

**CRM TECH**

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

August 4, 2017

Greg Quan
R.Y. Properties, Inc.
212 South Palm Avenue, Suite 200
Alhambra, CA 91801

Re: Update to Phase I Cultural Resources Study
Tentative Tract Map No. 16397; Assessor's Parcel No. 3096-311-02
City of Victorville, San Bernardino County, California
CRM TECH Project Nos. 1911/3228

Dear Mr. Quan:

At your request, CRM TECH has conducted a historical/archaeological resources records search, pursued historical background research, contacted Native American representatives, and carried out an archaeological field inspection on Tentative Tract Map No. 16397 in the City of Victorville, San Bernardino County, California. The subject property, currently designated Assessor's Parcel No. 3096-311-02 (formerly 3096-311-01), consists of approximately 80.75 acres of vacant land located on the south side of Dos Palmas Road between Bellflower Street and Mesa View Drive, in the northwest quarter of Section 28, T5N R5W, San Bernardino Baseline and Meridian (Figures 1, 2). This letter presents a summary of the methods, results, and final conclusions of these research procedures.

Background

As you know, the project area was previously the subject of standard Phase I cultural resource assessment completed by Statistical Research, Inc. (SRI) in 2005, which was subsequently updated by CRM TECH in 2006 (Doolittle 2005; Tang 2006; see Attachment A). For the 2005 study, SRI performed a cultural resources records search and an intensive-level field survey on the project area, and recorded a historic-period refuse scatter as Site 36-012058 (CA-SBR-12058H) in the process (Doolittle 2005:2-3). In 2006, CRM TECH also carried out a records search on the project area, the results of which revealed that the property had been surveyed adequately by SRI the year before (Tang 2006:1). In order to address additional requirements by federal regulations, CRM TECH then pursued Native American consultation (Tang 2006:1-3).

SRI determined that 36-012058 was not eligible for listing in the California Register of Historical Resources and did not constitute a "unique archeological resource" under the California Environmental Quality Act (CEQA; Doolittle 2005:3). During the Native American consultation in 2006, neither the Native American Heritage Commission nor the local tribal organizations identified any Native American cultural resources in the immediate vicinity (Tang 2006:3). Because those studies are now over ten years old, the present study was implemented at this time in order to confirm and/or update the findings. In addition, further historical background research was conducted to document the history of past development activities in and around the project area.

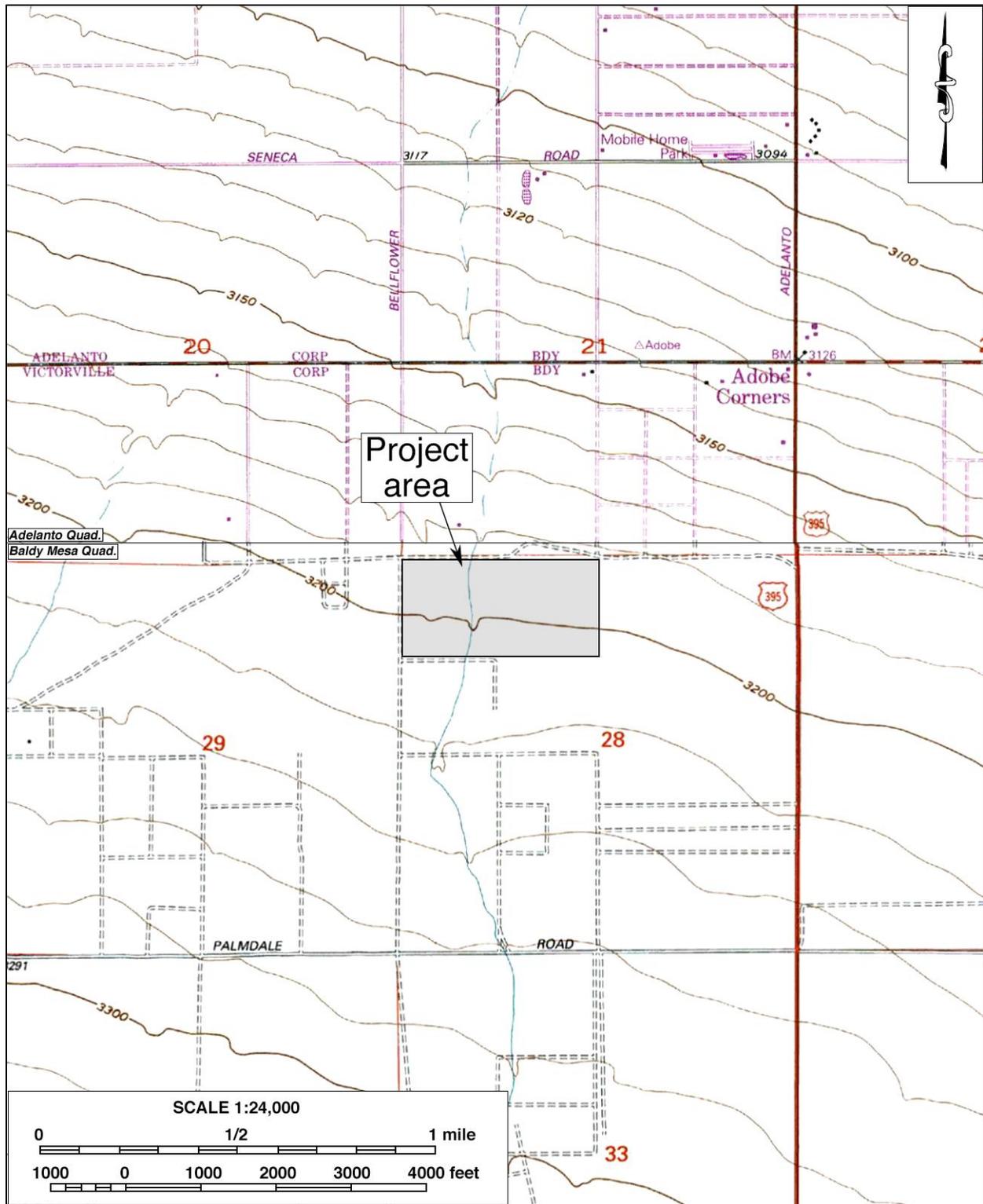


Figure 1. Location and configuration of the project area. (Based on USGS Adelanto and Baldy Mesa, Calif., 1:24,000 quadrangles [USGS 1993; 1996])

