APPENDIX 7

Cultural Memorandum

CRM TECH
1016 E. Cooley Drive, Suite A/B
Colton, CA 92324

MEMORANDUM

Date: October 17, 2021
From: Bai "Tom" Tang, Principal, CRM TECH
To: Tom Dodson, President, Tom Dodson & Associates
Subject: Cultural Resources Survey, Proposed AWPF at RP-4, City of Rancho Cucamonga

Dear Tom:

At your request, CRM TECH has conducted an intensive-level field survey on the project site for a proposed advanced water purification facility (AWPF) at the Inland Empire Utilities Agency's (IEUA) Regional Plant No. 4 (RP-4) in the City of Rancho Cucamonga, San Bernardino County, California. The project area consists of approximately 2.87 acres of vacant land in the western portion of RP-4, which is located at 12811 6th Street, on the southwestern corner of 6th Street and Etiwanda Avenue, and in the southeast quarter of Section 17, Township 1 South Range 6 West, San Bernardino Baseline and Meridian (Figures 1, 2).

As you know, the project area was partially included in the areas surveyed for cultural resources during two previous studies that our firm conducted for IEUA in 2002 and 2006 (Tang and Smallwood 2002; Encarnación et al. 2006). Both of those studies were standard Phase I cultural resources surveys completed under provisions of Section 106 of the National Historic Preservation Act. The scopes of these studies included cultural resources records searches in the California Historical Resources Information System, historical background research, consultations with Native American representatives, and intensive-level field surveys, and neither of them encountered any cultural resources (*ibid.*).

Since both of the previous studies are now well over ten years old, and since the project area lies entirely within or adjacent to the areas surveyed in 2002 and 2006, the present study is designed to be an update and an addendum to those studies. It is a part of the environmental review process for the AWPF project at RP-4, as required by the IEUA pursuant to the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of the survey is to confirm that the project will not cause a substantial adverse change in the significance of any "historical resources," as defined by CEQA (PRC §5020.1(j); Title 14 CCR §15064.5(a)(1)-(3)), especially those that may have become historical in age (i.e., more than 50 years old) since 2006.

The field survey of the project area was carried out on September 22, 2021, by project archaeologist Salvadore Z. Boites, M.A. It was observed during the survey that the entire project area has been extensively disturbed in the past and is now partially occupied by a wind turbine (Figure 3). The ground surface is mostly covered by landscaping plants, including brittlebush, California buckwheat, sagebrush, stinkwort, desertbroom, and other drought-resistant native species, and by wood chips (Figure 3). The existing surface sediments clearly represent imported soil, mainly a brown, indurated silty-sandy loam mixed with ample organic decay.

