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CULTURAL RESOURCES ASSESSMENT

Wood and Lurin Residential Project

City of Riverside, Riverside County,

California



**PHASE I CULTURAL RESOURCES ASSESSMENT
TENTATIVE TRACT MAP 38094 PROJECT
CITY OF RIVERSIDE, RIVERSIDE COUNTY, CALIFORNIA**

Prepared on Behalf of:
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Type of Study: Phase I Cultural Resources Assessment

Cultural Resources within Area of Potential Impact: None

Project Location: USGS 7.5' Topographic Quadrangle Riverside East, Section 29 of Township 03 South, Range 04 West

APN: 266-130-016, 266-130-023, and 266-130-024

Project Area: approx. 17.5 acres

Date of Field Survey: March 4, 2021

Key Words: Archaeology, CEQA, Riverside County, Positive Report, City of Riverside

MANAGEMENT SUMMARY

Coastal Commercial Properties proposes the construction of a residential housing community (Project), located within the City of Riverside in Riverside County, California. The Project involves the construction single family detached homes with associated parking and open spaces. Material Culture Consulting, Inc. (MCC) was retained by E|P|D Solutions, Inc. to conduct a Phase I cultural resource investigation of the Project Area. This assessment was conducted in accordance with the California Environmental Quality Act (CEQA) and guidelines set forth by the City of Riverside. This assessment included a cultural records search, a search of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC), outreach efforts with 21 Native American tribal representatives, background research, and a pedestrian field survey.

The cultural resources records search identified forty-five prior cultural resources investigations within a 1-mile radius of the Project Area. None of these studies intersects the Project Area. A total of twenty-nine previously recorded cultural resources were identified within a 1-mile radius. None of these resources are documented/located within the Project Area. A review of historical aerial photographs and topographic maps indicate the Project Area has been used for agricultural purposes, yet this is the extent of modern and historic land use of the parcels. A residence was noted near the intersection of Lurin Avenue and Dant Street during the review of historical aerials and topographic maps. Additional sources confirmed the residence was built in the 1920s.

MCC requested a Sacred Lands File search from the Native American Heritage Commission (NAHC) on January 19, 2021. The NAHC responded on February 3, 2021, stating the SLF search was negative for previously known tribal cultural resources or sacred lands within the Project Area or within a mile of the Project. The NAHC provided MCC with contact information for 21 other tribes/individuals to reach out to for additional information. Three tribes, the Cahuilla Band of Indians, Rincon Band of Luiseño Indians, and Agua Caliente Band of Cahuilla Indians, stated an interest in the Project requested that the lead agency schedule AB 52 consultation with the tribal government for more information. Additionally, the Augustine Band of Cahuilla Mission Indians requests to be notified if cultural resources are unearthed during ground disturbance and related activities. These results are summarized in the Native American Outreach and Background Research section of this report and in Appendix C. MCC did not conduct formal consultation with the Native American representatives.

The pedestrian survey of the Project Area was conducted on March 4, 2021 by MCC Archaeologist Erika McMullin. During the course of fieldwork, survey conditions were good due to high ground visibility in most of the Project Area. The Project Area is highly disturbed due to construction activities currently occurring and happening prior. The survey confirmed the presence of a residential structure near the intersection of Lurin Avenue and Dant Street. No additional cultural resources and no paleontological resources were observed.

Based on the results of our investigation, the potential for encountering significant cultural resources within the Project Area is considered low to moderate. The historic house, in addition to the disturbed nature of the Project from agricultural activities occurring over decades, has the potential to uncover cultural resources subsurface. Therefore, MCC recommends full time archaeological monitoring during initial ground-disturbance activities, such as site preparation and grubbing, in order to quickly assess any discoveries of cultural resources during project implementation. MCC also recommends setting a plan in place to expediently address inadvertent discoveries and/or human remains, should these be encountered during any phase of development associated with the Project. In addition, MCC recommends an architectural historian evaluate the house in order to assess the historical significance of the home. Furthermore, MCC recommends that the AB 52 consultation process be initiated as soon as possible, to avoid unnecessary delays to Project development and implementation.

All notes, photographs, correspondence, and other materials related to this Project are located at Material Culture Consulting, Inc., located in Pomona, California.

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APPENDIX B: CONFIDENTIAL CULTURAL RESOURCES RECORDS SEARCH RESULTS

APPENDIX C: NAHC AND NATIVE AMERICAN CORRESPONDENCE

INTRODUCTION

Coastal Commercial Properties proposes the construction of single family, detached residential community, located within the City of Riverside in Riverside County, California. The Project involves the construction single family detached homes with associated parking and open spaces. Material Culture Consulting, Inc. (MCC) was retained by E|P|D Solutions, Inc. to conduct a Phase I cultural resources investigation in accordance with the California Environmental Quality Act (CEQA). This assessment was conducted pursuant to all applicable State of California regulations regarding cultural resources, as well as guidelines established by the City of Riverside. According to these regulations and guidelines, if development of a Project has the potential to result in significant impacts to cultural resources, a plan must be developed to mitigate those impacts to a level which is less than significant. This assessment documents the potential for encountering cultural resources during development of this Project and provides recommendations on how to mitigate impacts to those resources.

PROJECT LOCATION AND DESCRIPTION

The Project is located within the City of Riverside in Riverside County, California (Figure 1). The Project Area lies at the northeast corner of the intersection of Wood Road and Lurin Avenue (Figures 2 and 3). The Project Area is bounded to the north by Krameria Avenue, to the east by Dant Street, to the south by Lurin Avenue, and to the west by Wood Road. Residential development surrounds the area in all directions, with current construction taking place south of Lurin Avenue. Specifically, the proposed Project is located in Section 29, within Township 3 South, Range 4 West on the U.S. Geological Survey (USGS) *Riverside East 7.5'* topographic quadrangle (San Bernardino Baseline Meridian) (Figure 2). The Project Area consists of three parcels: 266-130-016, 266-130-023, and 266-130-024. Presently, the Project Area exists as a vacant lot with an already developed residence in the southwest corner of the area.

PROJECT PERSONNEL

Tria Belcourt, M.A., RPA served as the Principal Investigator for the study and supervised all work. Ms. Belcourt coordinated and oversaw the records searches, communicated with NAHC and Native American individuals, and provided quality control for this report. Ms. Belcourt is a Registered Professional Archaeologist (RPA) and Qualified Riverside County Archaeologist, with a M.A. in Anthropology from the University of Florida, a B.A. in Anthropology from the University of California at Los Angeles and over sixteen years of experience in California archaeology (See Appendix A). Cultural Resources Assistant Project Manager Erika McMullin, B.A., provided authorship of this report and conducted the pedestrian survey. Cultural Resources Project Manager and GIS Specialist Julia Carvajal, M.A., provided GIS support for the project and report. Cultural Resource Project Manager Sonia Sifuentes, M.Sc., provided technical peer review for the report. MCC recommends that the AB 52 consultation process be initiated as soon as possible, to avoid unnecessary delays to Project development and implementation.

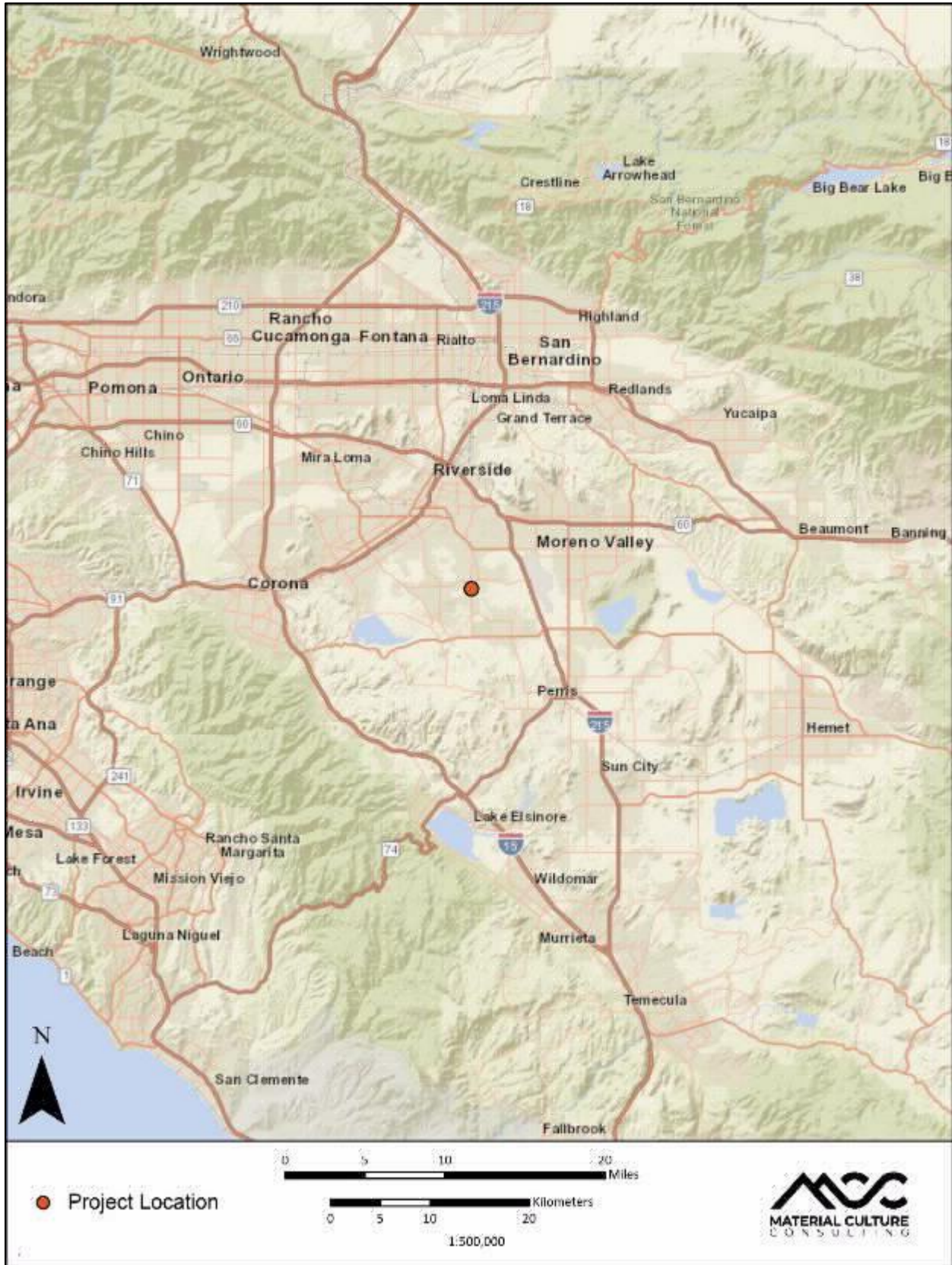


Figure 1. Tentative Tract Map 38094 Project Vicinity (1:500,000)

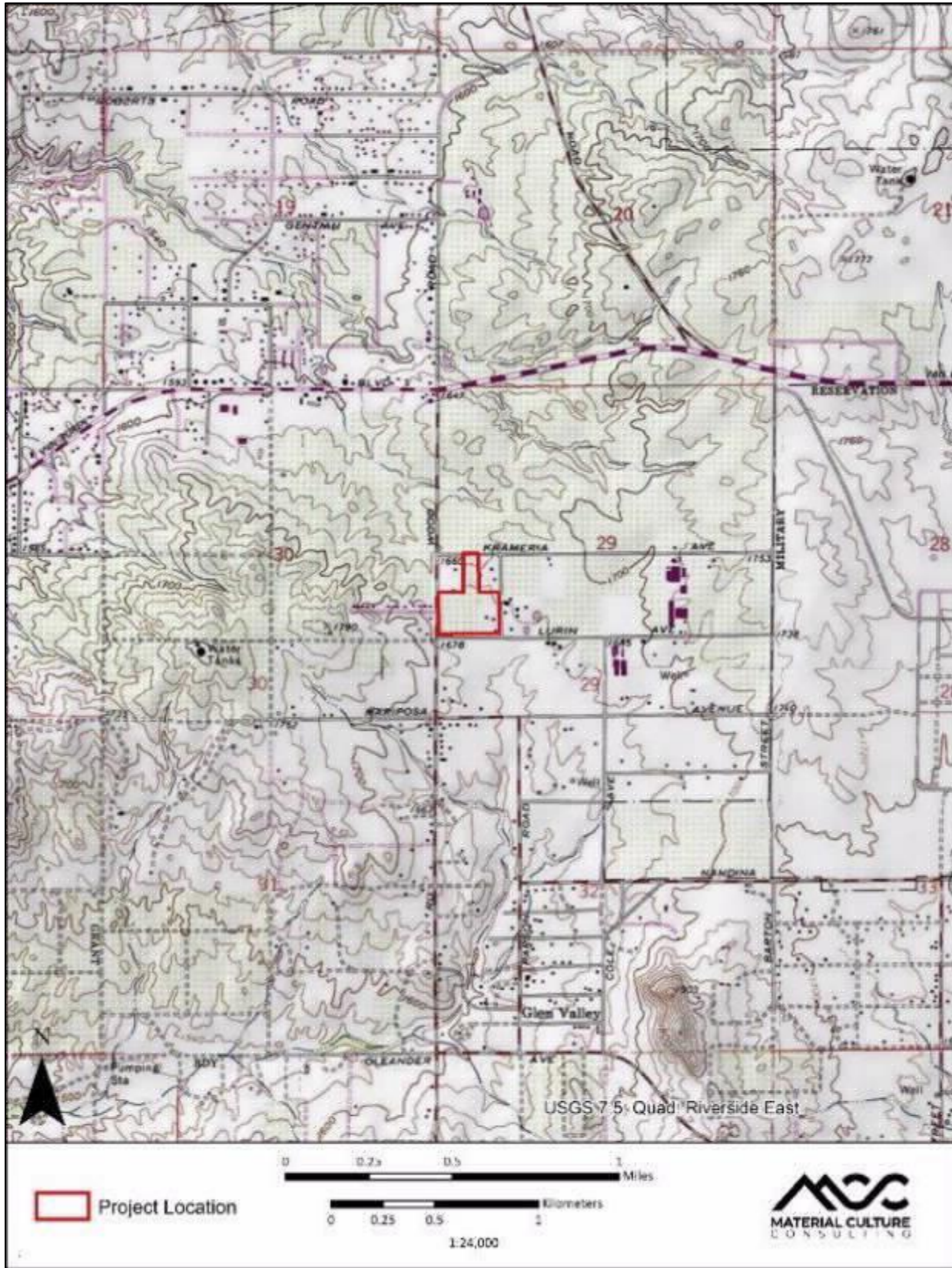


Figure 2. Tentative Tract Map 38094 Project Location (1:24,000, as depicted on *Riverside East* USGS 7.5 Minute Quadrangle)

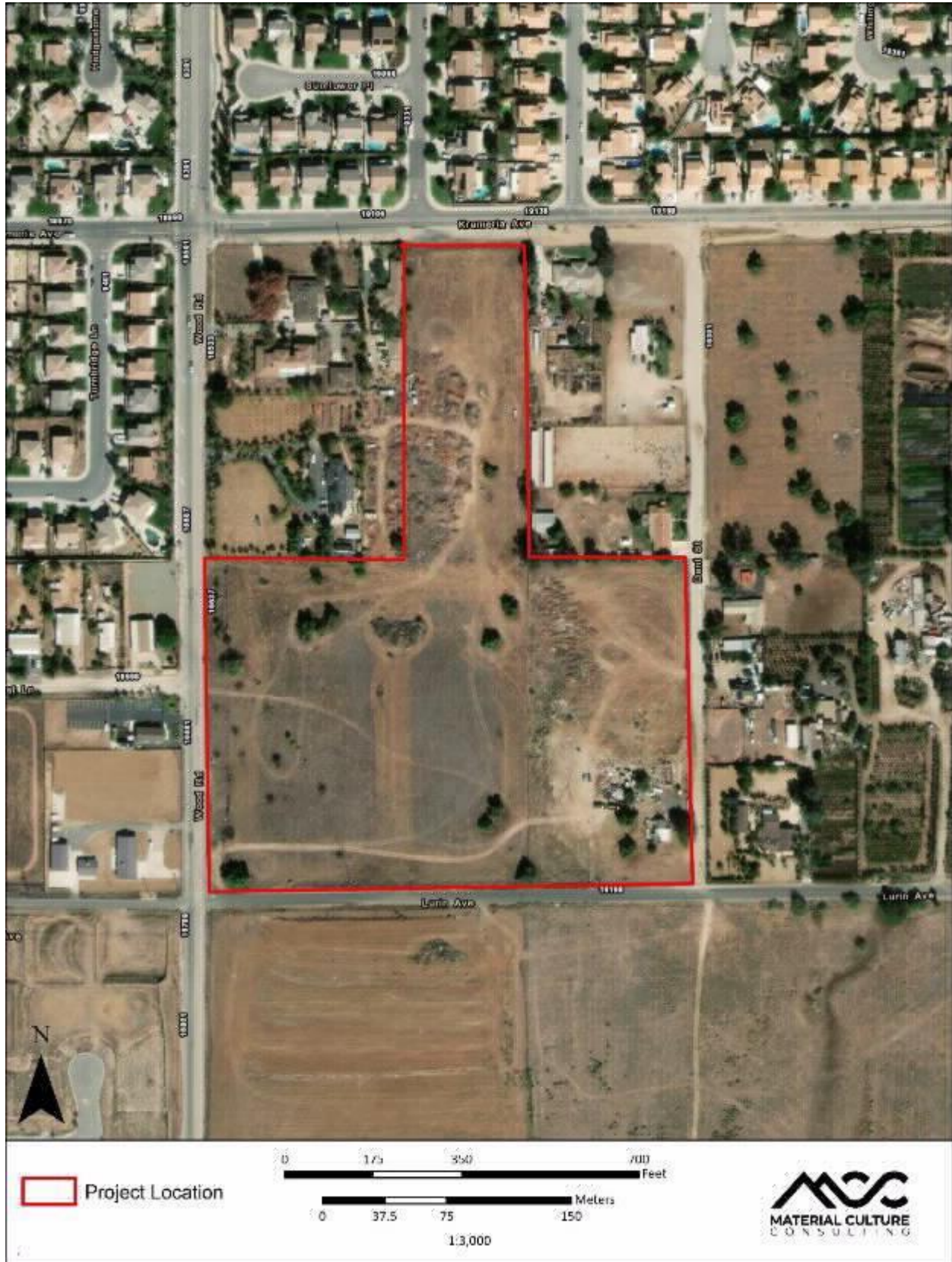


Figure 3. Tentative Tract Map 38094 Project Area (1:3,000, as depicted on aerial photograph)

ENVIRONMENTAL SETTING

The Project Area is located within the City of Riverside in Riverside County. Riverside County is situated within the Peninsular Ranges Geologic Province, and the Project Area itself is located within northwestern Riverside County, which opens up to the east onto the San Jacinto Valley. One of the northernmost ranges, Temescal Mountains, is located approximately 3.5 miles south of the Project Area. The Santa Ana River, located approximately 8 miles northwest of the Project Area, is the major drainage in the general region, with a river system flowing in an overall general northeast to southwest direction, emptying into the Pacific Ocean near Newport Beach and Huntington Beach. The Project Area is located within a relatively flat valley, with elevations averaging approximately 510 m (1675 ft.) above mean sea level (AMSL). A gradual, less than 10-degree west facing slope is present. The highest point is in the northern portion of the Project Area. To the north are the Jurupa Mountains, an east-west trending small mountain range that is approximately eight miles long and three miles wide (Daly 1931). Vegetation in much of the area has been altered by historical and modern development. Previously, the Project Area served as an orchard although it is no longer present. Vegetation observed included citrus trees, peach trees, olive trees, pepper trees, palm tree, prickly pear cactus, weeds, and grasses. The western region of Riverside County enjoys a mild Mediterranean climate characterized by warm, dry summers and cool, moist winters.