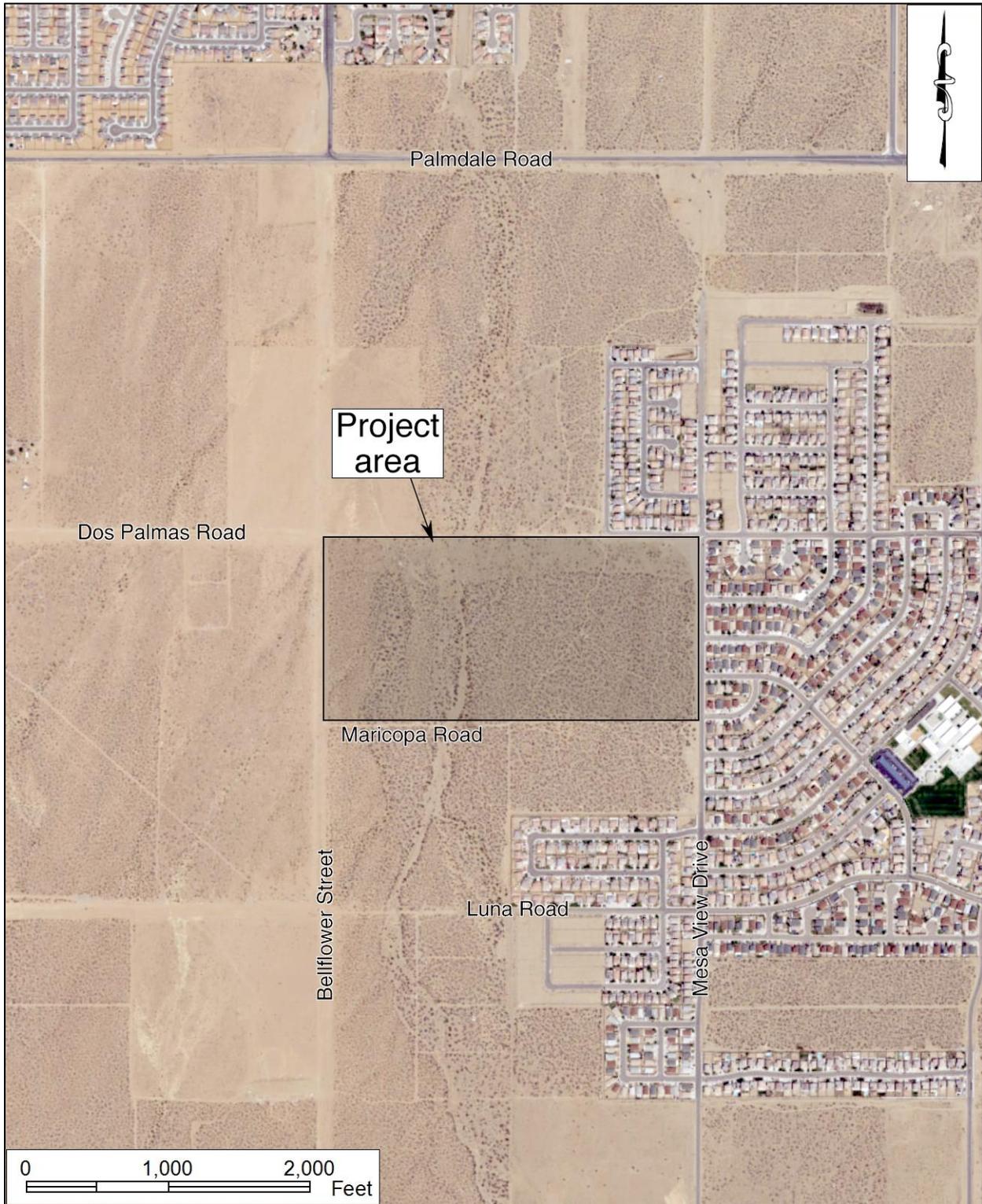


Figure 2. Aerial image of the project area. (Based on Google Earth imagery)

Records Search

A standard one-mile-radius records search was conducted on July 12, 2017, by CRM TECH archaeologist Nina Gallardo, B.A., at the South Central Coastal Information Center (SCCIC), California State University, Fullerton. The results of the records search indicate that the 2005-2006 reports referenced above remain the only cultural resources studies completed on the project area (Figure 3), and that Site 36-012058 remains the only historical/archaeological resource recorded within the project boundaries.

As recorded by SRI in 2005, Site 36-012058 consisted of historic-period household refuse scattered sparsely over a 24x18-meter area in the northeastern portion of the project area, near the southern edge of Dos Palmas Road, then a narrow, lightly used dirt road (Boggs and Lee 2005; Google Earth 2005). Artifacts observed at that time included more than 80 fragments of sun-colored amethyst glass, glass fragments from three canning jars, two clothing buttons, two metal canister lids, and three hole-in-cap cans (Boggs and Lee 2005:2).

Outside the project area but within the one-mile scope, SCCIC records show that to date 24 other cultural resources studies have been completed on various tracts of land and linear features, including adjacent properties to the north, east, and south (Figure 3). As a result of these and other similar studies in the vicinity, 11 additional historical/archaeological sites and three isolates—i.e., localities with fewer than three artifacts—have been identified within the scope of the records search, a significant increase from the four sites and one isolate identified during the records search in 2005 (Doolittle 2005:2).

One of the sites and one isolate were of prehistoric—i.e., Native American—origin, consisting of a lithic scatter and a basalt core-reduction flake, respectively, both recorded approximately 0.25 mile from the project location. The other ten sites and two isolates dated to the historic period and represented mainly refuse scatters, roads, and building foundations. None of these 11 sites and three isolates was found in the immediate vicinity of the project area, and thus none of them requires further consideration during this study.

Native American Consultation

On July 3, 2017, CRM TECH submitted a written request to the State of California's Native American Heritage Commission (NAHC) for a records search in the commission's sacred lands file (see Attachment B). In response, the NAHC reports in a letter dated July 6 that the sacred lands record search identified no Native American cultural resources within the project area, but recommends that local Native American groups be contacted for further information. For that purpose, the NAHC provided a list of potential contacts in the region (see Attachment B).

Upon receiving the NAHC's reply, on July 7, 2017, CRM TECH sent written requests for comments to all five individuals on the referral list (see Attachment B). As recommended by the appropriate tribal government staff, Raymond Huaute, Cultural Resource Specialist for the Morongo Band of Mission Indians, and Jessica Mauck, Cultural Resources Analyst for the San Manuel Band of Mission Indians, were also contacted. As of this time, only Ms. Mauck has responded to the inquiry (see Attachment B).

In an e-mail dated August 4, 2017, Ms. Mauck states that “there is knowledge of a few resources in and around the area of the proposed project,” which may be associated with the Oro Grande Wash and the Topipabit archaeological district some four miles to the southeast. Therefore, Ms. Mauck indicates that the tribe will pursue further, government-to-government consultation with the City of Victorville regarding this project and will request a copy of this study for tribal review (see Attachment B).

Historic Research

Historical background research for this study was conducted by CRM TECH principal investigator/historian Bai “Tom” Tang, M.A. In addition to published literature in local and regional history, sources consulted during the research included U.S. General Land Office (GLO) land survey plat map dated 1856, U.S. Geological Survey (USGS) topographic maps dated 1902-1996, and aerial photographs taken in 1952-2017. The historic maps are collected at the Science Library of the University of California, Riverside, and the California Desert District of the U.S. Bureau of Land Management, located in Moreno Valley. The aerial photographs are available at the NETR Online website and through the Google Earth software.

The historic maps and aerial photographs suggest that the project area is relatively low in sensitivity for cultural resources from the historic period. As Figures 4-7 illustrate, no evidence of any settlement or development activities was noted within or adjacent to the project area throughout the 1850s-1950s era. As late as 1994, the project area and the adjacent properties remained largely

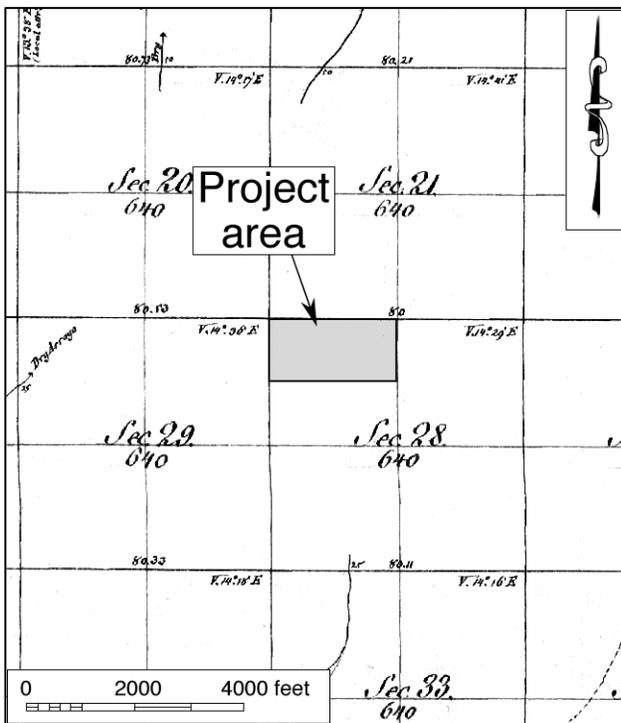


Figure 4. The project area and vicinity in 1853-1855.
(Source: GLO 1856)

