Appendix E
Tribal Cultural Resources

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October 5, 2022 14415

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Subject: Phase I Archaeological Resources Assessment for the Riverside Community College District Solar Plan Project, Cities of Norco and Moreno Valley, Riverside County, California

Dear Mr. Agah:

This letter documents the Phase I archaeological resources assessment conducted by Dudek for the Riverside Community College District Solar Plan Project (Project or proposed Project), located within the Cities of Norco and Moreno Valley, Riverside County, California. The present study documents the results of a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC), Native American coordination with the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) review, an archaeological pedestrian survey, an analysis regarding the potential for archaeological resources to be present, as well as management recommendations. The Riverside Community College District (District) is the lead agency responsible for compliance with California Environmental Quality Act (CEQA).

Project Location and Description

The proposed Project is located on two District campuses within Riverside County; Norco College and Moreno Valley College. For the purposes of this report, the two campuses that collectively represent the proposed Project site will be referred to as the Norco College Solar Site and the Moreno Valley College (MVC) Solar Site. The Norco College Solar Site is located within the City of Norco, outside the developed campus center and within mostly undeveloped lands and falls on public land survey system (PLSS) Sections 12 and 13 of Township 3 South, Range 7 West on the *Corona North*, CA 7.5-minute United States Geological Survey (USGS) Quadrangle. The MVC Solar Site is located within the City of Moreno Valley, outside the developed campus center and within mostly undeveloped rural lands, and falls on PLSS Section 28 of Township 3 South, Range 3 West on the *Sunnymead*, CA 7.5-minute USGS Quadrangle. See Figure 1, Project Locations Map, in Appendix A.

The Norco College Solar Site Project component includes the installation of a 2.1- MW, ground-mounted fixed tilt photovoltaic (PV) solar array approximately 6 acres in size and associated underground lines and Battery Energy Storage System (BESS) on the undeveloped hillside to the northeast of the developed Norco College campus. The MVC Solar Site Project component includes the installation of a 0.9-MW ground-mounted fixed tilt PV solar array approximately 2.7 acres in size and associated underground lines on undeveloped land on the easternmost edge of the MVC campus, including a solar switchboard at the northern edge of the PV solar array location. See Figures 2A and 2B, Project Site Maps, in Appendix A.

Current Project design indicates that the depths of ground disturbance for the proposed Project is between 4 to 8 feet (ft) below the existing ground surface for construction activities, including site preparation, grading, paving, boring and conduit installation, installation of racking and other mechanical components PV solar array panel installation and other electrical component installation.

Environmental Setting and Review of Soils

Norco College Solar Site

The Norco College Solar Site is within California's Transverse Ranges geomorphic province, which is defined by an east-west trending series of steep mountain ranges and valleys (California Geological Survey 2002). The transverse ranges include the Santa Ana Mountains to the southwest, the San Jacinto Mountains to the southeast, and the San Gabriel and San Bernardino Mountains to the north. The City of Norco is bound to the north by the Santa Ana River, to the west by the Prado Basin, and to the east and south by the Norco Hills. The topography within the Norco College Solar Site consists of lightly undulating valleys amongst gently rising hills. Elevations within the Norco College Solar Site generally decrease southwest with a high of 683 feet above mean sea level (AMSL) in the northeast to 610 feet AMSL in the southwest (Google 2021).

Present site conditions for the Norco College Solar Site primarily consist of a 6-acre, undeveloped hillside area to the northeast of the main campus that would support a future PV solar array, a BESS component on a developed portion of the main campus, and an EV charger switchboard (and associated AC conduit) in the southwest corner of the main campus. The proposed new 12 kV underground lines are within partially developed and undeveloped/vacant settings. At the location of the proposed 6-acre PV solar array, the underlying terrain lightly slopes northward, with grassland habitat dominating most of the rectangular area. Similar grassland habitat is found to the immediate west, north and south of this area; however, off-campus development further away consists of the multi-structure campus of Naval Sea Systems Command (located to the west) and one- and two-story commercial and office style development in the City of Norco. The proposed BESS component is located on the flat, developed/paved northerly portion of the main campus which currently supports the Main Plant, Operations Center, and campus staff parking. The EV charger switchboard and associated AC conduit are primarily proposed to be located to the immediate west of the Wilfred J. Airey Library and east of campus Parking Lot D. More specifically, the proposed switchboard is proposed in an existing shrub and tree vegetated planting area bordered by concrete sidewalk and paved parking and conduit would be installed beneath existing portions of the nearby parking lot.

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2021a), four soil types have been identified in the Norco College Solar Site: Cieneba rocky sandy loam and Cienega sandy loam; Delhi fine sand; and Vista coarse sandy loam. The soil series are described below according to their official soil descriptions.

Cieneba Series: Cieneba Series soils consist of very shallow and shallow, somewhat excessively drained soils that formed in material weathered from granitic rock. They occur on hills and mountains at elevations of 500 to 4,000 feet and have slopes of 9 to 85 percent. Vegetation is mainly chaparral and chemise with widely spread foothill pine or oak tree. A typical Cieneba series pedon extends 30 inches below ground surface (bgs). Cieneba rocky sandy loam and Cieneba sandy loam, 15 to 50 percent slopes, eroded is found within the location of the existing 12kV underground line and possible route of the new 12kV underground utility line, respectively.

Delhi Series: Delhi series soils are found on 0 to 15 percent slopes at elevations of 25 to 1,400 feet. They formed in wind-modified alluvium derived from granitic rock sources on floodplains, alluvial fans, and terraces. Principal native plants are buckwheat and a few shrubs and trees. Typical vegetation is annual grasses and forbs. A typical Delhi series pedon extends 70 inches bgs. Delhi fine sand, 2 to 15 percent slopes, wind-eroded is found within the location of the proposed BESS, launching pit, EV charger switchboard/pit, alternating current (AC) conduits, existing 12kV underground line, and the possible route of the new 12kV underground utility line.

Vista Series: Vista series soils are found on hilly slopes at elevations of 400 to 3,900 feet in Southern California and at lower than 3,500 feet elevation in Central California. Slopes range from 2 to 75 percent. The soils formed in material weathered from decomposed granite and other closely related rocks. The natural vegetation is annual grasses and forbs and such shrubs as California sagebrush (*Artemisia californica*), scrub oak (*Quercus berberidifolia*), lilac, chamise, sumac, and flattop buckwheat. A typical Vista series pedon extends 61 inches bgs. Vista coarse sandy loam, 8 to 15 percent slopes, eroded is found within the location of the proposed PV solar array, maintenance road, and portions of the possible route of the new 12kV underground utility line.

A review of the USGS mineral resources (USGS 2021) online spatial data for geology indicates that the Norco College Solar Site is comprised of two types of native soil. The western half of the Norco College Solar Site, including the proposed BESS, EV charger switch board, alternating current (AC) conduits, existing 12kV underground line, and the possible route of the new 12kV underground utility line areas are composed of Mesozoic granitic rocks, unit 2 (Peninsular Ranges) from the middle Jurassic to Late Cretaceous epoch. These formations have low potential to support the presence of buried archaeological resources.

The eastern half of the Norco College Solar Site, including the proposed PV solar array, existing 12kV underground line, and possible route of the new 12kV underground utility line areas are composed of Older Quaternary alluvium and marine deposits from the Pleistocene epoch. Late Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use, as well as represent ongoing processes of development that have potential to preserve cultural material in context, depending on area-specific topographical setting.

MVC Solar Site

The MVC Solar Site is within California's Peninsular Range geomorphic province, which is a prominent natural geomorphic province that extends from the Santa Monica Mountains approximately 900 miles south to the tip of Baja California, Mexico, and is bound to the east by the Colorado Desert. The Peninsular Range is characterized by steep, elongated ranges and valleys that generally trend northwesterly (California Geological Survey 2002). Topographically, the MVC Solar Site is situated along the foothills of Mount Russell Hills, part of the Lake Perris Recreation Area. The MVC Solar Site is surrounded by numerous ephemeral drainages originating from the mountainous terrain to the east. Elevations within the MVC Solar Site decrease from southeast the northwest, with a high of 1,654 feet AMSL at the proposed PV solar array area to 1,550 feet AMSL at the proposed BESS area (Google 2021).

Present site conditions for the MVC Solar Site primarily consist of an approximately 2.7-acre, undeveloped area on the easternmost edge of campus (and upslope of adjacent College Park) that would support a future PV solar array, a BESS component on a developed portion of the campus located to the north of the library, and an EV charger switchboard (and associated AC conduit) to the south of College Drive in campus Parking Lot B. The proposed new

12 kV underground lines are within partially developed and undeveloped/vacant settings. The proposed PV solar array area is surrounded by undeveloped hilly terrain to the north, east, and south, College Park to the southwest, and a previously graded yet undeveloped portion of the campus (and an adjacent surface parking lot) to the west and lightly developed portions of the campus to the northwest. Two large water storage tanks are located less than 200 feet northeast of this work area and public trails border the area to the north, east, and south. The BESS component encompasses a small, 0.04-acre area that consists of mostly of barren, rocky soils with a canopy of mature pine trees (Pinus sp.).

According to the USDA NRCS Web Soil Survey (USDA 2021a), 10 soil types have been identified in the MVC Solar Site: Cieneba rocky sandy loam; Fallbrook sandy loam; Hanford coarse sandy loam and Hanford loamy fine sand; Monserate sandy loam, eroded, and Monserate sandy loam, severely eroded; Ramona very fine sandy loam, Ramona sandy loam, severely eroded, and Ramona sandy loam, eroded and each Ramona series is comprised various slopes consisting of four Ramona soil types. The soil series are described below according to their official soil descriptions.