PREHISTORIC CONTEXT

Most researchers agree that the earliest occupation for the northwestern Riverside County area dates to the early Holocene (11,000 to 8,000 years ago). The earliest sites known in the area are attributed to the San Dieguito culture, which consisted of a hunting culture with flaked stone tool industry (Warren 1967). The material culture related to this time included scrapers, hammer stones, large flaked cores, drills, and choppers, which were used to process food and raw materials. During the archaeological investigations at the Eastside Reservoir, an early date of 7,380 +/- 300 before present from site CA-RIV-5786 implies that people lived in the area at this time. Two other archaeological sites that date to this period are located within this vicinity: CA-RIV-2798/H, near the shoreline of Lake Elsinore; and CA-RIV-6069, located in San Jacinto Valley near Mystic Lake. These early sites revealed deep, intact deposits with a number of stone tools and features, which are more likely to be found along ancient lake terraces.

Around 8,000 years ago subsistence patterns changed, resulting in a material complex consisting of an abundance of milling stones (for grinding food items) and a decrease in the number of chipped stone tools. The material culture from this time period includes large, bifacially worked dart points and grinding stones, handstones and metates. Archaeologists initially designated this period as the "Millingstone Horizon" (Wallace 1955). Later the Millingstone Horizon was redefined as a cultural tradition named the Encinitas Tradition (Warren 1967), with various regional expressions including Topanga and La Jolla. Use by archaeologists varied as some adopted a generalized Encinitas Tradition without regional variations, while others continued to use Millingstone Horizon, and still others used Middle Holocene (the geologic time period) to indicate this observed pattern (Sutton and Gardner 2010:1-2). Recently, this generalized terminology was criticized by Sutton and Gardner (2010) as suppressing the identification of cultural, spatial, and temporal variation, as well as the movement of peoples throughout space and time. It is these factors that are believed to be critical to an understanding of prehistoric cultural adaptation and change in this portion of southern California (Sutton and Gardner 2010:1-2).

The Encinitas Tradition characteristics include abundant metates and manos; crudely-made core and flake tools; bone tools; shell ornaments; and very few projectile points, indicating a subsistence pattern focused on hunting and gathering a variety of floral resources. Faunal remains vary by location but include marine mammals, fish, and shellfish; as well as terrestrial animals, reptiles, and birds (Sutton and Gardner 2010:7). The Encinitas Tradition has been redefined to have four patterns (Sutton and Gardner 2010: 8-25). These include the Topanga Pattern in

coastal Los Angeles and Orange counties; the La Jolla Pattern in coastal San Diego County; and the Sayles or Pauma cultures in inland San Diego County extending into western Riverside County, where the project is located. At approximately 3,500 years ago, Pauma groups in the general Project vicinity adopted new cultural traits which transformed the archaeological site characteristics - including mortar and pestle technology. This indicated the development of food storage, largely acorns, which could be processed and saved for the leaner, cooler months of the year.

At approximately 1,500 years before present, bow and arrow technology started to emerge in the archaeological record, which also indicates new settlement patterns and subsistence systems. The local population retained the subsistence methods of the past but incorporated new materials into their day to day existence, as evidenced by the archaeological record. The Palomar Tradition is attributed to this time, and is comprised of two larger patterns: the Peninsular Pattern in the inland areas of the northern Peninsular Ranges (e.g., San Jacinto and Santa Rosa mountains) and the northern Coachella Valley (Sutton 2010); and the San Luis Rey pattern of the Project Area. Archaeological sites from this time period are characterized by soapstone bowls, arrowhead projectile points, pottery vessels, rock paintings, and evidence of cremation sites. The shift in material culture assemblages is largely attributed to the emergence of Shoshonean (Takic-speaking) people who entered California from the east.

Investigations during the 2000s at the Eastside Reservoir project (Applied Earthworks 2001) refines the chronology for the past 1500 years into four stages: Saratoga Springs (1500-750 BP), Late Prehistoric (750-410 BP), Protohistoric (410-180 BP), and Historic (post-180 BP). The indications from this research show a large number of semi-residential sites during the Medieval Climatic Anomaly at the end of the Saratoga Springs period and ending by the Late Prehistoric (Applied Earthworks 2001). The increased use of the area suggests that the area may have had a more favorable environment than in surrounding regions.

ETHNOGRAPHIC CONTEXT

The Project Area has historically been situated between three Native American territories: the Cahuilla, Tongva Gabrieleno, Our research shows and the Luiseño people..

Cahuilla

The Cahuilla territory was bounded by the San Bernardino Mountains to the north, the Orocopia Mountains to the east, the Santa Ana River/the San Jacinto Plain and the eastern portion of Palomar Mountains to the west, and Borrego Springs and the Chocolate Mountains to the south (Bean 1978). The Project Area falls within the western region of the tribe's traditional territory, denoted by the San Gorgonio Pass. The Cahuilla existed within the most geographically diverse region, having exploited more than 500 native and non-native plants (Bean and Saubel 1972). The Cahuilla spoke a language that belongs to the Cupan group of the Takic subfamily of the Uto-Aztecan language family, a language family that includes the Shoshonean groups of the Great Basin (Bean and Shipek 1978).

The prehistoric Cahuilla occupation is characterized by structures within permanent villages that ranged from small brush shelters to dome-shaped or rectangular dwellings. Villages were situated near water sources, in the canyons near springs, or on alluvial fans at man-made walk-in wells (Bean 1972). There appears to be slight difference in subsistence tools between the Desert, Pass, or Mountain Cahuilla groups. The Desert Cahuilla used deep, wooden mortars with a long pestle whereas San Gorgonio Pass Cahuilla utilized shallower mortars with basketry rims (Kroeber 1908: 40, 43). Cahuilla granaries were usually raised on pole platforms two to four feet high, which resembled birds' nests, and were used to store mesquite (Kroeber 1908: 42).

In comparison with other Southern California tribes, the Cahuilla appear to have had a lower population density and a less rigid social structure. The Cahuilla are patrilineal, with closely related patrilineages that share an assumed common ancestor which is important socially and ceremonially (Hudlow 2007). The office of lineage leader, also known as a *nét*, directed subsistence activities, settled conflicts, represented the clan regionally and was responsible for correct performances of ceremonies, with the official role of the chief passed from father to eldest son (Bean 1978; Hudlow 2007).

Initial contact with European explorers with the Cahuilla most likely occurred during the expedition of Juan Bautista de Anza in 1777 (Napton and Greathouse 1982). The presence of the San Gabriel Mission in the early 1800s led to more contact via baptisms (Napton and Greathouse 1982). It also led to the Native Americans moving away from traditional habitation sites to separate themselves from the influence of the Mission (Brumgardt 1977). The Cahuilla traditions may have been relatively stable until mission secularization in 1834, due to the policy of the Catholic Mission fathers, or *padres*, to maintain imported European traditional style settlement and economic patterns (Bean and Shippek 1978). After 1877, when the United States government established Indian reservations in the region and religious missionaries began conversion of the Native American populations in the region, traditional cultural practices were prohibited. Presently, the Cahuilla reside in nine separate reservations in Southern California, located in Imperial, Riverside and San Diego counties (Bean 1978).

Gabrielino

The territory of the Gabrielino (Tongva) at the time of Spanish contact covered much of current-day Los Angeles and Orange counties and extended into the western part of San Bernardino County. The southern extent of this culture area is bounded by Aliso Creek, the eastern extent is located east of present-day San Bernardino along the Santa Ana River, the northern extent includes the San Fernando Valley, and the western extent includes portions of the Santa Monica Mountains (Bean and Smith 1978; McCawley 1996). The Gabrielino also occupied several Channel Islands including Santa Barbara Island, Santa Catalina Island, San Nicholas Island, and San Clemente Island. Because of their access to certain resources, including a steatite source from Santa Catalina Island, this group was among the wealthiest and most populous aboriginal groups in all of Southern California (Kroeber 1976). Trade of materials and resources controlled by the Gabrielino extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California (Johnson 1962; Kroeber 1976; Bean and Smith 1978). The name "Gabrielino" is Spanish in origin and was used in reference to the Native Americans associated with the Mission San Gabriel. It is unknown what these people called themselves before the Spanish arrived, but today they call themselves "Tongva," meaning "people of the earth."

The Gabrielino lived in permanent villages and smaller, resource-gathering camps occupied at various times of the year depending upon the seasonality of the resource. Larger villages were comprised of several families or clans, while smaller, seasonal camps typically housed smaller family units. The coastal area between San Pedro and Topanga Canyon was the location of primary subsistence villages, while secondary sites were located near inland sage stands, oak groves, and pine forests. Permanent villages were located along rivers and streams, as well as in sheltered areas along the coast. As previously mentioned, the Channel Islands were also the locations of relatively large settlements (Kroeber 1976; Bean and Smith 1978).

The Gabrielino tribe carried out food exploitation strategies that utilized local resources ranging from plants to animals; coastal resources were also exploited. Rabbit and deer were hunted and acorns, buckwheat, chia, berries, fruits, and many other plants were collected. Artifacts associated with their occupations include a wide array of chipped stone tools including knives and projectile points, wooden tools like digging sticks and bows, and ground stone tools like bedrock and portable mortars, metates, and pestles. Local vegetation was used to construct

shelters as well as for medicinal purposes. Cooked foods were prepared on hearths (Kroeber 1976; Bean and Smith 1978; McCawley 1996). Acorns were one of the most important food resources utilized by the Gabrielino and other Native American groups across California. The acorns were ground into a fine powder in order to make an acorn mush or gruel. A dietary staple, acorns provided a large number of calories and nutrients. The ability to store and create stockpiles in case of lean times also contributed to the importance of acorns as a vital natural resource. Much of the material evidence available to archaeologists concerning the Gabrielino is a result of tools and technologies related to their subsistence activities.

The social structure of the Gabrielino is little known; however, there appears to have been at least three social classes: 1) the elite, which included the rich, chiefs, and their immediate family; 2) a middle class, which included people of relatively high economic status or long-established lineages; and 3) a class of people that included most other individuals in the society. Villages were politically autonomous units comprised of several lineages. During times of the year when certain seasonal resources were available, the village would divide into lineage groups and move out to exploit them, returning to the village between forays (Kroeber 1976; Bean and Smith 1978). Each lineage had its own leader, with the village chief coming from the dominant lineage. Several villages might be allied under a paramount chief. Chiefly positions were of an ascribed status, most often passed to the eldest son. Chiefly duties included providing village cohesion, leading warfare and peace negotiations with other groups, collecting tribute from the village(s) under his jurisdiction, and arbitrating disputes within the village(s). The status of the chief was legitimized by his safekeeping of the sacred bundle, a representation of the link between the material and spiritual realms and the embodiment of power (Kroeber 1976; Bean and Smith 1978). Shamans were leaders in the spirit realm. The duties of the shaman included conducting healing and curing ceremonies, guarding of the sacred bundle, locating lost items, identifying and collecting poisons for arrows, and making rain (Kroeber 1976; Bean and Smith 1978). Marriages were made between individuals of equal social status and, in the case of powerful lineages, marriages were arranged to establish political ties between the lineages (Kroeber 1976; Bean and Smith 1978). Men conducted the majority of the heavy labor, hunting, fishing, and trading with other groups. Women's duties included gathering and preparing plant and animal resources, and making baskets, pots, and clothing (Kroeber 1976; Bean and Smith 1978).

Luiseño

The Spanish name Luiseño was used to identify Native Americans who were associated with the Mission San Luis Rey, with the Luiseño most likely had no known native term for their own nationality (Bean and Shipek 1978). Extensive research has been accumulated that gives detailed accounts of the Luiseño (DuBois 1908, Sparkman 1908, Kroeber 1976, White 1963, and Bean and Shipek 1978). At the time of these ethnographies, the Luiseño maintained a sophisticated political organization structure, and their lands extended from western San Jacinto to the Pacific Ocean along several major waterways, including Temecula, Santa Margarita, and San Luis Rey Rivers (Bean and Shipek 1978). Neighboring tribes included the Cahuilla to the east, the Serrano to the north, and the Gabrielino to the west. Each of these groups are part of the same Uto-Aztecan linguistic group and are Takic-speakers. The boundaries for territories fluctuate as new information evolves in ethnographic research, so there is a likelihood that there was quite a bit of overlap between groups over time as well.

The Luiseño organized themselves according to family groups or lineages, rather than forming exogamous moieties. Each lineage occupied land that they held in common, and they lived socially and politically separately from others (Bean and Shipek 1978). They typically resided in villages near reliable water sources and maintained special purpose camps close to the main villages. In the springtime, families would replenish food supplies by gathering local fruit, seeds, bulbs and roots. In the fall, families would move into the upland areas to gather acorns, prickly pear, toyon berries, and yucca. The Luiseño territory contained several species of oak that produced edible acorns. Acorns were stored and processed as needed by breaking the shell, grinding the meat into a powder, and

leaching the tannic acid from the nut by using water. A porridge was made from the leached nuts and cooked with water using hot stones in baskets. The Luiseño used a wide variety of tools, including manos and metates, bone and shell fish hooks, stone and shell ornaments, bone awls, wooden throwing sticks, hammer stones, handstones, pestles, mortars, and drills, which are evident in late Prehistoric archaeological sites. Presently, there are six federally recognized Luiseño tribes with associated reservations within Southern California.

HISTORIC CONTEXT

In 1769, Spanish settlers began to enter and colonize Alta California. Once the first European exploration of California occurred, the region underwent immense change. As early as 1827, Anglo-Americans were migrating into Southern California. In the decades to come, California would be taken by the United States with the close of the Mexican-American War and subsequent events such as the Civil War and California Gold Rush would continue to shape the history of California.

Spanish Period (1769 to 1821) to Mexican Period (1821 to 1848)

The Spanish period began in 1769 with Captain Gaspar de Portolá's land expedition, and ended in 1821 with Mexican Independence. During the Spanish Period, Riverside County was within the local territory of Mission San Gabriel Arcangel established in 1771 located in present-day San Gabriel. During the Mission Period of California, Alta California was settled at a slower pace compared to its neighboring areas due to its more inland location. In 1818, Leandro Serrano settled into the area. After obtaining permission from San Luis Rey Mission in San Diego to establish an area in the Temescal area. At its peak, the San Luis Rey Mission controlled multiple ranches and claimed control over what is now northern San Diego County and western Riverside County, including the Project Area. Most of these lands were managed as outlying ranches known as *asistencias*. The *asistencias* allowed native populations, such as the Luiseño of the area, to reside in their villages and not move onto the mission itself. However, after control of the area shifted to Mexico, secularization began throughout the area and the missions and their associated ranches began to decline. The Mexican government proceeded to push settlements of Mexican populations from the south by deeding large grants to individuals who promised to employ settlers. Small villages were established on some ranchos, while small towns appeared in areas between ranchos. Established in 1838 under Senor Don Juan Bandini, the Rancho Jurupa, near but outside of the Project area, was located along both banks of the Santa Ana River and covered approximately 40,569 acres (Hoffman 1862; City of Jurupa Valley 2019). Portions of Rancho Jurupa were sold in subsequent years, with the large portion sold to Bandini's son-in-law, Abel Stearns, in 1859 (Hoffman 1862). By 1879, Stearns had the property patented, which led to subsequent subdivision of the property as more settlers began to move into the region.

American Period (1848 to present)

The Gold Rush of 1849 would see tremendous influx of Americans and Europeans flooding into Southern California. The passing of the Homestead Act of 1862 increased the influx of settlers within the region. Eventually, Riverside County was settled by homesteaders and farmers, and quickly became a diversified agricultural area with citrus, grain, grapes, poultry, and swine being the leading commodities. This influx of settlers led to population pressures and increased conflicts with the local indigenous groups. The passage of the Act for the Governance and Protection of Indians in 1850 further degraded the position of the native population. By 1877, The Cahuilla were moved to reservations in a checkerboard pattern throughout the Palm Springs and Coachella Valleys in Riverside County (Napton and Greathouse 1982) which broke up reservation land into discontinuous patchwork pieces, restricting access by the tribe to sacred lands and traditional gathering places.

The Riverside Colony was founded in 1870 by abolitionist judge John W. North and a group of reform-minded colleagues as a cooperative joint-stock agriculture venture. This is the first time in which the area was referred to as Riverside. With a growing citrus industry, the City of Riverside became the richest U.S. city by 1895 (City of Riverside 2007). At this time, the city flourished and improved their irrigation, growing, processing and marketing for their cash crop, naval oranges. Soon after, the city would boast about its thriving and successful agricultural cooperative in the world, California Fruit Growers Exchange, trademarked as Sunkist (City of Riverside 2007). A world-class research institution, The Citrus Experiment Station became the center for citrus machinery production. The citrus horticultural advancements attracted immigrants from all over the world in hopes to help meet the demand of the growing and lucrative industry. As a result, the city developed a substantial Chinatown and other ethnic settlements such as Hispanic Casa Blanca and settlements of Japanese and Korean immigrants (City of Riverside 2007).

Citrus continued to bring in commerce and people to the area, especially during the Post World War I development that was experienced throughout southern California. In the 1950s, University of California, Riverside was selected for an undergraduate liberal art schools, which grew out of the Citrus Experiment Station (City of Riverside 2007).

The Project Area was used as an agricultural field from the at least the early 1900s until the late 1970s. The Project Area has evidence of it once being used for citrus farming as some citrus trees are still present. Originally within the census-designated place Woodcrest, the Project Area and vicinity was annexed into the City of Riverside in 2007.

REGULATORY CONTEXT

This project is subject to both state and local regulations, including CEQA and the City of Riverside General Use Plan. CEQA declares that it is state policy to "take all action necessary to provide the people of this state with...historic environmental qualities." It further states that public or private projects financed or approved by the state are subject to environmental review by the state. All such projects, unless entitled to an exemption, may proceed only after this requirement has been satisfied. CEQA requires detailed studies that analyze the environmental effects of a proposed project. In the event that a project is determined to have a potential significant environmental effect, the act requires that alternative plans and mitigation measures be considered. CEQA includes historic and archaeological resources as integral features of the environment. The level of consideration may vary with the importance of the resource.

SIGNIFICANCE EVALUATIONS

The criteria for listing resources on the California Register of Historic Resources (CRHR) were expressly developed to be in accordance with previously established criteria developed for listing on the National Register of Historic Places and require similar protection to that which the National Historic Preservation Act Section 106 mandates for historic properties. According to Public Resources Code (PRC) Section 5024.1(c) (1-4), a resource is considered historically significant if it meets at least one of the following criteria:

- 1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2) Associated with the lives of persons important to local, California or national history;
- 3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- 4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Note that California Historical Landmarks with numbers 770 or higher are automatically included in the CRHR.