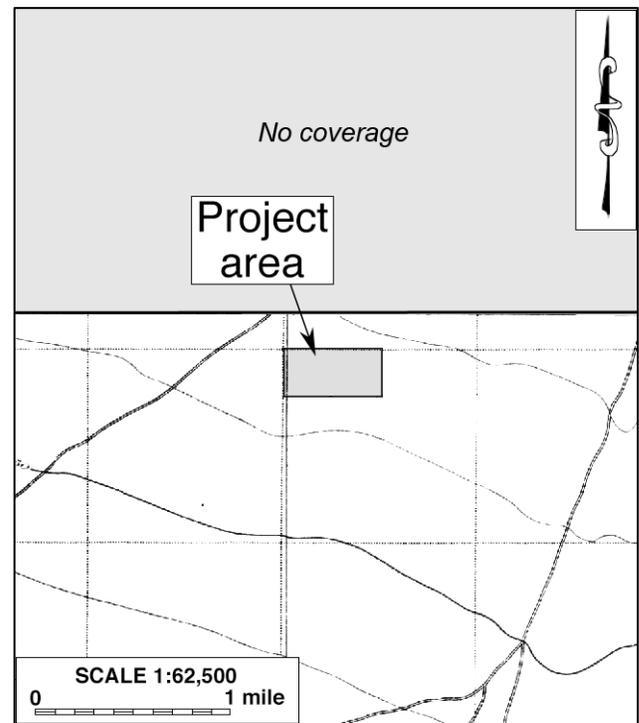


Figure 5. The project area and vicinity in 1898-1899.
(Source: USGS 1902)

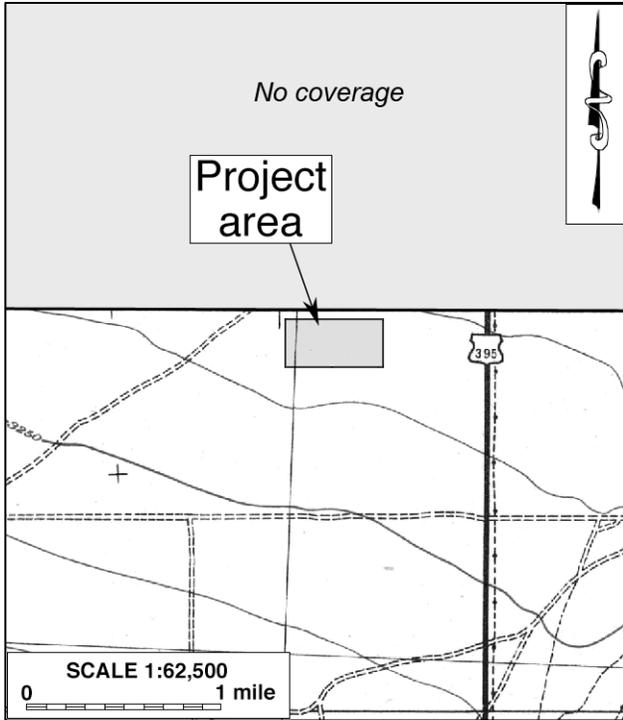


Figure 6. The project area and vicinity in 1940-1941.
(Source: USGS 1942)

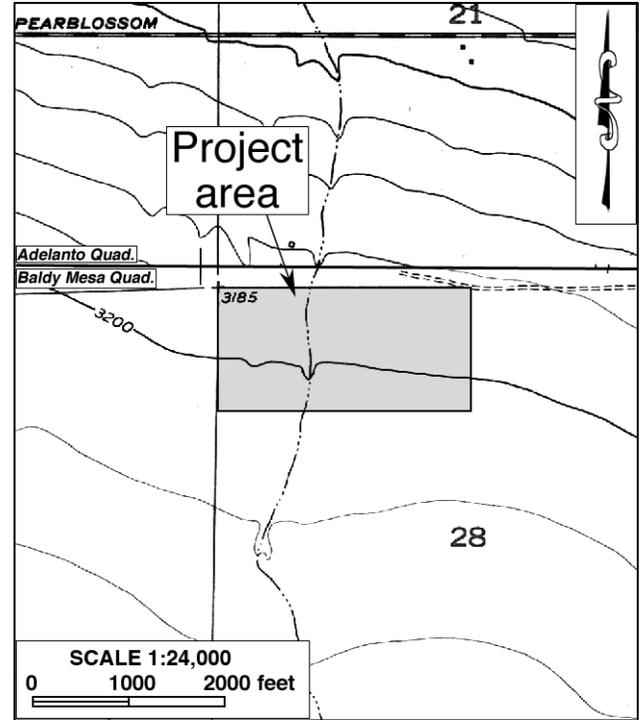


Figure 7. The project area and vicinity in 1952-1956.
(Source: USGS 1956a; 1956b)

unaltered by human activities except for the presence of a few dirt roads, including Dos Palmas Road and Bellflower Street (NETR Online 1952-1994; Google Earth 1994; Figure 1).

In 2002-2005, a residential neighborhood was constructed on the adjacent property to the east, across Mesa View Drive, which represented the earliest development in the immediate vicinity (Google Earth 2002-2005). It was followed in 2006 by another residential development on the adjacent property to the north, across Dos Palmas Road (Google Earth 2006). As a part of that project, a small segment of Dos Palmas Road was straightened, widened, and paved (Google Earth 2006; 2009). Despite these nearby developments, the project area itself has remained vacant and undeveloped to the present time (NETR Online 2005-2012; Google Earth 2006-2017).

Field Inspection

On July 6, 2017, CRM TECH archeologist Daniel Ballester, M.S., conducted a reconnaissance-level field survey of the project area by walking a series of parallel north-south transects spaced 50-75 meters (approximately 150-225 feet) apart. The purpose of the field reconnaissance was to confirm and update the survey results from 2005, including documenting the current condition of Site 36-012058, the only historical/archaeological site known to occur within the project boundaries. Ground visibility ranged from poor (25%) to fair (80%) depending on the density of the vegetation growth.

Utilizing locational data from the original site record such as UTM coordinates, maps, and written descriptions, a more intensive survey effort was made in the vicinity of Site 36-012058, but none of

the artifacts observed in 2005 could be found. Based on field observations and historic aerial photographs, the site appears to have been removed by construction activities when the segment of Dos Palmas Road nearby was improved and paved between 2006 and 2009 (Google Earth 2006; 2009). As a result, no evidence of any human activities dating to the prehistoric or historic period (i.e., 50 years or older) was observed throughout the field survey.

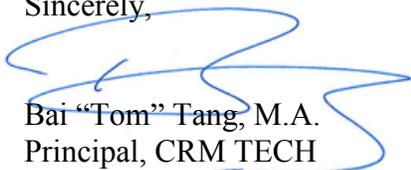
Conclusion and Recommendations

Based on the research results summarized above, CRM TECH concludes that the original conclusion of the 2005 and 2006 studies on the subject property—that “no adverse affects to historical resources are anticipated” (Doolittle 2005:3)—remains valid and appropriate. Accordingly, CRM TECH reiterates the 2006 recommendations regarding Tentative Tract Map 16397 to the City of Victorville (Tang 2006:5):

- The proposed project will not cause a substantial adverse change to any known “historical resources,” as defined by CEQA.
- No further cultural resources investigation is necessary for the proposed project unless development plans undergo such changes as to include areas not covered by this study.
- If buried cultural materials are discovered during any 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. If you have any questions or need further information regarding this study, please do not hesitate to contact our office.

Sincerely,



Bai “Tom” Tang, M.A.
Principal, CRM TECH

Reference Cited:

Boggs, Brian, and Lashawn Lee

2005 California Historical Resources Inventory record forms, Site 36-012058/CA-SBR-12058H. On file, South Central Coastal Information Center, California State University, Fullerton.