Cieneba Series: Cieneba Series soils consist of very shallow and shallow, somewhat excessively drained soils that formed in material weathered from granitic rock. They occur on hills and mountains at elevations of 500 to 4,000 feet and have slopes of 9 to 85 percent. Vegetation is mainly chaparral and chemise with widely spread foothill pine or oak tree. A typical Cieneba series pedon extends 30 inches below ground surface (bgs). Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded is found within the location of the possible route of the new 12kV underground utility line.

Fallbrook Series: Fallbrook Series soils are found on gently rolling to very steep hills at elevations of 200 to 3,000 feet or as high as 3,500 feet on south-facing slopes. They formed in material weathered from granite and closely related granitic rocks that are usually deeply weathered. Rock outcrops are common in some areas. Uncultivated areas are mainly annual grasses and forbs with considerable chaparral, chamise (*Adenostoma fasciculatum*), flattop buckwheat (*Eriogonum fasciculatum v. polifolium*), and other shrubs. A typical Fallbrook Series pedon extends 90 inches bgs. Fallbrook sandy loam, 8 to 15 percent slopes, eroded is found within a portion of the proposed BESS and existing 12kV underground line.

Hanford Series: Hanford Series soils are found on stream bottoms, floodplains, and alluvial fans at elevations of 150 to 3,500 feet. Slopes range from 0 to 15 percent. The soils formed in deep, moderately coarse textured alluvium, dominantly from granite and other quartz-bearing rocks of similar texture. Vegetation in uncultivated areas is mainly annual grasses and associated herbaceous plants. A typical Hanford Series pedon extends 60 inches bgs. Hanford loamy fine sand, 0 to 8 percent slopes, is found within the location of the proposed PV solar array. Hanford coarse sandy loam, 8 to 15 percent slopes, eroded is found within a portion of the proposed BESS, existing 12kV underground line, and the possible route of the new 12kV underground utility line.

Monserate Series: Monserate Series soils consists of fine-loamy, mixed, superactive, thermic Typic Durixeralfs and is formed in alluvium derived principally from granitic rocks on nearly level to moderately steep old dissected terraces and fans at elevations of 700 to 2,500 feet. Slopes range from 5 to 25 percent. Vegetation in uncultivated areas is mainly annual grasses and forbs, widely spaced native canyon oak, and shrubs on eroded slopes. A typical Monserate Series pedon extends 70 inches bgs. Monserate sandy loam, 5 to 15 percent slopes, eroded is found within the location of the existing 12kV underground line. Monserate sandy loam, 15 to 25 percent slopes, severely

eroded is found within the existing 12kV underground line, the possible route of the new 12kV underground utility line, and the launching pit.

Ramona Series: Ramona Series soils consists of well-drained soils formed in alluvium derived mostly from granitic materials. Ramona soils are on terraces and alluvial fans at elevations of 500 feet to 3,500 feet amsl with slopes of 0 to 25 percent. The natural vegetation consists primarily of annual grasses, forbs, chamise, sages (*Salvia* spp.), and California buckwheat (*Eriogonum fasciculatum*). Soils at the surface include sandy loam to very fine sandy loam, with some loamy sand, gravelly sandy loam, and gravelly fine sandy loam. A typical Ramona Series pedon extends 74 inches bgs. Ramona very fine sandy loam, 0 to 8 percent slopes, eroded, is found within a portion of the proposed EV charger switchboard, PV solar array and existing 12kV underground line. Ramona sandy loam, 5 to 8 percent slopes, severely eroded and Ramona sandy loam, 8 to 15 percent slopes, eroded, are found within the location of the existing 12kV underground line and the possible route of the new 12kV underground utility line and a portion of the proposed maintenance road. Ramona sandy loam, 0 to 5 percent slopes, severely eroded, are found within the location of the AC conduits, a portion of the EV charger switchboard, and the possible route of the new 12kV underground utility line.

A review of the USGS mineral resources (USGS 2021) online spatial data for geology indicates that the MVC Solar Site is comprised of two types of native soil. Approximately 95 percent of the MVC Solar Site, including the proposed PV solar array, BESS, EV charger switch board, AC conduits, existing 12kV underground line, and the possible route of the new 12kV underground utility line areas are composed of Mesozoic granitic rocks, unit 2 (Peninsular Ranges) from the middle Jurassic to Late Cretaceous epoch. These formations have limited potential to support the presence of buried archaeological resources.

The remaining 5 percent of the MVC Solar Site encompasses portions of the AC conduits, specifically the EV Charger-POI and INV-SPB, and is composed of Older Quaternary alluvium and marine deposits from the Pleistocene epoch. Late Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use, as well as represent ongoing processes of development that have potential to preserve cultural material in context, depending on area-specific topographical setting.

Regulatory Context

Work for this Project was conducted in compliance with the California Environmental Quality Act (CEQA). The regulatory framework as it pertains to cultural resources under CEQA is detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC Sections 21083.2 and 21084.1), the CEQA Guidelines (14 CCR 15064.5), and California Public Resources Code (PRC) Section 5024.1 (14 CCR 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for California Register of Historical Resources (CRHR) eligibility (PRC Section 5024.1).

The purpose of the CRHR is to maintain listings of the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term historical resources include a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that

a lead agency determines to be historically significant (14 CCR 15064.5[a]). The criteria for listing properties in the CRHR were developed in accordance with previously established criteria developed for listing in the National Register of Historic Places. The California Office of Historic Preservation regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation (OHP 1995:2).

State

The California Register of Historical Resources

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing on the CRHR. The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

1. is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological 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 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:
    - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
    - Has a special and particular quality, such as being the oldest of its type or the best available example of its type
    - Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the 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 that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered

significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource;" it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "tribal cultural resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

(1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

(2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC,

unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts 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 (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as 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.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on nonunique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a nonunique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources (TCRs) must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- 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.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

Local

City of Norco General Plan Land Use Element

The City's General Plan Goal 2.7 describes archaeological and paleontological resources, a regulatory framework, and policies and plans to protect such resources. The planning goals and policies are described below (City of Norco 2009).

The Historic Resources Element of the City's General Plan (adopted in 2009) addresses archaeological and historical cultural resources. Goal 4.3 in the Goals and Policies section states that the City will "preserve from development to the extent possible, the City's Historical and archaeological resources" Nine policies are enumerated to assist in implementation of the goal. The Historic Element also calls for an inventory of all historically significant sites and/or structures that require protection.

City of Moreno Valley Cultural Preservation (Title 7)

This study was completed in consideration of all sections of the City of Moreno Valley Cultural Preservation Ordinance (Title 7). Sections most relevant to this study are provided below (City of Moreno Valley 2007).

7.01.010 - Purpose of Title.

A. The general purpose of this title is to promote the public health, safety, and general welfare by providing for the preservation, identification, protection, enhancement and perpetuation of existing improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets and natural features having special cultural, historical, archaeological, architectural or community value in the city.

B. Specific purposes of this title are as follows:

1. To safeguard the city's heritage as embodied and reflected in such resources;
2. To encourage public knowledge, understanding, and appreciation of the city's past;
3. To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
4. To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the city;
5. To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the city's history;
6. To enhance property values and to increase economic and financial benefits to the city and its inhabitants;
7. To protect and enhance the city's attraction to tourists and visitors, thereby stimulating business and industry;
8. To identify as early as possible potential conflicts between the preservation of cultural resources and alternative land uses;
9. 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. (Ord. 126 § 1, 1987)

7.05.010 - Landmark.

A landmark is any site, including significant trees or other significant permanent landscaping located thereof, place, building, structure, street, improvement, natural feature or other object having a special historical, archaeological, paleontological, cultural, architectural or community value in the city and which has been designated a landmark pursuant to this title. (Ord. 126 § 1, 1987)

7.05.130 Structure of merit.

The City (sic) may encourage the protection, enhancement, appreciation and use of structures of historical, archaeological, paleontological, cultural, architectural, community or aesthetic value which have not been designated as landmarks but are deserving of recognition, by designating them as structures of merit so as to emphasize their importance in the past, present and future of the city. (Ord. 126 § 1, 1987)

7.07.010 Preservation district.

A preservation district is any legally described geographic area having historical significance; special character for aesthetic value; serving as an established neighborhood or community center; representing one or more architectural periods or styles typical in the history of the city; or constituting a distinct section of the city, and which has been designated a preservation district by committee or by the city council on appeal. (Ord. 126 § 1, 1987)

7.07.130 Neighborhood conservation area.

The City (sic) may encourage the protection, enhancement, appreciation and use of areas of historical, architectural, aesthetic, cultural or community value which have not been designated as preservation districts but are deserving of recognition by designating them as neighborhood conservation areas so as to emphasize their importance in the past, present and future of the city. Any decision of the City (sic) designating a neighborhood conservation area shall be final and no appeal may be taken to the city council on account of any such action by the committee. (Ord. 126 § 1, 1987)

Cultural Setting

Evidence for continuous human occupation in the region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750).

Paleoindian (pre-5500 BC)

Information pertaining to the Paleoindian occupation in the region is tenuous; the knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego through the Mojave Desert and beyond. One of the earliest dated archaeological assemblages in this area (excluding the Channel Islands) derives from SDI-4669/W-12, in La Jolla, San Diego County. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2006). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of groundstone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of groundstone tools. Prime examples of this pattern are sites that were studied by (Davis 1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and

large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679), a multicomponent fluted point site, and MNO-680, a single component Great Basined stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare, while finely made projectile points were common.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the Southern California region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site, located in the area now occupied by City of Escondido, are qualitatively distinct from most others in the region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, are very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with the general trends in Southern California deserts, wherein hunting-related tools are replaced by processing tools during the early Holocene (Basgall and Hall 1990).