Sites with the potential to yield artifacts and other data that can address research questions may be evaluated as eligible for CRHR listing per Criterion (4). Some prehistoric sites may be evaluated as CRHR-eligible under Criterion (1) if they relate to culturally significant events or (mythological) persons (Criterion 2), or represent high artistic forms (e.g., rock art), per Criterion (3).

Under CEQA, if an archaeological site is not a significant "historical resource" but meets the definition of a "unique archaeological resource" as defined in PRC Section 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined in PRC Section 21083.2(g) as follows:

An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing on the NRHP or CRHR nor qualify as a “unique archaeological resource” under CEQA PRC Section 21083.2 are viewed as not significant. Under CEQA, “A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” [PRC Section 21083.2(h)].

Impacts to historical resources that alter the characteristics that qualify the historical resource for listing on the CRHR are considered to be a significant effect (under CEQA). The impacts to a historical resource are considered significant if: The Project activities physically destroy or damage all or part of a resource; change the character of the use of the resource or physical feature within the setting of the resource which contribute to its significance; or introduce visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource. If it can be demonstrated that a Project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (Section 21083.2 (a), (b), and (c)).

Assembly Bill (AB) 52 (Gatto; Stats. 2014, ch. 532), enacted in September 2014, sets forth both procedural and substantive requirements for analysis of tribal cultural resources as defined in Public Resources Code (PRC) Section 21074, and consultation with California Native American tribes. Tribal cultural resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a tribe. A tribal cultural resource is one that is either: (1) listed on, or eligible for listing on the CRHR or local register of historical resources (see section below); or (2) a resource that the CEQA lead agency, at its discretion and supported by substantial evidence, determines is significant pursuant to the criteria in PRC Section 5024.1, subdivision (c) (see PRC Section 21074). Further, because tribes traditionally and culturally affiliated with a geographic area may have specific expertise concerning their tribal cultural resources, AB 52 sets forth requirements for notification and invitation to government to government consultation between the CEQA lead agency and geographically affiliated tribes (PRC Section 21080.3.1[a]). Under AB 52, lead agencies must avoid damaging effects to tribal cultural resources, when feasible, regardless of whether consultation occurred or is required.

Tribal cultural resources per PRC 21074 (a)(1)(A)–(B) are defined as either of the following:

- 1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set

forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- a) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

CITY OF RIVERSIDE GENERAL PLAN

The City Code of Riverside's Title 20 establishes the authority for preservation, the composition and administrative requirements of the Cultural Heritage Board, criteria for evaluating projects affecting cultural resources, and procedures for protecting and designating significant cultural resources. City approval is required to alter, demolish, or relocate historic resources. This process for preserving cultural resources is a major consideration in the City's planning and permitting actions. The City Code of Riverside state in Title 20 Cultural Resources states the purpose of the title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City for the following reasons:

- A. To safeguard the City's heritage as embodied and reflected in such resources;
- B. To encourage public knowledge, understanding and appreciation of the City's past;
- C. To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
- D. To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the City;
- E. To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history and to encourage complementary contemporary design and construction;
- F. To enhance property values and to increase economic and financial benefits to the City and its inhabitants;
- G. To protect and enhance the City's attraction to tourists and visitors, thereby stimulating business and industry;
- H. To identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses;
- I. To integrate the preservation of cultural resources and the extraction of relevant data from such resources into public and private land management and development processes;
- J. To conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment.
- K. To implement the City's General Plan.
- L. To work in concert with the City's Zoning Code.

In addition, the General Plan (Historic Preservation Element, adopted in 2003 and amended in 2012, includes the following policies to reduce potential impacts to cultural resources:

Historic Preservation

- Policy HP-1.1: The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.
- Policy HP-4.3 The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Our Neighborhoods

- Policy LU-30.4: Promote the placement of relocated historic structures on in-fill lots in neighborhoods within a designated historic district.

Hillsides

- Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

The General Plan (Historic Preservation Element 2012) includes the following policy, the adherence to which will reduce potential impacts to Native American villages, human remains, religious sites and human remains:

Historic Preservation

- Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and Federal cultural resources protection and management laws in its planning and project review process.
- Policy HP-4.3 The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Hillsides

- Policy LU-4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

RESEARCH DESIGN

The objectives of an archaeological assessment are to locate, interpret, and evaluate the indications of past human activities within the study area. The indicators of such activities are represented by cultural resources, which can consist of many different types of materials – stone tools, historic neighborhoods, historic-era can scatters, village sites, food waste, tool manufacturing waste, trails, stone alignments, petroglyphs, hearths, or human skeletal remains. All of these types of resources are known to exist within the general Project region. The scope of this study is to identify and evaluate the significance of observable cultural resources should they exist within the Project Area.

RESEARCH THEMES WITHIN THE PROJECT AREA

Riverside County has a rich prehistoric and historic cultural heritage. Prehistoric sites are known to occur along intermittent drainages, as well as in the hills southwest of the Project Area and are often associated with boulder outcrops. Food processing sites, consisting of bedrock grinding and milling features, and ground stone implement fragments are found within this region. The closest known sites such as these are located near the Project Area. There are 28 bedrock milling features within a 1-mile radius.

Future archaeological research within the general Project Area has the potential to address research questions regarding settlement patterns, site structure, subsistence strategies, trade and distribution networks and tool technologies. Questions for the Project have been selected to contribute to the context and understanding of the prehistory and history of California. Based on the literature review, research questions fall into several prehistoric and historic domains. The prehistoric research domains are Chronology and Cultural Affiliation, Subsistence and

Site Function, and Toolstone Procurement and Use. Historic research topics focus primarily on the domain of Community Development. Defining research questions also helps focus the documentation of resources during survey so that artifacts, features and other remains that can contribute to an understanding of regional history and prehistory are carefully noted.

CHRONOLOGY AND CULTURAL AFFILIATION

At prehistoric sites throughout Western Riverside County, chronometric data generally derive from time-sensitive artifacts (e.g., projectile points, beads, and ceramics), physically dateable artifacts (e.g., obsidian), and organic remains (dateable through chronometric assay). Time-sensitive and dateable artifacts can occur in surface and subsurface contexts, the former sometimes less reliable than the latter in terms of dating archaeological components. Dateable organic remains (e.g., bone, shell, fiber, loose charcoal) can be acquired from midden deposits or, in the best examples, from buried features like hearths. In any case, sites that have dateable items or remains can be placed at least tentatively within an existing temporal framework, be it local or regional, and used to compare and contrast temporal adaptive patterns in human behavior. For the most part, sites that can be dated have greater overall data potential than undated sites as they can be placed in time and help refine our understanding of long-and short-term changes in prehistoric human adaptation.

Given the importance of chronological data to all archaeological interpretation, it will be critical to document the presence of any time-sensitive artifacts within the Project Area. Sites that can contribute valuable chronological data may be recommended eligible for listing on CRHR under Criterion (4), research potential.

SUBSISTENCE-SETTLEMENT PATTERNS

Subsistence is one of the most basic of human needs having a direct effect on human behavior. Prehistoric subsistence procurement activities consist of any number of variables including site location in relation to land form, water supply, and raw materials; site size; site function; and duration of occupation. Material culture, such as lithic and ground stone tools, ceramics, and faunal and botanical remains, provide data representative of subsistence-related activities and strategies.

The Project Area is within a larger settlement area used by the Luiseño and several other overlapping cultures, which are known within the Perris Valley. Information on the nature and intensity of prehistoric use of the Project Area, including the types of sites present, their density, and environmental context, will contribute to a more complete picture of settlement and subsistence patterns in this part of California. Combined with chronological information (above), this information can also assist in determining adaptive changes over time. Sites that can offer valuable data concerning prehistoric subsistence-settlement patterns may be recommended eligible for listing on California Register of Historical Resources (CRHR) under Criterion (4), research potential.

TOOL-STONE PROCUREMENT AND USE

Basic patterns in lithic materials use can be useful for reconstructing the approximate geographic extent of past settlement and trade systems. Sites that offer valuable information concerning patterns of prehistoric tool-stone procurement and use may be recommended eligible for listing on CRHR under Criterion (4), research potential, particularly if they are accompanied by chronological data that may be used to place stone-working behaviors in time.

HISTORIC RESEARCH DOMAINS

Historic archaeological sites can offer important data concerning any number of historic themes and may be recommended eligible for listing on CRHR under Criterion (4), research potential. They may also be eligible under Criterion (1) if they can be linked to certain historical events that are important to California's past, Criterion (2) if they are found associated with persons important in history, or under Criterion (3) if they contain structural features that are distinctive of a particular historic period or demonstrate an exceptional aesthetic quality. For the purposes of this project, we plan to focus historic period research on the theme of community development and built environments. The historic research domains will specifically address the historic-era built environment within the project vicinity, as it is felt that this topic is important to our understanding of the history in Western Riverside County.

METHODS

CALIFORNIA HISTORIC RESOURCES INVENTORY SYSTEM AND CULTURAL BACKGROUND RESEARCH

On January 20, 2021, MCC submitted a record search request of the California Historical Resource Information System (CHRIS) from the Eastern Information Center (EIC), located on the campus of University of California, Riverside. The search was conducted by EIC staff and identified any previously recorded cultural resources and investigations within a 1-mile radius of the Project Area. The CHRIS search also included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Inventory of Historic Resources. MCC also reviewed the California State Historic Resources Inventory (HRI) and Built Environment Resources Directory (BERD) for Riverside County to determine any local resources that have been previously evaluated for historic significance. In addition, archival maps were inspected for indications of historical structures in the area.

NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

MCC requested a search of the Sacred Lands File (SLF) from the Native American Heritage Commission (NAHC) on January 19, 2021. The NAHC responded on February 3, 2021, stating the SLF search was negative for previously known tribal cultural resources or sacred lands within the Project Area or within a mile of the Project. The NAHC provided MCC with contact information for twenty-one other tribes/individuals to reach out to for additional MCC subsequently sent letters on February 9, 2021 to all 21 Native American contacts, requesting any information related to cultural resources or heritage sites within or adjacent to the Project Area. Additional attempts at contact by letter, email, or phone call were made on February 26 and March 10, 2021. MCC did not conduct formal consultation with the Native American representatives.

FIELD SURVEY

The survey stage is important in a project's environmental assessment phase to verify the exact location of each identified cultural resource, the condition or integrity of the resource, and the proximity of the resource to areas of cultural resources sensitivity. Erika McMullin, B.A., MCC Archaeologist and Cross-Trained Paleontologist, conducted the survey of the proposed Project Area on March 4, 2021. The survey consisted of walking in parallel transects spaced at approximately 5- to 10-meter intervals over the Project parcels, while closely inspecting the ground surface. Transect spacing was narrowed when ground visibility was poor. All undeveloped ground surface areas within the ground disturbance portion of the Project Area were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Existing ground disturbances (e.g. cutbanks, ditches, animal burrows, etc.) were visually inspected. Representative photographs were taken of the entire Project Area.

RESULTS

CALIFORNIA HISTORIC RESOURCES INVENTORY SYSTEM AND CULTURAL BACKGROUND RESEARCH

The CHRIS records search identified a total of 49 cultural resources investigations that have been previously conducted within a 1-mile radius of the Project Area (see Table 1). Of these studies, three of the previously conducted cultural studies include the Project Area. Additionally, four previously conducted studies are located adjacent to the Project Area and three previously conducted studies are located within ¼-mile.

Table 1. Previous Conducted Investigations within 1 -mile Radius of Project Area

CHRIS Report Number	Year	Author	Title of Study	Affiliation	Distance from Project Area
RI-00093	1973	Marsh, Amanda F.	Glen Valley Pipeline Woodcrest, Riverside County, Expected Impact On Archaeological Resources	Archaeological Research Unit, U.C. Riverside	Within 1-mile
RI-00809	1980	Bowles, Larry L. And Jean A. Salpas	An Archaeological Assessment Of Parcel 15033	Archaeological Consultants	Within ½-mile
RI-01144	1980	Horn, D.M Van	Archaeological Survey Report: The 1500 Acre Woodcrest Agricultural Preserve Located Adjacent To March Afb, Riverside County, California	Archaeological Associates, Ltd., Costa Mesa, Ca	Within Project (northern border)
RI-01250	1981	Salpas, Jean A.	An Archaeological Assessment Of Parcel 17657	Archaeological Consultant, Riverside, Ca	Within 1-mile
RI-01649	1983	Lerch, Michael K.	Cultural Resources Assessment Of The Santa Ana Watershed Project Authority Proposed Imported Water Conveyance System, Riverside County, California	San Bernardino County Museum Association	Within ¼-mile
RI-02125	1987	Swope, Karen K.	An Archaeological Assessment Of 970+ Acres Of Land Located On March Air Force Base, Riverside County, California	Archaeological Research Unit, U.C. Riverside	Within 1-mile
RI-02163	1987	De Munck, Victor C.	An Archaeological Assessment Of Tentative Parcel Map No. 21252 In The Woodcrest Area Of Riverside County, California	Archaeological And Ethnographic Field Associates	Within ¼-mile
RI-02224	1988	Mccarthy, Daniel F.	An Archaeological Assessment Of Parcel 1 Of Parcel Map 12069 Located In The Woodcrest Area Of Riverside County, California	Archaeological Research Unit, U.C. Riverside	Within 1-mile
RI-02293	1988	Drover, C.E.	An Archaeological Assessment Of The Proposed Barton Street Pipeline And Access Road Near Glen Valley, California	Unknown	Within 1-mile
RI-02458	1989	Parr, Robert E.	An Archaeological Assessment Of Parcel 23635, Located Near Woodcrest In Western Riverside County, California	Archaeological Research Unit, U.C. Riverside	Within ½-mile
RI-02645	1990	Drover, Christopher E.	An Archaeological Assessment Of The Lurin Roosevelt And Hillside Tank Sites Western Municipal Water District Riverside County, California.	Unknown	Within 1-mile
RI-02810	1990	Drover, Christopher E.	An Archaeological Assessment Of Parcel # 274-210-013 And 266-070-002, Woodside, Riverside County, California.	Unknown	Within 1-mile
RI-03465	1992	Drover, Christopher	A Cultural Resources Assessment Of The 800-Acre Alta Cresta Ranch Specific Plan, Riverside East - Steele Peak Usgs Quads, Woodcrest Ca	Unknown	Adjacent to Project Area

CHRIS Report Number	Year	Author	Title of Study	Affiliation	Distance from Project Area
RI-03485	1992	White, Robert S.	An Archaeological Assessment Of A 9.06-Acre Parcel Located At 19485 Dallas Ave	Archaeological Associates, Ltd.	Within 1-mile
RI-03827	1990	Drover, Christopher	Environmental Impact Evaluation: An Archaeological Assessment Of Tract Number 25641, Temecula, Riverside County, California	Unknown	Within ½-mile
RI-04373	2000	Duke, Curt	Cultural Resource Assessment For Modifications To Pacific Bell Wireless Facility Cm 348-03, County Of Riverside, California.	LSA Associates, Inc.	Within 1-mile
RI-04404	2000	Jones and Stokes Associates, Inc.	Final Cultural Resources Inventory Report For The Williams Communications, Inc., Fiber Optic Cable System Installation Project, Riverside To San Diego, California Vol I-Iv.	Jones and Stokes Associates, Inc.	Within Project Area (western border)
RI-04690	2002	Maxon, Patrick	Results Of A Pre-Development Cultural Resources Inventory And Biological Survey/Constraints Analysis For The 2.2 Acre Lincoln Self Storage Property, City Of Riverside, Riverside County, California	SWCA Environmental Consultants	Within 1-mile
RI-04858	1997	Irish, Leslie	An Archaeological Assessment Of The Orangecrest Hills Specific Plan Amendmend Area, A 520 Acre Project Located In The Community Of Orangecrest, Riverside County	L&L Environmental, Inc.	Within Project Area (northern border)
RI-04996	2001	Mckenna Et Al.	Cultural Resources Review Of Previous Studies At The Ben Clark Public Safety Training Center At March Air Force Base, Riverside County, California.	Mckenna Et Al.	Within 1-mile
RI-05169	2004	Mason, Roger D.	Phase I Archaeological Survey Report For The Chen Ta Project Riverside County, California	Ecorp Consulting, Inc.	Within 1-mile
RI-05179	2003	LSA Associates, Inc.	Cultural Resource Assessment, Beazer Homes Tract 30756, Riverside County, California	LSA Associates, Inc.	Within ½-mile
RI-05180	2005	Mason, Robert	Phase I Cultural Archaeological Survey Report For The Chen Ta North Project, Riverside County, California	Ecorp Consulting, Inc.	Within 1-mile
RI-05377	2001	Love, Bruce And Mariam Dahdul	Archaeological Testing At Sites Ca-Riv-4739, -4740, -4741, And -4743	CRM Tech	Within 1-mile
RI-05458	2005	Mason, Roger D.	Phase I Archaeological Survey Report For The Sawada Parcel (Apn 266-160-006), Riverside County, Ca	Ecorp Consulting, Inc.	Within ½-mile
RI-05460	2005	Mason, Roger D.	Phase I Archaeological Survey Report For The Chen Parcels (Apn 266-140-021, -022, -002) Riverside County, Ca	Ecorp Consulting, Inc.	Adjacent to Project Area
RI-05461	2005	Mason, Roger D.	Phase I Archaeological Survey Report For The Burdick Parcel (Apn 266-160-018), Riverside County, California	Ecorp Consulting, Inc.	Within 1-mile
RI-05463	2005	Mason, Roger D.	Phase I Archaeological Survey Report For The Hsiao And Rubin Parcels (Apn 266-140-029, -030), Riverside County, Ca	Ecorp Consulting, Inc.	Within ½-mile
RI-05470	2005	Brunzell, David And Daniel Ewers	Cultural Resources Assessment, Parsons Road Project, Tentative Tract Map No. 32530, Riverside County, Ca	LSA Associates, Inc.	Within ½-mile
RI-05926	2002	Love, Bruce, Bai Tang, Daniel Ballester, And Mariam Dahdul	Historical/Archaeological Resources Survey Report, Cajalco Sub-Area Sewer Facilities Improvement Project, Near The Cities Of Riverside And Perris, Riverside County, Ca	CRM Tech	Within 1-mile
RI-05994	2003	Dahdul, Mariam, Daniel Ballester, And Josh Smallwood	Archaeological Testing At Sites Ca-Riv-4736/H. Alta Cresta Specific Plan, Tentative Tract Map No. S 31237, 31238, 31360 To 31362, Near The City Of Riverside, Riverside County	CRM Tech	Adjacent to Project Area