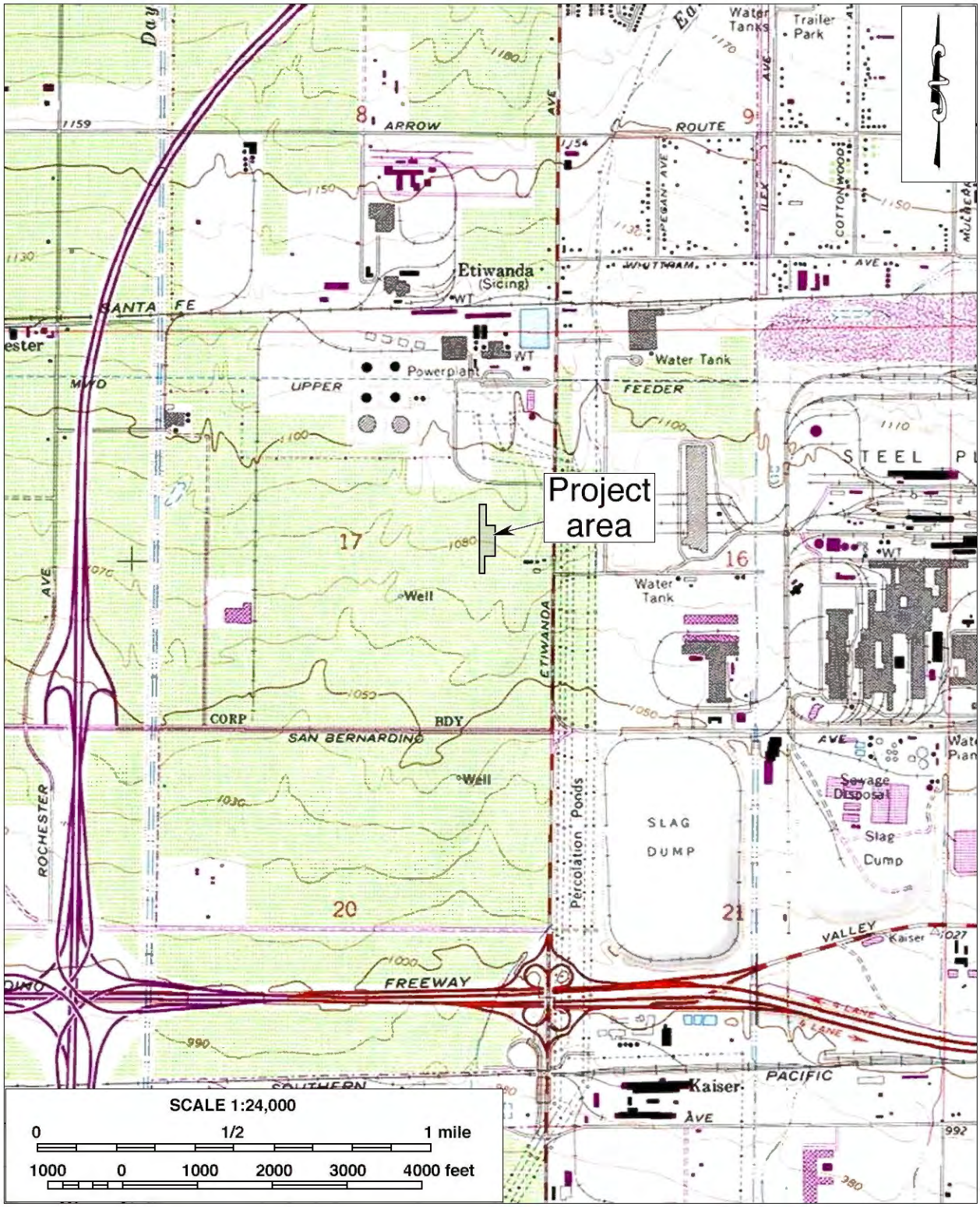


Figure 1. Project location. (Based on USGS Guasti, Calif., 7.5' quadrangle, 1981 edition)