Doolittle, Christopher J.

2005 SRI Technical Report 05-58: Cultural Resources Survey of an 80-Acre Parcel (APN 3096-311-01), in the City of Victorville, San Bernardino County, California. On file, South Central Coastal Information Center, California State University, Fullerton. (See Attachment A)

GLO (General Land Office, U.S. Department of the Interior)

1856 Plat Map: Township No. V North Range No. V West, San Bernardino Meridian; surveyed in 1853-1855.

Google Earth

1994-2017 Aerial photographs of the project vicinity; taken in 1994, 2002, 2003, 2005, 2006, 2009, 2013, and 2015-2017. Available through the Google Earth software.

NETR Online

1952-2012 Aerial photographs of the project vicinity; taken in 1952, 1968, 1994, 2002, 2005, 2009, 2010, and 2012. <http://www.historicaerials>.

Tang, Bai "Tom"

2006 Historical/Archaeological Resources Study, Tract No. 16397; Assessor's Parcel Number 3096-311-01, City of Victorville, San Bernardino County, California. On file, South Central Coastal Information Center, California State University, Fullerton. (See Attachment A)

USGS (United States Geological Survey, U.S. Department of the Interior)

1902 Map: Hesperia, Calif. (15', 1:62,500); surveyed in 1898-1999.

1942 Map: Hesperia, Calif. (15', 1:62,500); aerial photographs taken in 1940-1941.

1956a Map: Adelanto, Calif. (7.5', 1:24,000); aerial photographs taken in 1952.

1956b Map: Baldy Mesa, Calif. (7.5', 1:24,000); aerial photographs taken in 1952, field-checked in 1956.

1993 Map: Adelanto, Calif. (7.5', 1:24,000); 1956 edition photorevised in 1989.

1996 Map: Baldy Mesa, Calif. (7.5', 1:24,000); 1956 edition photorevised in 1994.

ATTACHMENT A

2005-2006 PHASE I CULTURAL RESOURCES STUDIES

1064581
SB 4581



STATISTICAL RESEARCH, Inc.

ARCHAEOLOGY • ANTHROPOLOGY • HISTORY • HISTORIC ARCHITECTURE

July 29, 2005

Isaac W. Shikuma
Lewis Operating Corp.
1156 N. Mountain Avenue
Upland, CA 91785-0670

RE: SRI Technical Report 05-58: *Cultural Resources Survey of an 80-Acre Parcel (APN 3096-311-01), in the City of Victorville, San Bernardino County, California*

Dear Isaac:

This letter reports the results of an archaeological survey conducted by Statistical Research, Inc. (SRI) for Lewis Operating Corp. (Lewis) of an 80-acre parcel (APN 3096-311-01) in the city of Victorville, San Bernardino County, California (Figure 1). Lewis is conducting a feasibility study in support of pending acquisition of the subject parcel. This study is not a "Project" as defined by the California Environmental Quality Act (CEQA) and is not subject to agency review at this time. The cultural resources study reported here is one component of the overall feasibility work. The purpose of the archaeological survey is to identify potentially significant cultural resources visible on the ground surface and to assess the potential for the presence of buried cultural resources. Although the feasibility study is not subject to CEQA, the cultural resources study was completed following CEQA guidelines regarding cultural resources. This will allow Lewis to use the final technical cultural resources survey report for subsequent environmental review. Public Resource Codes 21083.2 and 21084.1, and California Code of Regulations 15064.5 were used as the basic guidelines for this study.

Project Location and Description

The property is located in the western Mojave Desert, approximately one-half mile from Highway 395 (Figure 2). Dos Palmas Road borders the property to the north, Mesa View Road to the east, Bellflower Street to the west, and Maricopa Road to the south. The project area is in the north half of the northwest quarter of Section 28, Township 5 North, Range 5 West, San Bernardino Baseline and Meridian, as shown on the U.S. Geological Survey (USGS) Baldy Mesa, California, 7.5-minute quadrangle (1956, photorevised 1988).

Environmental Setting

The property is located west of the Mojave River, in the western Mojave Desert. Vegetation throughout the area consists of creosote bush and desert grasses with a small amount of intermittent Mohave yucca, cholla, and sage. Faunal resources include large and small mammals; birds, such as doves and quail, and a variety of reptiles, principally lizards and snakes.

Cultural Setting

The prehistory of the project region has been reviewed by Stickel and Weinman-Roberts (1980), Warren (1984), and others. The general pattern of cultural development in the region is one of early hunting cultures beginning more than 8,000 years ago, followed by Archaic period populations that emphasized plants for subsistence, and ultimately the development of a generalized hunting and gathering way of life. The latter pattern persisted into historical times and characterized the lifeway of the ethnographic inhabitants of the region, the Serrano Indians.

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7/29

The Serrano were hunters and gatherers who used both large and small game, as well as numerous plant resources, for food. Large game such as deer, pronghorn, and bighorn sheep were hunted with bows and arrows, whereas smaller animals, such as rabbits and various rodents, were taken with throwing sticks, nets, and snares. Acorns from several species of oak, piñon nuts, and mesquite beans formed the staples of the diet, supplemented by seeds such as chia, and roots, tubers, and greens. The settlement pattern of the Serrano consisted of permanent villages located in proximity to reliable sources of water, and within range of a variety of floral and faunal food resources, which were exploited from temporary camp locations surrounding the main village. More-detailed information on the lifeways of the Serrano may be found in studies by Benedict (1924), Kroeber (1925:611–619), and Bean and Smith (1978), among others.

Historical-period use of the project region began during the Spanish Mission period, with the earliest reference to the project region being the result of an expedition by Spanish soldier Captain Pedro Fages in 1772, which passed through Cajon Pass. Subsequent passages through the area were recorded by Spanish missionaries Francisco Garcés in 1776, José María Zalvidea in 1806, Joaquin Nuez in 1819, and by American Captain John C. Frémont in 1844. None of these early expeditions made specific reference to the project area (Stickel and Weinman-Roberts 1980).

Early-twentieth-century use of the project area is linked to an increase in the development of homes and light commercial businesses. Paved roads have been constructed where dirt roads had once been present, and existing paved roads have been widened to facilitate the increase in population.

Archaeological Records Search

The archaeological site records search was conducted in June 2005 at the San Bernardino County Archaeological Information Center (AIC), San Bernardino County Museum, for a 1-mile-radius area around the property. SRI staff reviewed site and isolate records, archaeological reports, and historical-period maps during the records search.

Results of the records search indicate 10 surveys have been completed within a 1-mile radius of the project area. None of the surveys included the parcel surveyed by SRI. Three of the previous surveys bordered the eastern edge. Four historical-period sites (Table 1) and one isolate have been recorded within a 1-mile radius of the project area. The sites include two historical-period refuse dumps, the remains of a roadside stand dating to the 1950s, and the remains of a barbed-wire fence with associated historical-period refuse. The isolate, P 36-064401, is a fine-grained, basalt core-reduction flake.

Table 1. Archaeological Sites within a 1-Mile Radius of the Project Area

Site No. and Name	Site Type	Description
CA-SBR-7750H	historical-period artifact scatter	small refuse dump
CA-SBR-7751H	historical-period artifact scatter	small refuse dump
CA-SBR-7994H	historical-period structure	roadside stand dating to the 1950s
CA-SBR-10504H	historical-period artifact scatter	barbed-wire fence and refuse dump

Survey Methods

SRI personnel, Brian Boggs and Lashawn Lee, surveyed the property on June 19, 2005 by walking linear east-west transects at 15-m intervals. The crew used maps provided by the client to find the corners of the survey area. Information recorded for the site included basic topographic and environmental setting, artifact counts and descriptions, feature descriptions, site size, evidence of human and natural disturbances, and location data obtained from the appropriate USGS topographic map and GPS readings.

