



**California Cultural Resource Preservation Alliance, Inc.**

P.O. Box 54132  
Irvine, CA 92619-4132

**An alliance of American Indian and scientific communities working for  
the preservation of archaeological sites and other cultural resources.**

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September 17, 2015

Julianne Polanco  
State Historic Preservation Officer  
Office of Historic Preservation  
California Department of Parks and Recreation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

Dear Ms. Polanco:

I am writing to make you aware of a pending development approval on Banning Ranch in Newport Beach which would have serious impact on several archaeological sites and the cultural landscape of the Tongva/Gabrieleno tribes. The Banning Project's proposed development consists of 401 acres with 1,375 residential units, 75,000 square feet of commercial uses, a 75 room resort inn with ancillary resort uses, approximately 51 acres for active and passive parks, and 252 acres retained in open space. Banning Ranch is the only remaining unprotected large coastal open space in Orange County. As such it not only contains important natural resources, but significant archaeological sites.

To date 90 percent of all coastal archaeological sites in Orange County have been destroyed due to development. At one time 11 archaeological sites were recorded within the Banning Ranch project area. Eight prehistoric sites and two historic sites. Today only three have escaped total destruction due to oil field development, CA-ORA-839, CA-ORA-844B, and CA-ORA-906. Archaeological and ethnographic data suggest that the sites are part of the extensive prehistoric settlement known as Genga. This settlement extended along the Santa Ana River from Costa Mesa to the mouth of the river. These sites have been determined eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), and under AB 52 (effective July 1, 2015), meet the criteria as Tribal Cultural Resources. If this project is approved they will be destroyed by the development including ground disturbing activities associated with planned removal of oilfield-related infrastructures.

In the past it was considered appropriate to mitigate significant archaeological sites through archaeological excavations to recover scientific data. However archaeology as it is practiced today is a destructive process and the public receives no benefits as the information is rarely made available. Furthermore, archaeological sites have cultural and religious values for Native American descendants and these values cannot be mitigated through archaeological excavations.

The three remaining archaeological sites are all that is left of an important prehistoric settlement that has cultural and religious values for Native American descendants and can provide important information to be retrieved by archaeologists in the future using non-destructive technology. This makes it all the more important that they be protected and preserved.



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The proposed project is currently scheduled to be heard by the Coastal Commission on October 7<sup>th</sup>-8<sup>th</sup> in Long Beach. A letter from your office regarding the significance of this site, its cultural relevance, and the need to protect this resource would be a very important element for the Commission in their deliberations. I urge your consideration, and am available to discuss this situation and to answer any questions you or your staff may have regarding the significance of the sites at Banning Ranch. If you are willing, the letter should be sent as soon as possible to Teresa Henry, District Manager, South Coast District, California Coastal Commission, 200 Oceangate, Suite 1000, Long Beach, Ca 90802-4302 [thentry@coastal.ca.gov](mailto:thentry@coastal.ca.gov). I appreciate your time and all your efforts to protect California's cultural resources

Sincerely,

A photograph of a handwritten signature in cursive script that reads "Patricia Martz". The signature is written in dark ink on a light-colored, slightly textured paper background.

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