Archaic (8000 BC–AD 500)

The more than 1500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the region. If San Dieguito is the only recognized Paleoindian component in the region, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (Hale 2001, 2009).

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region, with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is

adopted at around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities, and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decrease in proportion relative to expedient, unshaped groundstone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complimented only by the addition of the bow and ceramics.

Late Prehistoric (AD 500–1750)

The period following the Archaic and prior to Ethnohistoric times (AD 1750) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004). However, several other subdivisions continue to be used to describe various shifts in assemblage composition, including the addition of ceramics and cremation practices. The post-AD 1450 period is called the San Luis Rey complex (Meighan and True 1977). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics. Despite these regional complexes, each is defined by the addition of arrow points and ceramics and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey complex difficult. For this reason, the term Late Prehistoric is well suited to describe the last 1,500 years of prehistory in the region.

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. While steatite was commonly the material of choice for vessel production, it was generally replaced near the time of missionization by locally procured clay to produce ceramic vessels. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn processing and ceramic use in the region did not occur until the San Luis Rey pattern emerged after approximately AD 1450.

Ethnohistoric (post-AD 1750)

The following section represents a summary of applicable and commonly cited academic and historic era documentation pertaining to Native American history. The documented history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. While valuable for the record they created, these brief, and generally peripheral, accounts should also be subject to critical interpretation because they were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000; White 1963). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived

the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities. This understanding of culture is, of course, not consistent with contemporary considerations of culture change and continuity. Living Native American dependent communities and individuals, while subject to substantial historical abuses and disruptions by the Euroamerican population, are considered the stewards of their heritage and traditional tribal cultural knowledge and values. AB 52 and other regulatory requirements for consultation reflect this understanding.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families. Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative "time depth" of the speaking populations. A large amount of variation within the language of a group represents a greater time depth than a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, pp. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The majority of documentation assign the Proposed Project areas within the Cahuilla, Luiseño, Serrano, and Gabrieleño traditional use area also claim traditional associations with this area. The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Golla 2007, pp. 74). These groups include the Luiseño, Cupeño, and Cahuilla. Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010). The Cahuilla are linguistically and culturally related to the Gabrielino, Cupeño, and Luiseño, and represent the descendants of local Late Prehistoric populations. They are generally considered to have migrated into the area from the Mojave Desert, possibly displacing the prehistoric Yuman-speaking inhabitants.

The tribes of the region were organized into patrilineal clans or bands centered on a chief, comprised of 25–30 people (Kroeber 1925), each of which had their own territorial land or range where food and other resources were collected at different locations throughout the year (Sparkman 1908). The title of chief was heritable along family lines. Inter-band conflict was most common over trespassing. Sparkman observed that "when questioned as to when or how the land was divided and sub-divided, the Indians say they cannot tell, that their fathers told them that it had always been thus" (1908). Place names were assigned to each territory, often reflecting common animals, plants, physical landmarks, or cosmological elements that were understood as being related to that location. Marriages were generally arranged by parents or guardians. Free and widowed women had the option to choose their partner. Polygamy occurred though was not common, often with a single man marrying a number of sisters and wives. Shamanism was a major component in tribal life. The physical body and its components was thought to be related to the power of an individual, and wastes such as fluids, hair, and nails were discarded with intent. Hair, once cut, was often carefully collected and buried to avoid being affected negatively or controlled by someone who

wishes them harm. Some locations and natural resources were of cultural significance. Springs and other water-related features were thought to be related with spirits. These resources, often a component of origin stories, had power that came with a variety of risks and properties to those who became affected. Puberty ceremonies for both boys and girls were complex and rigorous. Mourning ceremonies were similar throughout the region, generally involving cut of the hair, burning of the deceased's clothes a year after death, and redistribution of personal items to individuals outside of the immediate tribal group (Sparkman 1908; Kroeber 1925). Areas or regions, identified by known physical landmarks, could be recognized as band-specific territories that might be violently defended. Other areas or resources, such as water sources and other locations that were rich in natural resources, were generally understood as communal land to be shared.

The staple food of the inhabitants of the region during the ethnohistoric period was acorns (Sparkman 1908). Of the at least six oak species within this tribal groups traditional territory, the most desirable of these was the black oak (*Quercus kelloggii*) due to its ease of processing, protein content, and digestibility. Acorns were stored in granaries to be removed and used as needed. The acorns were generally processed into flour using a mortar and pestle. The meal was most commonly leached with hot water and the use of a rush basket, however, there are also accounts of placing meal into excavated sand and gravel pits to allow the water to drain naturally. The acorn was then prepared in a variety of ways, though often with the use of an earthen vessel (Sparkman 1908). Other edible and medicinal plants of common use included wild plums, choke cherries, Christmas berry, gooseberry, elderberry, willow, Juncus, buckwheat, lemonade berry, sugar bush, sage scrub, currents, wild grapes, prickly pear, watercress, wild oats and other plants. More arid plants such as Yucca, Agave, mesquite, chia, bird-claw fern, Datura, yerba santa, Ephedra, and cholla were also of common use by some Luiseño populations. A number of mammals were commonly eaten. Game animals included back-tailed deer, antelope, rabbits, hares, birds, ground squirrels, woodrats, bears, mountain lions, bobcats, coyotes, and others. In lesser numbers, reptiles and amphibians may have been consumed. Fish and marine resources provided some portion of many tribal communities, though most notably those nearest the coast. Shellfish would have been procured and transported inland from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals.

The first extensive contact with Europeans occurred when the Juan Bautista de Anza expedition passed through the area, setting up a trade route to provide resources to the missions by land. Mexico's separation from the Spanish empire in 1821 and the secularization of the California missions in the 1830s caused further disruptions to native populations. Some former mission neophytes were absorbed into the work forces on the ranchos, while others drifted toward the urban centers at Los Angeles or moved to more rural areas where they were able to join still largely autonomous native communities. United States conquest and annexation, together with the gold rush in Northern California, brought many additional outsiders into the region. Development during the following decades was fitful, undergoing cycles of boom and bust. With rising populations in the nineteenth century throughout the Southern California region, there were increased demands for important commodities such as salt. While the first contact was hostile, later interaction included baptisms (at the surrounding missions) and, eventually, the adoption by the tribes of Euroamerican cattle and agricultural practices. Many tribal communities managed to maintain their political and economic autonomy through the Spanish period, Mexican period, and into the American pioneer period.

Background Research

SCCIC Records Search

The CHRIS is experiencing extensive delays in records search request turn-around times as a result of the COVID-19 pandemic. Therefore, as part of the cultural resources study prepared for the Project, Dudek utilized the results of records searches conducted for previous Dudek reports submitted to the District that address the Norco College Solar Site and the MVC Solar Site titled *Cultural Resources Study for the Norco College Veterans Resource Center, City of Norco, Riverside County, California* (Colston and Comeau 2019) and *Cultural Resources Inventory Report for the Moreno Valley College Welcome Center Project, City of Moreno Valley, Riverside County, California* (Nicolay et al. 2018), respectively. These records searches for the aforementioned projects cover the current proposed Project site, and is therefore considered adequate to support the analysis of previous cultural resources studies and previously recorded cultural resources within the Norco College Solar Site and the MVC Solar Site.

The CHRIS records search for the Norco College Solar Site (completed August 10, 2018) and the MVC Solar Site (completed November 13, 2018) included a 1-mile buffer and were completed at the Eastern Information Center (EIC), which houses cultural resources records for Riverside County. The search included previously recorded prehistoric and historic-age archaeological resources as well as any historic-age built-environment resources; Department of Park and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. 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 Historic Resources Inventory list. The confidential records search results are provided in Confidential Appendix B.

Previously Conducted Cultural Resource Studies

Norco College Solar Site

Results of the CHRIS records search indicate that eighteen (18) previous cultural resources studies have been conducted within 1-mile of the Norco College Solar Site. These studies were conducted between 1980 and 2017. One study, RI-01108, covers the Norco College Solar Site and indicates the prehistoric sensitivity of the surrounding area. A brief summary of this report is provided in the following paragraph.

RI-01108

Environmental Impact Evaluation: An Archaeological Assessment of the Proposed Riverside Community College District Site and Dean Homes Residential Development, Norco, California (Drover 1987), documents the results of a cultural resources survey of a 285-acre property posed for development. A portion of the study area would later become the site of Norco College, which includes Norco College Solar Site. Four prehistoric archaeological sites were identified within the 285-acre property as a result of the cultural resources study: P-33-001229/CA-RIV-001229, P-33-002315/CA-RIV-002315, and P-33-002316/CA-RIV-002316. All of these sites consist of bedrock milling features. No associated prehistoric artifacts, ecofacts, or midden soils were documented at any of the bedrock milling sites. However, none of the sites were subject to subsurface testing, nor were they evaluated for eligibility for listing on the NRHP or CRHR. Although prehistoric resources were encountered during the survey, none of the sites were within close proximity to the Norco College Solar Site. The prehistoric resources

were located west of the Norco College Solar Site with the closest milling site located within approximately 305 meters (1,000 feet). Additionally, a review of historical aerial photographs for the current study indicates that the area where the four prehistoric resources were encountered during the 1987 study has since been developed into a residential neighborhood. As a result, it is likely that these prehistoric resources have since been destroyed.