A sketch map of identified resources was created in the field using the compass-and-pace method. The map depicts relevant data regarding site size, environmental setting, point locations of important artifacts, and spatial relationships between outlying artifacts and artifact concentrations. Photographs were taken to document the general condition and environmental setting.

Survey Results

The archaeological survey covered the entire 80-acre property. One site was found in the project area (see Figure 2). A description of the site is provided below. Vegetation scattered throughout the project area obscured little ground surface. Scattered modern debris was found throughout the project area, with a higher density located adjacent to Dos Palmas Road. The southeast corner of the project area has been cleared recently by heavy machinery, greatly disturbing the ground surface. The cleared area measures approximately 1,000 feet square.

CA-SBR-12058H

This site consists of a moderate scatter of glass and metal historical-period artifacts (Figure 3). One concentration (AC 1) of artifacts measuring 15 by 10 feet composes the primary deposit of the site, with a small amount of outlying artifacts forming the site borders. The overall site measures 80 by 60 feet. Artifacts date from the turn-of-the-century to the 1930s. A moderate amount of creosote brush and desert grasses conceal the ground surface, and several cholla are scattered throughout the site. Modern refuse dumps are located within 50 feet of the site, but do not infringe upon its boundaries. One off-road-vehicle track does cross the northernmost border of the site, but modern disturbance is minimal otherwise.

Approximately 80 sun-colored amethyst (SCA) and clear glass fragments are located in AC 1. Base, body, and finishes are present, although no maker's marks could be ascertained. Three mason-jar lids were found associated with the scattered glass. The presence of SCA glass indicates the site could be as early as the turn-of-the-century, but probably no later than the 1930s.

Metal artifacts within AC 1 include two metal buttons (M1), several fragments of metal debris, seven metal lids, and one unidentifiable metal artifact. The two buttons measure $\frac{5}{8}$ inches and $\frac{15}{16}$ inches in diameter respectively. Three metal lids are mason-jar lids (M2), two of which are heavily rusted. The third lid is made of tin and in good condition with the ceramic seal still present. The 3-inch diameters of the lids are equivalent to the diameter of the glass finishes present within the concentration. The remainder of the metal lids include a baking powder lid (M3) measuring $2\frac{7}{8}$ inches in diameter with "K C BAKING POWDER for 15 cents" and "PURE" still visible on its surface; a lid measuring $2\frac{9}{16}$ inches in diameter; and two threaded caps measuring $1\frac{5}{8}$ inches in diameter.

Three hole-in-cap cans are located outside of the concentration (C1-C3) as well as small fragments of metal debris. The cans all measure $4\frac{3}{8}$ by $3\frac{7}{8}$ inches. The presence of the soldered cap indicates that the latest date for the cans is the 1930s. Locations of the cans form the boundaries of the site.

Summary and Recommendations

The records search and field survey resulted in the identification of one historical-period resource in the project area. This refuse deposit reflects upon a historical-period land-use pattern of wildcat refuse disposal. Vacant property was frequently used for illegal refuse dumping, and the site found during our survey probably resulted from such activities. The artifact assemblage present is common to a wide range of activities. It is unlikely that archival research or other sources will allow researchers to associate use of these sites with a specific person or group of people. Wildcat dumps like these are ubiquitous across the Mojave Desert, and our inability to precisely date these sites makes it difficult to associate them with important trends in land use of this area. Finally, there is limited potential for the site to be associated with significant buried features or artifacts, and current analysis of the surface artifacts has likely exhausted their research potential. We therefore recommend that CA-SBR-12058H is not eligible for listing in the CRHR. Similarly, this site is not a "unique archaeological resource" as defined by CEQA.

CA-SBR-12058H is recommended as not eligible for listing in the CRHR and is not a historical resources as defined in CEQA. No adverse effects to historical resources are anticipated should the parcel be developed. If

unanticipated discoveries are made during the course of project implementation, we recommend work be temporarily suspended and a qualified archaeologist be contacted to evaluate the significance of the resources. If human remains are encountered during construction, work in the affected area must be halted immediately, and the County Coroner must be notified pursuant to California Health and Safety Code 7050.5.

Sincerely,



Christopher J. Doolittle, M.A., RPA
California Office Director

References Cited

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1978 Serrano. In *California*, edited by R. F. Heizer, pp. 570–574. Handbook of North American Indians, Vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
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1924 A Brief Sketch of Serrano Culture. *American Anthropologist* 26(3):366–392.
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1925 *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin No. 78.
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1980 *An Overview of the Cultural Resources of the Western Mojave Desert*. Bureau of Land Management, Riverside.
- Warren, Claude N.
1984 The Desert Region. In *California Archaeology*, by Michael J. Moratto, pp. 339–430. Academic Press, Orlando, Florida.

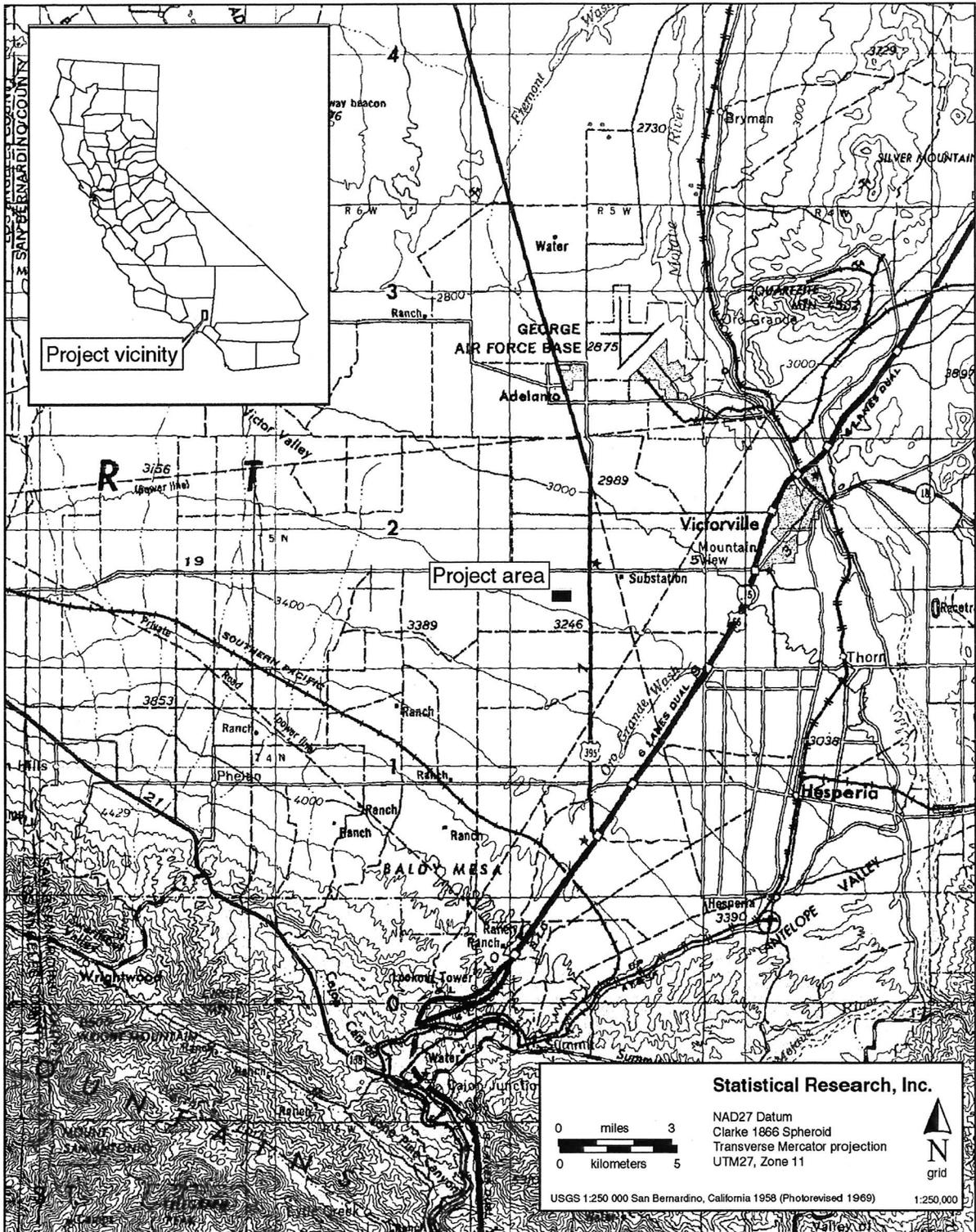


Figure 1. Project vicinity map.