CHRIS Report Number	Year	Author	Title of Study	Affiliation	Distance from Project Area
RI-06268	2006	Bholat, Sara And Evelyn Chandler	Cultural Resources Investigation of The 5.4-Acre Property Located South Of Van Buren Boulevard, City And County Of Riverside, California	Ecorp Consulting, Inc.	Within 1-mile
RI-06276	2005	Mason, Rodger, D.	Phase I Archaeological Survey Report For The Geiser Parcel (Apn266-160-008) Riverside County, California	Ecorp Consulting, Inc.	Within 1-mile
RI-06426	2004	Hogan, Michael, Bai Tang, Matthew Wetherbee, And John Eddy	Historical/Archaeological Resources Report, Tentative Tract Map Numbers 32301 And 32302, Woodcrest Area, Riverside County, California	CRM Tech	Adjacent to Project Area
RI-06951	2007	Ahmet, Koral And Cary Cotterman	Cultural Resources Evaluation Of Prehistoric and Historic-Period Resources On A 5.4 Acre Property, Located South Of Van Buren Boulevard, City And County Of Riverside, California.	Ecorp Consulting, Inc.	Within 1-mile
RI-07063	2007	Jordan, Stacey C.	Archaeological Survey Report For Southern California Edison Company New Underground System Project On Private Land Riverside County, California (Wo#6477-6245,Ai#6-6202)	Jones & Stokes	Within 1-mile
RI-07430	2006	Roger D. Mason And Cary D. Cotterman	Phase I Archaeological Survey Report For The Reddix Parcel (Apn 266-140-003) Riverside County, California	Ecorp Consulting, Inc.	Within 1-mile
RI-08149	2008	Wayne Bonner And Marnie Aislin-Kay	Letter Report: Cultural Resource Records Search For T-Mobile USA Facility Candidate	Michael Brandman Associates, Irvine, California	Within 1-mile
RI-08272	1995	Manely, William Consulting And Earth Tech	Historic Building Inventory And Evaluation, March Air Force Base, Riverside County, California	Michael Brandman Associates	Within 1-mile
RI-08592	2010	Bonner, Wayne H.	Letter Report: Cultural Records Search And Site Visit Results For T-Mobile USA Telecommunications Candidate IE24895-B (Mt. Moriah), 17011 Wood Road, Riverside, Riverside County, California	Michael Brandman Associates	Within ¼-mile
RI-09489	2014	Lindgren, Kristina And Roger D. Mason	Cultural Resources Survey Of A 1.44-Acre Property Located In The City And County Of Riverside, California	Ecorp Consulting, Inc.	Within 1-mile
RI-09577	2006	Mull, Tom	Delineation Of Jurisdictional Waters Jose Gonzales Family Residence Assessor's Parcel Number 267-090-004 Woodcrest Area, Riverside County, California	LSA Associates, Inc.	Within 1-mile
RI-09588	2014	Puckett, Heather R.	Cultural Resources Summary For The Proposed Verizon Wireless, Inc. Property, Tangelo-Candidate B, 8765 Trautwein Road, Riverside, Riverside County, CA 92508	Tetra Tech	Within 1-mile
RI-09971	1998	Schroth, Adella B.	Review Of Traditional Cultural Properties And Ethnography Of The March Joint Powers Authority Planning Area	LSA Associates, Inc	Within 1-mile
RI-10093	1996	Unknown	Environmental Impact Report For The March Air Force Base Redevelopment Project	Urban Futures, Inc.	Within 1-mile
RI-10306	2017	Tang, Bai "Tom"	Historical/ Archaeological Resources Survey Report Meridian South Campus Specific Plan Amendment-Land Swap Addendum Near The City Of Riverside, Riverside County, California CRM Tech Contract 3267	CRM Tech	Within 1-mile
RI-10307	2018	Tang, Bai "Tom"	Historical/ Archaeological Resources Survey Addition To South Campus (Balance Of Lot 41), Meridian Business Park Near The City Of Riverside, Riverside County, California CRM Tech Contract 3349	CRM Tech	Within 1-mile

CHRIS Report Number	Year	Author	Title of Study	Affiliation	Distance from Project Area
RI-10542	2018	Garrison, Andrew J., Jennifer, R.K. Stropes, And Brian F. Smith	Cultural Resource Report For The 18806 VanBuren Boulevard Project, City Of Riverside, Riverside County, California	Brian F. Smith And Associates	Within 1-mile
RI-10548	2018	Garrison, Andrew J. And Brian F. Smith	A Phase I Cultural Resources AssessmentFor Tr37594, Riverside County, California	Brian F. Smith And Associates, Inc.	Within 1-mile

The CHRIS records search identified 35 previously recorded resources within 1-mile radius of the Project Area; however, none of the previously recorded cultural resources are located within the Project Area. The nearest CHRIS-identified resource (P-33-007826) is located directly east of the Project Area at 16698 Dante Street. This resource is a historic single-family residence home, identified as the main ranch house for Dant Ranch. Three of the resources are located within a ¼-mile and seven resources are located within ½-mile. The CHRIS records search identified 28 prehistoric resources, and seven historic resources (see Table 2). All of the known prehistoric resources include bedrock milling features. Nine prehistoric resources, all bedrock milling features, are located within ¼-mile to ½-mile of the Project Area. The historic resources recorded within 1-mile buffer of the Project Area include single family properties, a church, and foundations associated with a barn.

Table 2. Previously Recorded Cultural Resources within 1-mile Radius of Project Area

Primary Number	Trinomial	Type	Age	Attributes	NRHP/CRHR	Recorded by	Distance from Project Area
P-33-001250	CA-RIV-001250	Site	Prehistoric	AP02; AP04; AP12	n/a	1973 (A.F Marsh)	Within 1-mile
P-33-001793	CA-RIV-001793	Site	Prehistoric	AP04	n/a	1979 (T. Banks, Archaeology Associates, Costa Mesa, CA.)	Within ½-mile
P-33-001794	CA-RIV-001794	Site	Prehistoric	AP04	n/a	1979 (T. Banks, Archaeological Associates, Costa Mesa, CA.)	Within ½-mile
P-33-001979	CA-RIV-001979	Site	Prehistoric	AP04	n/a	1980 (Salpas and Bowles); 1992 (C.E. Drover, D.M. Smith and T. Buckley, Christopher Drover, Santa Ana, CA.)	Within 1-mile
P-33-003290	CA-RIV-003290	Other	Prehistoric	AP04	n/a	1987 (K. Swope and B. Neiditch, Archaeology Research Unit, UC Riverside, CA.)	Within 1-mile

Primary Number	Trinomial	Type	Age	Attributes	NRHP/CRHR	Recorded by	Distance from Project Area
P-33-003293	CA-RIV-003293	Site	Prehistoric	AP04	n/a	1987 (K. Swope and B. Neiditch, Archaeological Research Unit, UCRiverside, CA.)	Within 1-mile
P-33-003294	CA-RIV-003294	Site	Prehistoric	AP04	n/a	1987 (K. Swope and B. Neiditch, Archaeology Research Unit, UC Riverside, CA.)	Within 1-mile
P-33-003295	CA-RIV-003295	Site	Prehistoric	AP04	n/a	1987 (K. Swope and B. Neiditch, Archaeological Research Unit, UCRiverside, CA.)	Within 1-mile
P-33-003491	CA-RIV-003491	Site	Prehistoric	AP04	n/a	1973(V. C. de Munck, Archaeological& Ethnographic Field Associates, Riverside, CA.)	Within 1-mile
P-33-003859	CA-RIV-003859	Site	Prehistoric	AP04	n/a	1989 (C.E. Drover and D.M. Smith)	Within 1-mile
P-33-004710	CA-RIV-004710	Site	Prehistoric	AP04	n/a	1992 (R. S. White, Archaeological Associates)	Within 1-mile
P-33-004732	CA-RIV-004732	Other	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T. Buckley, Christopher Drover); 2006 (K. Ahmet & S. Bholat, Ecorp Consulting Inc.); 2006 (B. W. Wilson, Moronga Band of Mission Indians); 2007 (K. Ahmet, EcorpConsulting, Inc.)	Within 1-mile
P-33-004735	CA-RIV-004735	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Snith, T.Buckley, C. Drover)	Within ½-mile

Primary Number	Trinomial	Type	Age	Attributes	NRHP/CRHR	Recorded by	Distance from Project Area
P-33-004736	CA-RIV-004736	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, and T. Buckley, C. Drover); 2003 (D.I Ballester, None indicated)	Within ½-mile
P-33-004737	CA-RIV-004737	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover); 2003 (D. Ballester, None indicated)	Within ½-mile
P-33-004738	CA-RIV-004738	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover)	Within ½-mile
P-33-004739	CA-RIV-004739	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover); 2001 (M. Lozano, V. Avalos, None Indicated)	Within 1-mile
P-33-004740	CA-RIV-004740	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover); 2001 (M. Lozano, V. Avalos, None Indicated)	Within 1-mile
P-33-004741	CA-RIV-004741	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover); 2001 (M. Lozano, V. Avalos, None indicated)	Within 1-mile
P-33-004742	CA-RIV-004742	Site	Historic	AH01; AH11; AH16	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover)	Within ½-mile
P-33-004743	CA-RIV-004743	Site	Prehistoric	AP04	n/a	1992 (C.E. Drover, D.M. Smith, T.Buckley, C. Drover); 2001 (M. Lozano, None indicated)	Within 1-mile

Primary Number	Trinomial	Type	Age	Attributes	NRHP/CRHR	Recorded by	Distance from Project Area
P-33-007815	n/a	Building, Structure	Historic	HP02; HP33	NR 5	1983 (J. Warner, Riverside County Historical Comm.)	Within ¼-mile
P-33-007817	n/a	Building, Structure	Historic	HP16	NR 6	1983 (J. Warner, Riverside County Historical Comm.)	Within 1-mile
P-33-007821	n/a	Building, Structure	Historic	HP02	NR 5	1983 (J. Warner, Riverside County Historical Comm.)	Within 1-mile
P-33-007826	n/a	Building, Structure	Historic	HP02	NR 5	1983 (J. Warner, Riverside County Historical Comm.)	Adjacent to Project Area
P-33-007827	n/a	Building, Structure	Historic	HP02	NR 5	1983 (J. Warner, Riverside County Historical Comm.)	Within 1-mile
P-33-008041	CA-RIV-005991	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Corona, CA)	Within ¼-mile
P-33-008042	CA-RIV-005992	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Corona, CA)	Within 1-mile
P-33-008043	CA-RIV-005993	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Coronda, CA)	Within 1-mile
P-33-008044	CA-RIV-005994	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Corona, CA)	Within 1-mile
P-33-008051	CA-RIV-006001	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Corona, CA)	Within ¼-mile
P-33-008052	CA-RIV-006002	Site	Prehistoric	AP04	n/a	1997 (L.S. White, L&L Environmental, Inc., Corona, CA)	Within 1-mile
P-33-013836	CA-RIV-007563	Site	Prehistoric	AP04	n/a	2004 (J. J. Eddy, CRM Tech)	Within ¼-mile

Primary Number	Trinomial	Type	Age	Attributes	NRHP/CRHR	Recorded by	Distance from Project Area
P-33-014873	CA-RIV-007928	Site	Prehistoric	AP04	n/a	2005 (C. D. Cotterman, ECORP Consulting, Inc.)	Within 1-mile
P-33-028499	n/a	Building	Historic	HP02	6Z	2018 (C. J. Accardy, J.R.K. Stropes, B.F. Smith and Associates, Inc.)	Within 1-mile

NRHP/CRHP codes: 5-Properties Recognized as Historically Significant by Local Government; 6-Not Eligible for Listing or Designation as specified; 6Z- Found ineligible for NR, CR, or Local designation through survey evaluation

Additional sources were reviewed as part of the cultural background research for the project, including the Built Environment Resource Directory (BERD) for Riverside County, the City of Riverside’s archaeological sensitivity maps, and historical aeriels. The City Riverside’s Archaeological Sensitivity map from Section 5.5-Cultural Resources indicates that the Project Area has as unknown sensitivity and the City’s Prehistoric Cultural Resources Sensitivity map indicates the Project Area has low prehistoric cultural resource sensitivity (Figure 4 and Figure 5; City of Riverside 2007).

Table 3. Additional Sources Consulted for the Project

Source	Results
National Register of Historic Places (1979-2002 & supplements)	Negative; Buildings are ineligible for listing (See Table 2)
Historical United States Geological Survey topographic maps (USGS 2012)	Positive, a residential home is present in a 1920s topographic map. The Project Area existed as a citrus grove in tandem.
Historical United States Department of Agriculture aerial photos	Positive, a residential home is present in a 1920s topographic map. The Project Area existed as a citrus grove in tandem.
California Register of Historical Resources (1992-2010)	Negative; Buildings are ineligible for CRHR listing (See Table 2)
California Inventory of Historic Resources (1976-2010)	Negative
California Historical Landmarks (1995 & supplements to 2010)	Negative
California Points of Historical Interest (1992 to 2010)	Negative
Local Historical Register Listings	Positive; P-33-007821, P-33-007826, and P-33-007827 are listed as Local Listings
Bureau of Land Management General Land Office Records	Positive; Land Patent CACAA 072347 issued to Southern Pacific Railroad Co on October 7, 1891 for 98330.04 acres.

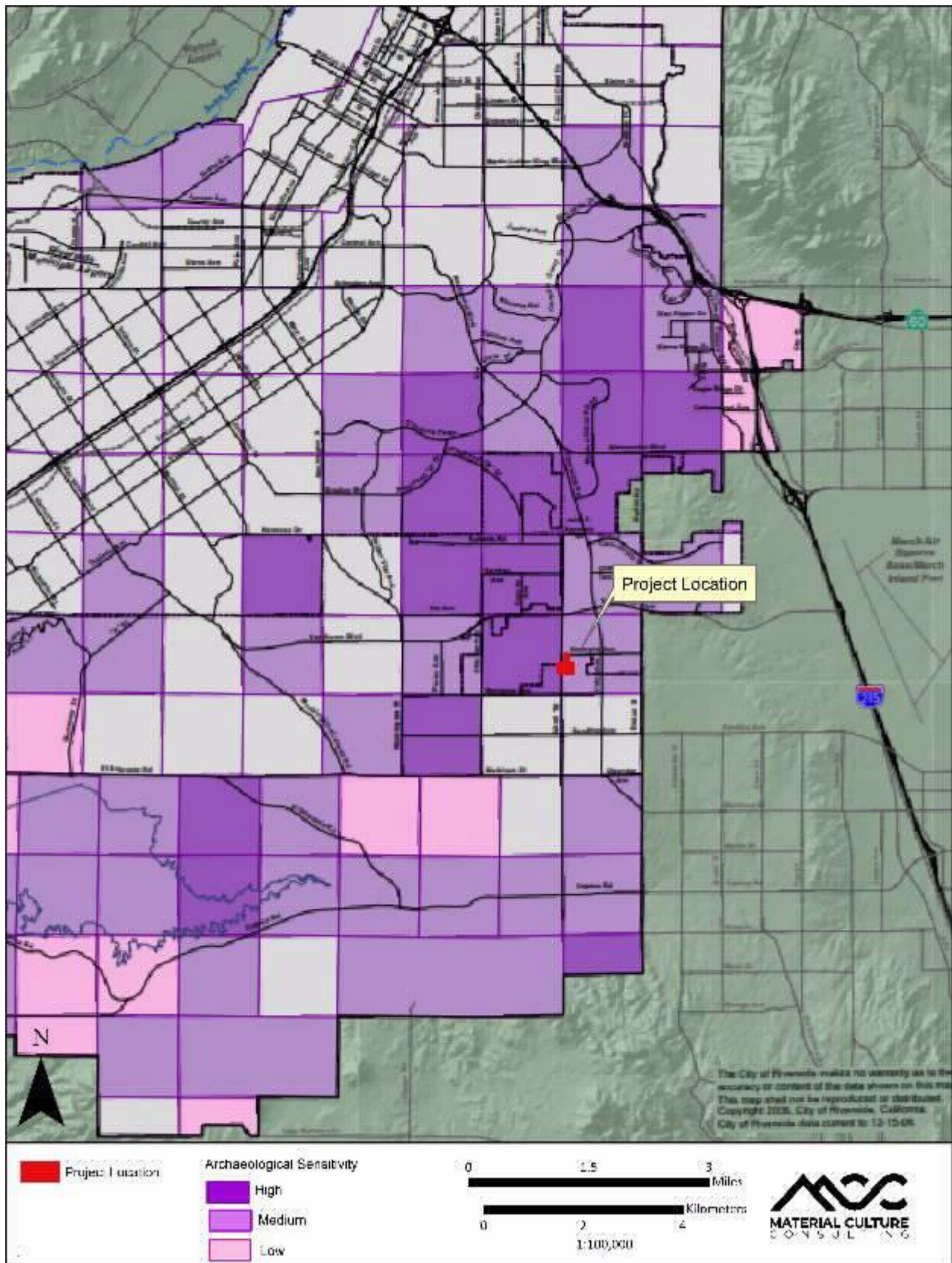


Figure 4. Archaeological Sensitivity Map with Project Area Highlighted (City of Riverside 2007)

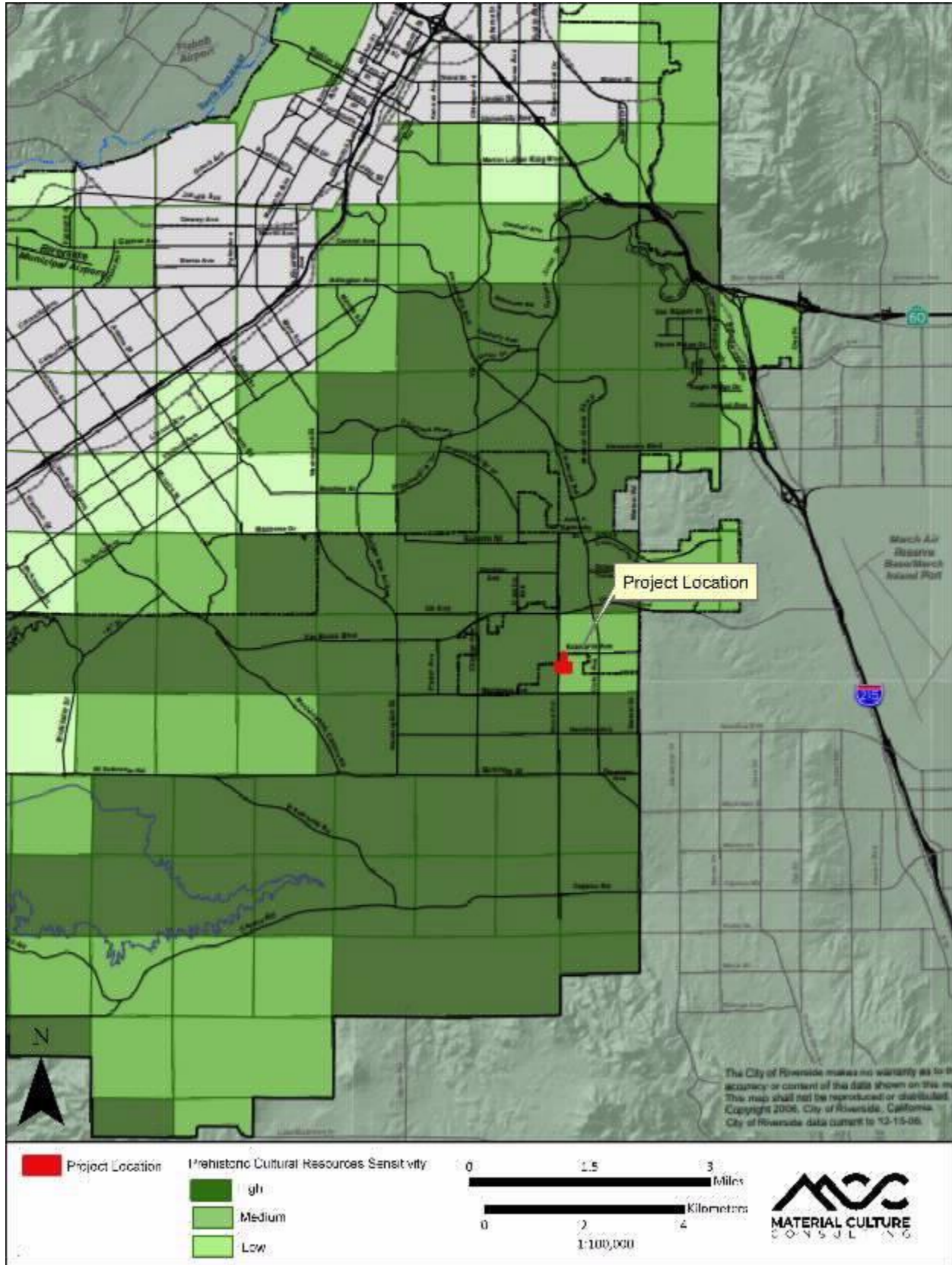


Figure 5. Map of Prehistoric Cultural Resources Sensitivity with Project Area Highlighted (City of Riverside 2007)

A review of historical aerial photographs and maps indicate the Project Area existed as an agricultural field during the early 1900s (Figure 7). In 1948, the Project Area has a historic building present at the intersection of Lurin Ave and Dant Street (Figure 8). The age of the residence was confirmed via Riverside County's Map My County parcel report (RCLIS 2021). The house located at 16725 Dant Street (APN 266-130-016) was built in 1927. The house is a single family, detached garage on a 4.82-acre lot. It is constructed of wood or light steel. According to the parcel report, the house is not located in a historic preservation district (RCLIS 2021). The structure is still present today. The rest of the Project Area at the same time (1948) shows the area was plowed, likely being prepared for agricultural uses as the area heavily depended on agricultural and horticultural as a means of subsistence. In 1966, the area looks to still be used as an agricultural field (Figure 9). In the late 1970s, the Project Area exists as a citrus grove with the historic structure still present. Other residences appear outside the Project (Figure 10). In the early 1990s, the Project Area has evidence of mowing or disking as rows are present, but it is not certain if the area was still being used for agricultural purposes (Figure 10). By the early 2000s and today, the area exists as a dirt lot and has been highly disturbed by dirt access roads leading to the residence on site in addition to a private residence outside the Project in the northernmost area (Figure 11-Figure 12).