MVC Solar Site

Results of the CHRIS records search indicate that seventeen (17) previous cultural resources studies have been conducted within 1-mile of the MVC Solar Site. These studies were conducted between 1953 and 2012. Two of these studies (RI-00137 and RI-01843) overlap the MVC Solar Site. These studies indicate the prehistoric sensitivity of the immediate surroundings of the MVC Solar Site, and will therefore be summarized in the following paragraphs.

RI-00137

Perris Reservoir Archaeology: Late Prehistoric Demographic Change in Southeastern California (O'Connell et al. 1974), was commissioned by the State of California Department of Parks and Recreation as a comprehensive study on prehistoric human adaptation within the Perris Reservoir region. This study was conducted in anticipation of the development of the Perris Reservoir and implemented using a cooperative approach among multi-institutional organizations. What resulted is an anthology of archaeological research of prehistoric human settlement patterns at Perris Reservoir.

Included within the study is Ambrose and King's report, *Archaeological Survey and Site Distributions*, which documents the results of an intensive-level pedestrian survey of the lower elevations of Perris Reservoir. The field reconnaissance included the Mount Russell Hills area in and around the MVC Solar Site. Overall, sixty-one (61) prehistoric archaeological sites were located as a result of the survey; fourteen (14) of which were captured in the CHRIS records search results of the current proposed Project. These 14 prehistoric archaeological sites (P-33-000530 through P-33-000543) located within 1-mile of the MVC Solar Site consist of bedrock milling stations that were interpreted to be food processing sites. No additional study was conducted at these sites beyond their initial documentation.

RI-01843

Cultural Resource Survey Report on Wolfskill Ranch (Scientific Resource Surveys, Inc. 1984) documents the cultural resources assessment conducted on Wolfskill Ranch prior to the subdivision and development of the 4000+ acre property. The ranch subsumes the MVC campus, and thus, the current MVC Solar Site was investigated as part of 1984 study. A systematic survey approach with the use of mules provided nearly full survey coverage of the 4000+ acre property. A total of fifty-one (51) archaeological resources were identified within the Ranch as a result of the study. Of these, twenty-four (24) were previously recorded prehistoric resources (including sites P-33-000530 through P-33-000543 discussed above), twenty-six (26) were newly identified prehistoric sites, and one (1) was a newly identified historic-age archaeological site. For any direct impacts that may occur to archaeological sites as a result of project grading and construction, Scientific Resource Surveys, Inc. (1984) recommended site documentation, subsurface testing and evaluation, and archaeological monitoring during grading.

Previously Recorded Cultural Resources

Norco College Solar Site

The CHRIS records search did not identify any previously recorded cultural resources within the Norco College Solar Site. However, twenty-four (24) previously recorded cultural resources were identified within 1-mile of the Project site. These resources consist of five (5) prehistoric sites, one (1) prehistoric isolated artifact, two (2) historic-age archaeological sites, and sixteen (16) historic-age built environment resources. Amongst the prehistoric archaeological resources are four (4) bedrock milling stations, one (1) low density lithic scatter, and one (1) isolated handstone fragment. The historic-age archaeological sites consist of foundation remnants of previously extant single-family properties. Table 1, below, provides a summary of the previously recorded cultural resources within 1-mile of the Norco College Solar Site.

Table 1. Previously Recorded Cultural Resources Within a 1-Mile Radius of the Norco College Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to Norco College Solar Site
001229	001229	Prehistoric Site	Bedrock milling station with one milling slick	7R. Identified during survey; Not evaluated	1977 (Eastvold); 1980 (Feickert and Bjornsen); 1985 (McCarthy); 1987 (Drover)	Outside
001230	001230	Prehistoric Site	Low density lithic scatter collected in 1977. No artifacts remain as of the 1984 update.	7R. Identified during survey; Not evaluated	1977 (Eastvold); 1984 (Drover)	Outside
002315	002315	Prehistoric Site	Bedrock milling stations; two boulders each with one slick	7R. Identified during survey; Not evaluated	1977 (Eastvold); 1980 (Feickert and Bjornsen); 1987 (Drover)	Outside
002316	002316	Prehistoric Site	Bedrock milling station with seven milling slicks	7R. Identified during survey; Not evaluated	1977 (Eastvold); 1980 (Feickert and Bjornsen); 1985 (McCarthy); 1987 (Drover)	Outside

Table 1. Previously Recorded Cultural Resources Within a 1-Mile Radius of the Norco College Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to Norco College Solar Site
002317	002317	Prehistoric Site	Bedrock milling stations; two boulders each with one slick	7R. Identified during survey; Not evaluated	1977 (Eastvold); 1980 (Feickert and Bjornsen); 1985 (McCarthy); 1987 (Drover)	Outside
009101	—	Historic-age Built Environment, Club/Hotel	Lake Norconian Club/Hotel: Spanish Colonial Revival style built c. 1929	1S. Individual property listed in the NRHP and CRHR	1998 (Ensley); 1999 (Urbas)	Outside
019896	010121	Historic-age Archaeological Site	Remnants of a single family residence built 1960 which includes concrete footings and concrete slab foundations	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Goodwin)	Outside
019897	010122	Historic-age Archaeological Site	Remnants of a single family residence built 1953 which includes concrete footings and concrete slab foundations	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Goodwin)	Outside
019898	—	Historic-age Built Environment, Single Family Residence	2441 First Street: modest Ranch-style residence built 1958	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019900	—	Historic-age Built Environment, Single Family Residence	2214 Second Street: vernacular residence built 1927	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside

Table 1. Previously Recorded Cultural Resources Within a 1-Mile Radius of the Norco College Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to Norco College Solar Site
019901	—	Historic-age Built Environment, Single Family Residence	2138 Second Street: vernacular farm cottage residence built 1924	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019902	—	Historic-age Built Environment, Single Family Residence	2266 Second Street: Ranch-style residence built 1956	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019903	—	Historic-age Built Environment, Single Family Residence	2390 Second Street: modest Ranch-style residence built 1958	6Z. Found ineligible for CRHR through survey evaluation; not evaluated for NRHP or local designation	2011 (Tibbet)	Outside
019904	—	Historic-age Built Environment, Single Family Residence	1492 Mountain Avenue: Ranch-style residence built 1949	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019906	—	Historic-age Built Environment, Ranch	1658 Mountain Avenue/Norco Egg Ranch: built 1956	5S3: Appears to be individually eligible for local listing designation through survey evaluation	2011 (Tibbet)	Outside
019908	—	Historic-age Built Environment, Single Family Residence	1463 Pacific Avenue: vernacular residence built 1947	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019909	—	Historic-age Built Environment, Two Single Family Residences	1451 and 1463 Pacific Avenue: two vernacular residences built 1949 and 1947	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside

Table 1. Previously Recorded Cultural Resources Within a 1-Mile Radius of the Norco College Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to Norco College Solar Site
019910	—	Historic-age Built Environment, Single Family Residence	1445 Pacific Avenue: vernacular residence built 1948	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
019911	—	Historic-age Built Environment, Single Family Residence	1463 Pacific Avenue: vernacular residence built 1947	6Z. Found ineligible for CRHR through survey evaluation; not evaluated for NRHP or local designation	2011 (Tibbet)	Outside
019912	—	Historic-age Built Environment, Single Family Residence	1577 Pacific Avenue: vernacular residence built 1920	6L. Determined ineligible for local designation; may warrant special consideration in local planning	2011 (Tibbet)	Outside
019913	—	Historic-age Built Environment, Single Family Residence	1619 Pacific Avenue: vernacular farm cottage with Craftsman elements residence built 1916	6Z. Found ineligible for CRHR through survey evaluation; not evaluated for NRHP or local designation	2011 (Tibbet)	Outside
019937	—	Historic-age Built Environment, Single Family Residence	1661 Mountain Avenue: vernacular farm cottage residence built 1948	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2011 (Tibbet)	Outside
024100	—	Historic-age Built Environment, Irrigation Structure	Concrete weir box dating mid-twentieth century	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2014 (Evans and Smallwood)	Outside
028176	—	Prehistoric Isolate	Isolated granitic bifacial handstone	6Z. Found ineligible for NRHP, CRHR, or local designation through survey evaluation	2018 (Moslak)	Outside

MVC Solar Site

The CHRIS records search did not identify any previously recorded cultural resources within the MVC Solar Site. However, seventeen (17) previously recorded cultural resources were identified within 1-mile of the MVC Solar Site. All of these resources are prehistoric archaeological sites consisting of bedrock milling stations distributed along the foothills of Mount Russell Hills east of the MVC Solar Site. No associated prehistoric artifacts, ecofacts, or midden soils were documented at any of the bedrock milling sites. Additionally, none of the sites were subject to subsurface testing, nor were they evaluated for eligibility for listing on the NRHP or CRHR. Table 2, below, provides a summary of the previously recorded cultural resources within 1-mile of the MVC Solar Site.

