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Updated Phase I and Phase II Cultural Resources Assessment for the Arroyo Vista Project, Unincorporated Riverside County, California

U.S. Geological Survey 7.5-minute Quadrangles: Riverside East (1967 photorevised 1979)

Parcel Information: APNs 245-300-001, 245-300-004

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Results: Testing at six sites yielded negligible data; not eligible for inclusion in NRHP/CRHR

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MANAGEMENT SUMMARY

a) Purpose of Investigation

TTLIC Riverside Chicago, LLC proposes to develop the Arroyo Vista Project on two parcels located at Chicago Avenue in Riverside County, near the community of Woodcrest. In 2015, First Carbon Solutions (FCS) conducted a Phase I Cultural Resources Assessment in support of the Project. The 2015 FCS report summarizes the results of the Phase I study that covered 120 acres of the current Project Area. ECORP Consulting, Inc. conducted an update to the Phase I study in 2022 to include an additional 20 acres added to the Project Area since the original study, fill data gaps in the original study, and to present data consistent with Riverside County standards. The Assessor's Parcel Numbers (APN) for the two properties included in the Project Area are 245-300-001 and 245-300-004. The total Project Area contains 140 acres of land.

On April 27, 2022, ECORP Consulting, Inc. submitted an updated Phase 1 cultural resources inventory report to the County that included a recommendation for Phase II testing at sites P-33-012915/CA-RIV-7181, P-33-012916/CA-RIV-7182, P-33-012917/CA-RIV-7183, P-33-012918/CA-RIV-7184, CA-001, and CA-002. Under a County-approved testing plan, ECORP implemented the Phase II study in December 2022 to determine if there are intact archaeological deposits present that could, upon further examination, produce data that satisfy the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) criteria. Because preservation in place is the preferred treatment of pre-contact archaeological sites, the fieldwork focused on establishing the site boundaries.

Subsequently, field visits with culturally affiliated tribes identified additional features. This Phase II testing report has been updated to include all features identified to date.

b) Major Findings

Testing at these sites was carried out from December 7 to 21, 2022. Very little archaeological data was observed during testing.

c) Summary of Significance

The results of the testing indicate that sites P-33-012915/CA-RIV-7181, P-33-012916/CA-RIV-7182 are eligible for listing in the NRHP and CRHR. Sites P-33-012917/CA-RIV-7183, P-33-012918/CA-RIV-7184, CA-001, and CA-002 are not eligible. Whether or not any of the non-eligible sites are significant as tribal cultural resources is addressed separately by the County through tribal consultation.

d) Summary of Recommendations

Avoidance and preservation in place are recommended for the two eligible sites plus the bedrock features for the non-eligible sites. If avoidance is not feasible for part or all of these, then data recovery or relocation would be necessary. For sites preserved in place, temporary construction fencing, controlled grading, and deed restrictions are recommended. Construction-related measures such as worker awareness training, tribal monitoring during construction, and repatriation and reburial procedures, are also recommended.

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LIST OF ACRONYMS AND ABBREVIATIONS

Term	Definition
AB	Assembly Bill
APN	Assessor Parcel Number
BERD	Built Environment Resource Directory
BP	Before present
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
COA	County Condition of Approval
CRHR	California Register of Historical Resources
DPR	Department of Parks and Recreation
ECORP	ECORP Consulting, Inc.
EIC	Eastern Information Center
FCS	First Carbon Solutions
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PRC	Public Resources Code
RPA	Registered Professional Archaeologist
SB	Senate Bill
U.S.	United States of America
UCSB	University of California, Santa Barbara
USGS	U.S. Geological Survey

I. INTRODUCTION AND SETTING

a) Project Description

The Arroyo Vista Project is located on parcels APN 245-300-001 and 245-300-004 at Chicago Avenue in Riverside County, near the unincorporated community of Woodcrest. TTLC Riverside Chicago, LLC proposes to construct a residential development on approximately 140 acres. The proposed project includes the construction of single-family residential lots, open space and preserve areas, trails, parks, water quality basins, and associated infrastructure such as roads, sidewalks, water and sewer lines, and utilities.

Project construction will entail grubbing, clearing, grading, trenching, and excavation in the development footprint. The exceptions include the open space channel that is oriented northwest to southeast through the approximate center of the project area – this area will remain largely untouched.

b) Project Location

The Project Area is located within the unincorporated Woodcrest area of Riverside County, south of Twin Lakes Drive, north of Iris Avenue, west of Chicago Avenue, and east of an unnamed, unpaved road connecting Iris Avenue to Ridge Canyon Drive. A regional overview map is provided in Appendix A.

c) USGS Quad Location

As shown on the U.S. Geological Survey (USGS) 7.5-minute Riverside East, California topographic quadrangle map (1967, photorevised 1980), the Project Area is in Section 24 of Township 3 South, Range 5 West of the San Bernardino Base and Meridian. The location is shown in the maps in Appendix A.

d) Field Personnel

Field personnel consisted of ECORP Consulting, Inc. archaeologists Robert Cunningham (Field Director), Evelyn Hildebrand, RPA, Casey LeJeune, RPA, Sonia Sifuentes, RPA, William Gillean, and Steve Wintergerst. Lisa Westwood, RPA served as principal investigator. Fieldwork was monitored by tribal representatives from the Soboba Band of Luiseno Indians and the Pechanga Band of Luiseno Indians.

Robert Cunningham has 17 years of experience in cultural resources management, with an emphasis on the recording, analysis, and evaluation of historic-period resources. He has participated in all aspects of archaeological fieldwork, including survey, test excavation, and construction monitoring. He has served as Field Director for archaeological inventories and site evaluation projects and has worked on San Diego County projects under ECORP's blanket purchase order since 2010. He has recorded and mapped numerous pre-contact and historic-period archaeological sites and has identified and documented hundreds of pre-contact and historic artifacts. Mr. Cunningham has prepared numerous archaeological site records and has authored and contributed to a variety of cultural resources technical reports.

Evelyn Hildebrand, M.A., RPA, is an Associate Archaeologist with over five years of experience working in cultural resource management across California. She holds an M.A. in Applied Archaeology and a B.A. in Anthropology with a focused curriculum in archaeology. She meets the Secretary of the Interior's Professional Qualifications Standards for pre-contact and historic archaeology. She has participated in various aspects of archaeological fieldwork including survey, test excavation, data recovery, artifact analysis, construction monitoring, both as an archaeological monitor and field lead, and the recording and recovery of pre-contact and historic-period

archaeological sites. She has also worked with Egypt's Department of Antiquities in collaboration with the Wadi el-Hudi expedition in 2019 in the desert southeast of Aswan, Egypt, using photogrammetry to record and create digital 3D models of endangered Middle Kingdom mining sites.

Casey LeJeune, RPA is a Staff Archaeologist who has worked in cultural resource management since 2020, with experience in the southeast, the southwest, and southern California. She holds an M.A. in Anthropology, with focus in forensic anthropology and bioarchaeology. She meets the Secretary of the Interior's Professional Qualifications Standards for pre-contact and historic archaeology. She has participated in fieldwork on forensic and historic burials, survey, large-scale data recovery, monitoring, and in-field lithic analysis. Ms. LeJeune also has extensive labwork in human osteology and analysis of historic and pre-contact artifacts.

Sonia Sifuentes, RPA is a Senior Archaeologist at ECORP and has more than 15 years of experience in cultural resources management, primarily in southern California. Ms. Sifuentes holds a M.S. in Archaeology of the North. She has participated in and supervised numerous surveys, test programs, and data recovery excavations for both pre-contact and historical sites; and has cataloged, identified, and curated thousands of artifacts. She has conducted evaluations of cultural resources for eligibility for the NRHP and CRHR. Ms. Sifuentes is experienced in the organization and execution of field projects in compliance with Section 106 of the NHPA and CEQA. She has contributed to and authored numerous cultural resources technical reports, research designs, and cultural resources management plans.

William Gillean is an on-call archaeologist with ECORP. Mr. Gillean has over 15 years of experience in cultural resource management (CRM) and extensive experience working on projects requiring inventory, testing, and data recovery efforts. He has performed field work throughout Riverside, San Bernardino, Los Angeles, Inyo, Imperial and San Diego Counties, including projects in the Mojave, and Colorado Deserts, the San Joaquin Valley, and throughout the San Bernardino National Forest. He has worked for several federal and state government agencies and has completed work on various military installations in California and Arizona. Mr. Gillean has monitored for cultural resources during project implementation and worked on various projects involving recording of historical-period sites as well as authoring or contributing to numerous technical reports. Mr. Gillean holds a Bachelor's of Science degree from Cal Poly, Pomona.

Steven Wintergerst is an Associate Archaeologist with 11 years of experience in cultural resources management. He holds a B.A. in Anthropology. Mr. Wintergerst has participated in all aspects of archaeological fieldwork and laboratory process, with extensive experience throughout California and western Arizona. His experience has involved working as an archaeological crew chief, archaeological technician, archaeological monitor, paleontological monitor, and paleontological preparator. He is experienced in the organization and execution of field projects in compliance with CEQA and Section 106 of the NHPA.

Principal Investigator Lisa Westwood, RPA has 30 years of experience and meets the Secretary of the Interior's Professional Qualifications Standards for pre-contact and historical archaeology. She holds a B.A. in Anthropology and an M.A. in Anthropology (Archaeology). She is the Director of Cultural Resources for ECORP.

e) Previous Work from Phase I Survey

In 2015, First Carbon Solutions (FCS) conducted a Phase I Cultural Resources Assessment in support of the Riverside Chicago Avenue Project (Project). The FCS 2015 report summarizes the results of the Phase I study that covered 120 acres of the current Project Area. ECORP Consulting, Inc. conducted an update to the 2015 Phase I study in 2022. The purpose of the update was to include an additional 20 acres added to the Project Area since

the original study, cover lapses in the original study, and to present data consistent with Riverside County standards. Between December and April 2021, ECORP requested a cultural resources records search from the Eastern Information Center (EIC; University of California, Riverside), requested a search of the Sacred Lands File from the Native American Heritage Commission (NAHC), and conducted a field visit and a second intensive systematic pedestrian survey of the additional 20 acres.

The updated records search indicated that 55 cultural resources investigations have been conducted within the 1-mile records search radius between 1974 and 2016. Of these studies, two investigations overlapped the Project Area, covering more than 95 percent of the area. The records search also showed that four cultural resources have been recorded within or adjacent to the Project Area. One hundred and five previously recorded cultural resources are located within 1 mile of the Project Area.

The results of the Sacred Lands File search by the NAHC did not indicate the presence of Native American sacred lands within the vicinity of the Project Area. In addition to the search of the Sacred Lands File, the NAHC identified 21 Native American groups and individuals with historical and traditional ties to the Project Area.

ECORP conducted field visits in February and April 2022 to document ground conditions and to revisit four previously recorded sites. During the field visits, ECORP confirmed the presence of the four previously recorded resources and updated site boundaries. Previously recorded sites consisted of four bedrock milling sites: P-33-012915, P-33-012916, P-33-012917, and P-33-012918.

In March 2022, ECORP conducted an intensive pedestrian survey of the 20-acre addition to the Project Area. As a result of the 20-acre survey, ECORP identified two newly recorded resources. The two newly recorded resources consist of two bedrock milling feature sites: CA-001 and CA-002. Surface visibility during the survey ranged from fair (60 percent) to poor (10 percent) throughout the entire Project Area. Due to poor ground visibility, there exists the potential for additional resources to be present within the Project Area; however, due to the past agricultural use of the property, in-situ cultural deposits are unlikely.

In 2024, ECORP, the County, and representatives from Pechanga Band of Indians and Soboba Band participated in field visits. As a result, additional features were identified, including temporary field numbers CAR-04, CAR-05, CAR-08, CAR-09, CAR-10, CAR-11, CAR-12, and CAR-13-I.

ECORP recommended that all known sites be avoided and preserved in place. If avoidance is not possible, ECORP recommended additional Phase II studies be conducted for resources that will be impacted by Project activities. Subsequently, the County requested a Phase II work plan, which was developed in consultation with culturally affiliated tribes and approved by the County in November 2022. The current Phase II report documents the methods and results of the Phase II study and was updated in 2024 to add the resources observed during the tribal visits.

f) Topographic Description and Elevation

The Project Area is in western Riverside County, near the unincorporated community of Woodcrest, approximately 7.39 miles east of the City of Norco, 5.09 miles northwest of the City of Perris, and 0.5 mile south of the City of Riverside. The Project Area is situated at an elevation 1,403 feet above mean sea level in the Mead Valley, located east of the Santa Ana Mountains and west of the San Jacinto Mountains in Southern California. The San Bernardino Mountains are to the north. Local topography is undulating terrain crossed by seasonal arroyos. The

climate of the Project Area is somewhat comparable to the high deserts of Southern California, though with a more moderate coastal temperature range than the inland deserts.

g) Disturbance and Present Land Use

The eastern portion of the Project Area is a former orchard, and the western portion is undeveloped grassland. Historic aerial photographs show that the eastern portion of the Project Area was undeveloped land from 1931 to 1962 prior to being utilized for agriculture. In aerial photographs from 1962, a house and two additional built structures are visible within the Project Area, and the southern portion of the Project Area has been planted for orchards (NETROnline 2022; UCSB Library 2022). Since 2018, the last year for which aerial photographs of the Project Area are available, the orchards and irrigation features have been removed and the ground surface is covered in a dense layer of wood chips. The western undeveloped portion of the Project Area has been disturbed by Off-Highway Vehicle (OHV) activity and modern dumping.

Surrounding parcels are utilized for residential, small-scale agricultural use, and recreational purposes with notable increases in residential development since the late 1970s. Some of the adjacent land still sits vacant. Investment in community-oriented projects is evident in the presence of Martin Luther King High School, John F. Kennedy Elementary School, and Orange Terrace Park to the east of the Project Area.

The orchard referenced above was present at the time of the FCS survey in 2015 but had been removed before ECORP's 2022 updated Phase I survey. As a result of the removal of the orchard, field crews had better ground surface visibility with which to confirm and record sites.

h) Vegetation

Vegetation within the Project Area consisted of low-lying invasive grasses in formal agricultural areas, and dense and tall vegetation along drainages and fence lines. Much of the property has undergone decades of extensive agricultural use. The Project Area contains non-native grassland characterized by Russian thistle and other non-native grasses and scrub.

i) Geology

Local geology can be characterized as cretaceous period plutonic rocks of peninsular ranges (qdi) composed of quartz diorite (Dibblee 2003). Surface sediments within the Project Area are mainly composed of sandy loam alfisols, entisols, and inceptisols resulting from granite-derived alluvium. Base landforms are characterized as alluvial fans and rocky outcrops. Most of the Project Area contains three soil types: Fallbrook sandy loam coarse sandy loam with 8 to 15 percent slopes, Vista coarse sandy loam with 8 to 15 percent slopes, and Cieneba rocky sandy loam with 15 to 50 percent slopes. Other soil types that overlap the Project Area include Cieneba sandy loam, Bonsall fine sandy loam, and Handord coarse sandy loam (Soilweb 2022).

II. PRE-CONTACT CONTEXT

The pre-contact context of the Project Area is provided in summary form below. The full context is provided in the FCS 2015 report and ECORP 2022 Updated Phase I report, which are hereby incorporated by reference.

The first inhabitants of Southern California from 12,000 to 10,000 years before present were big game hunters and gatherers exploiting extinct species of Pleistocene megafauna (e.g., mammoth and other Rancholabrean fauna). Local "fluted point" assemblages composed of large spear points or knives are stylistically and technologically

similar to the Clovis Paleo-Indian cultural tradition dated to this period elsewhere in North America (Moratto 1984). Archaeological evidence for this period in Southern California is limited to a few small temporary camps with fluted points found around late Pleistocene lake margins in the Mojave Desert and around Tulare Lake in the southern San Joaquin Valley (Rondeau, Cassidy, and Jones 2007).

Approximately 10,000 years ago at the beginning of the Holocene, warming temperatures and the extinction of the megafauna resulted in changing subsistence strategies with an emphasis on hunting smaller game and increasing reliance on plant gathering. Artifacts include large leaf-shaped points; leaf-shaped knives; large ovoid, domed, and rectangular end and side scrapers; engraving tools; and crescentics (Koerper, Langenwalter, and Schroth 1991).

The Encinitas Tradition (Warren 1968) and the Milling Stone Period (Wallace 1955) (8,500 to 3,500 years before present) refer to a long period of time during which small mobile bands of people who spoke an early Hokan language foraged for a wide variety of resources including hard seeds, berries, and roots/tubers (yucca in inland areas), rabbits and other small animals, and shellfish and fish in coastal areas. Residential bases have hearths and fire-affected rock indicating overnight stays and food preparation. Residential bases along the coast have large amounts of shell and are often termed shell middens. The resource acquisition locations have no evidence for overnight stays. The most common artifacts found in residential bases are manos and milling stones (metates) and large core-cobble chopping tools including hammerstones and scraper planes.

The native people of Southern California (north of a line from Agua Hedionda to Lake Henshaw in San Diego County) spoke Takic languages that form a branch or subfamily of the Uto-Aztecan language family. The Takic languages are divided into the Gabrieliño-Fernandeño language, the Serrano-Kitanemuk group (the Serrano, which includes the Vanyume dialect] and Kitanemuk languages), the Tataviam language, and the Cupan group (the Luiseño-Juaneño language, the Cahuilla Language, and the Cupeño language) (Golla 2011). According to Sutton (2009), Takic speakers occupied the southern San Joaquin Valley before 3,500 BP.

With time, mobility greatly decreased compared to the Encinitas Tradition and small groups of related people lived in semi-permanent residential bases near a water source. Subsistence changed from a mobile foraging pattern to a collector pattern (Binford 1980). People collected resources and brought them back to the residential base. People stayed overnight in temporary camps when away from the residential base.

The complex hunter-gatherer cultures encountered by the Spaniards in Southern California developed during the Late Prehistoric Period. People lived in villages of up to 250 people located near permanent water and a variety of food sources. Each village was typically located at the center of a defended territory from which resources for the group were gathered. Small groups left the village for short periods of time to hunt, fish, and gather plant foods. While away from the village, they established temporary camps and created locations where food and other materials were processed. Subsequently, the introduction of the bow and arrow made deer hunting more efficient. Acorn processing was labor intensive, requiring grinding in a mortar and leaching with water to remove tannic acid (Basgall 1987). Many of the mortars are bedrock mortars. Seeds from sage and grasses, goosefoot, and California buckwheat were collected and ground into meal with manos and metates. Seeds were used as the storable staple in areas which lacked acorn-producing oak groves. Protein was supplied through the meat of deer, rabbits, and other animals, hunted with bow and arrow or trapped using snares, nets, and deadfalls. On the coast, fish were obtained using shell fishhooks and nets.

The Project Area is located within the territory known to have been occupied by the Cahuilla group of Native Americans, and near territory occupied the Gabrieliño and Luiseño groups of Native Americans at the time of contact with Europeans, around A.D. 1769. Additional ethnohistoric context is provided in the updated Phase I report (ECORP 2022).

III. HISTORIC CONTEXT

The historic context of the Project Area is provided in summary form below. The full context is provided in the FCS 2015 report and ECORP 2022 Updated Phase I report, which are hereby incorporated by reference.

The first European to visit California was Spanish maritime explorer Juan Rodriguez Cabrillo in 1542. Cabrillo was sent north by the Viceroy of New Spain (Mexico) to look for the Northwest Passage. Cabrillo visited San Diego Bay, Catalina Island, San Pedro Bay, and the northern Channel Islands. European colonization of California began later, with the Spanish Portolá land expedition. The expedition, led by Captain Gaspar de Portolá of the Spanish army and Father Junipero Serra, a Franciscan missionary, explored the California coast from San Diego to the Monterey Bay Area in 1769. As a result of this expedition, Spanish missions to convert the native population, presidios (forts), and towns were established. The Franciscan missionary friars established 21 missions in Alta California (the area north of Baja California) beginning with Mission San Diego in 1769 and ending with the mission in Sonoma established in 1823. The purpose of the missions and presidios was to establish Spanish economic, military, political, and religious control over the Alta California territory (Castillo 1978).

After Mexico became independent from Spain in 1821, what is now California became the Mexican province of Alta California. The Mexican government closed the missions in the 1830s and former mission lands were granted to retired soldiers and other Mexican citizens for use as cattle ranches. The Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848. As a result of the treaty, Alta California became part of the United States as the territory of California. Rapid population increase occasioned by the Gold Rush of 1849 allowed California to become a state in 1850 (Cleland 1941).

In the following decades, the local citrus industry grew and agriculture was the predominant economy of the area. The Great Depression in the 1930s, however, brought hardships to the region and some farmers were forced to sell their orchards. During the U.S. involvement in World War II, the San Bernardino area was made headquarters of the Western Defense Command because of its safe distance from the threat of an aircraft carrier-based aerial attack and its status as a regional rail, highway, and communications hub (Belden 1963; Brown 1985). Following World War II, agriculture declined as industrial and suburban development increased. In the 1950s and 1960s construction of State Highways 91 and 60 through the area stimulated new housing and commercial growth, and Riverside stretched southward and northward along the freeway. By the 1980s, the expanding city limits had reached northward to the Riverside/San Bernardino County Line and agriculture had nearly disappeared (Brown 1985).

Woodcrest is a census designated place in Riverside County. Although its name comes from Woodcrest Acres, a subdivision constructed in 1924, people have claimed it is attributed to the people with variations of the surname Wood who were involved in the early history of the area. One such person was John C. Woodard, an Ohio native, who built a homestead in Woodcrest in 1884. The Woodcrest area was initially populated by dry land grain farmers in the late 19th century (Find a County n.d.). In 1894, the population had grown enough for the Riverside County Board of Supervisors to establish a school in the area, and on February 6 of that year they authorized the Oak Glen School District.

The City of Riverside, and the western county, remained the center of the navel orange business, which soared in the 1880s. As demand for citrus grew, along with the county's citrus acreage, citrus quickly became the economic base for the area. In 1893 growers formed the Southern California Fruit Exchange, a cooperative, known today as Sunkist Growers (Lee 2010).

IV. RESEARCH GOALS

The County-approved testing plan (ECORP 2022) presented several research topics, which the testing program was designed to address. These topics are summarized below; additional detail is provided in the testing plan.

The data needed to answer these questions would be found from a determination of each site's boundaries, depth, stratigraphy, integrity, contents (material culture and non-artifactual materials), spatial distribution of artifacts and faunal remains, cultural affiliation, and any chronological indicators.

a) Activities and Site Function

What activities other than acorn processing, if any, took place at the sites? Is there a full range of activities represented such as would be characteristic of a habitation site or only a limited set of activities? Is there evidence for lithic tool production and what techniques were used? Did techniques change over time? Data requirements to address these questions include tools classified functionally and debitage classified technologically. If subsurface features (hearths, ovens) are present, the type and number of features will also help address these questions.

b) Internal Site Organization

Are there distinct manufacturing, processing, or food preparation areas within the sites? Were male and female activities carried out in different areas of a site? Are distinct activity areas associated with each outcrop containing bedrock mortars or was a single activity area used by everyone using any of the bedrock mortars at the site? Data requirements include maps of the spatial distribution of tools, debitage, subsistence remains, and features. If the site is small and there are few categories that do not vary spatially, this domain cannot be addressed.

c) Subsistence Patterns

Were resources, other than acorns, brought to the sites, prepared, and consumed? Is there evidence for specialization or intensification of resource use? Specialization would be indicated by large numbers of the remains of a single species. Intensification would be indicated by reliance on resources that require greater amounts of labor to procure or process. To address questions about subsistence, a reliable sample of plant or animal subsistence remains would be necessary.

d) Technology

Technology serves as the interface between humans and nature, providing a means of extracting resources as well as manipulating the carrying capacity of environments. How technologies are organized speaks not only to the manner in which pre-contact populations manufactured and used artifacts but provides important data regarding patterns of mobility and tool recycling. As with other research themes identified for this evaluation, regional trends show important changes in technology over the last 10,000 to 12,000 years. Both flaked- and groundstone assemblages show a shift from more formalized, transported tools in the early- and mid-Holocene, to more expedient implements in late pre-contact times. Direct data needed to address such research issues will emerge from analysis of the tool assemblages collected from sites. Analytical methods must be structured to recover

appropriate information on tool lithology, morphology, mode of production, functional characteristics, levels of modification and wear, and condition at time of discard. Debitage components will be just as important as tools in indicating whether onsite or offsite reduction occurred. Contextual data require careful assessment of tool and stone distributions in the area to secure inferences regarding point-of-material origin. Finally, as with other research questions, these studies will only be as good as their spatial-temporal controls allow, dependent on assemblages from discrete, well-dated archaeological deposits. This research issue would be applicable to all site types; however, it will be most useful with the category of Temporary Camps, Lithic Scatters, and Lithic Sources/Quarries.

e) Trade Interactions

Understanding long-range trade and exchange networks is a major research domain of the region. This large research domain, which is applicable to all site types, is understood as concerning the research areas such as the change of material types over time, presence of culturally diagnostic artifacts, presence of non-local or exotic materials, and similar indicators.

f) Chronology and Temporal Patterning

Chronological controls are essential for any kind of integrative archaeological analysis. They are necessary not only to date artifacts, features, and site deposits, but also to trace regional trends in assemblage composition and pre-contact behavior. No matter how rich in artifacts or organic remains, deposits of unknown or uncertain temporal affinity will have limited interpretive value. Data needed to assess and refine chronological issues relate both to temporally indicative data and to the careful recordation of spatial-temporally intact archaeological deposits and assemblages. Exploring discrete stratigraphic and feature contexts will be key to establishing chronological control; without good context, little can be done to independently assess the placement of artifact types, reduction strategies, or raw material use profiles. This research issue would be applicable to all site types.

V. METHODS

a) General Testing Methods

In accordance with California Government Code 4216-4216.9 and California Division of Occupational Safety and Health (Cal/OSHA) Title 8, Chapter 4, Subchapter 4, Article 6, Section 1541, prior to excavation, ECORP contacted Dig Alert. On December 7, ECORP delineated the excavation location with white pin flags and contacted Dig Alert (Ticket # A223390469-00A). AT&T, SoCal Gas, Utiliquest for SCE, Western Municipal Water and Sewer, and Spectrum responded to ECORP prior to excavation and all but AT&T confirmed that there were no known underground utilities within the area being excavated. An automated response from AT&T noted the presence of switching, routing, and transmission facilities in the immediate area but a visit to the work area by AT&T personnel noted there was no conflict with our work area and AT&T facilities. The remaining service providers did not respond within the required timeframe. All subsurface testing avoided marked underground utilities.

Following utilities clearance, ECORP carried out the Phase II testing plan as approved by Riverside County. Fieldwork began on December 7, 2022 and concluded on December 21, 2022. Subsurface testing consisted of a combination of auguring and strategically placed shovel test units at or around each of the sites. The field methods were conducted with the intention to be minimally invasive and only include enough excavation needed to confirm presence or absence of cultural deposits with the goal of maximizing avoidance and preservation in place. ECORP also recognizes the effect of excavation on descendent communities and extended the opportunity

to any interested and consulting tribes to be present during the testing fieldwork. The Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians both chose to have tribal cultural resource monitors present throughout testing. Moreover, ECORP performed only in-field identification and documentation, and did not collect, analyze, or curate any observed materials. All materials were immediately returned to their place of origin before backfilling, as agreed upon by the tribes. Photographs documenting the testing program are provided in Appendix B.

b) Sampling Strategies

The testing plan proposed to place auger tests around the outside of the site boundaries to confirm or modify the original alignment of those boundaries. The plan allowed for substitution of auger tests with shovel test units, and this modification was implemented following the first day of testing upon consensus with ECORP field staff and the Native American tribal monitors in the field. Based on input from tribal representatives on site, the County directed ECORP to abandon the auguring after eight were placed and proceed exclusively with shovel test units after conducting an initial series auger tests. Shovel test units were placed around the outside of existing site boundaries in approximately equal distribution of distance. Changes in site conditions since the Project Area was last surveyed caused some unrecorded surface artifacts to be visible, and test unit locations accounted for these when they could be ascribed to an existing site.

In the case of a positive test unit, additional units were placed in five-meter increments moving away from the site boundary until they were culturally sterile. Based on the testing plan, input from tribal representatives, and findings in the field, test units were placed around each of the six sites and feature.

c) Testing Locations

The locations of test units were selected in the field based on topography and location relative to bedrock and approved by on-site tribal representatives before every unit was excavated. Table 1 summarizes the total number of units by site excavated. A map of testing locations is provided in Appendix C.

Site or Feature	Total Augers	Total Shovel Tests
P-33-12915 (CA-RIV-7181)	0	15
P-33-12916 (CA-RIV-7182)	0	14
P-33-12917 (CA-RIV-7183)	8	4
P-33-02918 (CA-RIV-7184)	0	9
CA-01	0	5
CA-02	0	9
TOTALS	8	56

d) Excavation and Screening Methods

Augers were excavated by hand and had a diameter of approximately eight inches. Shovel tests were approximately 50 cm in diameter in arbitrary 20 cm levels unless clear cultural stratigraphy was observed and

excavated. All units were hand excavated to a depth of 40 cm or until a restrictive feature such as bedrock or hardpan soil was encountered. Shovel test units which were positive for cultural material were terminated at the depth the material was found. All soils from auger and shovel test units were dry screened using 1/8-inch wire mesh screens. For each test unit, opening and closing photographs were taken, and soil characteristics were recorded for the surface and the bottom of each 20 cm level.

e) Wet Screening

Wet screening was not employed during the testing and was not required by the County-approved testing plan.

f) Scientific Sampling

Because of the use of a zero-collection policy, scientific sampling was not employed during the testing and was not required by the County-approved testing plan.

g) Laboratory Methods

Because of the use of a zero-collection policy, laboratory analysis was not employed during the testing. All cultural material located inside test units was documented in the field and then immediately reburied.

h) Curation

Because of the use of a zero-collection policy, curation was not employed during the testing.

i) Native American Consultation

The County planning department carried out tribal consultation with the Agua Caliente Band of Cahuilla Indians, Pechanga Band of Luiseno Indians, and the Soboba Band of Luiseno Indians as part of environmental review under the California Environmental Quality Act. The County sought comments from the tribes on the testing plan prior to authorizing the testing to commence. Tribal consultation by the County is ongoing.

VI. RESULTS

Section X of the County's Phase II report guidelines requires information on site boundaries, depth, age, integrity, stratigraphy, contents, and spatial distribution. This information is provided on a site-by-site basis in the following sections. DPR update forms are provided in Confidential Appendix D.

a) P-33-12915/CA-RIV-7181

This site was originally recorded by Dice and Bouscaren in 2003 and was described as [REDACTED] bedrock outcrops with [REDACTED] milling slicks on the exposed surface. As originally recorded, the site comprised [REDACTED] [REDACTED] Stone tools and lithic debitage were observed within the vicinity of the milling features. According to FCS (2015: 27), "CA-RIV-7181 underwent Phase II testing in 2004 that included a surface artifact collection as well as subsurface testing (Dice and Bouscaren 2004). Recovered materials originated from five distinct surface lithic scatters and three of the four subsurface shovel test pits. In total, approximately 150 artifacts were collected including roughly 130 flakes from chert, metavolcanic, obsidian and quartz sources. The remaining artifacts include manos or mano fragments, a fractured metate, cores or core fragments, bifaces and reworked bifaces, fire-affected rocks, and hammerstones. A single notched quartz projectile point was also recovered as well as hundreds of small mammal bone fragments, some of which were fire-affected. Dice and Bouscaren believed that they encountered the remains of an eroded

hearth and associated prehistoric food sources at a shovel test location in the southwestern portion of the site.” The current disposition of the observed artifacts reported by Dice and Bouscaren is unknown to ECORP.

After testing, Dice and Bouscaren (2004) cited a total of [REDACTED]. FCS noted that the original Phase II testing was conducted in 2004 and is no longer considered adequate for current use. Dice and Bouscaren (2004) evaluated the site and found it to be eligible for the CRHR under Criterion 4 and considered it a unique archaeological resource under CEQA. FCS (2015) concurred that the site is likely eligible for inclusion in the NRHP and CRHR under Criterion D/4. FCS recommended additional Phase II testing to better define the site boundaries and confirm eligibility findings.

The site was revisited by ECORP archaeologists on February 17 and April 1, 2022. The site was located, and updated site boundaries were collected. The overall site conditions have not changed since the initial recording. The updated site boundary is illustrated in Appendix C.

The shovel test units placed by ECORP around CA-RIV-7181 were dug in arbitrary 20-centimeter levels, as no cultural stratigraphy was observed in excavation. Soil on the surface at the testing spots consisted of sandy loam in varying shades of brown with less than five percent sub-angular gravel present. Test unit number 44 was the only one at the site with an anomalous surface, because it was placed in an area of [REDACTED]. The color of the surface soil in this area was a reddish yellow and the compaction and amount of clay in the soil was greater than the other areas tested. Below the surface, the soil in all the test units contained varying levels of clay and was recorded as varying shades of dark brown. Those which were terminated above a depth of 40 centimeters due to compaction contained the most clay. Disturbance from burrowing animals and granite deposits were also observed in multiple test units, with some having to be terminated due to reaching bedrock. Table 2 presents the results of testing at CA-RIV-7181.

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-19-22	STP-42	STP	Negative	40cm	Sterile	-
12-20-22	STP-43	STP	Negative	17cm	Hardpan	-
12-20-22	STP-44	STP	Negative	10cm	Hardpan	-
12-20-22	STP-45	STP	Negative	35cm	Hardpan	-
12-20-22	STP-46	STP	Negative	25cm	Hardpan	-
12-20-22	STP-47	STP	Positive	38cm	Positive	1 jasper shatter and 1 obsidian flake
12-20-22	STP-48	STP	Negative	25cm	Hardpan	-
12-20-22	STP-49	STP	Positive	30cm	Positive	1 basalt flake
12-21-22	STP-50	STP	Negative	40cm	Sterile	-
12-21-22	STP-51	STP	Positive	17cm	Positive	1 quartz flake and 1 chalcedony flake
12-21-22	STP-52	STP	Negative	38cm	Hardpan	-

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-21-22	STP-53	STP	Negative	40cm	Sterile	-
12-21-22	STP-54	STP	Positive	34cm	Positive	Basalt flake
12-21-22	STP-55	STP	Negative	40cm	Sterile	-
12-21-22	STP-56	STP	Negative	38cm	Hardpan	-

Testing results around CA-RIV-7181 yielded four positive shovel test units containing a total of 6 flakes. In addition to this, multiple surface artifacts (primarily lithic debitage) were observed, which informed the locations chosen for test excavations. A shell bead was observed by the County and a representative of the Pechanga during a field visit on December 8. By accounting for those surface resources outside of the existing site boundary when placing test units, the boundary of the site was expanded to extend to the western border of the Project Area and to include more area to the south and west than was part of the previous site boundary. The positive shovel test units, numbers 47, 49, 51, and 54, were included inside of the revised site boundary. Each time a positive unit was encountered, a new test unit was placed approximately five meters further from the existing site boundary. All these units were negative for cultural material, so the revised site boundary did not include those areas.

b) P-33-12916/CA-RIV-7182

This site was originally recorded by Dice and Bouscaren in 2003 in the east-central portion of the project area and was described as a 2.5-acre site composed of [REDACTED] bedrock outcrops with [REDACTED] milling slicks on the exposed surface with debitage observed within the vicinity of the milling features. According to FCS (2015: 27), "CA-RIV-7182 underwent Phase II testing in 2004 that included a surface artifact collection as well as subsurface testing (Dice and Bouscaren 2004). Recovered materials originated from two distinct surface lithic scatters and three of the four subsurface shovel test pits. In total, approximately 100 artifacts were collected, including mostly flakes from chert, metavolcanic, obsidian and quartz sources. The remaining artifacts include a ceramic buffware sherd broken into three smaller fragments, three bifaces, a drill fragment, fire-affected rocks, and numerous small mammal bone fragments, some of which were fire-affected. Dice and Bouscaren believed that he encountered the remains of an eroded hearth and associated prehistoric food sources at a shovel test location in the central portion of the site." The current disposition of the observed artifacts reported by Dice and Bouscaren is unknown to ECORP.

Similar to CA-RIV-7181, FCS notes that the original Phase II testing was conducted in 2004 and is no longer considered adequate for current use. Dice and Bouscaren (2004) evaluated the site through subsurface testing and did not find buried intact deposits. The result was Dice and Bouscaren's recommendation that the site does not meet the criteria for inclusion in the CRHR under any criteria. FCS, however, disagreed and suggested that this site be considered eligible for the NRHP and CRHR under Criterion D/4. FCS recommended additional Phase II testing to better define the site boundaries and confirm eligibility findings.

The site was revisited by ECORP archaeologists on February 17 and April 1, 2022. The site was located, and updated site boundaries were collected. The site may have been impacted by the removal of the orange grove previously present in the Project Area.

All the shovel test units placed by ECORP around CA-RIV-7182 were excavated in arbitrary 20-centimeter levels, as no cultural stratigraphy was observed. Surface soil at the testing locations consisted of sandy loam in varying shades of dark brown, with small amounts of sub-angular gravel present. There was substantial disturbance in the form of wood chips from the former orange orchard covering most of the surface. Below the surface, substantial deposits of degrading granitic deposits were encountered around the site, with some test units containing large rocks or requiring termination due to bedrock. The soil around CA-RIV-7182 was not compact through the second level in most units, though some did contain deposits of clay which created heavy compaction. Table 3 summarizes the results of test excavations around CA-RIV-7182.

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-15-22	STP-28	STP	Negative	40cm	Sterile	-
12-15-22	STP-29	STP	Negative	40cm	Sterile	-
12-15-22	STP-30	STP	Positive	20cm	Positive	Quartz flake
12-15-22	STP-31	STP	Negative	40cm	Sterile	-
12-15-22	STP-32	STP	Negative	32cm	Hardpan	-
12-16-22	STP-33	STP	Negative	38cm	Hardpan	-
12-16-22	STP-34	STP	Negative	20cm	Bedrock	-
12-16-22	STP-35	STP	Negative	40cm	Sterile	-
12-16-22	STP-36	STP	Negative	40cm	Sterile	-
12-16-22	STP-37	STP	Negative	40cm	Sterile	-
12-16-22	STP-38	STP	Negative	40cm	Sterile	-
12-19-22	STP-39 (at new feature)	STP	Negative	20cm	Hardpan	-
12-19-22	STP-40 (at new feature)	STP	Negative	37cm	Hardpan	-
12-19-22	STP-41 (at new feature)	STP	Negative	40cm	Sterile	-

Only one shovel test unit at CA-RIV-7182 was positive for cultural material – one quartz flake was observed. This unit, STP 30, expands the site boundary to the east by approximately 20 meters. Additionally, surface artifacts and a new bedrock mortar feature were located in the area by ECORP field staff and tribal monitors in the process of placing shovel test units, which expands the boundaries of this site. These artifacts were likely obscured by the orange trees that were present during the last survey of this portion of the Project Area and are now visible on the surface after the disturbance from the removal of the trees. This also suggests that the artifacts observed on the surface are not in situ deposits.

In 2024, ECORP, the Pechanga Band of Indians, the Soboba Band of Luiseño Indians, and Riverside County personnel revisited the site on June 4, 2024 as part of a field visit to the Project. At this time, Pechanga identified a previously undocumented [REDACTED] within Feature 7, one cupule (3 meters north of Feature 7), a boulder with

several cupules (6 meters south of Feature 7), and a core and a mano fragment [REDACTED]. The site boundary was expanded to include the single cupule and the cupule boulder.

c) P-33-12917/CA-RIV-7183

This site was originally recorded by Dice and Bouscaren in 2003 in the [REDACTED] of the project area and was described as two bedrock outcrops with at least seven milling slicks on the exposed surface. The original site boundary includes adjacent property [REDACTED] th, which is outside of the current Project Area. Stone tools and debitage were observed within the vicinity of the milling features. In 2015 (FCS 2015:26), FCS cited that this site could not be relocated, "because of the degradation of the sites by natural erosion factors and orchard maintenance activities." Dice and Bouscaren conducted Phase II testing in 2004 and observed and collected 93 surface artifacts, all of which were groundstone or flaked stone artifacts. One plummet-shaped [REDACTED], a broken Elko side-notched projectile point, and various pieces of heat-treated chert. Below surface, only 35 quartz flakes and 14 fragments of fire affected rock were collected. Dice and Bouscaren (2004) evaluated the site through subsurface testing and did not find buried intact deposits. The result was Dice and Bouscaren's recommendation that the site does not meet the criteria for inclusion in the CRHR under any criteria.

Since that time, the orchard had been removed, and in 2022, ECORP successfully located the site. ECORP updated site boundaries but did not observe any associated artifacts on the surface. The site has been impacted by the removal of the orange grove previously present in the Project Area.

A total of eight auger tests were performed by ECORP around site CA-RIV-7183 before the testing strategy was amended through consensus of ECORP field staff and the Native American tribal monitors present. The soil in all of the auger tests was loamy sand in varying shades of brown and dark brown, with compaction due to clay deposits or degraded granite deposits present in some. After the initial eight auger tests, field crew commenced excavation of four shovel test units around the site. No cultural strata were observed, so excavation was conducted using arbitrary 20-centimeter levels. Surface soils were reddish or yellowish brown, and compaction varied based on the amount of clay and granite encountered. Some of the surface area around CA-RIV-7183 was disturbed due to previous discing. Results of the augers and shovel testing are shown in Table 4, below.

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-7-22	7183-A	Auger	Negative	37cm	Bedrock	-
12-7-22	7183-B	Auger	Negative	40cm	Sterile	-
12-7-22	7183-C	Auger	Negative	53cm	Hardpan	-
12-7-22	7183-D	Auger	Negative	40cm	Sterile	-
12-7-22	7183-E	Auger	Negative	40cm	Sterile	-
12-7-22	7183-F	Auger	Negative	40cm	Sterile	-
12-7-22	7183-G	Auger	Negative	40cm	Sterile	-
12-7-22	7183-H	Auger	Negative	5cm	-	-

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-7-22	STP-1	STP	Positive	40cm	Positive	Shattered quartz at 5cm
12-7-22	STP-2	STP	Positive	40cm	Positive	Shattered quartz at 40cm
12-8-22	STP-3	STP	Negative	40cm	Sterile	-
12-8-22	STP-4	STP	Negative	30cm	Hardpan	-

The eight initial auger tests around and between the two previously recorded bedrock mortar features (A and B) at CA-RIV-7183 were negative for cultural material. After field methods were modified to substitute shovel test units for auger tests, the first two units excavated on the [REDACTED] side of the site boundary yielded pieces of naturally-occurring shattered quartz. Neither of these pieces were culturally modified and do not represent debitage; however, their presence and importance were noted by tribal representatives.

During testing of this site, a newly identified bedrock mortar slick was observed [REDACTED] of the site (Feature C). This site is now recognized as being composed of three discrete features. From east to west, these three are shown on the site location map in Appendix C as Features A, B, and a newly identified feature, C. Because testing around and between these features failed to identify indications of archaeological deposits, the site boundaries are limited to the bedrock features themselves and not the space between them.

d) P-33-12918/CA-RIV-7184

This site was originally recorded by Dice and Bouscaren in 2003 in the [REDACTED] of the project area and was described as three bedrock outcrops with at least 11 milling slicks on the exposed surface. No associated artifacts were noted during the initial recordation. This site was not subjected to Phase II testing by Dice and Bouscaren in 2004, based on their examination of the site and observation that topsoil in the site boundary is extremely thin (2004:36). Dice and Bouscaren (2004) evaluated the site based on survey level data alone and recommended that the site does not meet the criteria for inclusion in the CRHR under any criteria.

The site was revisited by ECORP archaeologists on February 17 and April 1, 2022. The original outcrops with milling features were not relocated; however, a separate bedrock outcrop with at least [REDACTED] milling slicks was observed [REDACTED]. The site was located, and updated site boundaries were collected.

No cultural stratigraphy was observed by ECORP in the soil around CA-RIV-7184, so shovel test units were all excavated in arbitrary 20-centimeter levels. The soil was primarily loose loamy sand, with some mildly to heavily compact silty clay loam below 20 centimeters. Soil colors in the test units was brown, reddish brown, and dark yellowish brown. Some vegetation and roots were observed, and there were also deposits of degraded granite. All but two of the test units around CA-RIV-7184 reached a terminal depth of 40 centimeters. Results from testing are listed in Table 5.

Table 5. Testing Results for P-33-12918/CA-RIV-7184						
Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-8-22	STP-5	STP	Negative	40cm	Sterile	-
12-8-22	STP-6	STP	Negative	36cm	Hardpan	-
12-9-22	STP-7	STP	Negative	40cm	Sterile	-
12-9-22	STP-8	STP	Negative	40cm	Sterile	-
12-9-22	STP-9	STP	Negative	40cm	Sterile	-
12-9-22	STP-10	STP	Negative	39cm	Hardpan	-
12-9-22	STP-11	STP	Negative	40cm	Sterile	-
12-9-22	STP-12	STP	Negative	40cm	Sterile	-
12-9-22	STP-13	STP	Negative	40cm	Sterile	-

Nine total shovel test units were excavated around the outside of the CA-RIV-7184 site boundary. No cultural material was recovered in testing.

This site is now recognized as being composed of five discrete features. [REDACTED] these five are shown on the site location map in Appendix C as Features A, B, C, D, and E. Because testing around and between these features failed to identify indications of archaeological deposits, the site boundaries are limited to the bedrock features themselves and not the space between them.

e) CA-01

This pre-contact site consists of a bedrock milling feature that was initially recorded in 2022 during the supplemental field surveys for the updated Phase 1 (ECORP 2022). The feature is composed of a deeply embedded granitic boulder with an exposed surface measuring 3.7 meters east to west by 2.8 meters north to south. Three well-formed milling slicks measuring 31 centimeters are located near the center of the boulder. The exposed surface of the feature lies low to the ground with the slicks approximately 20 centimeters above ground surface. A layer of sediment covers large portions of feature that may obscure other milling slicks, and therefore, testing to confirm boundaries was warranted.

Five shovel test units were excavated around the outside of site CA-01. No cultural strata were present, so excavation was conducted in arbitrary 20-centimeter levels. The entire area around the site had been previously disced, so the surface was heavily disturbed. Soil types observed in the areas around the site included loam and silty clay loam in varying tones of reddish and yellowish dark brown. Some small rocks and granite deposits were observed during excavation. Test unit number 14 was terminated due to reaching a buried PVC irrigation pipe that precluded further excavation, with the remainder of units being terminated due to heavily compact soil deposits. Results from the testing at CA-01 are shown in Table 6, below.

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-13-22	STP-14	STP	Negative	30cm	PVC pipe at 30cm	-
12-13-22	STP-15	STP	Negative	37cm	Hardpan	-
12-13-22	STP-16	STP	Negative	37cm	Hardpan	-
12-13-22	STP-17	STP	Negative	37cm	Hardpan	-
12-13-22	STP-18	STP	Negative	40cm	Hardpan	-

No cultural material was located during testing around CA-01. Therefore, the boundaries of the site as originally recorded did not need to be revised.

f) CA-02

This pre-contact site consists of a bedrock milling feature that was initially recorded in 2022 during the supplemental field surveys for the updated Phase 1 (ECORP 2022). The bedrock milling feature is composed of a large bedrock outcrop measuring 27.35 meters east to west by 39.53 meters north to south. The outcrop contains at least [REDACTED] milling slicks. [REDACTED]. Most of the milling slicks are located along the [REDACTED] side of the outcrop, approximately 30 centimeters above ground surface. A granitic mano was identified embedded in the ground adjacent to the [REDACTED] edge of the outcrop.

Shovel test units surrounding CA-02 were excavated in arbitrary 20-centimeter levels, as no cultural strata were observed. The entire area around the site had been previously disced, causing substantial surface disturbance. Soil types observed during excavation included silty loam and silty clay loam in varying shades of reddish and yellowish dark brown. Deposits of degraded granite were observed throughout much of the soil, and that combined with clay deposits led to heavy compaction in the soil. Below 20 centimeters, all of the units became much more compact, with some having to be terminated due to this. The results of testing near CA-02 are listed in Table 7.

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-13-22	STP-19	STP	Negative	32cm	Hardpan	-
12-14 to 12-15-22	STP-20	STP	Negative	31cm	Hardpan	-
12-14-22	STP-21	STP	Negative	40cm	Hardpan	-
12-14-22	STP-22	STP	Negative	30cm	Hardpan	-
12-14-22	STP-23	STP	Negative	40cm	Hardpan	-
12-14-22	STP-24	STP	Negative	40cm	Hardpan	-
12-14-22	STP-25	STP	Negative	20cm	Bedrock	-

Date	Identifier	Unit Type	Results	Depth at Termination	Reason for Termination	Artifacts
12-15-22	STP-26	STP	Negative	40cm	Hardpan	-
12-15-22	STP-27	STP	Negative	40cm	Hardpan	-

The recent discing around site CA-02 seems to have disturbed some subsurface cultural deposits, leading to multiple mano and metate fragments around the outside of the site. These resources were observed in the process of deciding placement of shovel test units around the site. Because of this, the site boundary had to be revised to include these resources, so shovel test units were placed at least five meters further from the site boundary than any surface resources were located. Nine test units in total were placed around CA-02, and no cultural material was observed in any. Therefore, revisions of the site boundary were required only to accommodate surface artifacts and bedrock feature but excluded the locations of the shovel test units.

g) CA-04

This precontact site consists of a bedrock milling feature. The feature is a granite outcrop measuring 6.5 meters southeast to northwest by 3 meters southwest to northeast and is 2 meters tall at its highest point. The outcrop contains two basins and three slicks. [REDACTED]. This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

h) CA-05

This precontact site is a bedrock milling feature. The feature is a bedrock outcrop measuring 1.9 meters north to south by 5 meters east to west and is 31 centimeters above ground surface at its highest point. The outcrop contains two slicks. The surface of the outcrop is heavily weathered and friable. This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

i) CAR-08

This precontact site is a bedrock milling feature. The feature is a granite outcrop measuring 2.47 meters north to south by 1.09 meters east to west and it is 0.5 meters above ground surface at its highest point. The outcrop contains one slick. [REDACTED] This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

j) CAR-09

This precontact site is a bedrock milling feature. The feature is granite outcrop measuring 2.95 meters northwest to southeast by 1.03 meters northeast to southwest and it is 0.63 meters above ground surface at its highest point. The outcrop contains two milling slicks. The surface of the outcrop is weathered and it is partially covered by vegetation. [REDACTED] This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

k) CAR-10

This precontact site is a bedrock milling feature. The feature is a granite outcrop measuring 3.58 meters north to south by 1.78 meters east to west and it is 0.54 meters above ground surface at its highest point. The outcrop contains one basin. The surface of the outcrop exhibits weathering and crustose lichens are growing on one-quarter of the exposed surface area. This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

l) CAR-11

This precontact site is a bedrock milling feature. The feature is a bedrock outcrop measuring 2.24 meters north to south by 2.3 meters east to west and it is 2.12 meters above ground surface at its highest point. The outcrop contains one slick. [REDACTED]. This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

m) CAR-12

This precontact site consists of a bedrock milling feature. The bedrock milling feature is composed of a partially embedded granitic boulder outcrop. Two milling slicks are present on one boulder (west) and one is present on a separate boulder (east). This site was located after the completion of the Phase II testing for the project and was not subject to subsurface testing.

n) CAR-13-I

This precontact isolate consists of a unifacial granite mano. The resource was identified [REDACTED]

VII. SIGNIFICANCE

Each of the pre-contact archaeological sites inside the Project Area must be evaluated for significance based on the whole of the record, which is composed of the 2022 Phase II testing (reported herein), all previous archaeological research by Dice and Bouscaren (2004) and FCS (2015), and tribal consultation between the County and culturally affiliated Native American tribes. Should the tribes offer additional information to the County during consultation regarding significance or identification, the County will take that into account when making the final determinations of eligibility or may determine that any of these sites are tribal cultural resources (as defined in Section 21074 of the Public Resources Code), regardless of NRHP- or CRHR-eligibility.

The eligibility criteria for the NRHP are as follows (36 CFR 60.4): "The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess aspects of integrity of location, design, setting, materials, workmanship, feeling, association, and

- (a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) that are associated with the lives of persons significant in our past; or

- (c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- (d) that have yielded, or may be likely to yield, information important in prehistory or history.

In addition, the resource must be at least 50 years old, except in exceptional circumstances (36 CFR 60.4).

Effects to NRHP-eligible resources (historic properties) are adverse if the project may alter, directly or indirectly, any of the characteristics of a Historic Property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Separately, under State law (CEQA), cultural resources are evaluated using CRHR eligibility criteria in order to determine whether any of the sites are Historical Resources, as defined by CEQA. CEQA requires that impacts to Historical Resources be identified and, if the impacts would be significant, that mitigation measures to reduce the impacts be applied.

A Historical Resource is a resource that:

1. is listed in or has been determined eligible for listing in the CRHR by the State Historical Resources Commission;
2. is included in a local register of historical resources, as defined in PRC 5020.1(k);
3. has been identified as significant in a historical resources survey, as defined in PRC 5024.1(g); or
4. is determined to be historically significant by the CEQA lead agency [CCR Title 14, § 15064.5(a)]. In making this determination, the CEQA lead agency usually applies the CRHR eligibility criteria.

The eligibility criteria for the CRHR (CCR Title 14, § 4852(b)) state that a resource is eligible if:

1. it is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. it is associated with the lives of persons important to local, California, or national history.
3. it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. it has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the Nation.

In addition, the resource must retain integrity. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (CCR Title 14, § 4852(c)). Impacts to a Historical Resource (as defined by CEQA) are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired (CCR Title 14, § 15064.5(a)).

a) P-33-12915/CA-RIV-7181

Fifteen STPs were excavated at this site in December 2022. Six pre-contact flakes were observed in 4 of the STPs at depths between 17 and 38 cm below surface. The flakes were observed among homogenous or previously disturbed sediments along the site's western periphery. The majority of the site lies outside of the project footprint [REDACTED] and was not subjected to testing. Although the 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV, prior research by Dice and Bouscaren (2004) and FCS (2015) demonstrates that this site possesses the potential to yield important information in pre-contact history ("prehistory"). The types of lithic materials reported by these previous studies suggests that the site could possess archaeological data to address research questions regarding activities and site function, subsistence patters, technology, trade interactions, and possibly chronology and temporal patterns. As a result, this site is eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4.

No information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

The majority of this site [REDACTED] [REDACTED] [REDACTED] [REDACTED] Although soils are not likely to possess substantial depth, the soils that do exist are largely undisturbed [REDACTED]. Based on site descriptions from Dice and Bouscaren (2004), [REDACTED] the site appears to retain sufficient integrity of materials, location, and (for the bedrock features) workmanship. These aspects of integrity are most important in conveying the significance of the site under NRHP/CRHR Criterion D/4 because in situ archaeological data is necessary to answer the research themes noted above.

Because site P-33-12915/CA-RIV-7181 is eligible for the NRHP and CRHR under criteria D and 4, respectively, and because it retains sufficient integrity, this site is considered a historical resource under CEQA and a historic property under Section 106. Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

b) P-33-12916/CA-RIV-7182

Fourteen STPs were excavated at this site in December 2022. One pre-contact flake was observed in 1 of the STPs within the top 20cm of the unit. The flake were observed among homogenous or previously disturbed sediments along the [REDACTED]. The majority of the site lies outside of the project footprint [REDACTED] and was not subjected to testing. Although the 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV, prior research by Dice and Bouscaren (2004) and FCS (2015) demonstrates that this site possesses the potential to yield important information in pre-contact history ("prehistory"). The types of lithic materials reported by these previous studies suggests that the site could possess archaeological data to address research questions regarding activities and site function,

subsistence patterns, technology, trade interactions, and possibly chronology and temporal patterns. As a result, this site is eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4.

No information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

A portion of this site [REDACTED] [REDACTED]. Although soils within the drainage are not likely to possess substantial depth, the soils that do exist [REDACTED] [REDACTED] undisturbed. Based on site descriptions from Dice and Bouscaren (2004), the site appears to retain sufficient integrity of materials and location and (for the bedrock features) workmanship. These aspects of integrity are most important in conveying the significance of the site under NRHP/CRHR Criterion D/4 because in situ archaeological data is necessary to answer the research themes noted above.

Because site P-33-12916/CA-RIV-7182 is eligible for the NRHP and CRHR under criteria D and 4, respectively, and because it retains sufficient integrity, this site is considered a historical resource under CEQA and a historic property under Section 106. Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

c) P-33-12917/CA-RIV-7183

Eight augers and 4 STPs were excavated at this site in December 2022. Only shattered naturally occurring quartz was observed in 2 of the STPs between 5 and 40cm below surface. Otherwise, all units were culturally sterile. The 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV. Prior research by Dice and Bouscaren (2004) and FCS (2015) demonstrates that this site previously yielded surface artifacts, but all were on the surface and in a heavily disturbed context. Previous subsurface testing by Dice and Bouscaren failed to yield any subsurface deposits, which is consistent with the 2022 testing results.

The absence of in situ archaeological data means that the site does not possess the potential to yield important information or address research questions presented above. As a result, this site is not eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4. In addition, no information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

Because site P-33-12917/CA-RIV-7183 is not eligible for the NRHP and CRHR under any criteria, this site is not considered a historical resource under CEQA and a historic property under Section 106. Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

d) P-33-12918/CA-RIV-7184

Nine STPs were excavated at this site in December 2022. All units were culturally sterile. The 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV. Prior research by Dice and Bouscaren (2004) and FCS (2015) demonstrates that this site previously failed to yield any artifacts, which is consistent with the 2022 testing results.

The absence of in situ archaeological data means that the site does not possess the potential to yield important information or address research questions presented above. As a result, this site is not eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4. In addition, no information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

Because site P-33-12918/CA-RIV-7184 is not eligible for the NRHP and CRHR under any criteria, this site is not considered a historical resource under CEQA and a historic property under Section 106.

Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

e) CA-01

Five STPs were excavated at this site in December 2022. All units were culturally sterile. The 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV.

The absence of in situ archaeological data means that the site does not possess the potential to yield important information or address research questions presented above. As a result, this site is not eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4. In addition, no information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

Because site CA-01 is not eligible for the NRHP and CRHR under any criteria, this site is not considered a historical resource under CEQA and a historic property under Section 106. Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

f) CA-02

Nine STPs were excavated at this site in December 2022. All units were culturally sterile. The 2022 testing efforts failed to yield sufficient data that could be used to address the research themes and questions presented in Section IV.

The absence of in situ archaeological data means that the site does not possess the potential to yield important information or address research questions presented above. As a result, this site is not eligible for inclusion in the NRHP under Criterion D and CRHR under Criterion 4. In addition, no information could be located in the archival record to indicate that this site is associated with important events or persons in history or pre-contact history and therefore, this site is not eligible for inclusion in the NRHP under Criteria A or B or CRHR under Criteria 1 or 2. This site also does not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values, and as such, is not eligible for inclusion in the NRHP under Criterion C or CRHR under Criterion 3.

Because site CA-02 is not eligible for the NRHP and CRHR under any criteria, this site is not considered a historical resource under CEQA and a historic property under Section 106. Recommendations for management of this resource as part of the proposed development are provided in Section VIII.

g) CA-04

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

h) CA-05

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

i) CAR-08

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

j) CAR-09

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

k) CAR-10

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

l) CAR-11

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

m) CAR-12

This precontact site consists of a bedrock milling feature that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

n) CAR-13-I

This precontact isolate consists of a unifacial granite mano that was located after the completion of the Phase II testing for the project and was not subject to subsurface testing. ECORP recommends that this site be treated as eligible for the purpose of this project.

o) Summary

The results of the testing performed under the County-approved testing plan, and in consideration of the previous research performed on the property, indicate the following.

Table 8. Summary of Evaluation Recommendations				
Site	NRHP A / CRHR 1	NRHP B / CRHR 2	NRHP C / CRHR 3	NRHP D / CRHR 4
P-33-12915 (CA-RIV-7181)	Not eligible	Not eligible	Not eligible	Eligible
P-33-12916 (CA-RIV-7182)	Not eligible	Not eligible	Not eligible	Eligible
P-33-12917 (CA-RIV-7183)	Not eligible	Not eligible	Not eligible	Not eligible
P-33-02918 (CA-RIV-7184)	Not eligible	Not eligible	Not eligible	Not eligible
CA-01	Not eligible	Not eligible	Not eligible	Not eligible
CA-02	Not eligible	Not eligible	Not eligible	Not eligible
CA-04	Treat as eligible for the purpose of this project			
CA-05	Treat as eligible for the purpose of this project			
CAR-08	Treat as eligible for the purpose of this project			
CAR-09	Treat as eligible for the purpose of this project			
CAR-10	Treat as eligible for the purpose of this project			
CAR-11	Treat as eligible for the purpose of this project			
CAR-12	Treat as eligible for the purpose of this project			
CAR-13-I	Treat as eligible for the purpose of this project			

As summarized above, only two of the six archaeological sites present within the project area are significant on an individual level because they possess sufficient archaeological data to address research themes and questions presented further above. Four sites do not meet the criteria for inclusion in the NRHP or CRHR; however, when viewing the project area as a whole, the presence of multiple bedrock mortar features (even those without associated archaeological deposits) suggests that the local area was heavily occupied in pre-contact times. The

spatial distribution of sites loosely conforms to the orientation and path of a drainage corridor that bisects the project area. The remaining eight sites were not subject to testing and cannot be evaluated by surface-level data alone, and therefore ECORP recommends that they be treated as eligible for the purpose of this project.

Given the nearly universal association between water features and human occupation, it stands to reason that the pre-contact occupation of the project area focused on the drainage corridor and that smaller resource processing localities flanked each side. There currently does not exist sufficient archaeological data to test such a theory or determine whether or not there is a temporal and functional association between these six sites. Therefore, calling it a district or cultural landscape may be premature, but the importance of the bedrock features themselves to modern descendant communities is well understood. The remaining value of the non-eligible sites is the bedrock outcrops themselves, even though they do not rise to the level of significance established by the NRHP and CRHR criteria. Tribal consultation between the County and culturally affiliated tribes has led to the determination that all of the pre-contact sites, regardless of archaeological significance, constitute a tribal cultural landscape that meets the definition of a tribal cultural resource under CEQA. The following section offers recommendations for management of the resources on the property.

VIII. IMPACT ASSESSMENT

The results of the inventory and Phase II testing program led to additional changes to project design to increase preservation in place to the greatest extent feasible.

Avoidance and preservation in place can be defined in several ways. Horizontal avoidance is defined as the pulling back of project elements and putting into place measures such as exclusionary fencing, taking advantage of natural topographic barriers, or deed restrictions (or a combination thereof) to ensure that activity during construction or use of the completed project does not encroach into the area of avoidance.

Avoidance can also be achieved by creating a vertical separation between the resource and project activity. This is often accomplished by engineered capping, especially in areas of planned fill or non-structural and above-ground infrastructure is necessary. The method of capping and the thickness of the soil cap varies from site to site but is generally composed of a combination of geotextile fabric or geogrid over the site surface, followed by layers of soil or sand fill, above which landscaping, trails, recreation areas, or access roads can be constructed. The use of capping must be accompanied by a deed restriction to ensure that future project activity does not penetrate the geogrid and impact the resource.

Appendix E provides a map showing the areas proposed for avoidance and a map showing the proposed fencing plan. Table 9, below, summarizes and quantifies the avoidance. Collectively, the sites and features identified on the property total approximately 16.39 acres. Of this, 14.66 acres will be preserved in place through horizontal avoidance and placement into open space, which constitutes almost 90 percent of the cultural resources area. This number increases to just over 90 percent when considering Feature E of CA-RIV-7184 and CAR-12 will be capped in place. Approximately 10 percent of the cultural resource areas cannot be preserved in place because of the need for infrastructure, ingress/egress, and engineering constraints.

Table 9. Summary of Effect			
Site	Eligibility	Project Impact	Remarks
P-33-12915 (CA-RIV-7181)	Eligible	0.610 ac	95% of the site will be preserved in place; no bedrock milling features will be affected
P-33-12916 (CA-RIV-7182)	Eligible	0.970 ac	75% of the site will be preserved in place; bedrock milling features A, B, C, and D are included in the 25% of the site that will be impacted, but the rest of the features will be preserved in place
P-33-12917 (CA-RIV-7183) – Feature A	Not eligible	0	100% of the site will be preserved in place
P-33-12917 (CA-RIV-7183) – Feature B	Not eligible	0	100% of the site will be preserved in place
P-33-12917 (CA-RIV-7183) – Feature C	Not eligible	0	100% of the site will be preserved in place
P-33-02918 (CA-RIV-7184) – Feature A	Not eligible	0	100% of the site will be preserved in place
P-33-02918 (CA-RIV-7184) – Feature B	Not eligible	0.010 ac	-
P-33-02918 (CA-RIV-7184) – Feature C	Not eligible	0.030 ac	-
P-33-02918 (CA-RIV-7184) – Feature D	Not eligible	0.010 ac	-
P-33-02918 (CA-RIV-7184) – Feature E	Not eligible	0.090 ac	This feature will be capped, thereby providing vertical separation between the resource and post-construction use
CA-01	Not eligible	0.002 ac	-
CA-02	Not eligible	0	100% of the site will be preserved in place
CAR-04	Eligible	0.004 ac	-
CAR-05	Eligible	0.003 ac	-
CAR-08	Eligible	0.0005 ac	-
CAR-09	Eligible	0	100% of the site will be preserved in place
CAR-10	Eligible	0.001 ac	-
CAR-11	Eligible	0	100% of the site will be preserved in place
CAR-12	Eligible	0	This feature will be capped, thereby providing vertical separation between the resource and post-construction use
CAR-13-I	Eligible	0.00002 ac	-
	Total	1.73 ac	

IX. RECOMMENDED MITIGATION

Mitigation measures or conditions of approval will ensure preservation in place of 90 percent of the cultural resources and address any unanticipated discoveries during construction. Table 10 summarizes the treatment for each site.

Table 10. Summary of Treatment												
Site	Treatment											
	A	B	C	D	E	F	G	H	I	J	K	L
P-33-12915 (CA-RIV-7181)	X	-	-	-	X*	-	X	X	X*	X*	X	X
P-33-12916 (CA-RIV-7182) – Feature A	X	-	X	X	-	X	X	X	-	-	X	X
P-33-12916 (CA-RIV-7182) – Feature B	X	-	X	X	-	X	X	X	-	-	X	X
P-33-12916 (CA-RIV-7182) – Feature C	X	-	X	X	-	X	X	X	-	-	X	X
P-33-12916 (CA-RIV-7182) – Feature D	X	-	X	X	-	X	X	X	-	-	X	X
P-33-12916 (CA-RIV-7182) – Balance of Site	X	-	-	-	X	-	X	X	X	X	X	X
P-33-12917 (CA-RIV-7183) – Feature A	X	-	-	-	X	-	X	X	X	X	X	X
P-33-12917 (CA-RIV-7183) – Feature B	X	-	-	-	X	-	X	X	X	X	X	X
P-33-12917 (CA-RIV-7183) – Feature C	X	-	-	-	X	-	X	X	X	X	X	X
P-33-02918 (CA-RIV-7184) – Feature A	X	-	-	-	X	-	X	X	X	X	X	X
P-33-02918 (CA-RIV-7184) – Feature B	X	-	X	X	-	X	X	X	-	-	X	X
P-33-02918 (CA-RIV-7184) – Feature C	X	-	X	X	-	X	X	X	-	-	X	X
P-33-02918 (CA-RIV-7184) – Feature D	X	-	X	X	-	X	X	X	-	-	X	X
P-33-02918 (CA-RIV-7184) – Feature E	X	X	X	X	-	X	X	X	-	-	X	X
CA-01	X	-	X	X	-	X	X	X	-	-	X	X
CA-02	X	-	-	-	X	-	X	X	X	X	X	X
CAR-04	X	-	X	X	-	X	X	X	-	-	X	X
CAR-05	X	-	X	X	-	X	X	X	-	-	X	X
CAR-08	X	-	X	X	-	X	X	X	-	-	X	X
CAR-09	X	-	-	-	X	-	X	X	X	X	X	X
CAR-10	X	-	X	X	-	X	X	X	-	-	X	X
CAR-11	X	-	-	-	X	-	X	X	X	X	X	X
CAR-12	X	X	-	-	-	-	X	X	-	-	X	X
CAR-13-I	X	-	X	X	-	-	X	X	-	-	X	X

*This treatment pertains to a portion of the resource, as illustrated in Appendix E

Prior To Grading Permit Issuance**a) 060 - Planning-CUL. 1 Cultural Sensitivity Training**

The County shall ensure that a worker awareness training program is developed and delivered to train the Contractor's equipment operators and the Project's field consultants about tribal cultural resources and the requirements for avoidance and minimization. The program shall inform workers about the following topics: federal and state regulations pertaining to cultural resources and tribal cultural resources; the presence of ESAs that are restricted from all Project-related activities; the requirement for ground-disturbing activities near the ESAs to be monitored by a Tribal Monitor; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the County and, if necessary, the coroner, of any occurrences; confidentiality requirements; appropriate and respectful behavior when in the presence of tribal cultural resources; maintaining a harassment-free and safe work environment for monitors; and enforcement of penalties and repercussions for non-compliance with the program.

The County shall offer the opportunity to consulting tribes to provide content for the training program. The training shall be given first to construction supervisors and may be recorded. The construction supervisors are responsible for ensuring that all workers that will operate ground-disturbing equipment receive this training prior to operating equipment that will disturb original ground. All trained workers will be required to receive a brochure and hardhat sticker and sign a form indicating their understanding of the requirements and restrictions and copies of the forms shall be provided to the County as proof of compliance. Materials and supplies delivery drivers, above-ground construction workers (i.e., framers, carpenters, electricians, plumbers, painters, and roofers) are not required to receive the training because the type of specialized activities that they will perform does not have the potential to disturb cultural resources or tribal cultural resources.

b) 060 - Planning-CUL. 2 Capping

The bedrock milling feature at cultural site(s) Feature E of site P-33-02918 (CA-RIV-7184) and CAR-12 cannot be avoided unless vertical separation between the feature and project construction can be ensured. To address capping in this area, a plan will be developed and included in the CRMP by the Project Archaeologist. The capping plan shall specify the thickness of the soil cap, the combination of geotextile fabric or geogrid over the site surface, and composition of layers of soil or sand fill, above which landscaping, trails, recreation areas, or access roads can be constructed. Results of the capping shall be included in the Phase IV monitoring report.

c) 060 - Planning-CUL. 3 Controlled Grading

The bedrock milling features at cultural site(s) P-33-002918 (CA-RIV-7184) Features B, C, D, E, P-33-12916 Features A, B, C, D, CA-01, CAR-04, CAR-05, CAR-08, CAR-10, and CAR-13-I will be impacted during construction activities and the soils surrounding them will be disturbed. To address controlled grading in this area, a plan will be developed and included in the CRMP by the Project Archaeologist. The controlled grading plan shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV monitoring report.

d) 060 - Planning-CUL. 4 ECS Sheet- Resource Relocation and Reburial Area

Prior to issuance of grading permits: the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate an area to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.

e) 060 - Planning-CUL. 5 ECS Sheet

Prior to final map approval the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been included in the Grading Plans. This sheet shall indicate the presence of environmentally constrained area(s) and the requirements for avoidance of portions of P-33-012915 (CA-RIV-7181), portions of P-33-012916 (CA-RIV-7182), P-33-012917 (CA-RIV-7183) Features A, B and C, P-33-02918 (CA-RIV-7184) Feature A, CA-02, CAR-09, and CAR-11.

f) 060 - Planning-CUL. 6 Feature Relocation

Site(s) P-33-002918 (CA-RIV-7184) Features B, C, D, P-33-12916 (CA-RIV-7182) Features A, B, C, D, CA-01, CAR-04, CAR-05, CAR-08, and CAR-10 cannot be avoided through Project redesign. Prior to grading permit issuance, the Project Supervisor and Project Archaeologist and a representative from the consulting Tribe(s) shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, any visible artifacts shall be recovered and recorded, photo documentation of each feature in situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in the Phase IV Monitoring Report.

g) 060 - Planning-CUL. 7 Native American Monitor

Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for the appropriate number of Native American Monitor(s). In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection. The developer/permit applicant shall submit a fully executed copy of the agreement(s) to the County

Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

h) 060 - Planning-CUL. 8 Project Archaeologist

Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a digitally-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.

The Professional Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

i) 060 - Planning-CUL. 9 Temporary Fencing

Temporary fencing shall be required for the protection of cultural site(s) portions of P-33-012915, portions of P-33-012916 (CA-RIV-7182), P-33-012917 (CA-RIV-7183) Features A, B and C, P-33-02918 (CA-RIV-7184) Feature A, CA-02, CAR-09, and CAR-11 during grading activities. Prior to commencement of grading or brushing, the project archaeologist shall confirm the site boundaries and determine an adequate buffer for protection of the site(s). The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor. The fencing can be removed only after grading operations have been completed.

Prior To Grading Final Inspection

j) 070 - Planning-CUL. 1 Deed Restrictions

At the conclusion of all construction activities, the Project proponent and landowner shall record a deed restriction on the avoidance areas (and the reburial location, if used) with the County to restrict development of the ESAs in the future. Deed restrictions shall not disclose the nature of the ESAs. A copy of the deed restriction(s) shall be submitted to the County planning staff as proof of compliance prior to the issuance of certificates of occupancy for the Project.

Required Notifications

The following notifications are included as part of the recommendation of approval for TTM38510. They are intended to advise the applicant of various Federal, State and County regulations applicable to this entitlement and the subsequent development of the subject property.

k) Planning-CUL. 1 Human Remains

If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

l) Planning-CUL. 2 Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

Tribal Cultural Landscape

Tribal consultation between the County and culturally affiliated tribes has identified the presence of a tribal cultural landscape that is considered a tribal cultural resource for the purpose of CEQA. This is independent of the archaeological findings of significance. An impact assessment and determination of additional appropriate mitigation for any impacts will be discussed separately in the CEQA document.

X. CERTIFICATION

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

Prepared by: _____ Date _____
Lisa Westwood, RPA

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LIST OF APPENDICES

- A. Project Plans and Maps
- B. Photographs and Photo Record
- C. Site Location Map (CONFIDENTIAL)
- D. DPR Site Records (CONFIDENTIAL)
- E. Impact Map and Fencing Plan (CONFIDENTIAL)