Figure 6. Project Area utilized for agriculture with historic building present (as depicted on 1948 aerial photography).



Figure 7. Project Area as agricultural field with surrounding development (as depicted on 1966 aerial photography).

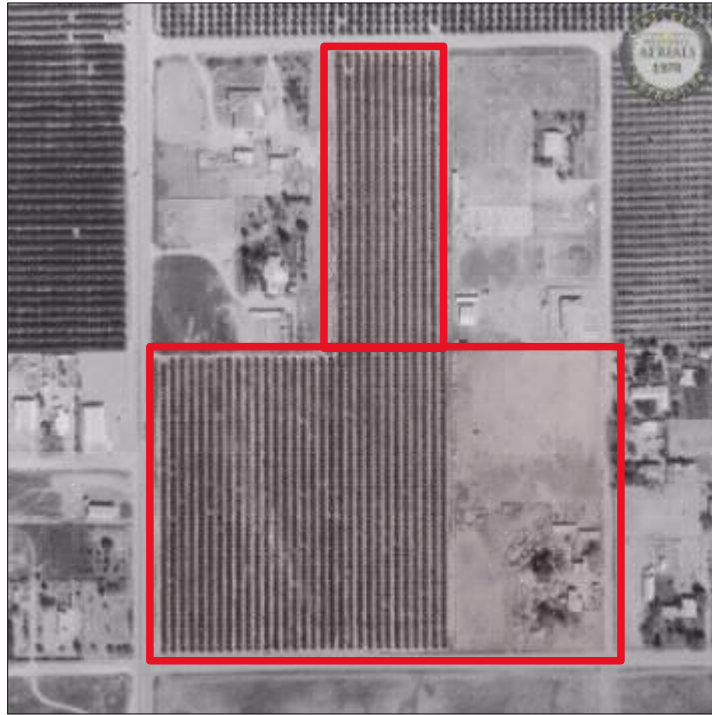


Figure 8. Project Area as citrus grove with surrounding groves and some development (as depicted on 1994 aerial photography).



Figure 9. Project Area as vacant lot with historic structure present in addition to surrounding residential development (as depicted on 1978 aerial photography).



Figure 10. Project Area as it exists today (as depicted on 2016 aerial photography).

NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

As a result of the effort to contact the twenty-one Native American Tribes or individuals identified by the NAHC, MCC received five responses. These responses came in the form of letters, emails, and phone calls. Below is a summary of the responses provided by Native American Tribes.

On February 22, 2021, MCC received an email from Jill McCormick, Historic Preservation Officer of the Quechan Tribe of the Fort Yuma Reservation stating, the Tribe has no comments on this project and defers to the more local Tribes and support their decisions on the project.

On February 26, 2021, MCC received an email from Cheryl Madrigal, Tribal Historic Preservation Officer of the Rincon Band of Luiseno Indians. Ms. Madrigal stated, the Band has specific concerns that that the project may impact tangible Tribal Cultural Resource. The Rincon Band recommends conducting an archaeological/cultural resources study, to include an archeological record search and complete intensive survey of the property. Additionally, the tribe asks that a professional Tribal monitor to accompany the archaeologist during the survey. The Rincon Band further requests to consult directly with the lead agency regarding project impacts to cultural resources. MCC thanked the tribe for their response and informed them via email on March 2, 2021 and via phone call on March 3, 2021 that MCC would be conducting the pedestrian survey on March 4, 2021. MCC did not receive a response from tribe.

On March 10, 2021, MCC received an email from BobbyRay Esparza, Cultural Resources of Cahuilla Band of Indians in response to a phone call outreach on the same day. Mr. Esparza's email stated, the Project is within Traditional Use Lands and the tribe requests a monitor present during all ground disturbance activities.

On March 10, 2021, MCC spoke to Patricia Garcia-Plotkin of the Aqua Caliente Band of Cahuilla Indians via phone call. Ms. Garcia-Plotkin informed MCC the tribe is process of reviewing the project and will get back to MCC shortly. On March 12, 2021, MCC received an email from Lacey Padilla, Archaeologist of Aqua Caliente Band of Cahuilla Indians, who stated the Project Area is located within Traditional Use Area and requested a cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area, a copy of the records search with associated survey reports and site records from the information center and copies of any cultural resource documentation (report and site records) generated in connection with this project.

On March 12, 2021, MCC received an email from Jacobia Kirksey, Tribal Executive Assistant of Augustine Band of Cahuilla Mission Indians, with an attachment from Victoria Martin, Tribal Secretary stating, the tribe is unaware of specific cultural resources that may be affected by the proposed project; however, in the event, any cultural resources are discovered during the development of this project please contact the Augustine Band of Cahuilla Mission Indians office immediately for further evaluation.

As of March 24, 2021, MCC has not received any additional responses from the remaining NAHC-listed groups or individuals we contacted for information. MCC resent the initial outreach letter at the request of several tribal members during follow up attempts. Should MCC receive additional responses once the final report is submitted, the information will be passed on to the E|P|D Solutions, Inc. to be added to the report as an addendum. NAHC and Native American correspondence materials, including our communication attempts, are provided as Appendix C.

FIELD SURVEY RESULTS

During the course of fieldwork, survey conditions were good (Figures 13 through 25). Ground visibility in the entire Project Area ranged from poor to excellent (5-90%) due to density of overgrown grass and weeds. The average surface visibility was good (75%). The eastern and northwestern portion of the Project Area had lowered visibility (5-25%). Areas with poorer visibility were surveyed in 5-meter transects instead of 10-meter transects. Presently, the Project Area exists as a grassy field with a gradual west-facing slope of less than 10-degrees. Construction on Wood Road and south of Lurin Avenue was taking place at the time of the survey. A portion (approximately 0.43 acres) of the Project on the western boundary, near Wood Road was being used by the construction crew to house equipment such as machinery, work vehicles, and construction material. A residential home was present in southeast corner of Lurin Avenue and Dant Street. A locked, chain linked fence surrounded the home and immediate area around the home (approximately 0.65 acres). The area around the active construction site and the immediate area around the home and the house itself was not surveyed (Figure 13).

Overall, the Project Area is highly disturbed. Evidence of construction vehicles activity, including tracks was observed throughout the Project Area. Disking by machinery looks to have taken place recently as evident by overturned soil. Historically, the Project Area was used for agricultural purposes, specifically as an orchard. This was supported by the presence of a few citrus trees, peach trees, and olive trees. Piles of cut trees were present in the northernmost portion. In addition, remnants of a modern irrigation system was observed present. Multiple dirt roads are located throughout the Project area, including in the northern portion of the Project Area leading from the area to residential homes outside of the Project. On the eastern portion of the Project Area, west of the house, the area was highly disturbed and piles of building materials such as roofing, 2" x 4" wood, imported rocks, and refuse was present in this area. In addition, concrete foundation was observed. The concrete foundation appears to have been previously dumped into the Project Area as it was in secondary deposition and nontemporal due to lack of features and markings. Soil in the area consisted of brown fine to coarse-grained sandy loam with pebble to small boulder inclusions of gray granitic material and quartz material. The sediments present may be imported at one time to improve the soil conditions of the orchard. Faunalurbation of cottontail rabbit and ground squirrel burrows were present. No cultural resources were observed during the field survey.

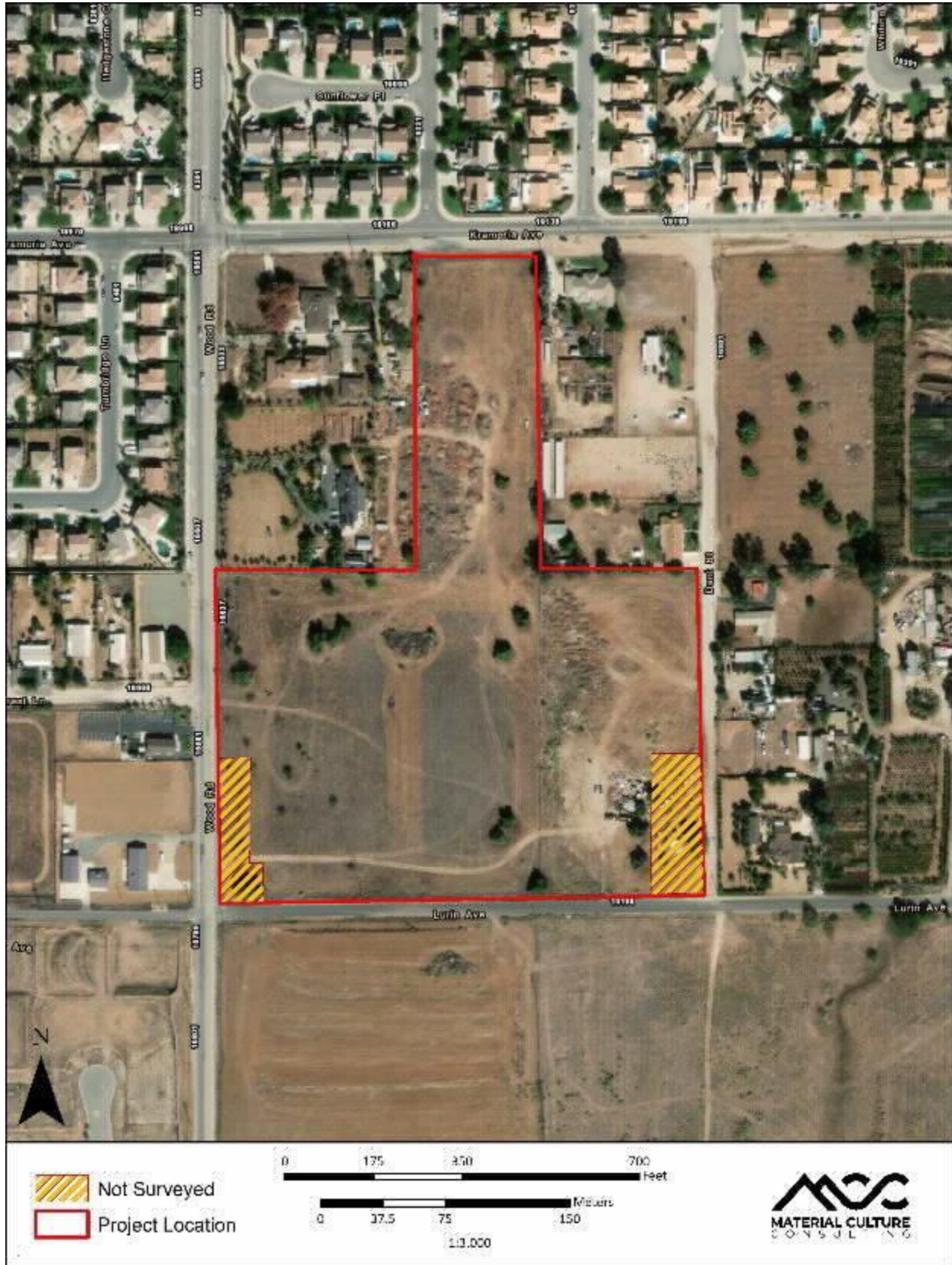


Figure 11. Map of Unsurveyable Areas during Field Survey (as depicted on aerial photograph, 1:3000)



Figure 12. Project Overview from western corner on Wood Rd, view southeast



Figure 13. Representative photograph of soil from western portion of Project Area, plan view



Figure 14. Representative photograph of ground visibility (excellent) in western portion of Project Area, plan view



Figure 15. Project Overview looking at western corner, view west



Figure 16. Representative photo of coarse-grained sandy loam in central portion of Project Area, plan view



Figure 17. Project Overview looking towards intersection of Lurin Ave and Wood Rd., view southwest



Figure 18. Project overview of northern portion with chopped wood pile in background, view north



Figure 19. Project overview from northern boundary, view south



Figure 20. Representative photograph of soil from northern portion of Project Area, plan view



Figure 21. Project overview of eastern portion with low visibility, view south



Figure 22. Project overview of eastern portion with greater visibility, view south



Figure 23. Representative photograph of reddish-brown, coarse-grained sandy loam with granitic inclusions in eastern portion, plan view



Figure 24. Representative photograph of brown, coarse-grained sandy loam with granitic inclusions in eastern portion, plan view



Figure 25. Overview of residential home in southeastern corner of Project Area, view northeast



Figure 26. Overview of historic residential home, view northwest



Figure 27. Overview of historic residence, view east



Figure 28. Overview of nontemporal concrete foundations in eastern portion, view west



Figure 29. Overview of refuse piles in eastern portion, view south



Figure 30. Representative photograph of mowing disturbance, view north



Figure 31. Representative photograph of dirt access road in Project Area, view north

CONCLUSIONS AND RECOMMENDATIONS

The Phase I cultural resource assessment of the Project Area included a Sacred Lands File search, NAHC outreach, background research, and a field pedestrian survey. The Project has been heavily disturbed and utilized for multiple purposes such as agriculture as depicted by aerial photography. The cultural resources survey resulted in negative findings and reaffirmed the extensive disturbance currently occurring within the Project Area. The modification and disturbance associated with the prior agricultural within the project area has eradicated any near-surface record of prehistoric, ethnohistoric, or historic-era behavioral activities that may have otherwise been preserved as archaeological sites, deposits, or features. The City of Riverside's archaeological sensitivity maps indicate that the Project Area has moderate sensitivity for archaeological resources with low sensitivity for prehistoric archaeological resources specifically. A historic building, a residential home, is present within the Project Area and background research dates the building to the late 1920s. Four Native American Tribes, Cahuilla Band of Indians, Rincon Band of Mission Indians, Agua Caliente Band of Cahuilla Mission Indians, and Augustine Band of Cahuilla Indians have stated an interest in the Project. Rincon Band of Mission Indians have requested consultation with the Lead Agency to discuss the potential impact to cultural resources. Cahuilla Band of Indians and Agua Caliente Band of Cahuilla Indians stated the Project is within their Traditional Use Area. Cahuilla Band of Indians has requested a tribal monitor to be present for all ground disturbing activities. Agua Caliente Band of Cahuilla Indians requests a copy of the report and any other documentation associated with cultural resources of the Project. Lastly, Augustine Band of Cahuilla Mission Indians stated the tribe be informed if any cultural resources are uncovered during ground disturbing and/or related activities.

Based on the results of the cultural resources records search, the survey, and the presence of a historic building, the proposed Project Area is considered to have low to moderate sensitivity for presence of prehistoric or historical archaeological deposits. Therefore, MCC recommends full time archaeological monitoring during initial ground-disturbance activities, such as site preparation and grubbing, in order to quickly assess any discoveries of cultural resources during project implementation. MCC recommends an architectural historian evaluate the house in order to assess the historical significance of the home. Prior to the start of construction, a cultural resources management plan (CRMP) should be prepared and implemented. It is recommended the Project's CRMP implement the following procedures:

- Archaeological monitoring during initial ground-disturbance activities, such as site preparation, and demolition of historic structures, in order to quickly assess any discoveries of cultural resources during project implementation.
- Development of an inadvertent discovery plan in place to expediently address archaeological and / or tribal cultural resource discoveries should these be encountered during any phase of development associated with the Project. In the event that these resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).
- Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work within 50 feet of the vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The San Bernardino County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains. Further

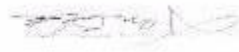
actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours upon being granted access to the site to make recommendations regarding the disposition of the remains. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendant may request mediation by the NAHC.

CERTIFICATION: I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date:

March 25, 2021

Signed:



Printed Name: Tria Belcourt, M.A., RPA, Qualified Riverside County Archaeologist
President and Principal Archaeologist, Material Culture Consulting, Inc.

REFERENCES CITED

Applied Earthworks, Inc.

2001 *Eastside Reservoir Project Final Report of Archaeological Investigations, Volumes I-V*. Prepared for Metropolitan Water District of Southern California. On file at Eastern Information Center, University of California, Riverside.

Bean, L.J.

1972 *Mukat's People: The Cahuilla Indians of Southern California*. University of California Press, Berkeley.

1978 "Cahuilla." In *Handbook of North American Indians, Volume 8. California*, volume edited by Robert F. Heizer, pp. 575-587 (W. T. Sturtevant, general editor). The Smithsonian Institution, Washington, D.C.

Bean, L.J., and Katherine Siva Saubel

1972 *Temalpakh: Cahuilla Indian Knowledge and Use of Plants*. Malki Museum, Banning, California.

Bean, L.J. and C.R. Smith

1978 "Gabrielino." In *Handbook of North American Indians, Volume 8. California*. Volume edited by Robert F. Heizer, pp. 538-549 (W. T. Sturtevant, general editor). The Smithsonian Institution, Washington, D.C.

Bean, L.J. and F.C. Shippek

1978 "Luiseño." In *Handbook of North American Indians, Volume 8. California*, edited by Robert F. Heizer, pp. 538-549 (W. T. Sturtevant, general editor). The Smithsonian Institution, Washington, D.C.

Brumgardt, Dr. John R.

1977 Site Record P-33-001701, Supplemental Material (The Gilman Ranch). On file at the Eastern Information Center, Riverside, California.