Table 2. Previously Recorded Cultural Resources Within a 1-Mile Radius of the MVC Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to MVC Solar Site
000530	000530	Prehistoric Site	Bedrock milling station with one milling slicks	7. Not evaluated	1972 (Terry Ambrose); 1983 (Jackie Desautels); 1988 (Beth Padon and Pat Jertberg)	Outside
000531	000531	Prehistoric Site	Bedrock milling station with three milling slicks	7. Not evaluated	1972 (Terry Ambrose); 1983 (Jackie Desautels); 1988 (Beth Padon and Pat Jertberg)	Outside
000532	000532	Prehistoric Site	Bedrock milling station with several milling slicks	7. Not evaluated	1972 (Terry Ambrose)	Outside
000533	000533	Prehistoric Site	Bedrock milling station with one milling slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000534	000534	Prehistoric Site	Bedrock milling station with one milling slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000535	000535	Prehistoric Site	Bedrock milling station with seven milling slicks	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000536	000536	Prehistoric Site	Bedrock milling stations; two boulders each with one slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000537	000537	Prehistoric Site	Bedrock milling station with two slicks	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside

Table 2. Previously Recorded Cultural Resources Within a 1-Mile Radius of the MVC Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to MVC Solar Site
000538	000538	Prehistoric Site	Bedrock milling station, two boulders one with two milling slicks and one with one milling slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000539	000539	Prehistoric Site	Bedrock milling station with two milling slicks	7. Not evaluated	1972 (Terry Ambrose)	Outside
000540	000540	Prehistoric Site	Bedrock milling stations, three boulders one with four milling slicks, one with two milling slicks, and one with one milling slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000541	000541	Prehistoric Site	Bedrock milling slick with seven milling slicks and one mortar	7. Not evaluated	1963 (P. Chace and E. Shepard); 1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000542	000542	Prehistoric Site	Bedrock milling station with one milling slick	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000543	000543	Prehistoric Site	Bedrock milling stations, two boulders one with one milling slicks and one with two milling slicks	7. Not evaluated	1972 (Terry Ambrose); 1983 (Don Carey)	Outside
000715	000715	Prehistoric Site	Bedrock milling stations with three boulders, one with five milling slicks, one with one milling slick and a mortar, and one with one milling slick	7. Not evaluated	1963 (P. Chace and E. Shepard); 1983 (Jackie Desautels); 1988 (Beth Padon and Pat Jertberg)	Outside

Table 2. Previously Recorded Cultural Resources Within a 1-Mile Radius of the MVC Solar Site

Primary (P-33-)	Trinomial (CA-RIV-)	Resource Age and Type	Resource Description	NRHP Eligibility	Recording Events	Proximity to MVC Solar Site
002829	002829	Prehistoric Site	Bedrock milling station with four milling slicks	7. Not evaluated	1983 (Ann Cody)	Outside
002994	002994	Prehistoric Site	Bedrock milling station with ten milling slicks on a split boulder outcrop	7. Not evaluated	1984 (Roger Mason)	Outside

Review of Historical Topographical Maps and Aerial Photographs

Dudek consulted historical topographic maps and aerial photographs through the Nationwide Environmental Title Research, LLC (NETR) to better understand any natural or human-made changes to the Norco College Solar Site and MVC Solar Site and surrounding properties over time. It is important to note that while topographic maps are informative, they do not illustrate the minute changes that can occur to a landscape overtime and at times, are inconsistent with what is depicted year to year. Most often, structures depicted in topographical maps are limited to those with community or social significance (e.g. Firehouses or Hospitals), including additions or changes to roads and/or waterways. Nonetheless, the information gathered contributes to the understanding of the chronological development of a study area.

Norco College Solar Site

Historical Topographic Maps

USGS topographic maps for the Norco College Solar Site are available for the years 1947 through 2018 (NETR 2021a). The first available topographic map of 1947 depicts the Norco College Solar Site as within the 678-acre luxury resort known as the Lake Norconian Club. Though numerous roads run around and throughout the Norco College Solar Site, only one structure is represented. That structure appears to be a single-family residence placed outside, yet adjacent to, the southwest portion of the Norco College Solar Site's proposed locations of the EV charger switchboard and associated AC conduit, and possible route of the new underground 12 kV underground line. No significant changes observed to the Norco College Solar Site.

By 1955, it is evident that the resort complex has been sold to the U.S. Navy as "NAVAL RESERVATION" is labeled over the complex. There have been slight alterations to some of the road alignments, though they have generally remained consistent with the previous year. One major difference to the area is the addition of barracks and a building labeled "Ordinance Laboratory" to the west of the presently proposed BESS area. The structure adjacent to the southwest portion of the Norco College Solar Site is no longer depicted. No significant changes observed to the Norco College Solar Site.

A few more structures have been added to the 1969 topographic map within the Naval Reservation. No significant changes observed to the Norco College Solar Site.

On the 1982 topographic map, "NAVAL RESERVATION" has been changed to "NAVAL WEAPONS CENTER", though no other changes to the Norco College Solar Site are depicted.

Norco College is first depicted on the 2012 topographic map as "Riverside Community College Norco Campus," indicating the sale of the government-owned land to District. Though the map does not show any structures, the roads are in their present-day alignments. There are no features depicted within the Norco College Solar Site.

There are no changes depicted within the Norco College Solar Site on either the 2015 or 2018 topographic maps. However, directly north of the Norco College Solar Site is the added perimeter of a naval base labeled "NWS-SEAL BEACH CORONA".

Historical Aerial Photographs

A review of historical aerial photographs was conducted as part of the archival research effort from the following years: 1938, 1948, 1966, 1967, 1980, 1994, 1998, 1999, 2002, 2005, 2009, 2010, 2012, 2014, 2016, and 2018 (NETR 2021b). This section will only focus on noticeable changes to the Norco College Solar Site as they developed over time and not the development of the Norco College campus as a whole.

The 1938 historic aerial photograph shows the Norco College Solar Site within vacant and undeveloped land with the exception of a few dirt roads. The Lake Norconian resort complex is visible north of the Norco College Solar Site along the north shore of Lake Norconian. The dirt roads that weave in and around the Norco College Solar Site connect to the complex.

The naval barracks and Ordinance Laboratory adjacent to the proposed BESS area are clearly visible on the 1948 historic aerial photograph. The Norco College Solar Site has remained relatively undisturbed with the exception of the partial cultivation of the proposed BESS area.

By 1966, two small sheds and a graded dirt parking lot/turn-around are visible southwest of the Norco College Solar Site's proposed locations of the EV charger switchboard and associated AC conduit, and possible route of the new underground 12 kV underground line. No significant changes observed to the Norco College Solar Site.

More substantial disturbances are visible within the Norco College Solar Site on the 1980 aerial photograph. Numerous informal dirt roads of varying widths cut through each work area making a network of scars. The work areas are entirely altered due to the construction of Norco College as seen on the 1994 aerial photograph. All work areas have been subject to some degree of ground disturbance either through complete grading or plowing. Alterations to the Norco College campus and associated facilities continues until 2009 when the campus and Norco College Solar Site look much as they do today. There are no other substantial alterations to the work areas through 2018 besides the routine disking and/or plowing of the area southwest of the proposed locations of the EV charger switchboard and associated AC conduit, and possible route of the new underground 12 kV underground line, and proposed BESS area.

MVC Solar Site

Historical Topographic Maps

USGS topographic maps for the MVC Solar Site are available for the years 1954 through 2018 (NETR 2021c). The first available topographic map from 1954 depicts the MVC Solar Site as mostly undeveloped aside from a north-south trending tract road that meanders the perimeter of the Mount Russell Hills, eventually bisecting the proposed BESS area. The 1963 map depicts a second tract road within the MVC Solar Site. This north-south trending road runs adjacent to the western border of proposed PV solar array area. The 1968 map details a shift in the tract road alignments. The road that once intersected the proposed BESS area is offset to the west, and the road adjacent to the proposed PV solar array location is no longer depicted. There are no changes to the topographic maps until 2012, at which time the surrounding area is shown as entirely developed, and Moreno Valley College is labeled on the map, though no individual features are depicted. There are no additional updates to the topographic maps through 2018.

Historical Aerial Photographs

A review of historical aerial photographs was conducted as part of the archival research effort from the following years: 1966, 1967, 1978, 1997, 2002, 2005, 2009, 2010, 2012, 2014, 2016, and 2018 (NETR 2021d). This section will only focus on noticeable changes to the MVC Solar Site as they developed over time and not the development of the MVC campus as a whole.

The 1966 aerial photograph shows the MVC Solar Site within disturbed land denuded of vegetation and with little to no boulder outcrops. This is a noticeable stark contrast to the undisturbed Mount Russell Hills that abut the MVC Solar Site and contain a plethora of visible outcrops. The location of the proposed PV solar array has been graded and prepped for possible cultivation and a natural drainage bisects this area north-south. A dirt road encircles the cleared area encompassing the proposed PV solar array area. Similarly, the proposed BESS area has also been subject to earth moving activities as evidenced by the lack of vegetation and an informal dirt road bisects this area northwest to southeast. Immediately south of the MVC Solar Site is a large, flat parcel of cultivated land that is the eventual location of the MVC campus.

There are no substantial changes to the MVC Solar Site until 1997, when the development of the MVC campus has completely altered the landscape. Two large water tanks have been erected immediately north of the proposed PV solar array location. Additionally, a network of informal dirt roads crisscross and delineate the boundaries of proposed PV solar array area. A row of ornamental trees has been added to the proposed BESS area, though it otherwise remains vacant; however, paved roads and campus buildings surround this area to the north, east, and south.

By 2005, the proposed PV solar array area has been graded and shaped into a flat pad. At this point, the MVC Solar Site appears as it does in its current condition. No discernable changes occurred within the MVC Solar Site through 2018.

Geotechnical Report Review

The geotechnical report, *Preliminary Geotechnical Investigation Report Districtwide Solar Planning Initiative Project, Moreno Valley And Norco College Campuses, Cities of Moreno Valley and Norco, Riverside County, California* (Converse Consultants 2021), was prepared for District in October 2021 to determine the subsurface geological conditions of the proposed Project site. The results of the subsurface investigations for the Norco College Solar Site and the MVC Solar Site are individually discussed below.