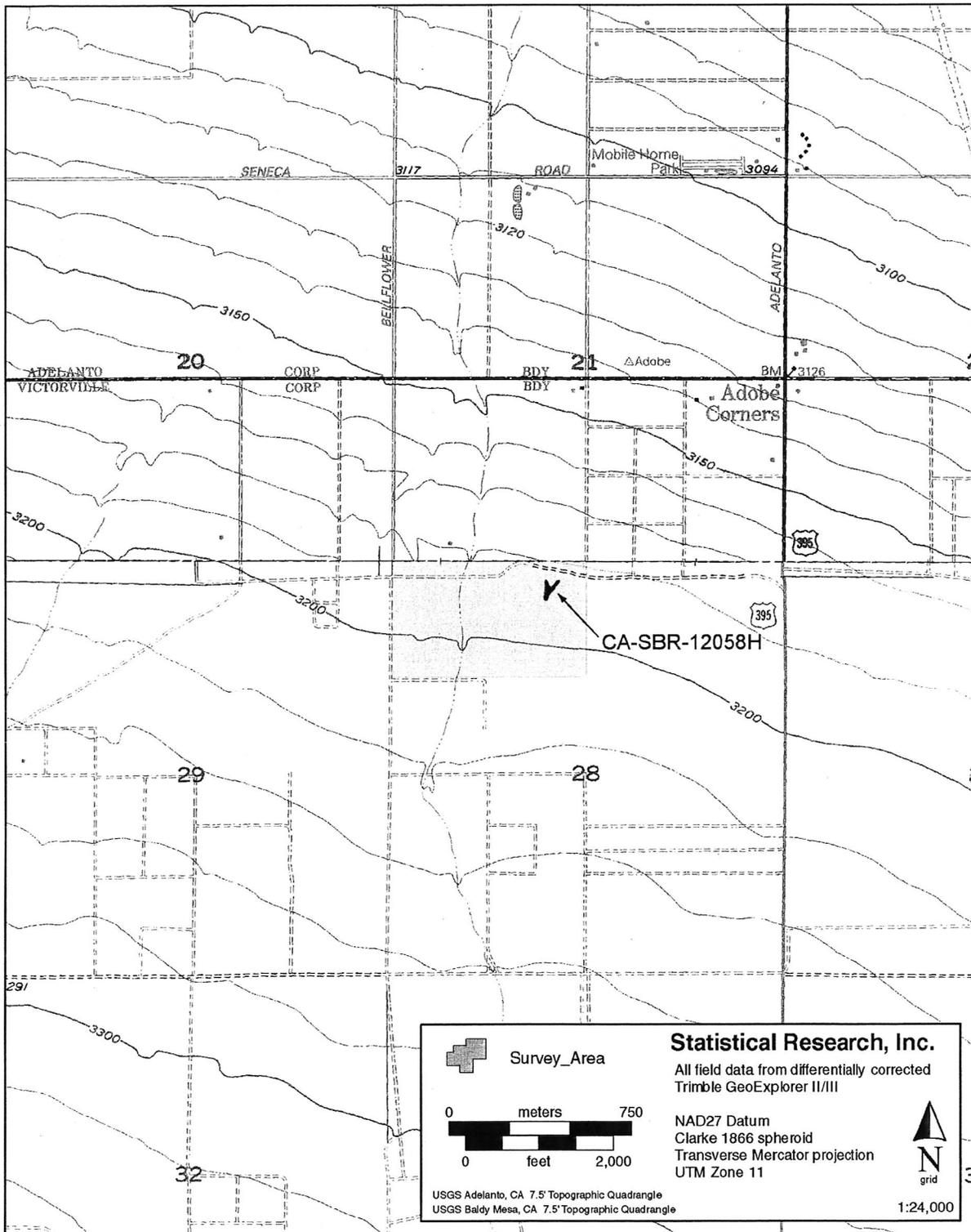


Figure 2. Project location map.

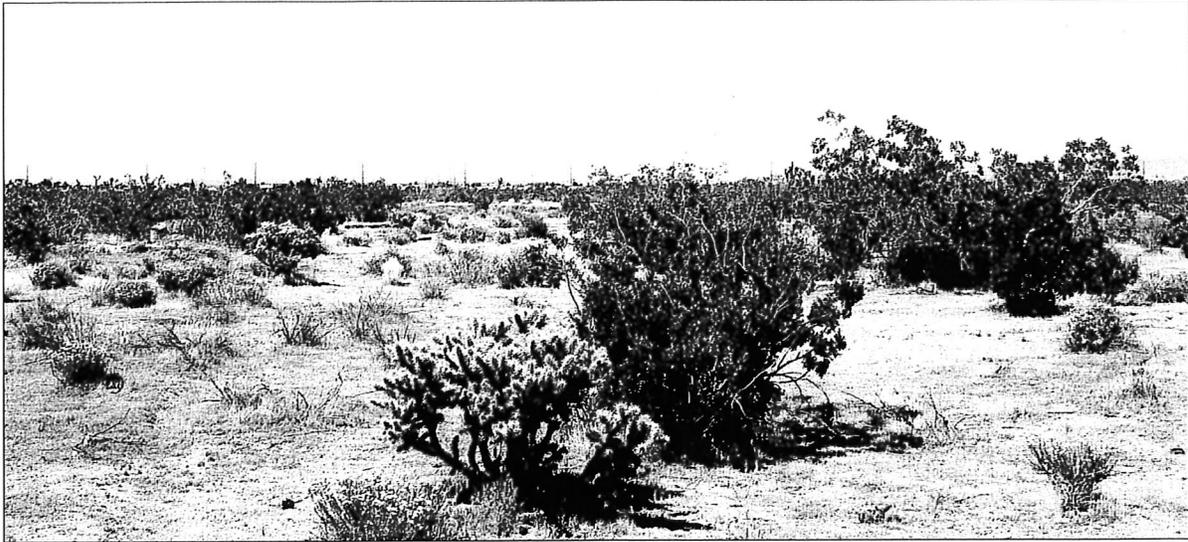


Figure 3. Overview of scatter of glass and metal historical-period artifacts at CA-SBR-12058H.

August 24, 2006

Greg Quan
R.Y. Properties, Inc.
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Alhambra, CA 91801

Re: Historical / Archaeological Resources Study
Tract No. 16397; Assessor's Parcel Number 3096-311-01
City of Victorville, San Bernardino County, California
CRM TECH Contract #1911

Dear Mr. Quan:

In July 2006, CRM TECH was contracted by R.Y. Properties, Inc., to conduct a historical / archaeological resources study on the property referenced above (Fig. 1), as required by the U.S. Army Corps of Engineers pursuant to Section 106 of the National Historic Preservation Act. As a part of the study, CRM TECH conducted a records search at the Archaeological Information Center, San Bernardino County Museum, Redlands, which is the State of California's official cultural resource records repository for the County of San Bernardino. During the course of the record search, it was discovered that Statistical Research, Inc. (SRI), of Redlands had previously surveyed the subject property during a cultural resources study in June of 2005, and a letter report had been produced as a result of that study. A copy of the 2005 report is enclosed with this letter.