City of Jurupa Valley

2019 "History." *City of Jurupa Valley*. Available online at <https://www.jurupavalley.org/309/History>. Last accessed September 16, 2019.

City of Riverside

2007 General Plan and EIR Draft. Available online at:

https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/general-plan/vol2/5-5_Cultural_Paleontological_Resources.pdf. Accessed on March 12, 2021

2012 Historic Preservation Element. Riverside General Plan 2025, Amended November 2012. Available online at:

https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/general-plan/16_Historic_Preservation_Element.pdf. Accessed on March 12, 2021.

2018 City Code of Riverside, California. Available at:

https://library.municode.com/ca/riverside/codes/code_of_ordinances?nodeId=CICORICA. Accessed on March 24, 2021

Daly, J.W.

1931 "Geologic Map of the Crestmore Quarries, Riverside Co. California: Supplement 2 from "The geology and mineralogy of the limestone deposits at Crestmore, Riverside County, California" (Thesis). Available online at <https://data.caltech.edu/records/335>. Last accessed on September 10, 2019.

DuBois, C.

1908 "The Religion of the Luiseño and Diegueno Indians of Southern California." In *University of California Publications in American Archaeology and Ethnology* 8(3):69-186, Berkeley, California.

Hoffman, C.F.

1868 "Plat of the Rancho Las Bolsas." United States Surveyor General. Available at:
<https://calisphere.org/item/ark:/13030/hb587005tt/>

Hudlow, Scott M.

2007 *A Phase I Cultural Resource Survey for Global Premiere, APN 541-10-024 and -025, Williams and Alessandro Streets City of Banning, California.* Prepared for National Affordable Communities, Inc.

Johnson, B. E.

1962 "California's Gabrielino Indians". *Fedrick Webb Hodge Anniversary Fund Publication No. 8*, Southwest Museum, Los Angeles.

Kroeber, A.L.

1908 Ethnography of the Cahuilla Indians. In *American Archaeology and Ethnology*. University of California Publications, Vol 8, No 2. pp. 29-68

1976 *Handbook of Indians of California*. Reprint of 1925 original edition, Dover Publications, New York.

McCawley, W.

1996 *First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press/Ballena Press, Banning, CA.

Napton, L. Kyle and E. A. Greathouse

1982 *Cultural Resources Investigations Morongo Indian Reservation, California.* Prepared for United States Department of the Interior National Park Service.

Sparkman, P.

1908 *Fading Images Indian Pictographs of Western Riverside County*. Riverside Museum Press, Riverside, California.

Sutton, M.

2010 "The Del Rey Tradition and its Place in the Prehistory of Southern California." *Pacific Coast Archaeological Society Quarterly* 44(2):1-54

Sutton, M. and J. Gardner

2010 "Reconceptualizing the Encinitas Tradition of Southern California." *Pacific Coast Archaeological Society Quarterly* 42(4):1-64

Wallace, William J.

1955 "A Suggested Chronology for Southern California Coastal Archaeology." *Southwestern Journal of Anthropology* 11(3):214-230

Warren, Claude N.

1967 "Cultural Tradition and Ecological Adaptation on the Southern California Coast." In *Archaic Prehistory in the Western United States*, edited by C. Irwin-Williams, pp. 1-14. *Eastern New Mexico University Contributions in Anthropology* 1(3).

White, R.

1963 "Luiseño Social Organization" *University of California Publications in American Archaeology and Ethnology* 48(2):91-194, Berkeley, California.

Appendix A: Qualifications

Tria Belcourt, M.A., RPA
President and Principal Investigator



Tria Belcourt oversees and is responsible for the entire work process at Material Culture Consulting. She is responsible for planning, supervising, and overseeing field projects, including responsibility for the professional quality of evaluations and recommendations. Tria has primary accountability for the technical completeness and competence of work conducted by her staff. She is responsible for development of work plans and/or research designs, for performance of crew chiefs, for selection standards and limitations on work assignments of crew members, for analysis and interpretation of field data, for integration of fieldwork results into comparative regional perspectives, and for preparation of reports. Tria's advanced academic training and more than twelve years of professional archaeological experience has included rigorous training and application of anthropological and archaeological theory and methods, and in recording, collecting, handling, analyzing, evaluating, and reporting cultural property data, relative to the type and scope of work proposed.

Tria has been an archaeological project manager and principal investigator for over six years, leading and managing several complex compliance projects throughout the State of California and in Southern Nevada, which have involved each step of cultural resource compliance and management. Prior to this, she spent six years as a field technician and crew chief on projects throughout California and the Southeastern United States. Her experience includes conducting background research, field survey, resource testing and formal NRHP/CRHR evaluation, data recovery plan development and implementation. She has prepared hundreds of technical reports for all of the above to state and federal standards, including following BLM standards for GIS spatial data management and technical reporting – ranging from simple clearance forms, to letter reports, to extensive data recovery reports. She was the lead preparer of the Fort Irwin Integrated Cultural Resource Management Plan (2009-2013) and has also prepared several cultural resource management plans for state regulated projects. She has overseen and conducted archaeological monitoring and management of unanticipated discovery of resources, including Native American human remains on federal lands (and repatriation of the remains), and reported the results and outcomes of cultural resource monitoring efforts in lengthy technical reports. Finally, Tria regularly provides third party and QA/QC review of cultural resource technical documents, due to her keen understanding of state and federal regulations and laws governing the management of cultural resources throughout the state of California.

Education

- 2014 Graduate Certificate in Environmental Management of Military Lands, Colorado State University
- 2010 Professional Certification in CEQA/NEPA, ICF International Corporation
- 2009 M.A. in Anthropology, University of Florida Gainesville, Florida
Professional Certification in GIS
- 2006 B.A. in Anthropology, Magna Cum Laude, University of California, Los Angeles, California

Affiliations/Certifications/Training

- Archaeological Institute of America (AIA)
- Society for Historical Archaeology (SHA)
- Society for California Archaeology (SCA)

Utility Sector Experience

Pacific Gas and Electric Company (PG&E), NERC Alert Program – Archaeological Principal Investigator; throughout California; 2015 – Present. Belcourt provides oversight of all task orders and project management of on-call task orders involving cultural resource desktop reviews, records searches and field reviews for the PG&E NERC Alert program: tracking and reporting efforts, maintaining project schedule, and timely submittal of data to prime contractor (ARCADIS).

Southern California Edison (SCE), On-Call and Emergency Projects – Archaeological Principal Investigator and Project Manager; throughout California, 2013 – Present. Belcourt provides oversight of all task orders and project management of on-call task orders involving cultural resource desktop reviews, records searches and field reviews for deteriorated poles, system upgrades, initial studies to support capital projects, and monitoring support to replace facilities due to natural disasters. This high-volume program includes preparing and submitting budgets, managing support staff and overseeing work, tracking and reporting efforts, maintaining project schedules, and preparing technical reports and GIS datasets for submittal to prime contractor (SWCA).

Southern California Edison (SCE), Small Capital Projects – Archaeological Principal Investigator and Project Manager; throughout California, 2014 – Present. Belcourt provides oversight of all task orders and project management of task orders involving cultural resources for this contract with ICF. This includes preparing and submitting budgets, managing support staff and overseeing work, tracking and reporting efforts, maintaining project schedule, and preparing technical reports and GIS datasets for submittal to prime contractor.

Southern California Edison (SCE), Coolwater Lugo Transmission Project — Environmental Project Manager; San Bernardino County, California; 2014 – 2015. Belcourt provided oversight of all project management on CWLTP: tracking and reporting efforts of subconsultants (Pacific Legacy, Paleo Solutions and Urbana Preservation and Planning), maintaining project schedule and timely submittal of project deliverables to agency reviewers. Served as communication facilitator between SCE and BLM/CPUC agency reviewers. Provided final review of the Cultural Resources Technical Report (which included over 1,000 cultural resources) and the Historic Built Environment Report - prior to draft submittal to BLM.

SCE, Eldorado Ivanpah Transmission Project – In-house Consultant for Archaeology; San Bernardino County, California and Clark County, Nevada; 2010-2012. Belcourt provided complex regulatory oversight and project management regarding cultural and paleontological resource management. She developed cultural resource specific compliance training to inform and guide construction activities and major capital project teams. She also developed and implemented internal cultural resource management programs based on the mitigation measures in the FEIR/EIS. Tria coordinated with BLM archaeologists on discovery and management of previously unknown cultural resources discovered during construction, and managed the treatment of these resources and reporting. She provided environmental analyses, technical reports, and clearance documentation for over 20 project modifications during construction without delay to project. Developed the cultural resources geodatabase for EITP and coordinated regularly with the project GIS team.

Silver State South Substation, In-house Consultant for Archaeology; Southern California Edison, Clark County, NV; 2010-2012. Provided regulatory oversight and project management regarding cultural and paleontological resource management during project licensing and scoping. Identified potential impacts to cultural and paleontological resources, developing appropriate mitigation measures in preparation for and projecting alternative conclusions.

Tehachapi Renewable Transmission Project, Multiple Roles; Southern California Edison, Segments 1-3 and Segments 6-11, Kern, Los Angeles and Orange County, CA; 2009 - Present. Tria provided service to this project over seven years in multiple roles – archaeological field monitor, project coordinator, in-house consultant at SCE, and principal investigator. She provided regulatory oversight and project management regarding cultural and paleontological resource management for all segments of TRTP. Developed and implemented internal cultural resource management programs based on the mitigation measures in the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) for TRTP, and for the existing Special Use Permits and Record of Decision for TRTP, issued by the Angeles National Forest (ANF). Oversaw preparation of the Historic Properties Treatment Plans, fieldwork and technical report preparation for two large-scale Phase III Data Recovery excavations on Angeles National Forest. Coordinated with ANF archaeologists on discovery and management of previously unknown cultural resources identified during construction. Provided cultural resources analyses and clearance documentation, including technical reports, for over 100 project modifications during construction without delay to project. Finally, Tria was responsible for maintaining the geospatial data for the project within the SCE cultural resources geodatabase TRTP and coordinated with the project GIS team.

Desert Tortoise Habitat Conservation Plan Area, Principal Investigator; Cadiz Inc., San Bernardino County, CA; 2013. Oversaw records search to identify the extent of previous cultural resources surveys and all previously recorded prehistoric and historic resources within the 7,500-acre Desert Tortoise Habitat Conservation Plan (HCP) area (Project Area) located on lands administered by the BLM Needles Field Office in unincorporated San Bernardino County, California.

Water Sector

OC-44 Pipeline Rehabilitation/Replacement, Mesa Water District, Newport Beach, Orange County, CA; 2014. Conducted a Phase I Cultural Resources Assessment to determine the potential for adverse effects to historic properties during rehabilitation and replacement of the pipeline beneath San Diego Creek, between Jamboree Road and MacArthur Blvd. Records search, Sacred Lands search, NAHC consultation, intensive-level pedestrian survey and GIS mapping of the APE with negative results. Archaeology Project Manager and Principal Investigator and author of technical report.

Ames/Reche Groundwater Storage and Recovery Program, Winters Road Flow Control and Recharge Facility, Mojave Water Agency, Landers, San Bernardino County, CA; 2013. Oversaw intensive cultural and paleontological pedestrian survey of a limited portion of the larger project along Winters Road between Warren Vista Avenue and Pipes Wash, as required by mitigation measures listed in the CEQA Initial Study (IS) and Mitigated Negative Declaration for the Project (MND) (Bighorn Desert View Water Agency 2010). Archaeology and Paleontology Project Manager and Principal Investigator, and author of technical report.

Street and Storm Drain Improvements, Jackson Avenue Bridge at Warm Springs Creek, City of Murrieta, Riverside County, CA; 2014. Oversaw cultural and paleontological monitoring efforts and production of monthly monitoring reports during construction of a new bridge traversing Warm Springs Creek, pursuant to the mitigation measures listed in the Mitigated Negative Declaration and associated Mitigation Monitoring Plan for the Project. Archaeology Project Manager and Principal Investigator and author of technical report.

Housing and Private Development Sector

Bloomington Affordable Housing Project, Bloomington, San Bernardino County, CA; 2013.

Oversaw cultural survey and literature review for the project, pursuant to requirements of federal and state guidelines for archaeology and historic preservation. The Bloomington Affordable Housing Project received federal funding by the United States Department of Housing and Urban Development (HUD). Archaeology Project Manager and Principal Investigator and author of technical report.

Arbor Green Apartments, Affirmed Housing Group, Carson, Los Angeles County, CA; 2013.

Oversaw all monitoring efforts, and data recovery of discovered resources for an HUD affordable housing development project. Archaeology Project Manager and Principal Investigator and author of monitoring and data recovery reports.

Transportation Sector

Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles County, California; 2014 - Present. Provided archaeological and paleontological services for multiple task orders involving preparation of Mitigation Plans, Evaluation Reports, Mitigation Reports, and construction monitoring for infrastructure improvements. Projects include: Regional Connector (60336473), Crenshaw (60327167), and Division 13 (60323604). Worked as a subconsultant with AECOM. Principal Investigator and Project Manager.

Federal Sector

Bodie Hills Cultural Resources Surveys, Desert Restoration Projects, Bureau of Land Management, Bishop Field Office, Mono County, CA; FY13-14 and FY14-15. Class III Cultural Resources Inventory survey of over 6,000 acres of BLM land identified for vegetation management. Work includes records search, intensive pedestrian survey, archaeological resource inventory and NRHP site evaluations, and a technical report. The survey areas were located between the Town of Bridgeport and Lee Vining. Archaeology Principal Investigator.

Desert Tortoise Habitat Conservation Plan Area, Cadiz Inc., San Bernardino County, CA; 2013.

Oversaw records search to identify the extent of previous cultural resources surveys and all previously recorded prehistoric and historic resources within the 7,500-acre Desert Tortoise Habitat Conservation Plan (HCP) area (Project Area) located in unincorporated San Bernardino County, California. Principal Investigator and contributing author of technical report.

Fort Irwin, U.S. Army National Training Center/GSA Region 9, San Bernardino County, CA; 2012-2013.

Class III Cultural Resources Inventory Survey of 14,332 acres (58 sq. km) and National Register Evaluation of Archaeology Sites east of Goldstone in four survey blocks. The project involved preparation of literature overview, research design and field evaluation guidelines; intensive field survey, site recording and site evaluations to NHPA Section 106 standards. Archaeology Project Manager and Principal Investigator, contributing author of technical and progress reports.

Fort Irwin, U.S. Army National Training Center, San Bernardino County, CA; 2009-2010.

Directed all cultural resource assessments under NEPA and Section 106 of NHPA, including technical reporting of field work (pedestrian surveys, artifact collection and site mapping), formal NRHP evaluation of 50+ archaeological sites, preparation of SHPO consultation letters, and Native American consultation letters. Bureau of Land Management (BLM) Barstow Field Office Coordination and Consultation; led joint SHPO consultation and management efforts for Fort Irwin/NTC for several sites that crossed Fort Irwin and BLM lands and developed and maintained strong working relationship between Fort Irwin/NTC Resource Management Group and BLM Barstow Field Office Resource Management Group. Authored installation guidance documents, including the 2010 Integrated Cultural Resource Management Plan (ICRMP), and the Ft. Irwin/NTC GIS Standard Mapping Procedures. Principal Investigator for Cultural Resources Division, Directorate of Public Works, NTC/Fort Irwin.

Selected Publications

Belcourt, T.

- 2014- 2016 *Southern California Edison – TRTP Segments 6 and 11C - Cultural Resources Monitoring Report*, Prepared Monthly (October 2014-March 2016) for Angeles National Forest (ANF) and SCE. On file at ANF and SCE Irwindale.
- 2013 *Cultural and Paleontological Resource Assessment for the Ames/Reche Groundwater Storage and Recovery Program, Winters Road Flow Control and Recharge Facility, Mojave Water Agency, Landers, San Bernardino County, California*. Prepared by Cogstone Resource Management, Inc. On file at Mojave Water Agency.
- 2014 *Cultural and Paleontological Monitoring Compliance Report for Street and Storm Drain Improvements, Jackson Avenue Bridge at Warm Springs Creek, City of Murrieta, Riverside County*. Prepared by Cogstone Resource Management, Inc. On file at City of Murrieta Planning Department.
- 2014 *Cultural and Paleontological Resource Assessment for the OC-44 Pipeline Rehabilitation and Replacement Project, Mesa Water District, Newport Beach, Orange County, California*. Prepared by Cogstone Resource Management, Inc. On file at Mesa Water District.
- 2015 *Archaeological Monitoring and Survey Report, Southern California Edison Dead Tree Removal near Pine Flat, Tulare County, California*. Submitted to SCE and on file at SCE Irwindale.
- 2015 *Class III Cultural Resources Survey of the Pacific Gas & Electric Company (PG&E) Kerckhoff #1-Kerckhoff #2 115kV and Kerckhoff-Clovis-Sanger 115kV Projects, located on Lands Administered by the Bureau of Land Management (BLM), Bakersfield Field Office, within Fresno County, California*. Prepared on behalf of PG&E and submitted to BLM Bakersfield Office. On file at PG&E, Fresno.
- 2015 *Class III Cultural Resources Survey of the SCE Shoshone Emergency Response Location, on Lands Administered by the Bureau of Land Management (BLM), Barstow Field Office, within Inyo County, California*. Prepared on behalf of SCE and submitted to BLM Barstow Field Office. On file at SCE Irwindale.
- 2015 *Cultural Resources Assessment of Effect for Southern California Edison TD835602: Deteriorated Pole Replacement, Sequoia National Park, Three Rivers Area, Tulare County, California*. Prepared on behalf of SCE for Sequoia National Park. On file at SCE Irwindale.
- 2015 *Cultural Resources Impact Assessment for Southern California Edison TD1037389: Line Extension – Soda Springs 12 kV, Tulare County, California*. Prepared for SCE. On file at SCE Irwindale.
- 2015 *Cultural Resources Inventory for Southern California Edison’s Replacement of Nine Deteriorated Power Structures (TD993840, TD994158, and TD1029116), near Kramer Junction, on Lands Administered by the Bureau of Land Management Barstow Field Office,*