Norco College Solar Site

Subsurface exploratory investigations were conducted within the location of the 2.1- MW, ground-mounted fixed tilt PV solar array within the Norco College Solar Site. According to the boring logs for the two (2) locations investigated (BH-05 and BH-06) within the Norco College Solar Site's proposed PV solar arrays work area, alluvium (native soils) was encountered from the surface to 15 feet below existing ground surface at both boring locations. Underlying the alluvium is bedrock. No fill soils were encountered within the locations subjected to subsurface investigation.

MVC Solar Site

Subsurface exploratory investigations were conducted within the location of the 0.9-MW ground-mounted fixed tilt PV solar array within the MC Solar Site. According to the boring logs for the two locations investigated (BH-01 and BH-02) within the MVC Solar Site's proposed PV solar arrays work area, alluvium (native soils) was encountered from surface to between 15 to 45 feet below existing ground surface at BH-01 and BH-02, respectively. Underlying the alluvium is bedrock. No fill soils were encountered within the locations subjected to subsurface investigation.

Native American Coordination

NAHC Sacred Lands File Search

Norco College Solar Site

The SLF record is maintained at a public land survey system section level meaning the negative or positive result is respective of a general area covering approximately 1 square mile (640 acres) rather than the exact area of study. As part of the process of identifying cultural resources within or near the Norco College Solar Site, a search of the NAHC's SLF database was requested on May 13, 2022. The NAHC's SLF search result (received June 16, 2022) was positive; however, as previously stated, the SLF record is maintained at a public land survey system section level, which indicates a recorded sacred site could be anywhere within this 1 square mile (640 acre) area and therefore, does not necessarily equate to the existence of resources within the specific area occupied by the Norco College Solar Site.

MVC Solar Site

A search of the NAHC's SLF database for the MVC Solar Site was requested on May 13, 2022. The NAHC's SLF search result (received June 16, 2022) was negative for known Native American heritage resources within the MVC Solar Site. It is important to note that the SLF maintained by the NAHC represents a curation of "sacred lands" or tribal cultural resources (TCRs) provided by Tribal entities and Native American representatives. For various

reasons, Tribal entities and Native American representatives do no not always report sacred lands or TCRs to the NAHC. As such, the NAHC's SLF is not a comprehensive list, and searches of the SLF must be considered in concert with other research and not used as a sole source of information regarding the presence of Native American sacred sites or resources documented to be of specific Native American origin.

Documentation of the NAHC SLF search results for both the Norco College Solar Site and the MVC Solar Site are provided in Appendix C.

Assembly Bill 52

The proposed Project is subject to compliance with AB 52 (PRC 21074), which requires consideration of impacts to TCRs as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives that have requested notification who are traditionally or culturally affiliated with the geographic area of the proposed Project site. Native American consultation completed to date has identified at named village locations and traditional landscapes intersecting and surrounding both the Norco College campus and the MVC campus. All records of correspondence related to AB 52 notification and any subsequent consultation are on file with the District. A summary of the consultation record is provided and addressed in the Initial Study/Mitigated Negative Declaration document for the proposed Project.

Field Survey

Methods

Norco College Solar Site

Dudek Cultural Specialist, Adriane Gusick, conducted a pedestrian survey of the Norco College Solar Site on August 25, 2021, specifically the locations of the proposed BESS and PV solar array. Dudek Cultural Specialists, Linda Kry and Lanette Renz, conducted a supplemental survey of the Norco College Solar Site on September 28, 2022 focusing on the limits of the possible new underground line that extends from the proposed PV solar array to the existing 12 kV underground line and BESS.

Given present site conditions within the work areas for the Norco College Solar Site, survey techniques were adjusted to accommodate for variations in level of development, ground surface visibility, and terrain. An opportunistic survey approach was employed in areas with dense vegetation cover and low visibility, which involved meandering through vegetation, and inspecting areas of cut banks when possible, including atop and along the hill to the southwest of the proposed PV solar array work area. An intensive-level survey was conducted within areas of good to excellent visibility resulting from recent plowing for weed abatement areas and where informal dirt access roads are present. The intensive-level survey entailed walking parallel transects spaced no more than 10 to 15 meters apart (approximately 32 to 50 feet) where feasible, within the limits of the proposed work areas.

Throughout the extent of the Norco College Solar Site, the ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historic-period artifacts (e.g., metal, glass, ceramics,

building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. Particular attention was given to examining all bedrock outcrops present within the proposed work areas for signs of prehistoric milling activities. Location-specific photographs were taken using an Apple 3rd Generation iPad equipped with 8-megapixel resolution and georeferenced PDF maps of the Norco College Solar Site. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California, office.

MVC Solar Site

Dudek Cultural Specialist, Adriane Gusick, conducted a pedestrian survey of the MVC Solar Site on August 25, 2021, specifically the locations of the proposed BESS and PV solar array. Dudek Cultural Specialists, Linda Kry and Lanette Renz, conducted a supplemental survey of the MVC Solar Site on September 28, 2022 focusing on the limits of the possible new underground line that extends from the proposed PV solar array to the existing 12 kV underground line and BESS.

Given present site conditions within the work areas for the MVC Solar Site, survey techniques were adjusted to accommodate for variations in level of development, ground surface visibility, and terrain. An opportunistic survey approach was employed in areas with dense vegetation cover and low visibility, which involved meandering through vegetation, and inspecting areas of cut banks when possible. An intensive-level survey was conducted within areas of moderate to excellent visibility resulting from landscaping activities, grading work as evidenced by the presence of push piles, weed abatement, mechanically sloped terraces, informal dirt access roads, and pedestrian trails that meander within the vacant and undeveloped areas. The intensive-level survey entailed walking parallel transects spaced no more than 10 meters apart (approximately 32 feet) where feasible, within the limits of the proposed work areas.

Throughout the extent of the MVC Solar Site, the ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historic-period artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. Particular attention was given to examining all bedrock outcrops, if present within the proposed work areas, for signs of prehistoric milling activities. Location-specific photographs were taken using an Apple 3rd Generation iPad equipped with 8-megapixel resolution and georeferenced PDF maps of the MVC Solar Site. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California, office.

Results

Norco College Solar Site

The Norco College Solar Site work areas are within disturbed and mostly undeveloped land. The following provides a brief summary of the results of the pedestrian survey within each specific work area:

BESS, AC Conduit, EV Charger/Solar Switchboard Work Areas. These work areas are within developed settings, such as paved parking lots, including a paved parking lot within the Central Plants facility (Image 1), extant campus buildings/structures, as well paved walkways/roadways and landscaped areas. As such, ground surface visibility in these areas non-existent to poor (0 to less than 20 percent). Given that no cultural resources survey was able to be conducted within these work areas, results of the pedestrian survey are considered inconclusive for archaeological resources.

Image 1. View of BESS Work Area, looking northwest (IMG_2275)

PV Solar Array Work Area. This work area is comprised of a hillside that gradually raises in elevation to the north. This portion of vacant, cultivated land is bound by the naval base to the north and west, by commercial, residential, and educational buildings to the east, and continued open space to the south. The parcel is fenced on all sides except the southern perimeter. An approximately 60-foot-wide strip of recently plowed earth comprises the eastern perimeter of the work area. This recent plowing allowed for excellent (100 percent) ground surface visibility in this area. However, the majority of the work area was covered in dense knee-high grasses that obscured the ground surface and provided poor visibility (0 percent). Clusters of low-lying bedrock outcrops were identified at the apex of the hill. Those that were visible through the vegetation cover were inspected for the presence of prehistoric milling. However, numerous outcrops were completely covered by grasses and were thus not able to be inspected. No cultural material was identified in this work area as a result of the pedestrian survey. However, given the poor visibility throughout the majority of the work area, the results of the survey are considered inconclusive for

archaeological resources. Image 2 below shows the current site conditions within the proposed PV solar array work area.

Image 2. View of PV Solar Array Work Area, looking southeast (IMG_2332)

New 12 kV Underground Line. This work area is comprised of relatively flat, vacant, cultivated land with the exception of the north-facing slope to the south, south-facing slope to the north, and a hill to the southwest of the proposed PV solar array work area. As currently proposed, the new 12 kV underground line would extend from the southwest corner of the PV solar array work area, travel southwest and turn slightly south, skirting around the extant hill, as it travels to connect with the existing 12 kV underground line at the northwestern border of the Norco College campus. In an effort to capture the limits of all other possible routes of the new 12 kV underground line, the areas outside of this presently proposed alignment within this work area were also surveyed. This included the areas immediately west and south of the proposed PV solar array work area and limited to the undeveloped areas bordered to the east and south by commercial, residential, and educational buildings. With respect to the hill located approximately 200 feet southwest of the PV solar array, a few factors were considered as part of the field survey methodology. For instance, ground disturbing activities for the proposed Project is anticipated to be between 4 to 8 feet below existing ground surface. The extant hill, at its highest point is at an elevation of 740 feet AMSL. Therefore, the probability of the Project design to include trenching for the installation of the proposed new 12 kV underground line from the location of the PV solar array through or over the extant hill to the existing 12 kV underground line is low, while the route to skirt the base of the extant hill on its western or eastern borders presents less of a constraint for Project logistics. Therefore, an opportunistic survey of the extant hill was conducted, which involved inspecting the rocks scattered across the hilltop for evidence of prehistoric milling (Image 3). Overall, ground surface visibility within this work area was variable. The currently proposed route of the new 12 kV underground line exhibits extensive ground disturbance as evidenced by the presence of an informal dirt roads, weed abatement activities, mechanical sloping of the hilly terrain, including evidence of plowing and tilling, all of which provided for excellent visibility (100 percent). The other areas surveyed was covered in dense vegetation, including grasses, weeds, and bushes and therefore, presented non-existent to fair visibility (0 to 30 percent). No

cultural material was identified in this work area as a result of the pedestrian surveys. Images 4 through 9 shows the current site conditions of the currently proposed alignment for the new 12 kV underground line, including areas outside of this presently proposed alignment within this work area.