During the field survey for that study, SRI identified and recorded one historic-era archaeological site, a moderately sized refuse scatter designated CA-SBR-12058H, on the subject property. At the completion of the study, SRI concluded that Site CA-SBR-12058H was not eligible for listing in the California Register of Historical Resources and did not constitute a "unique archeological resource" under the California Environmental Quality Act (CEQA). Due to the similarities in the pertinent provisions of CEQA and Section 106, Site CA-SBR-12058H, one of the numerous similar sites that are virtually ubiquitous across the Mojave Desert, would not qualify as a "historic property" for Section 106 compliance purpose, based on information and analysis provided by the SRI study.

According to SRI's report, the 2005 study included a records search and an intensive-level field survey of the subject property, which is essentially identical to the proposed scope of the present study with the exception of Native American consultations required specifically by Section 106 procedures. Upon close examination of the research methods completed during the 2005 study, CRM TECH determined that the records search and the field survey were conducted in a manner consistent with Section 106 standards. Since that study occurred only a year ago, CRM TECH concluded that a re-survey of the subject property would not be necessary.

In order to address additional requirements of the Section 106 process, CRM TECH initiated Native American consultations on behalf of R.Y. Properties, Inc., and the U.S. Army Corps of Engineers in July and August 2006. For that purpose, CRM TECH contacted the State of California's Native American Heritage Commission on July 7, 2006,

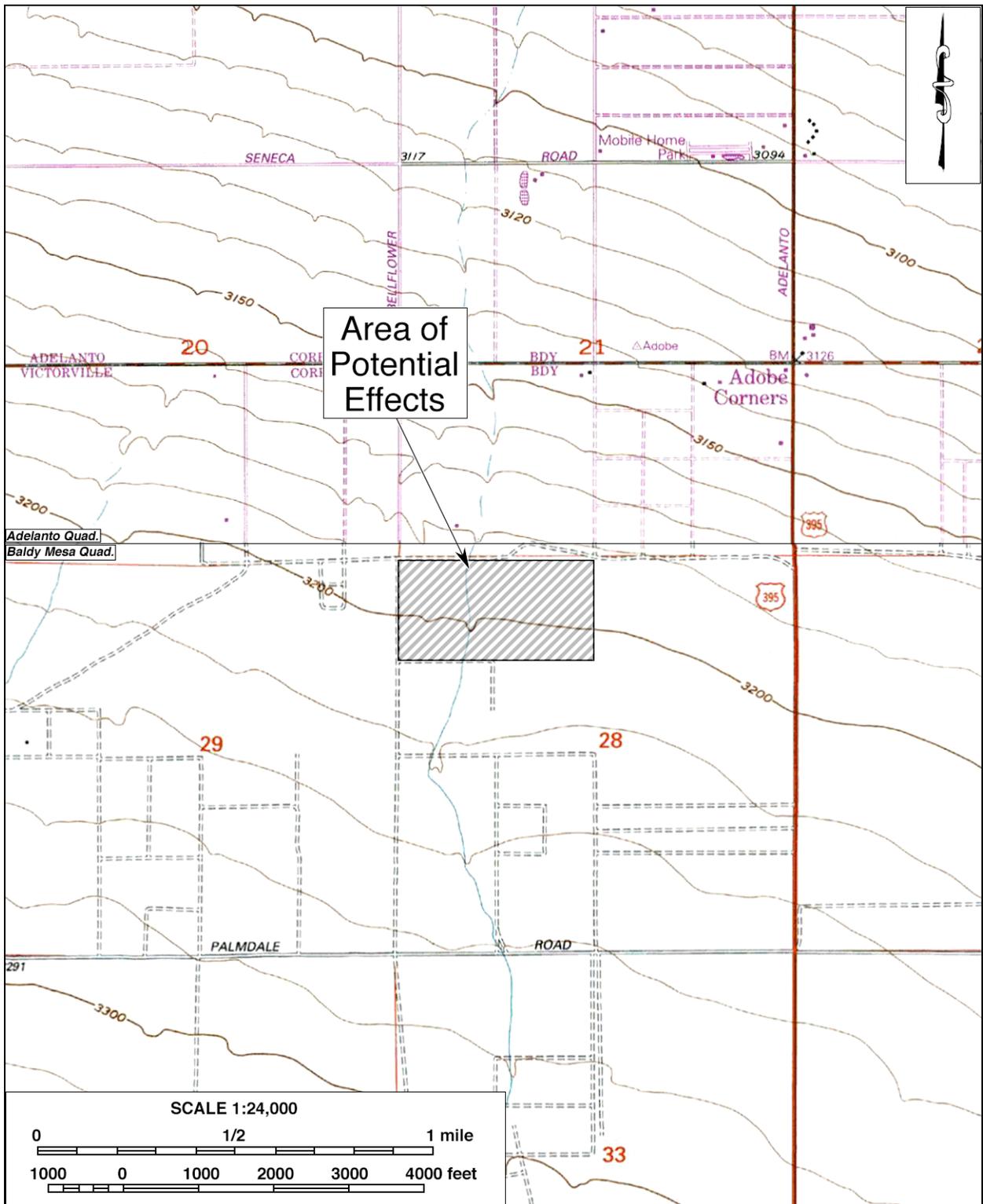


Figure 1. Area of Potential Effects. (Based on USGS Baldy Mesa and Adelanto, Calif., 1:24,000 quadrangles)

to request a records search in the commission's sacred lands file. The correspondences between CRM TECH and the Native American Heritage Commission are attached to this letter in Appendix 1.

In response to CRM TECH's inquiry, the Native American Heritage Commission reported that the sacred lands record search identified no Native American cultural resources in the immediate vicinity of the property. However, noting that "the absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area," the commission suggested that other Native American representatives be contacted, and provided a list of potential contacts in the region.

Following the commission's recommendations, CRM TECH contacted all six Native American representatives on the commission's referral list and the tribal organizations they represent in writing on July 20, 2006. In addition, CRM TECH pursued telephone contacts between August 15 and 23. As of this time, one written and two verbal responses have been received. Correspondences with these local Native American representatives and a telephone log are also included in Appendix 1.

Britt Wilson, Cultural Resources Coordinator for the Morongo Band of Mission Indians, replied by e-mail on July 25, 2006. In the e-mail, Mr. Wilson states that he has no specific knowledge of cultural resources in the vicinity of the subject property but recognizes the location as a part of the Morongo Tribe's Traditional Use Area. Therefore, if any Native American cultural resources are discovered during earth-moving activities, Mr. Wilson requests that all work in the immediate vicinity be halted until a qualified archaeologist can be retained to assess the find. In addition, Mr. Wilson requests that any treatment plan or action plan drafted by an archaeologist as a result of such a find include further consultations with the Morongo Band of Mission Indians. If human remains are discovered, Mr. Wilson requests that the County Coroner be contacted to examine the remains in accordance with state law.

John Valenzuela of the San Fernando Band of Mission Indians and Goldie Walker of the Serrano Band of Indians both responded by telephone, and both requested to be informed if any human remains, sacred sites, or any other Native American cultural resources are found on the property. None of the Native American representatives who have responded to the inquiries identified any specific sites of Native American cultural concerns. If any Native American concerns over cultural resource issues arise in future consultations, they will be reported immediately to the project proponent and the U.S. Army Corps of Engineers.

In conclusion, CRM TECH did not perform a field survey for this study because the proposed undertaking's Area of Potential Effects (APE) was previously surveyed in its entirety by SRI in 2005, because that study was considered adequate for Section 106 compliance purposes, and because no "historic properties," as defined by Section 106 regulation, were previously identified within the APE. During the Native American consultation, to date neither the Native American Heritage Commission nor the local tribal organizations have identified any Native American cultural resources in the immediate vicinity of the APE.

Based on these findings, CRM TECH concludes that no "historic properties" are present within the APE. Pursuant to 36 CFR 800.4(d)(1), CRM TECH recommends to the U.S. Army Corps of Engineers a determination that *no known historic properties will be affected by the proposed undertaking*. No further cultural resources investigation is recommended for the undertaking unless project plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are encountered during any earth-moving operations associated with the undertaking, 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 very much for this opportunity to be of service.

Sincerely,

Bai "Tom" Tang, Principal
CRM TECH

ATTACHMENT B

**CORRESPONDENCE WITH
NATIVE AMERICAN REPRESENTATIVES***

* A total of seven local Native American representatives were contacted; a sample letter is included in this report.

SACRED LANDS FILE RECORDS SEARCH & NATIVE AMERICAN

CONTACTS LIST REQUEST

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916)373-3710
(916)373-5471 Fax
nahc@pacbell.net

Project: Tentative Tract Map 16397; Assessor's Parcel Number 3096-311-02 (CRM TECH Contract No. 3228)

County: San Bernardino

USGS Quadrangle Name: Adelanto and Baldy Mesa, Calif.

Township 5 North **Range** 5 West **SB BM; Section(s)** 28

Company/Firm/Agency: CRM TECH

Contact Person: Nina Gallardo

Street Address: 1016 E. Cooley Drive, Suite A/B

City: Colton, CA

Zip: 92324

Phone: (909) 824-6400

Fax: (909) 824-6405

Email: ngallardo@crmtech.us

Project Description: The primary component of the project is to develop 80 acres of land located at the southwest corner of Dos Palmas Road and Mesa View Street, in the City of Victorville, San Bernardino County, California.

July 3, 2017

NATIVE AMERICAN HERITAGE COMMISSION

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



July 6, 2017

Nina Gallardo
CRM TECH

Sent by E-mail: ngallardo@crmtech.us

RE: Proposed Tentative Tract Map 16397; Assessor's Parcel Number 3096-311-02 (CRM TECH Contract No. 3228) Project, City of Victorville; Adelanto and Baldy Mesa USGS Quadrangles, San Bernardino County, California

Dear Ms. Gallardo:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. Please note that the intent of the reference codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public agencies** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
 - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.

3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. A search of the SFL was completed for the project with negative results.
4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

Native American Heritage Commission
Native American Contact List
San Bernardino County
7/6/2017

**Morongo Band of Mission
Indians**

Robert Martin, Chairperson
12700 Pumarra Road Cahuilla
Banning, CA, 92220 Serrano
Phone: (951) 849 - 8807
Fax: (951) 922-8146

**Morongo Band of Mission
Indians**

Denisa Torres, Cultural Resources
Manager
12700 Pumarra Road Cahuilla
Banning, CA, 92220 Serrano
Phone: (951) 849 - 8807
Fax: (951) 922-8146
dtorres@morongo-nsn.gov

**San Fernando Band of Mission
Indians**

John Valenzuela, Chairperson
P.O. Box 221838 Kitanemuk
Newhall, CA, 91322 Serrano
Phone: (760) 885 - 0955 Tataviam
tsen2u@hotmail.com

**San Manuel Band of Mission
Indians**

Lee Clauss, Director of Cultural
Resources
26569 Community Center Drive Serrano
Highland, CA, 92346
Phone: (909) 864 - 8933
Fax: (909) 864-3370
lclauss@sanmanuel-nsn.gov

**Serrano Nation of Mission
Indians**

Goldie Walker, Chairperson
P.O. Box 343 Serrano
Patton, CA, 92369
Phone: (909)528-9027

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Tentative Tract Map 16397; Assessor's Parcel Number 3069-311-02 Project, San Bernardino County.

July 7, 2017

Robert Martin, Chairperson
Morongo Band of Mission Indians
49750 Seminole Drive
Cabazon, CA 92220

RE: Tentative Tract Map Number 16397
Assessor's Parcel Number 3096-311-02
80 Acres in the City of Victorville
San Bernardino County, California
CRM TECH Contract #3228

Dear Mr. Martin:

I am writing to bring your attention to an ongoing CEQA-compliance study for a proposed residential development project on approximately 80 acres of undeveloped land (Tentative Tract Map Number 16397; Assessor's Parcel Number 3096-311-02) located at the southwest corner of Dos Palmas Road and Mesa View Street. The accompanying map, based on the USGS Adelanto and Baldy Mesa, Calif., 7.5' quadrangles, depict the location of the project area in Section 28, T5N R5W, SBBM.

Previously, the project area property was surveyed intensively in 2005, which resulted in a historic-period refuse scatter being recorded as Site 36-012058. During a reconnaissance-level field survey on July 6, 2017, Site 36-012058 could not be relocated and no new historical/archaeological resources were encountered. Also on July 6, the Native American Heritage Commission reported that a sacred lands record search identified no Native American cultural resources within the project area, but recommended that local Native American groups be contacted for further information (see attached). Therefore, as part of the cultural resources study for this project, I am writing to request your input on potential Native American cultural resources in or near the project area.

Please respond at your earliest convenience if you have any specific knowledge of sacred/religious sites or other sites of Native American traditional cultural value in or near the project area, or any other information to consider during the cultural resources investigations. Any information or concerns may be forwarded to CRM TECH by telephone, e-mail, facsimile, or standard mail. Requests for documentation or information we cannot provide will be forwarded to our client and/or the lead agency, namely the City of Victorville.

We would also like to clarify that, as the cultural resources consultant for the project, CRM TECH is not involved in the AB 52-compliance process or in government-to-government consultations. The purpose of this letter is to seek any information that you may have to help us determine if there are cultural resources in or near the project area that we should be aware of and to help us assess the sensitivity of the project area. Thank you for your time and effort in addressing this important matter.

Respectfully,

Nina Gallardo
Project Archaeologist/Native American liaison

Encl.: NAHC response letter and project location map

From: Jessica Mauck [<mailto:JMauck@sanmanuel-nsn.gov>]
Sent: Thursday, August 3, 2017 3:19 PM
To: 'Nina Gallardo' <ngallardo@crmtech.us>
Subject: RE: NA Scoping Letter for the TTM 16397; APN 3096-311-02

Hello Nina,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 7 July 2017. The location on page 1 is listed as the southwest corner of Dos Palmas Road and Mesa View Street. While I do not see a Mesa View Street, I do see a Mesa View Road, but the juncture of Mesa View Road and Dos Palmas Road is south of Palmdale Road, while the attached map shows the project location north of Palmdale Road. Can you please clarify the location of this project?

Regards,

Jessica Mauck

CULTURAL RESOURCES ANALYST

O: (909) 864-8933 x3249

M: (909) 725-9054

26569 Community Center Drive, Highland California 92346



From: Nina Gallardo [<mailto:ngallardo@crmtech.us>]
Sent: Thursday, August 3, 2017 3:40 PM
To: Jessica Mauck
Subject: RE: NA Scoping Letter for the TTM 16397; APN 3096-311-02

Hi Jessica,

It's Mesa View Road. Sorry for any confusion.

Nina

From: Jessica Mauck [<mailto:JMauck@sanmanuel-nsn.gov>]
Sent: Friday, August 4, 2017 2:22 PM
To: 'Nina Gallardo' <ngallardo@crmtech.us>
Subject: RE: NA Scoping Letter for the TTM 16397; APN 3096-311-02

Hi Nina,

Thank you for the clarification. There is knowledge of a few resources in and around the area of the proposed project. The Oro Grande Wash, which is a break off of the Mojave River, has highly sensitive cultural material given its associated with the Topipabith archaeological district. It is around 4 miles southeast of the project area and likely the reason for cultural materials in the region. I will keep an eye out for the notice from the City of Victorville, at which time I request the cultural report completed by CRM Tech.

Regards,

Jessica Mauck

CULTURAL RESOURCES ANALYST

O: (909) 864-8933 x3249

M: (909) 725-9054

26569 Community Center Drive, Highland California 92346

SAN MANUEL
BAND OF MISSION INDIANS