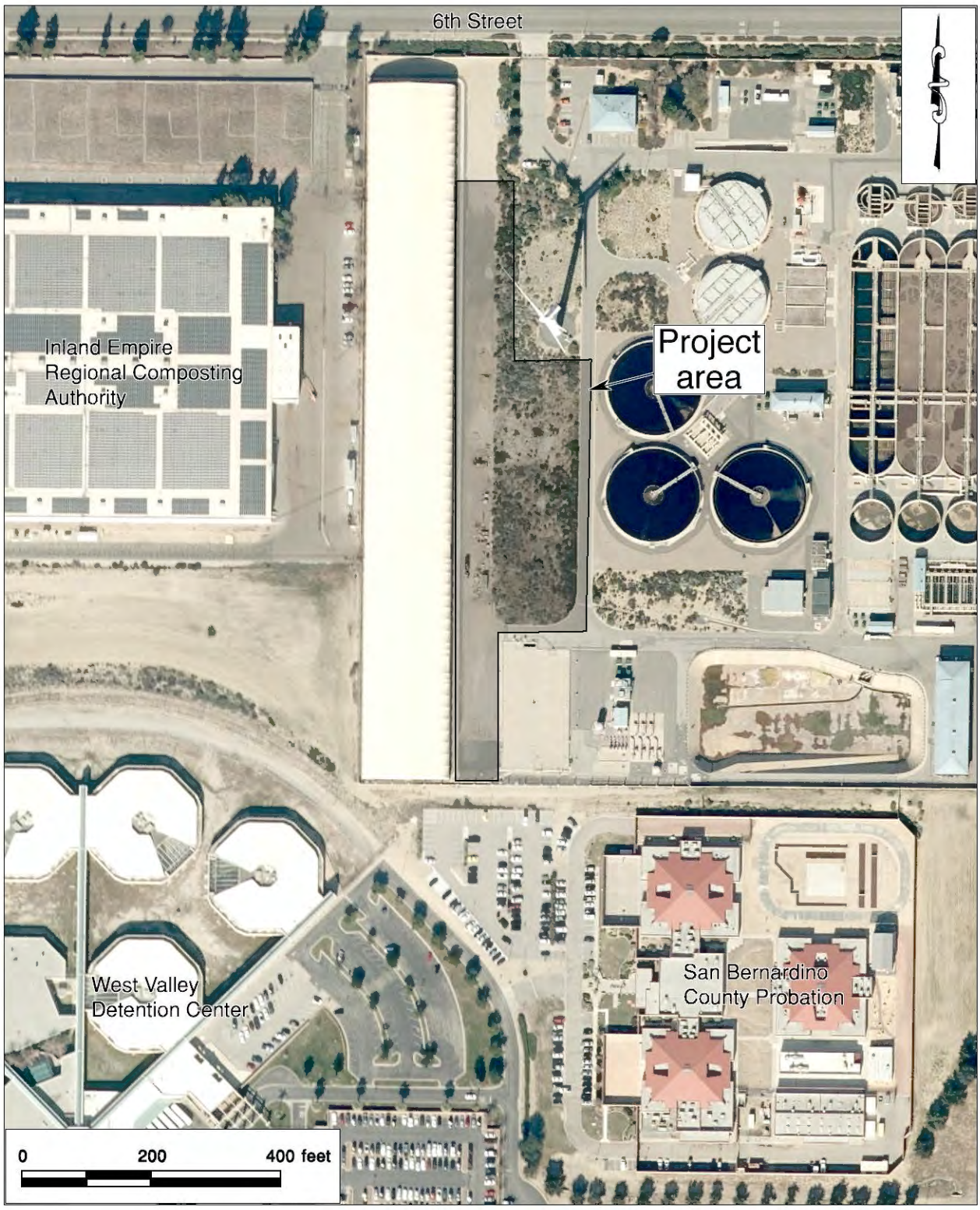


Figure 2. Recent aerial photograph of the project area.

Figure 3. Typical landscape within the project area. (View to the south; photograph taken on September 22, 2021)

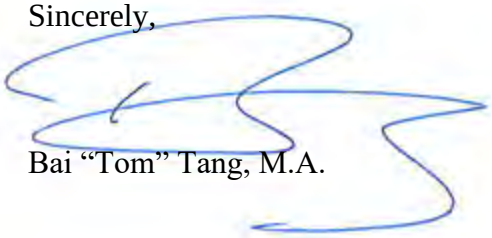
Aerial photographs taken since 1938 suggest that the project area, once part of a large expanse of farmland, became a part of RP-4 when the plant was built around 1997 (NETR Online 1938-2002; IEUA n.d.). The area was cleared, graded, and apparently used as a stock yard between 2003 and 2007, and the landscaping in place today was completed sometime between 2007 and 2009 (Google Earth 2002-2009). The wind turbine in the project area was evidently installed in 2011-2012 (Google Earth 2011; 2012).

Because of the limited size of the area and the presence of dense patches of landscaping plants, Boites completed the field survey by walking along meandering lines across accessible open land and carefully examined the ground surface for any evidence of human activities from the prehistoric or historic era. Ground visibility was roughly 50 percent in the northern portion of the project area and roughly 30 percent in the southern portion. In light of the level of past ground disturbance in the project area, the ground visibility was deemed adequate for this survey.

Throughout the course of the survey, no buildings, structures, objects, sites, features, or artifacts of prehistoric or historical origin were encountered within or adjacent to the project area. Therefore, CRM TECH recommends to the IEUA a finding of *No Impact* regarding "historical resources." No further cultural resources investigation is recommended for the project unless construction plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are discovered during earth-moving operations associated with the project, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

Thank you for this opportunity to be of service.

Sincerely,



Bai “Tom” Tang, M.A.

References Cited:

Encarnación, Deirdre, Thomas Melzer, and Laura H. Shaker
2006 Identification and Evaluation of Historic Properties: 1158 Zone Pipeline Project, City of Rancho Cucamonga, San Bernardino County, California. On file, South Central Coastal Information Center, California State University, Fullerton.

Google Earth
2002-2012 Aerial photographs of the project vicinity; taken in 2002-2007, 2009, 2011, and 2012. Available through the Google Earth software.

IEUA (Inland Empire Utilities Agency)
n.d. Regional Water Recycling Plant No. 4. https://www.ieua.org/facilities/regional-water-recycling-plant-no-4/.

NETR (Nationwide Environmental Title Research) Online
1938-2002 Aerial photographs of the project vicinity; taken in 1938, 1948, 1959, 1966, 1994, and 2002. http://www.historicaerials.com.

Tang, Bai, and Josh Smallwood
2002 Identification and Evaluation of Historic Properties: Recycled Water Facilities Improvement Project, Regional Plants No. 1 and No. 4, Cities of Ontario and Rancho Cucamonga, San Bernardino County, California. On file, South Central Coastal Information Center, California State University, Fullerton.