the IS/MND is revised as follows:

The prehistory of the region has been summarized within four major horizons or cultural periods: Early [~~10,000~~ 13,000 to 8,000 before present (B.P.)], Millingstone (8,000 to 3,000 B.P.), Intermediate (3,000 to 1,500 B.P.), and Late Prehistoric (1,500 B.P to A.D. 1769) (Wallace 1955; Warren 1968).

The southern California coast may have been settled as early as ~~10,000~~ 13,000 years ago (~~Jones 1992~~ Waters and Stafford 2007). Evidence of human occupation as early as 13,000 B.P. was found at the southern California Fairpoint Site located on Point Dume in Malibu, which was validated by the national museum, The Smithsonian (Stanford 2007).

Appendix D, Page 8

The first sentence of paragraph five on page 8 of Appendix D, Cultural Resources / Archeological Research Plan is revised as follows:

The proposed project is located at the southern extent of ~~Gabrielino-Kizh-Tongva~~ Kizh territory, near the boundary with the Juaneño–Acjachemen territory to the south.

Appendix D, Pages 8 and 9

Appendix D, Phase 1 Cultural Resources / Archeological Research Plan, is modified to reflect the reference to sources for the mentioned “Ethnographic Setting” on pages 8 through 9 and the reference to Mr. Anthony Salas has been revised as follows:

~~Mr. Anthony Salas~~ Mr. Chairman Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation, provided information on known ethnographic village sin the project vicinity. These include Lukupangna, Lopusuknga, Moyonga (or Moyo), Kengaa, and Kenyaanga (or Kenyaangna), two of which are located near Newport Beach. For reasons of confidentiality, more specific locations are not provided. The Gabrielino-Kizh-Tongva are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith, 1978; Johnston, 1962; McCawley, 1996; Teutimes-Salas et al., 2013).



Ms. Nova, AICP
October 10, 2018
Page 5

Appendix D, Page 40

The following sources have been added to the References Cited section on page 40 of Appendix D, Phase 1 Cultural Resources / Archeological Research Plan:

Johnston, Bernice. 1962. California Gabrielino Indians. Southwest Museum Pres, Los Angeles.

McCawley, William. 1996. The First Angelinos, the Gabrielino Indians of Los Angeles. Malki Musuem/Ballena Press, Banning, California.

Teutimes-Salas, E.A. Salas, C. Swindall-Martinez and G. Stickel 2013 Toypurnia, the Joan of Arc of California. Kizh Tribal Press, San Gabirel

Waters, Michael B. and Thomas W. Stafford Jr. 2007. Redefining the Age of Clovis: Implication for the Peopling of the Americas. Science, Vol. 315, pp. 1122-1126.

If you have any questions regarding the above information, please call me at 714 742 5375.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael E. Houlihan', written in a cursive style.

Michael Houlihan, AICP
Principal Associate

VICINITY MAP



Coastal Development Permit No. CD2018-027 and
Mitigated Negative Declaration No. ND2018-001
(PA2018-078)

1900 Back Bay Drive