- San Bernardino County, California*. Prepared on behalf of SCE and submitted to BLM Barstow Field Office. On file at SCE Irwindale.
- 2015 *Cultural Resources Monitoring for Southern California Edison IO328390: Replace Pole and Upgrade Overhead Switch – Dinkey Creek 4kV (TD721303). Sierra National Forest, High Sierra District, Fresno County, California*. Prepared on behalf of SCE for Sierra National Forest. On file at SCE Irwindale.
- 2015 *Cultural Resources Survey in Support of a Request for Final Engineering Concurrence for Tehachapi Renewable Transmission Project Segment 8 T/L West (Phase IV) – Erosion Repair Associated with Structure M43-T3, unincorporated Los Angeles County, California*. Submitted to SCE and CPUC. On file at SCE Irwindale.
- 2015 *Cultural Resources Survey in Support of a Temporary Work Change Request for Wire Setup Sites, Distribution Pole Work Area, and Access Road near Structure M57-T2 for Segment 8, Tehachapi Renewable Transmission Project, unincorporated Los Angeles County, California*. Submitted to SCE and CPUC. On file at SCE Irwindale.
- 2015 *Results of Faunal Analysis for the Los Angeles Metropolitan Transportation Authority (Metro) Division 13 Bus Maintenance and Operation Facility Construction Project, City of Los Angeles, Los Angeles County, California*. Submitted to Metro. On file at Resource Sciences and Planning, LLC, Monrovia.
- 2016 *Archaeological Monitoring Compliance Report, Pacific Gas & Electric Company NERC Alert Program, Helms-Gregg 230kV Grading Project, Sierra National Forest, Fresno County, California*. Prepared on behalf of PG&E and submitted to Sierra National Forest. On file at PG&E, Fresno.
- 2016 *Archaeological Resource Assessment, SCE Infrastructure Replacement- Pickle Meadows 12kV, Toiyabe National Forest, Bridgeport, Inyo County, California*. Prepared on behalf of SCE and submitted to Toiyabe National Forest. On file at SCE, Irwindale.
- 2016 *Cultural Resources Assessment: 84 Lumber Company Project, City of Lancaster, Los Angeles County, California*. Prepared on behalf of 84 Lumber Company for City of Lancaster. On file at Material Culture Consulting, Claremont.
- 2016 *Cultural Resources Assessment of Effect for Southern California Edison TD1029531: Deteriorated Pole Replacement on Lands Administered by Bureau of Land Management, Ridgecrest Field Office, near Mojave, Kern County, California*. Prepared on behalf of SCE. On file at SCE Irwindale.
- 2016 *Cultural and Paleontological Resources Records Searches and Field Survey, Tandis Homes Residential Development, City of Menifee, Riverside County, California*. Prepared for City of Menifee. On file at Material Culture Consulting Claremont.
- 2016 *Class III Cultural Resources Survey of the Southern California Edison Company Replacement of Thirteen Deteriorated Poles Near Lockhart and Flamingo Heights, on Lands Administered by the Bureau of Land Management, Barstow Field Office, within San Bernardino County, California*. Prepared on behalf of SCE and submitted to BLM Barstow Field Office. On file at SCE Irwindale.
- 2016 *Phase I Cultural and Paleontological Assessment: Tandis Homes 21 Lot Residential Development Project City of Menifee, Riverside County, California*. Prepared on behalf of Ridgemoor Investments, LLC for City of Menifee Planning Department. On file at Material Culture Consulting, Claremont.
- Belcourt, T. and S. Gust
- 2014 *Class III Cultural Resource Investigations for Bodie Hills Desert Restoration Projects, Bureau of Land Management, Bishop Field Office, Mono County, CA - FY13-14*. Prepared by Cogstone Resource Management, Inc. for BLM Bishop Field Office. On file at BLM Bishop Field Office.
- 2015 *Class III Cultural Resource Investigations for Bodie Hills Desert Restoration Projects, Bureau of Land Management, Bishop Field Office, Mono County, CA - FY14-15*. Prepared by

- Cogstone Resource Management, Inc. for BLM Bishop Field Office. On file at BLM Bishop Field Office.
- Belcourt, T., T. Jackson, M. Kay and R. Moritz
2016 *Class III Cultural Resources Inventory for the Southern California Edison Company Kelly Cutover Project (FWA 680-16-07), Volume I – Archaeological Resources, San Bernardino County, California.* Submitted to BLM Barstow Field Office, On file at Resource Sciences and Planning, LLC, Monrovia.
- Belcourt, T. and M. Kay
2016 *Southern California Edison Company Replacement of Three Deteriorated Poles Near Fort Irwin, on Lands Administered by the Bureau of Land Management, Barstow Field Office, San Bernardino County, California.* Prepared on behalf of SCE and submitted to BLM Barstow. On file at Resource Sciences and Planning, LLC Monrovia.
- Belcourt, T., M. Kay, and R. Moritz
2016 *Cultural Resources Assessment of the State of California Department of General Services and Department of State Hospitals, Metropolitan Hospital, Norwalk, Los Angeles County, CA.* Prepared for DGS/DSH. On file at Resource Sciences and Planning, LLC, Monrovia.
- Belcourt, T. and J. Kelly
2016 *Cultural and Paleontological Resources Assessment: Village 605 Environmental Impact Report Addendum, City of Los Alamitos, Orange County, California.* Prepared for City of Los Alamitos on behalf of Katella Property Owner, LLC by Material Culture Consulting, on file at Material Culture Consulting, Claremont.
- Belcourt, T., K. Scott and S. Gust
2013 *Paleontological and Archaeological Assessment of the Bloomington Affordable Housing Project, San Bernardino County, California.* Prepared by Cogstone Resource Management, Inc., On file at Cogstone Resource Management, Inc., Orange.
- Belcourt, T., M. Valasik, and S. Gust
2013 *Class III Cultural Resource Investigation for the Cadiz Solar Array Desert Tortoise Habitat Conservation Plan Area, on Lands Managed by BLM Needles Field Office, San Bernardino County, CA.* Prepared by Cogstone Resource Management on behalf of Cadiz, Inc.
- Daly, P. and T. Belcourt
2016 *Class III Cultural Resources Inventory for the Southern California Edison Company Kelly Cutover Project (FWA 680-16-07), Volume II – Historic Built Environment Resources, San Bernardino County, California.* Submitted to BLM Barstow Field Office, On file at Resource Sciences and Planning, LLC, Monrovia.

Technical Report QA/QC and Third-Party Review (representative selection)

- Lamb, Meghan
2016 *Archaeological Resources Monitoring Report: Lot 19 Tustin Legacy (Tustin Air Base) Project, City of Tustin, Orange County, California.* Prepared by Paleo Solutions, Inc., and submitted to City of Tustin, California. On file at Paleo Solutions, Monrovia.
- Kelly, J. and G. Aron
2015 *Final Paleontological Monitoring Report: Tehachapi Renewable Transmission Project, Segment 6, Los Angeles County, California.* Prepared for SCE by Paleo Solutions, Inc., and submitted to ANF and CPUC. On file at SCE Irwindale.
- Kelly, J. and G. Aron
2015 *Final Paleontological Monitoring Report: Tehachapi Renewable Transmission Project, Segment 7, Los Angeles County, California.* Prepared for SCE by Paleo Solutions, Inc., and submitted to ANF and CPUC. On file at SCE Irwindale.
- Kelly, J. and G. Aron
2015 *Final Paleontological Monitoring Report: Tehachapi Renewable Transmission Project, Segment 8, Los Angeles County, California.* Prepared for SCE by Paleo Solutions, Inc., and submitted to ANF and CPUC. On file at SCE Irwindale.

Kelly, J. and G. Aron

2015 *Final Paleontological Monitoring Report: Tehachapi Renewable Transmission Project, Segment 11, Los Angeles County, California.* Prepared for SCE by Paleo Solutions, Inc., and submitted to ANF and CPUC. On file at SCE Irwindale.

Tinsley-Becker, W.

2015 *Cultural Resources Inventory for the SCE Coolwater-Lugo Transmission Project, San Bernardino County, California, Volume 1: Historic-Era Built Environment Survey Report.* Submitted to BLM Barstow Field Office, On file at Resource Sciences and Planning, LLC, Monrovia.

Pacific Legacy, Inc.

2015 *Cultural Resources Inventory for the SCE Coolwater-Lugo Transmission Project, San Bernardino County, California, Volume 2: Archaeological Resources.* Submitted to BLM Barstow Field Office, On file at Pacific Legacy, Inc., Berkeley.

Webster, B.

2016 *Archaeological Monitoring Report: OCTA San Juan Capistrano Rail Side Passing Project, City of San Juan Capistrano, Orange County, California.* Prepared for Earth Mechanics, Inc. by Paleo Solutions, Inc. On file at Paleo Solutions, Monrovia.

Webster, B. and M. Kay

2016 *Archaeological Survey Report for the Southern California Edison Company Replacement of Five Deteriorated Power Poles on an Unnamed Circuit (TD 979272), Topanga State Park, Los Angeles County, California.* Prepared by Paleo Solutions, Inc., on behalf of SCE.

2015 *Archaeological Survey Report for the Southern California Edison Company Replacement of One Deteriorated Power Pole on an Unnamed Circuit (TD 1020522), Topanga State Park, Los Angeles County, California.* Prepared by Paleo Solutions, Inc., on behalf of SCE.

2015 *Archaeological Survey Report for the Southern California Edison Company Replacement of Two Deteriorated Power Poles on the Vicasa 16kv Circuit (TD 1039350), Topanga State Park, Los Angeles County, California.* Prepared by Paleo Solutions, Inc., on behalf of SCE.

Appendix B:
(CONFIDENTIAL) CHRIS Results

Appendix C:
NAHC and Native American
Correspondence

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



September 20, 2018

Tria Belcourt

Material Culture Consulting

Sent by Email: tria@materialcultureconsulting.com

Re: Lurin and Wood Residential Project, Riverside County

Dear Ms. Belcourt,

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not preclude the presence of cultural resources in any project area. Other sources for cultural resources should also be contacted for information regarding known and/or recorded sites.

Enclosed is a list of Native Americans tribes who may have knowledge of cultural resources in the project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at 916-573-1033 or frank.lienert@nahc.ca.gov.

Sincerely,



Frank Lienert
Associate Governmental Program Analyst

Native American Heritage Commission
Native American Contacts List
10/22/2018

Agua Caliente Band of Cahuilla Indians Jeff Grubbe, Chairperson 5401 Dinah Shore Drive Palm Springs ,CA 92264 (760) 699-6800 (760) 699-6919 Fax	Cahuilla	Cabazon Band of Mission Indians Judy Stapp, Director of Cultural Affairs 84-245 Indio Springs Parkway Indio ,CA 92203 jstapp@cabazonindians-nsn.gov (760) 342-2593 (760) 347-7880 Fax	Cahuilla
Agua Caliente Band of Cahuilla Indians Patricia Garcia-Plotkin, Director, THPO 5401 Dinah Shore Drive Palm Springs ,CA 92264 ACBCI-THPO@aguacaliente.net (760) 699-6907 (760) 699-6924 Fax	Cahuilla	Cahuilla Band of Indians Daniel Salgado, Chairperson 52701 U. S. Highway 371 Anza ,CA 92539 Chairman@cahuilla.net (951) 763-5549 (951) 763-2808	Cahuilla
Augustine Band of Cahuilla Indians Amanda Vance, Chairperson P.O. Box 846 Coachella ,CA 92236 (760) 398-4722	Cahuilla	Kupa Cultural Center (Pala Band) Shasta Gaughen, Assistant Director PMB 50, 35008 Pala Temecula Rd. Pala ,CA 92059 sgaughen@palatribe.com (760) 891-3515 (760) 742-4543 Fax	Luiseno
Augustine Band of Cahuilla Indians Karen Kupcha P.O. Box 849 Coachella ,CA 92236 (760) 398-4722	Cahuilla	La Jolla Band of Luiseno Indians Thomas Rodriguez, Chairperson 22000 Highway 76 Pauma Valley ,CA 92061 (760) 742-3771 (760) 742-3779 Fax	Luiseno
Cabazon Band of Mission Indians Doug Welmas, Chairperson 84-245 Indio Springs Parkway Indio ,CA 92203 (760) 342-2593 (760) 347-7880 Fax	Cahuilla	Los Coyotes Band of Cahuilla and Cupeno Indians Shane Chapparosa, Chairman P.O. Box 189 Warner Springs ,CA 92086-018 Chapparosa@msn.com (760) 782-0711 (760) 782-0712 Fax	Cahuilla

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes for the proposed: Lurin and Wood Residential Project, Riverside County.

**Native American Heritage Commission
Native American Contacts List
10/22/2018**

Los Coyotes Band of Cahuilla and Cupeno Indians
Janice Elzendnqa, Tribal Administrator
P.O. Box 189 Cahuilla
Warner Springs ,CA 92086-018
(760) 782-0711
(760) 782-2701 Fax

Pala Band of Mission Indians
Robert H. Smith, Chairperson
12196 Pala Mission Road Luiseno
Pala ,CA 92059 Cupeno
rsmith@palatribe.com
(760) 891-3500
(760) 742-3189 Fax

Los Coyotes Band of Cahuilla and Cupeno Indians
John, Perada, Environmental Director
P.O. Box 189 Cahuilla
Warner Springs ,CA 92086-018
(760) 782-0712
(760) 782-2730 Fax

Pauma Band of Luiseno Indians
Temet Aquilar, Chairperson
P.O. Box 369 Luiseno
Pauma Valley ,CA 92061
(760) 742-1289, Ext. 303
(760) 742-3422 Fax

Morongo Band of Mission Indians
Denisa Torres, Cultural Resources Manager
12700 Pumarra Road Cahuilla
Banning ,CA 92220 Serrano
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(951) 849-8807

Pauma Band of Luiseno Indians
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P.O. Box 369 Luiseno
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(760) 617-2872
(760) 742-3422 Fax

Morongo Band of Mission Indians
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Banning ,CA 92220 Serrano
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(951) 922-8146 Fax

Pauma Band of Luiseno Indians
Charles Devers, Cultural Committee
P.O. Box 369 Luiseno
Pauma Valley ,CA 92061
(760) 742-1289, Ext. 317
(760) 742-3422 Fax

Pala Band of Mission Indians
Shasta Gaughen, PhD, THPO
PMB 50, 35008 Pala Temecula Rd. Luiseno
Pala ,CA 92059 Cupeno
sgaughen@palatribe.com
(760) 891-3515
(760) 742-3189 Fax

Pechanga Band of Luiseño Indians
Paul Macarro, Cultural Resources Coordinator
P.O. Box 1477 Luiseno
Temecula ,CA 92593
pmacarro@pechanga-nsn.gov
(951) 770-6306
(951) 506-9491 Fax

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes for the proposed: Lurin and Wood Residential Project, Riverside County.

**Native American Heritage Commission
Native American Contacts List
10/22/2018**

<p>Pechanga Band of Luiseño Indians Mark Macarro, Chairman P.O. Box 1477 Temecula ,CA 92593 epreston@pechanga-nsn.gov (951) 770-6000 (951) 695-1778 Fax</p>	<p>Luiseno</p>	<p>Ramona Band of Cahuilla John Gomez, Environmental Coordinator P.O. Box 391670 Anza ,CA 92539 Jgomez@ramonatribe.com (951) 763-4105 (951) 763-4325 Fax</p>	<p>Cahuilla</p>
<p>Pechanga Band of Luiseño Indians Gary DuBois, Director of Cultural Resources Department, P.O. Box 2183 Temecula ,CA 92593 gdubois@pechanga-nsn.gov (951) 770-6302 (951) 695-1778 Fax</p>	<p>Luiseno</p>	<p>Rincon Band of Luiseño Indians Jim McPherson, Tribal Historic Pres. Officer 1 West Tribal Road Valley Center ,CA 92082 vwhipple@rincontribe.org (760) 749-1051 (760) 749-5144</p>	<p>Luiseno</p>
<p>Pechanga Band of Luiseño Indians Tuba Ebru Ozdil, Cultural Resources Planning Specialist P.O. Box 1477 Temecula ,CA 92593 eozdil@pechanga-nsn.gov (951)-770-6313 (951) 695-1778 Fax</p>	<p>Luiseno</p>	<p>Rincon Band of Luiseño Indians Bo Mazzetti, Chairperson 1 West Tribal Road Valley Center ,CA 92082 bomazzetti@aol.com (760) 749-1051 (760) 749-5144</p>	<p>Luiseno</p>
<p>Ramona Band of Cahuilla Joseph Hamilton, Chairman P.O. Box 391670 Anza ,CA 92539 admin@ramonatribe.com (951) 763-4105 (951) 763-4325 Fax</p>	<p>Cahuilla</p>	<p>San Luis Rey Band of Mission Indians Tribal Council 1889 Sunset Drive Vista ,CA 92081 cjmojado@slrmissionindians.org (760) 724-8505 (760) 724-2172 Fax</p>	<p>Luiseno</p>
<p>Ramona Band of Cahuilla Manuel Hamilton, Vice Chairperson P.O. Box 391670 Anza ,CA 92539 admin@ramonatribe.com (951) 763-4105 (951) 763-4325 Fax</p>	<p>Cahuilla</p>	<p>San Luis Rey Band of Mission Indians Cultural Department 1889 Sunset Drive Vista ,CA 92081 cjmojado@slrmissionindians.org (760) 724-8505 (760) 724-2172 Fax</p>	<p>Luiseno Cupeno</p>

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes for the proposed: Lurin and Wood Residential Project, Riverside County.

Native American Heritage Commission
Native American Contacts List
10/22/2018

Santa Rosa Band of Cahuilla Indians
Steven Estrada, Chairman
P.O. Box 391820 Cahuilla
Anza ,CA 92539
(951) 659-2700
(951) 659-2228 Fax

Torres-Martinez Desert Cahuilla Indians
Thomas TorteZ, Chairperson
P.O. Box 1160 Cahuilla
Thermal ,CA 92274
tmchair@torresmartinez.org
(760) 397-0300
(760) 397-8146 Fax

Santa Rosa Band of Cahuilla Indians
Terry Hughes, Tribal Administrator
P.O. Box 391820 Cahuilla
Anza ,CA 92539
thughes@santarosacahuilla-nsn.gov
(951) 659-2700
(951) 659-2228 Fax

Torres-Martinez Desert Cahuilla Indians
Michael Mirelez, Cultural Resource Coordinator
P.O. Box 1160 Cahuilla
Thermal ,CA 92274
mmirelez@tmdci.org
(760) 399-0022, Ext. 1213
(760) 397-8146 Fax

Soboba Band of Luiseno Indians
Carrie Garcia, Cultural Resources Manager
P.O. Box 487 Luiseno
San Jacinto ,CA 92581 Cahuilla
carrieg@soboba-nsn.gov
(951) 654-2765
(951) 654-4198 Fax

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto ,CA 92581 Cahuilla
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-4198 Fax

Soboba Band of Luiseno Indians
Scott Cozart, Chairman
P. O. Box 487 Luiseno
San Jacinto ,CA 92583 Cahuilla
(951) 654-2765
(951) 654-4198

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This list is only applicable for contacting local Native American Tribes for the proposed: Lurin and Wood Residential Project, Riverside County.

October 24, 2018



****EXAMPLE LETTER***

RE: Proposed Lurin and Wood Residential Project, City of Riverside; Riverside East and Steele Park USGS Quadrangle, Riverside County, California.

Greetings,

Pacific Coast Land Consultants, Inc. proposes the construction of 33 single family residences and two water quality basins within the City of Riverside, California (see attached map). Material Culture Consulting, Inc. (MCC) is conducting the cultural resources review of the project to support preparation of the environmental documents. As part of our background research, we would like to request your input on potential cultural resources within the Project Area. Please note - this request is **not** part of any formal local, state, or federal consultation process, and all requests for consultation should be directed to the City of Riverside as Lead CEQA Agency.

Our firm contacted the Native American Heritage Commission (NAHC) on October 2, 2018 to request review of the Sacred Lands File and for a list of tribes with traditional lands and/or cultural places within the area. The NAHC responded on October 8, 2018, stating that the Sacred Lands File review resulted in **negative** results, and provided your contact information as part of the list. We understand that negative results do not preclude the existence of cultural resources, and that a tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why we are contacting you.