Image 3. Inspecting rocks atop hill southwest of PV Solar Array Work Area, looking north (IMG_0663)

Image 4. View of New 12 kV Underground Line Work Area, looking north (IMG_0657)

Image 5. View of New 12 kV Underground Line Work Area, looking northeast towards the PV Solar Array Work Area (IMG_0656)

Image 6. View of area south of PV Solar Array Work Area, looking south (IMG_0670)

Image 7. View of area south of PV Solar Array Work Area, looking southwest (IMG_0671)

Image 8. View of area south of PV Solar Array Work Area, looking west towards hill (IMG_0672)

Image 9. View of area where route of New 12 kV Underground line would exit the vacant/undeveloped area towards the campus, looking south/southwest (IMG_0679)

Overall, native soils observed were consistent with the USDA's description of soils in work areas as discussed in the environmental setting and review of soils section of this report.

MVC Solar Site

The MVC Solar Site work areas are within disturbed and undeveloped land. The following provides a brief summary of the results of the pedestrian survey within each specific work area:

BESS, AC Conduit, EV Charger/Solar Switchboard Work Areas. BESS work area is comprised of a flat, disturbed area adjacent to MVC campus infrastructure and facilities. Ground surface visibility was non-existent to poor (0 to 25 percent) due to dense duff produced by pine trees that flank the work area. Inspecting the ground surface required the use of boot scrapes employed in approximately 10-foot increments. Additionally, three cargo containers occupied a majority of the BESS work area. Nevertheless, visible portions of the ground surface indicate that the BESS work area is entirely disturbed through grading activities, landscaping, buried utilities, and the construction of the campus facilities. The remainder of the work areas, including where the proposed new 12 kV underground line connects to the existing 12 kV underground line, AC conduits, EV Charger/Solar switchboard work areas are within paved parking lots and roadways, including sidewalks, extant buildings/structures, landscape areas, and areas of subjected to substantial grading activities. As such, ground surface visibility in these areas was variable and ranged from non-existent to poor (0 to less than 20 percent) in developed settings and excellent (100 percent)

within the undeveloped areas. No cultural material was identified in this work area as a result of the pedestrian survey. Image 10 below shows the current MVC Solar Site conditions within the BESS work area.

Image 10. View of BESS Work Area, looking north (IMG_2133)

PV Solar Array Work Area. This work area is comprised of a once small, mounded hill that has been cut and mechanically shaped into a pad. Ground surface visibility was considered good to excellent (75 percent to 100 percent) given the low to moderate density of knee-high ruderal vegetation. The entire PV solar array work area is disturbed. Native surface soils were removed during construction of the pad. Additional disturbances include scarring from heavy machinery, multiple informal roads, and walking trails. A portion of the western half of the work area was covered in protective fencing due to undermining and deep erosional cuts caused by a storm water event. The erosional cut provided an opportunity to assess approximately seven feet of stratigraphy. Heavily disturbed alluvium was noted throughout as was plastic refuse approximately 4 feet bgs. No cultural material was identified in this work area as a result of the pedestrian survey. Image 11 below shows the current MVC Solar Site conditions within proposed PV solar array work area.

Image 11. View of PV Solar Array Work Area, looking northeast (IMG_2095)

New 12 kV Underground Line. This work area is comprised of a range of topography, including relatively flat, vacant, landscaped and graded areas to areas that increases with elevation along the southern base of the Mount Russell Hills. As currently proposed, the new 12 kV underground line would extend from the northwest corner of the PV solar array work area, travel west and upturns northwest to connect with the existing 12 kV underground line along the northeastern border of the MVC campus. In an effort to capture the limits of all other possible routes of the new 12 kV underground line, the areas outside of this presently proposed alignment within this work area was also surveyed. This included the areas immediately north, northwest, and west of the proposed PV solar array work area, including the base of the Mount Russell Hills to the north and undeveloped areas and graded areas to the west/southwest. Disturbances observed within this survey area consisted of landscaped areas and areas subjected to substantial grading activities. Also observed along the base of the slope of the Mount Russell Hills are several pedestrian trails, informal dirt roads, mechanical slope work, and the placement of rip rap for retention of the slope as well as a concrete-lined water diversion channel. Based on present site conditions, including dense vegetation comprised of grasses, weeds, and bushes, ground surface visibility was variable. In areas of development, including paved lots and walkways, extant buildings/structures, and landscaped areas, ground surface visibility was non-existent to poor (0 to 20 percent). Whereas the undeveloped areas with dense vegetation, trails, informal dirt roads, graded areas provided for poor to excellent ground surface visibility (20 to 100 percent). No cultural material was identified in this work area as a result of the pedestrian surveys. Images 12 through 14 shows the current site conditions of the new 12 kV underground line work area.

Image 12. View of New 12 kV Underground Line where it connects to the Existing 12 kV Underground Line Work Area, looking east/northeast (IMG_0688)

Image 13. View of concrete-lined water diversion channel within the New 12 kV Underground Line Work Area, looking west (IMG-0698)

Image 14. View of the New 12 kV Underground Line Work Area, looking north towards the Mount Russell Hills (IMG-0702)

Overall, native soils observed were consistent with the USDA's description of soils in work areas as discussed in the environmental setting and review of soils section of this report.

Sensitivity Analysis

Archaeological Sensitivity

Norco College Solar Site

The archaeological resources study revealed that the potential for unrecorded cultural resources to exist within the Norco College Solar Site is considered low based on the following factors: 1) though the topography and natural features that surround the Norco College Solar Site are conducive to supporting prehistoric occupation, archival review and existing Norco College Solar Site conditions determined that the Norco College Solar Site has been routinely disturbed since at least the mid twentieth century; 2) although the data provided by the CHRIS records search indicates that the surrounding area is sensitive for the presence of prehistoric archaeological sites, the previously recorded resources primarily consist of bedrock milling stations with no associated midden or artifacts; 3) it is unlikely that such sites would be encountered within the Norco College Solar Site as the few existing outcrops within the work areas that were examined during the pedestrian survey were found to be without evidence of milling; 4) results of the study indicate that no built environment structures or buildings occupied any of the work areas since at least the mid-twentieth century, suggesting that the possibility of buried historic-age archaeological deposits associated with once extant structures is considered low; and 5) no cultural material was identified within

the Norco College Solar Site as a result of the pedestrian survey. Given these factors, the Norco College Solar Site is considered low sensitivity for the presence of cultural resources.

MVC Solar Site

The archaeological resources study revealed that the potential for unrecorded archaeological resources to exist within the MVC Solar Site is considered low based on the following factors: 1) though the topography and natural features that surround the MVC Solar Site are conducive to supporting prehistoric occupation, archival review and existing MVC Solar Site conditions determined that the MVC Solar Site has been routinely disturbed by grading activities since at least the mid-twentieth century; 2) although the data provided by the CHRIS records search indicates that the surrounding Mount Russell Hills are highly sensitive for the presence of prehistoric archaeological sites, the previously recorded resources are a singular site type consisting of bedrock milling stations with no associated midden or artifacts; 3) it is unlikely that such sites would be encountered within the MVC Solar Site as there are no bedrock outcrops within the work areas; 4) additionally, no previously recorded historic-age archaeological sites are documented within 1-mile of the MVC Solar Site, nor was any evidence of historic-age built environment structures or buildings identified within the MVC Solar Site during archival review that would suggest the possibility of buried historic-age archaeological deposits; and 5) no cultural material was identified within the MVC Solar Site as a result of the pedestrian survey. Given these factors, the MVC Solar Site is considered low sensitivity for the presence of cultural resources. The likelihood of encountering intact deposits during ground disturbing activities is considered low due to the disturbed nature of the MVC Solar Site.

Management Recommendations

Although the CHRIS records search results indicate that the areas surrounding the proposed Project site (inclusive of both the Norco College Solar Site and MVC Solar Site) are highly sensitive for the presence of prehistoric archaeological sites, the previously recorded resources are a singular site type consisting of bedrock milling stations with no associated midden or artifacts. Moreover, it is unlikely that such sites would be encountered within the proposed Project site as there are no bedrock outcrops within the work areas. However, although the potential to encounter subsurface intact deposits to exist within native soils to the depths of proposed ground disturbance (between 4 and 8 feet bgs) is considered low, there is a possibility for archaeological resources to be encountered during Project implementation. For these reasons, the proposed Project site should be treated as potentially sensitive for archaeological resources. In the event that unanticipated archaeological resources are encountered during Project implementation, impacts to these resources would be potentially significant.

Project-specific mitigation is included in the MND, a brief summary of which is included here. **MM-CUL-1** requires that all Project construction personnel participate in a Workers Environmental Awareness Program training for the proper identification and treatment of inadvertent discoveries. **MM-CUL-2** requires the retention of an on-call qualified archaeologist to conduct spot monitoring and respond to and address any inadvertent discoveries. **MM-CUL-3** requires construction work occurring within 100 feet of an inadvertent cultural resource discovery be immediately halted until the qualified archaeologist and representatives of traditionally culturally affiliated consulting tribes have been contacted. The qualified archaeologist will inspect the find and, in consultation with the consulting tribal representatives, will provide an initial assessment and management recommendations. The lead agency will weigh recommended management strategies and provide the final determination with regard to resources treatment.