Project Location and Description

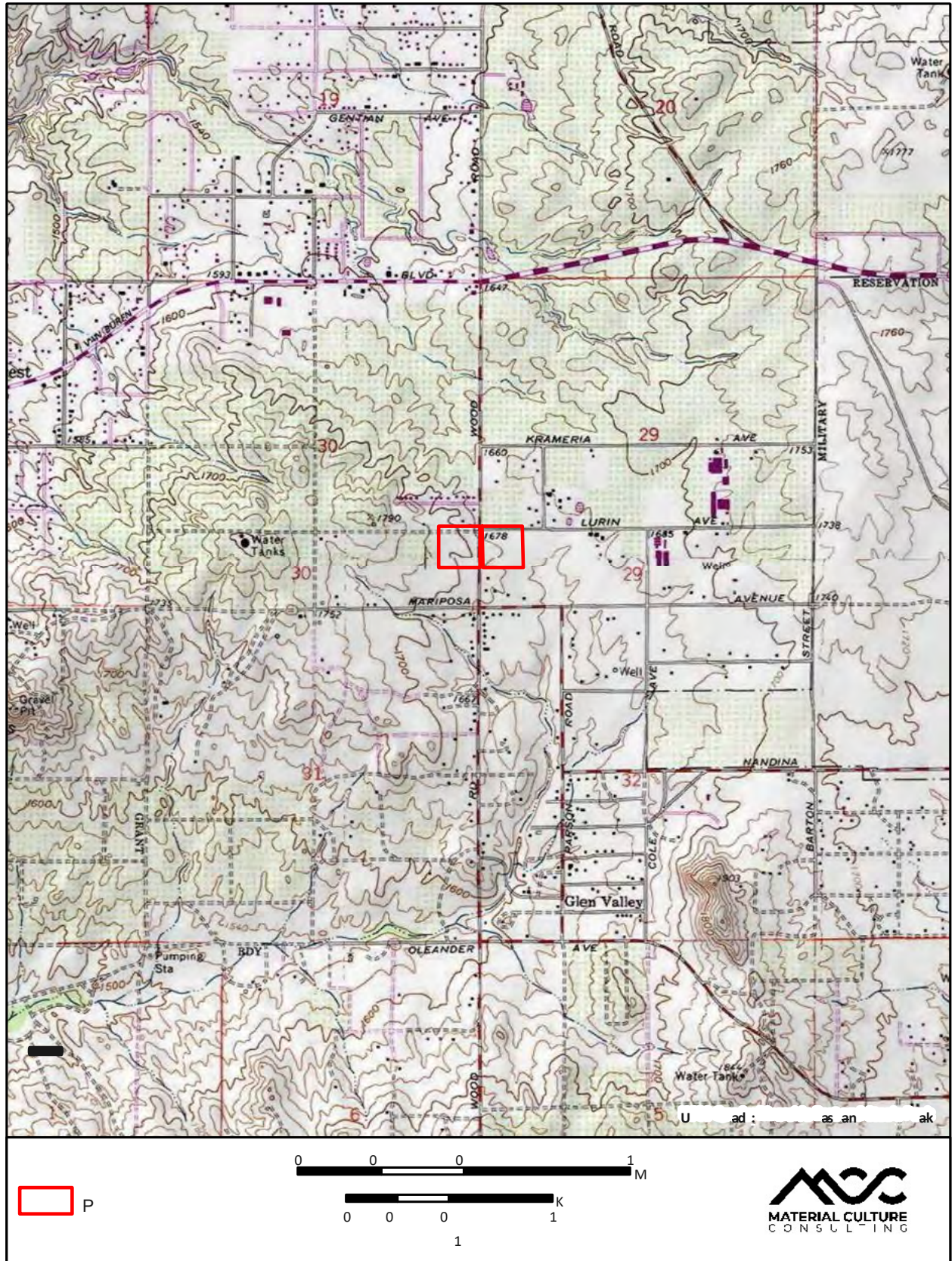
The proposed project is located at the corner of Lurin Avenue. and Wood Drive. (see attached map). The area of potential impact (API) includes two parcels that encompass a total of approximately 21 acres and located within Sections 29 and 30 of Township 3 South and Range 4 West (San Bernardino Base Meridian).

Please respond at your earliest convenience if you wish to share any knowledge of cultural resources within or adjacent to the API. Any information, concerns, or recommendations regarding cultural resources within the API can be shared with me via telephone, email, or via standard mail. Thank you very much for your assistance.

Kindest regards,

-

Tria Belcourt, M.A., RPA
President and Principal Archaeologist
626-205-8279
tria@materialcultureconsulting.com



Map of Proposed Project, as depicted on Riverside East and Steele Peak USGS 7.5 minute Quadrangle

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
 November 2018
 Page 1 of 9

Name/ Affiliation	Date and Method of 1st Contact	Date of 1 st Follow-Up Attempt	Date of 2 nd Follow-Up Attempt	Results	MCC Response
Jeff Grubbe, Chairperson Agua Caliente Band of Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; letter was received, Chairperson is currently away	Not necessary	Letter email received on November 9, 2018 from Lacy Padilla, Tribal Historic Preservation Office- The Project Area is not located within the boundaries of the ACBCI Reservation but within the Tribe's Traditional Use Area. ACBCI THPO defers to Soboba and the letter concludes their consultation efforts.	MCC thanked Ms. Padilla for her response and stated that their response would be included within the report.
Patricia Garcia- Plotkin, Director Agua Caliente Band of Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	See above response	N/A
Amanda Vance, Chairperson Augustine Band of Cahuilla Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 12, 2018- via phone- Secretary said either Amanda Vance or Victoria Martin has sent out a response letter in regards to the Project.	Letter received on November 14, 2018 dated November 5, from Victoria Martin, Tribal Secretary- Tribe is unaware of specific cultural resources that may be affected by the proposed project. ABCI encourages contact with other tribes within the immediate vicinity of the project and to contact a monitor to be able onsite full-time during the pre-construction and construction phase of the project. Lastly, ABCI requests to be notified of any cultural discoveries associated with the project.	N/A

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
 November 2018
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1 st Follow-Up Attempt	Date of 2 nd Follow-Up Attempt	Results	MCC Response
Karen Kupcha Augustine Band of Cahuilla Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 12, 2018- via phone-see above	See above response	N/A
Doug Welmas, Chairperson Cabazon Band of Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 12, 2018- via phone; message left	As of November 15, 2018-no response	N/A
Judy Stapp, Director of Cultural Affairs Cabazon Band of Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 12, 2018- via phone; message left	As of November 15, 2018-no response	N/A
Daniel Salgado, Chairperson Cahuilla Band of Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- Secretary recommended email for contact-email sent	Email received on November 14, 2018 from BobbyRay Esparza, Cultural Coordinator- CBI does not know of any cultural resources/sites within or near the Project Area. While the Project is outside the CBI reservation boundaries, it is within the Tribe's traditional land use area. CBI believe there is possibility of unearthing cultural resources during construction and request tribal monitors be present during all ground disturbing activities. CBI also request to be kept informed of all changes/updates going forward with the Project.	MCC thanked the tribe for their response and state their comments and recommendations would be included within the report.

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
 November 2018
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1 st Follow-Up Attempt	Date of 2 nd Follow-Up Attempt	Results	MCC Response
Shasta Gaughen, Assistant Director Kupa Cultural Center (Pala Band)	October 12, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	Email received on October 29, 2018- official letter should be arriving-defers to local tribes	MCC thanked the tribe for their response
Thomas Rodriguez, Chairperson La Jolla Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via phone; VM box full	November 13, 2018- via phone-no answer	As of November 15, 2018-no response	N/A
Shane Chapparosa, Chairperson Los Coyotes Band of Cahuilla and Cupeno Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- Current Tribal Admin Alvina Fletcher requested digital copy of letter sent to her (Alvina_fletcher@yahoo.com) and would respond by earliest next week.	As of November 15, 2018-no response	N/A
Janice Elzendnga, Tribal Admin. Los Coyotes Band of Cahuilla and Cupeno Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 13, 2018- via phone- Current Tribal Admin Alvina Fletcher requested digital copy of letter sent to her (Alvina_fletcher@yahoo.com) and would respond by earliest next week.	As of November 15, 2018-no response	N/A

Name/ Affiliation	Date and Method of 1st Contact	Date of 1 st Follow-Up Attempt	Date of 2 nd Follow-Up Attempt	Results	MCC Response
John Perada, Environmental Director Los Coyotes Band of Cahuilla and Cupeno Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone-no answer	November 13, 2018- via phone- Current Tribal Admin Alvina Fletcher requested digital copy of letter sent to her (Alvina_fletcher@yahoo.com) and would respond by earliest next week.	As of November 15, 2018-no response	N/A
Robert Martin, Chairperson Morongo Band of Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via phone; transferred to cultural department: Email received by Travis Armstrong informed letter has yet to be received and to direct mails to the Tribal Historic Preservation Office	Not necessary	See above response	N/A

Name/ Affiliation	Date and Method of 1st Contact	Date of 1 st Follow-Up Attempt	Date of 2 nd Follow-Up Attempt	Results	MCC Response
Denisa Torres, CRManager Morongo Band of Mission Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	Letter email received on November 2, 2018 from Travis Armstrong, Tribal Historic Preservation Officer-Project is located within the Tribe's aboriginal territory or in an area considered to be a traditional use area or one in which the MBMI has cultural ties. MBMI requests a thorough records search be conducted at a CHRIS Archaeological Information Centers and a copy of the search results be provided to the tribe, and a tribal monitor participate during the initial pedestrian field survey of the Phase I Study of the project and a copy of the results of that study be provided. In the event the survey has already been conducted, MBMI requests a copy of the Phase I study be provided to the tribe as soon as it can be made available.	MCC thanked the tribe for their response

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1st Follow-Up Attempt	Date of 2nd Follow-Up Attempt	Results	MCC Response
Shasta Gaughen, THPO Pala Band of Mission Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	Responded via email that official letter should be arriving- defers to local tribes	MCC thanked the tribe for their response
Robert H. Smith, Chairperson Pala Band of Mission Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	See response above	N/A
Temet Aguilar, Chairperson Pauma Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 13, 2018-via phone- Re- directed to Chris Devers	As of November 15, 2018-no response	N/A
Bennae Calac, Pauma Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018-via phone- Re- directed to Chris Devers	As of November 15, 2018-no response	N/A
Charles Devers, Cultural Committee Pauma Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via phone; Secretary stated name is Chris Devers; message left	November 13, 2018- via phone- requested digital copy sent to cultural@pauma-nsn.gov .	As of November 15, 2018-no response	N/A
Paul Macarro, CR Coordinator Pechanga Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A
Mark Macarro, Chairman Pechanga Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone	As of November 15, 2018-no response	N/A
Gary DuBois, Director CRM Pechanga Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
 November 2018
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1st Follow-Up Attempt	Date of 2nd Follow-Up Attempt	Results	MCC Response
Tubu Ebru Ozdil, CR Planning Specialist Pechanga Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- Ozdil stated official response email will be sent by end of the day	As of November 15, 2018-no response	N/A
Joseph Hamilton, Chairman Ramona Band of Cahuilla	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A
Manuel Hamilton, Vice Chairperson Ramona Band of Cahuilla	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A
John Gomez, Envir't Coordinator Ramona Band of Cahuilla	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A
Jim McPherson, Tribal Pres. Officer Rincon Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- both numbers provided went to a Verizon error message that number is not available	As of November 15, 2018-no response	N/A
Bo Mazzetti, Chairperson Rincon Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- both numbers provided went to a Verizon error message that number is not available	As of November 15, 2018-no response	N/A

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
 November 2018
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1st Follow-Up Attempt	Date of 2nd Follow-Up Attempt	Results	MCC Response
Tribal Council San Luis Rey Band of Mission Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018-via phone- Re- directed to Cami (760- 917-1736)- message left	As of November 15, 2018-no response	N/A
Cultural Department San Luis Rey Band of Mission Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018-via phone- Re- directed to Cami (760- 917-1736)- message left	As of November 15, 2018-no response	N/A
Steven Estrada, Chairman Santa Rosa Band of Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- Secretary re- directed contact with Gabriella Rubalcava and email sent: grubalcava@ santarosacahu illa-nsn.gov	November 13, 2018- Secretary re- directed contact with Gabriella Rubalcava and email sent: grubalcava@ santarosacahu illa-nsn.gov	As of November 15, 2018-no response	N/A
Terry Hughes, Tribal Admin. Santa Rosa Band of Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- Secretary re- directed contact with Gabriella Rubalcava and email sent: grubalcava@ santarosacahu illa-nsn.gov	As of November 15, 2018-no response	N/A
Carrie Garcia, CR Manager Soboba Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A
Joseph Ontiveros, CR Dept. Soboba Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone- message left	As of November 15, 2018-no response	N/A

Lurin and Wood Residential Project
 CEQA Due Diligence Native American Contact Log
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Name/ Affiliation	Date and Method of 1st Contact	Date of 1st Follow-Up Attempt	Date of 2nd Follow-Up Attempt	Results	MCC Response
Scott Cozart, Chairman Soboba Band of Luiseno Indians	October 12, 2018- letter sent via USPS	October 29, 2018- via phone; message left	November 13, 2018- via phone-Re- directed to Cultural Department	As of November 15, 2018-no response	N/A
Thomas Tortez, Chairperson Torres-Martines Desert Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	Not necessary	As of November 15, 2018-no response	N/A
Michael Mirelez, CR Coordinator Torres-Martines Desert Cahuilla Indians	October 24, 2018- letter sent via USPS	October 29, 2018- via email	November 13, 2018- via phone	Mr. Mirelez states the Tribes defers to Soboba as they are the closer tribe.	MCC thanked Mr. Mirelez for his time and stated his response would be included in the report.



MORONGO BAND OF MISSION INDIANS
TRIBAL HISTORIC PRESERVATION OFFICE
12700 PUMARRA RD BANNING, CA 92220
OFFICE 951-755-5259 FAX 951-572-6004

Date: 11/2/2018

Re:
Lurin and Wood Residential Project, Riverside

Dear,
Tria Belcourt
President and Principal Archaeologist
Material Culture Consulting

Thank you for contacting the Morongo Band of Mission Indians (MBMI) Cultural Heritage Department regarding the above referenced project(s). After conducting a preliminary review of the project, the tribe would like to respectfully issue the following comments and/or requests:

- The project is located within the Tribe's aboriginal territory or in an area considered to be a traditional use area or one in which the Tribe has cultural ties. In order to further evaluate the project for potential impacts to tribal cultural resources, we would like to formally request the following:
 - A thorough records search be conducted by contacting one of the California Historical Resources Information System (CHRIS) Archaeological Information Centers and a copy of the search results be provided to the tribe.
 - Tribal monitor participation during the initial pedestrian field survey of the Phase I Study of the project and a copy of the results of that study. In the event the pedestrian survey has already been conducted, MBMI requests a copy of the Phase I study be provided to the tribe as soon as it can be made available.

Please include this response in your report to your client.

Sincerely,

Travis Armstrong
Tribal Historic Preservation Officer
Morongo Band of Mission Indians
Email: tpho@morongo-nsn.gov
Phone: (951) 755-5259

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



03-013-2018-012

November 09, 2018

[VIA EMAIL TO:tria@materialcultureconsulting.com]
Material Culture Consulting
Mrs. Tria Belcourt
342 Cucamonga Avenue
Claremont, CA 91711

Re: Lurin and Wood Residential

Dear Mrs. Tria Belcourt,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Lurin and Wood Residential project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*At this time ACBCI defers to Soboba. This letter shall conclude our consultation efforts.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeological Technician
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

**CEQA Outreach Follow up, Proposed Lurin and Wood Residential Project, City of Riverside, Riverside East and Steele Park USGS Quadrangle, Riverside County**

Shasta Gaughen <sgaughen@palatribe.com>
To: Sonia Sifuentes <sonia@materialcultureconsulting.com>
Cc: Alexis Wallick <awallick@palatribe.com>

Mon, Oct 29, 2018 at 11:29 AM

Hi Sonia – you should soon be receiving a letter from us stating that we defer to tribes closer to the project area.

Thanks,
Shasta

Neshúun 'icháachuqe (thank you),

Shasta C. Gaughen, PhD

Environmental Director/Tribal Historic Preservation Officer

Pala Band of Mission Indians

PMB 50, 35008 Pala Temecula Rd.

Pala, CA 92059

760-891-3515

sgaughen@palatribe.com

Túkve'esh • Pál • Temál • 'Etáx'em

"Sky, Water, Land, People"

From: Sonia Sifuentes [mailto:sonia@materialcultureconsulting.com]

Sent: Monday, October 29, 2018 11:19 AM

To: Tria Belcourt <info@materialcultureconsulting.com>

Subject: CEQA Outreach Follow up, Proposed Lurin and Wood Residential Project, City of Riverside, Riverside East and Steele Park USGS Quadrangle, Riverside County

[Quoted text hidden]



Prioposed Lurin and Wood Residential Project

1 message

Cultural Department <culturaldirector@cahuilla.net>

To: Sonia Sifuentes <sonia@materialcultureconsulting.com>

Cc: Tria Belcourt <tria@materialcultureconsulting.com>, anthony madrigal <anthonymad2002@gmail.com>

Wed, Nov 14, 2018 at 3:06 PM

Dear Ms. Sifuentes,

The Cahuilla Band of Indians received your letter of October 24, 2018 regarding the proposed Lurin and Wood Residential Project in the City of Riverside located at the corner of Lurin Avenue and Wood Drive, Riverside County, Ca. The Cahuilla Band does not have knowledge of any cultural resources/sites within or near the project area. Although this project is outside the Cahuilla reservation boundaries, it is within the Cahuilla traditional land use area. Therefore we believe there is the possibility of unearthing cultural resources during construction and request tribal monitors be present during all ground disturbing activities. Please keep us informed of all changes/updates going forward with this project and we appreciate your help in preserving Tribal Cultural Resources in your project.

Respectfully,

BobbyRay Esparza
Cultural Coordinator
Cahuilla Band of Indians
Cell: (760)423-2773
Office: (951)763-5549
Fax:(951)763-2808



AUGUSTINE BAND OF CAHUILLA INDIANS

PO Box 846 84-481 Avenue 54 Coachella CA 92236

Telephone: (760) 398-4722

Fax (760) 369-7161

Tribal Chairperson: Amanda Vance

Tribal Vice-Chairperson: William Vance

Tribal Secretary: Victoria Martin

November 5, 2018

Tria Belcourt
Material Culture Consulting
2701-B North Towne Avenue
Pomona, CA 91767

Re: Proposed Lurin and Wood Residential Project, City of Riverside; Riverside East and Steel Park USGS Quadrangle, Riverside County, California

Dear Ms. Belcourt-

Thank you for the opportunity to offer input concerning the development of the above-identified project. We appreciate your sensitivity to the cultural resources that may be impacted by your project, and the importance of these cultural resources to the Native American peoples that have occupied the land surrounding the area of your project for thousands of years. Unfortunately, increased development and lack of sensitivity to cultural resources has resulted in many significant cultural resources being destroyed or substantially altered and impacted. Your invitation to consult on this project is greatly appreciated.

At this time we are unaware of specific cultural resources that may be affected by the proposed project. We encourage you to contact other Native American Tribes and individuals within the immediate vicinity of the project site that may have specific information concerning cultural resources that may be located in the area. We also encourage you to contract with a monitor who is qualified in Native American cultural resources identification and who is able to be present on-site full-time during the pre-construction and construction phase of the project. Please notify us immediately should you discover any cultural resources during the development of this project.

Very truly yours,

A handwritten signature in blue ink that reads "Victoria Martin".

Victoria Martin
Tribal Secretary