In addition, mitigation required to address impacts related to the inadvertent discovery of human remains have been provided in **MM-CUL-4** and **MM-CUL-5**. Mitigation is inclusive of all comments provided by consulting tribes and is in compliance with appropriate regulations. With implementation of these measures, significant impacts to cultural and tribal cultural resources and human remains would be reduced to **less than significant with mitigation incorporated**.

Should you have any questions relating to this report and its findings, please do not hesitate to contact us.

Sincerely,

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Att: *Appendix A: Figures*
Appendix B. (Confidential) EIC Records Search Results
Appendix *C. NAHC SLF Search Results*

cc: *Rachel Struglia, Laura Masterson, Dudek*

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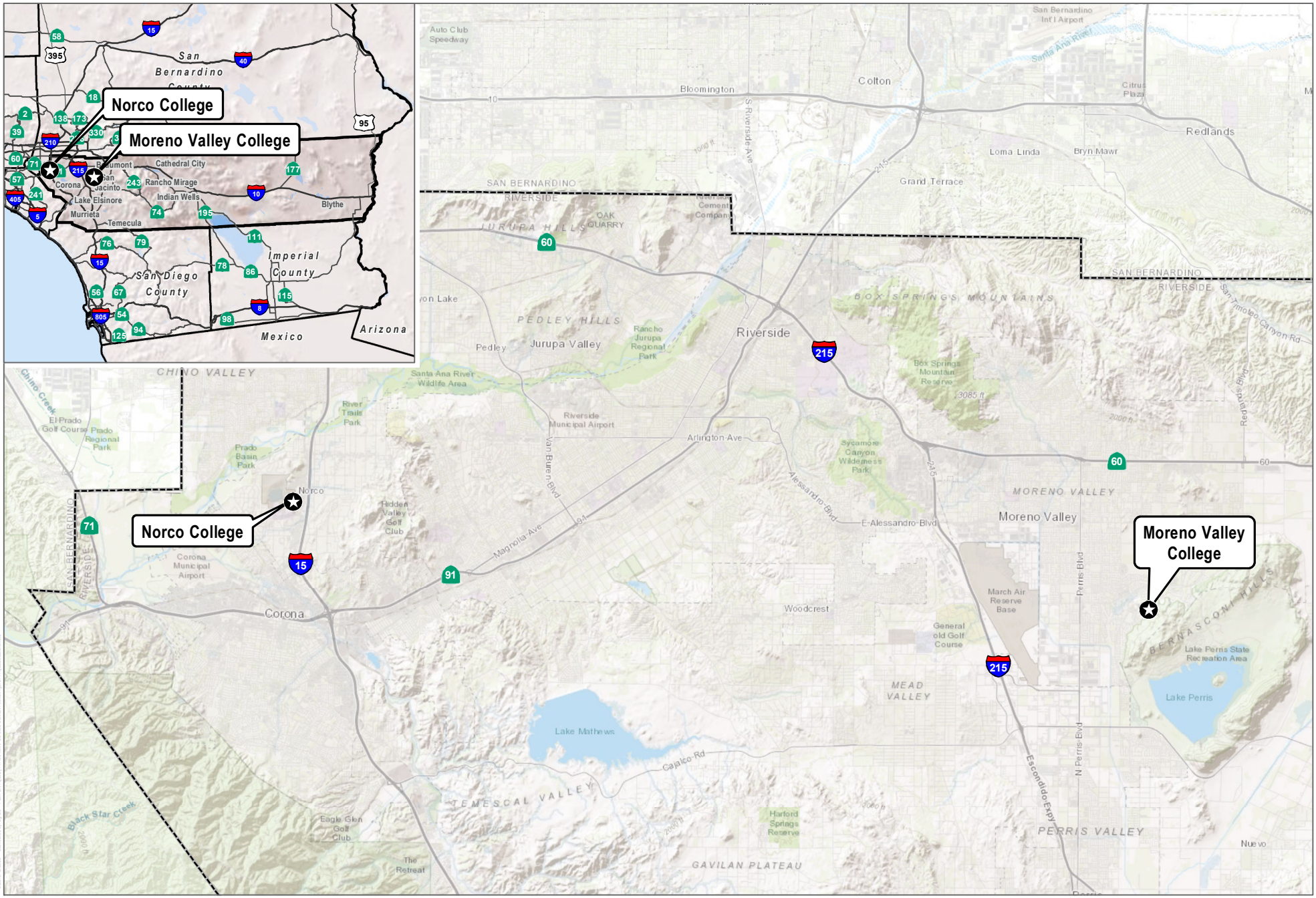
Appendix A
Figures



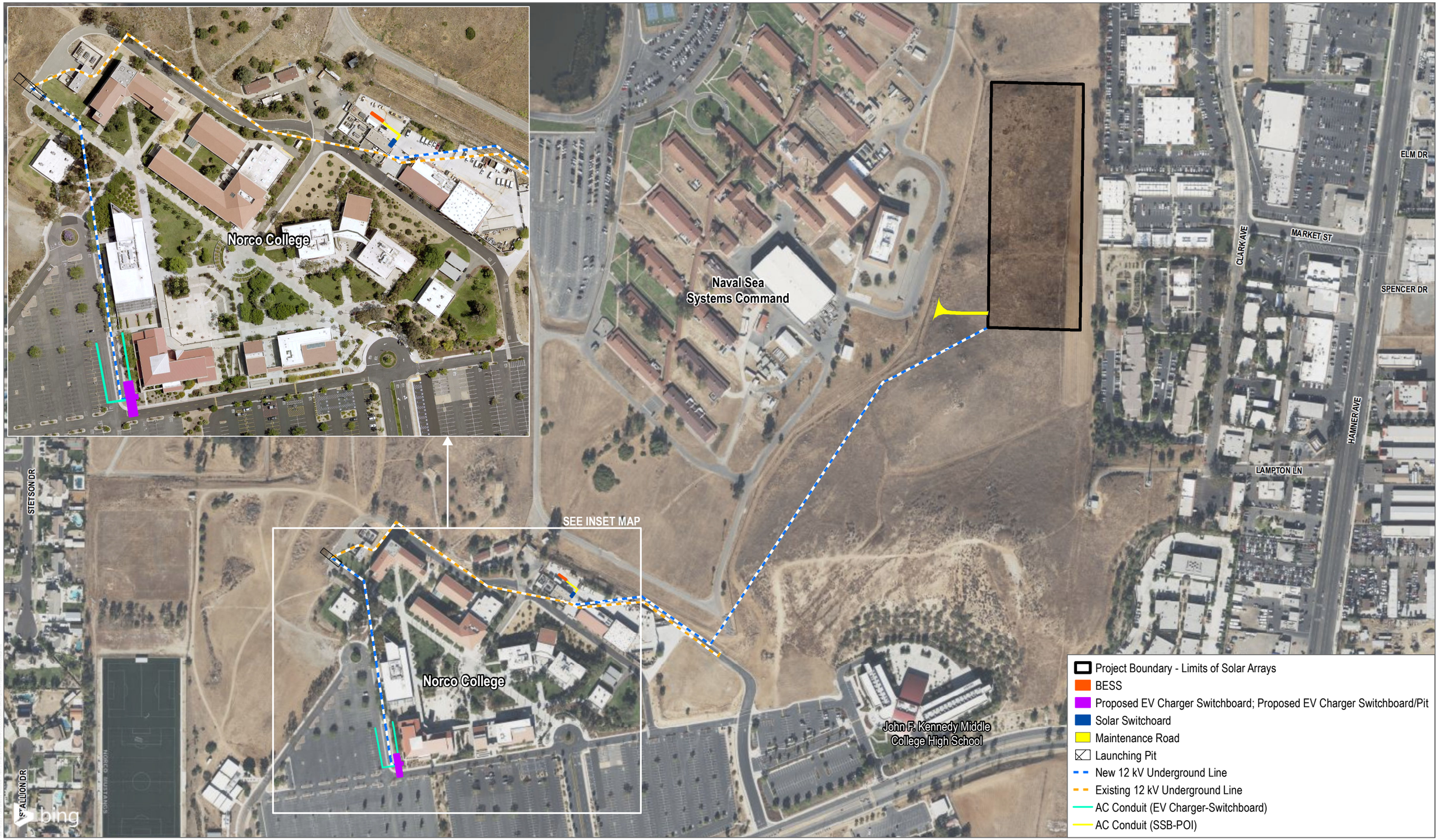
SOURCE: Riversdie County 2022; ESRI World Topographic Map

DUDEK

FIGURE 1

Project Locations

Riverside Community College District Solar Plan MND



SOURCE: SUNPOWER 2021; Riverside County 2020, 2022; Bing Maps

DUDEK

0 150 300 Feet

FIGURE 2A

Project Site - Norco College

Riverside Community College District Solar Plan MND

SOURCE: SUNPOWER 2021; Riverside County 2022; Bing Maps

DUDEK

0 100 200 Feet

FIGURE 2B

Project Site - Moreno Valley College

Riverside Community College District Solar Plan MND

Appendix B (Confidential)

EIC Records Search Results

Appendix C
NAHC SLF Search Results

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

June 16, 2022

Heather McDaniel McDevitt
DUDEK

Via Email to: karchipov@dudek.com

Re: RCCD Solar Plan MND – Norco College (PN 14415) Project, Riverside County

Dear Ms. McDevitt:

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 positive. Please contact the tribes on the attached list for more information. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed 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 or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

June 16, 2022

Heather McDaniel McDevitt
DUDEK

Via Email to: karchipov@dudek.com

Re: RCCD Solar Plan MND – Moreno Valley College (PN 14415) Project, Riverside County

Dear Ms. McDevitt:

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 indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed 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 or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment