Appendix C
Cultural Resources Technical Report

DRAFT

Cultural Resources Technical Report for the Meridian Storm Drain Pipeline Extension Project, Riverside, California

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July 2022
PN 40310

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EXECUTIVE SUMMARY

This Cultural Resources Technical Report (CRTR) is an assessment of potential effects and impact from the Meridian Storm Drain Pipeline Extension Project (Project). The Project is located within an unincorporated area of Riverside County adjacent to the eastern edge of the Riverside National Cemetery. This report was prepared in compliance with NEPA (National Environmental Policy Act), Section 106 of the National Historic Preservation Act (NHPA), and the California Environmental Quality Act (CEQA) and guided by the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards). March Joint Powers Authority (MJPA) is the lead agency for the Project for compliance with CEQA with the Veterans Administration (VA) serving as the lead agency for NEPA compliance.

ASM Affiliates, Inc. (ASM) was contracted by Kimley-Horn to prepare this CRTR. ASM conducted an archaeological and architectural history survey of the Project area, identified historic properties/historical resources, and assessed effects and impacts. The only historic property/historical resource within the Area of Potential Effects (APE) is the Riverside National Cemetery. The VA with concurrence from the California State Historic Preservation Office (SHPO) has previously determined that the Riverside National Cemetery is eligible for the National Register of Historic Places (NRHP) under Criterion A with a period of significance of 1976 to present.

After careful consideration of the potential for effects/impacts to Riverside National Cemetery, ASM recommends that the Project will not cause a substantial adverse change in the significance of a historical resource pursuant to the CEQA Guidelines (14 CCR §15064.5). In accordance with the implementing regulations for Section 106 of the NHPA (36 CFR §800.4(d)(1)), no historic properties will be affected by the proposed undertaking.

1.0 INTRODUCTION

ASM Affiliates, Inc. (ASM) was contracted by Kimley-Horn to prepare this Cultural Resources Technical Report (CRTR) in support of the Meridian Storm Drain Pipeline Extension Project (Project). The majority of the Project is located within a 40-foot sanitary sewer and storm sewer easement at the eastern boundary of the Riverside National Cemetery in an unincorporated area of Riverside County, California (Figure 1). The storm drain pipeline extension is needed as the volume of the Meridian Project development continues to increase and larger facilities are required. The Project consists of a master planned storm drain improvement project along the west side of Interstate 215, south of Van Buren Boulevard, adjacent to the Riverside National Cemetery to the west and south, and Riverside County Transportation Commission (RCTC) railroad right-of-way to the east. The Project will extend approximately 2,350 linear feet south of Van Buren Boulevard and connect to an existing dual reinforced concrete pipe at the RCTC railroad right-of-way. The Project would also include the removal and replacement of portions of Avenue A and the removal and replacement of an existing retaining wall.

The site of the Meridian Business Park just north of the current alignment was previously part of March Air Force Base (AFB). Its predecessor, March Field, was initially established as a military training field in February 1918. March AFB was chosen for realignment in 1993, which resulted in a reduction of forces and re-designation of the base as an Air Reserve Base (ARB). The change in use required less acreage by the base, and the March Joint Powers Authority (MJPA) was formed by the Cities of Moreno Valley, Perris, and Riverside, and the County of Riverside to jointly oversee the management of the remaining land.

The Project is located along the eastern boundary of the Riverside National Cemetery. The property was established as a national cemetery in 1976 on 740 acres transferred for its use from March AFB and is now owned by the federal government; the cemetery is managed by the Veterans Administration (VA) National Cemetery Administration (NCA). A master plan was prepared in 1976 to guide the growth and expansion of the cemetery, and an updated master plan was in preparation in 2018 (Marstel-Day 2018:3). The cemetery has been expanded in phases, and encompassed 922 acres, of which 276 acres were developed and 43 acres were in development at the time of ASM's site survey in 2018 (Figure 2) (Marstel-Day 2018:2). A cemetery expansion project, Phase 5, was under construction at the time of survey; this expansion will develop 43 acres southeast of the current developed cemetery property, including additional sites for in-ground burial sites for caskets and cremains, and columbarium sites, as well as roadways and landscaping. A Site-Specific Environmental Assessment (SEA) for the Phase 5 expansion and improvements at the Riverside National Cemetery was prepared by Marstel-Day, LLC in 2018.

According to the *National Register Eligibility of National Cemeteries - A Clarification of Policy* (2011), the VA determined that all VA cemeteries are eligible historic resources regardless of their age, and the potential impacts from the Project on the cemetery must be considered in compliance with the National Environmental Protection Act (NEPA) and the California Environmental Quality Act (CEQA). This CRTR was prepared to identify any known cultural and historic resources within the Project area and the area of potential effects (APE), in compliance with the NEPA and CEQA processes. The APE is the same as the area of potential impacts (API) for CEQA compliance. According to the 2011 *Clarification of Policy*, the Riverside National Cemetery should be evaluated only under the NRHP eligibility criteria. California Public Resources Code (PRC) §5024.1(d)(1) states that the California Register of Historical Resources (CRHR) shall include properties formally determined eligible for, or listed in, the NRHP. As such, the Riverside National Cemetery is therefore eligible for the CRHR. Therefore, the Riverside National Cemetery is considered a historic property in consideration of the NEPA process and a historical

resource in the CEQA process. Direct and indirect Project effects/impacts to the Riverside National Cemetery and any archeological resources identified will be assessed under NEPA, NHPA, and CEQA.

A pedestrian survey of the Project APE was completed by ASM Senior Architectural Historian Shannon Davis, M.A., RPH, and Architectural Historian Laura Voisin George, M.A., on August 23, 2018, accompanied by Sherri Andrews, M.A., RPA, who served as the Project Archaeologist for this CRTR. This prior survey, conducted in support of the Meridian Trunk Sewer Project, substantially followed the same alignment as the current Project, and given its recency is deemed adequate for application to the current Project.

1.1 PROJECT DESCRIPTION

The Project consists of a master planned storm drain improvement project along the west side of Interstate 215, south of Van Buren Boulevard, adjacent to the Riverside National Cemetery to the west and south, and Riverside County Transportation Commission (RCTC) railroad right-of-way to the east. The Project is located within a 40-foot sanitary sewer and storm sewer easement at the eastern boundary of the Riverside National Cemetery.

The Project would construct an underground 6-foot by 4-foot reinforced concrete box (RCB) from an existing 6-foot by 3-foot RCB at Van Buren Boulevard, extending approximately 2,350 linear feet south and connecting to existing dual 48-inch reinforced concrete pipes (RCPs) at the RCTC railroad right-of-way. The Project would also include the removal and replacement of portions of Avenue A and the removal and replacement of an existing retaining wall. Approximately 2.02 acres would be disturbed by the proposed Project including the construction staging area. The depth of the pipeline would be a minimum of 6 inches and a maximum depth of 9 feet below the existing surface.

The limits of construction along the proposed storm drain alignment would be within an approximately 36-foot-wide area along the 2,350-foot alignment. In addition to construction of the RCB, construction activities along the alignment would include trenching, staging of material, replacement of a retaining wall, and replacement of portions of Avenue A. The 36-foot area is within an existing 40-foot sanitary sewer and storm sewer easement.

An approximately 0.11-acre construction staging area would be located on the south side of Van Buren Boulevard between the sewer line and storm drain alignments. This area is where construction equipment and materials would be temporarily stored during the construction process, which is estimated to take six months. Once construction activities are complete, this area would be restored to existing conditions and would remain undeveloped. With the staging area, the total project footprint is approximately 2.02 acres.

1.2 PROJECT APE

1.2.1 Direct APE

A project's direct APE is defined as the geographic area or areas, regardless of land ownership, within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. Figure 3 illustrates the direct APE.

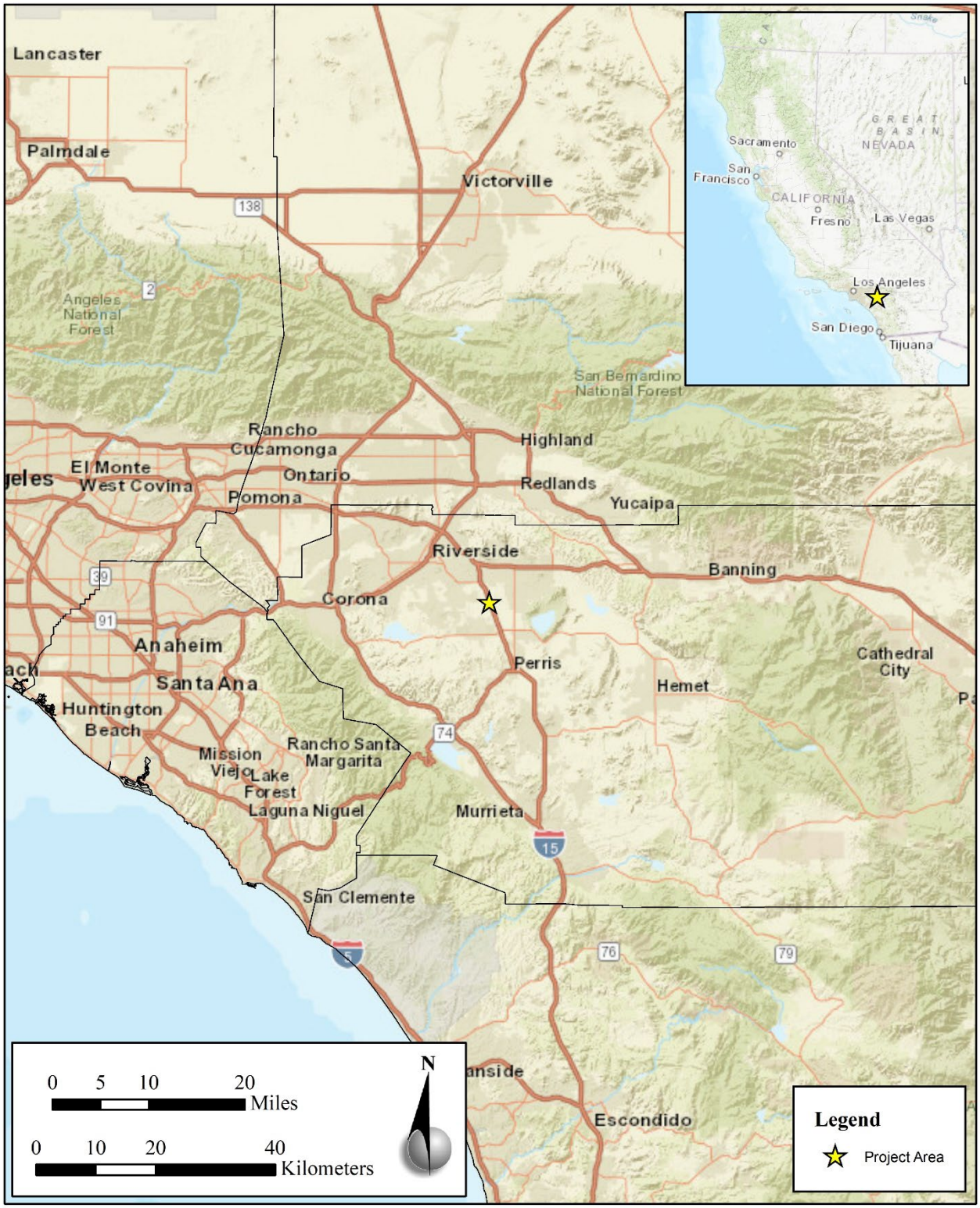

Figure 1. Project vicinity map.

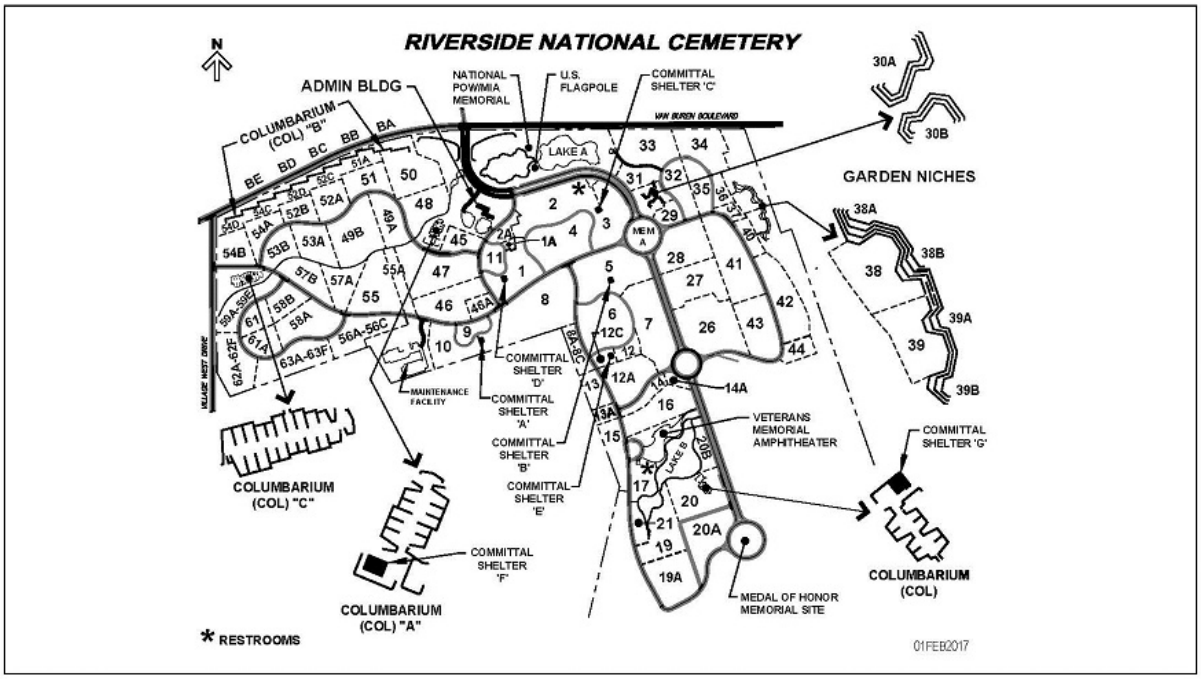

Figure 2. 2018 map of developed section of Riverside National Cemetery.

1.2.2 Indirect APE

The indirect APE is the same boundary as the direct APE due to the nature of the project. Upon completion, the storm drain will not be visible above ground and therefore does not have the potential for visual impacts. The potential for auditory or atmospheric impacts will be limited to the construction phase of the Project and is not anticipated to extend beyond the limits of the Project area.

1.3 REGULATORY FRAMEWORK

The Project area includes federally administered land, thus requiring compliance with regulations set forth in the NHPA governing the discovery and treatment of cultural resources as well as CEQA. The sections following outline the NHPA and CEQA regulations.

1.3.1 National Historic Preservation Act (NHPA)

The NHPA established the NRHP and the President's Advisory Council on Historic Preservation (ACHP), and provided that states may establish SHPOs to carry out some of the functions of the NHPA. Most significantly for federal agencies responsible for managing cultural resources, Section 106 of the NHPA directs that "[t]he head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP." Section 106 also affords the ACHP a reasonable opportunity to comment on the undertaking (54 United States Code [U.S.C.] §306108).

Figure 3. Meridian Storm Drain Expansion alignment.

36 Code of Federal Regulations (CFR), Part 800 (36 CFR §800) implements Section 106 of the NHPA. It defines the steps necessary to identify historic properties (those cultural resources listed in or eligible for listing in the NRHP), including consultation with federally recognized Native American tribes to identify resources of concern to them; to determine whether or not they may be adversely affected by a proposed undertaking; and the process for eliminating, reducing, or mitigating adverse effects.

NHPA Historical Property

The NHPA defines a "historic property" as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register," such term includes artifacts, records, and remains which are related to such district, site, building, structure, or object" as stated in 54 U.S.C. §300308.

1.3.2 National Register of Historic Places Significance Criteria

Authorized by the NHPA, the National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. The NRHP is the official list of the nation's historic places worthy of preservation.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and 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 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.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

a) a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

b) a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

c) a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or

d) a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

e) a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

f) a property primarily commemorative in intent, if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

g) a property achieving significance within the past 50 years if it is of exceptional importance.

As stated in the 2011 *National Register Eligibility of National Cemeteries – A Clarification of Policy*, all national cemeteries are considered exceptionally significant as a result of their Congressional designation as nationally significant places of burial and commemoration. This means they meet the special requirements set forth in the NRHP Criterion Considerations for cemeteries, graves, commemorative properties, and resources less-than-50 years of age. It also means that for the purpose of documenting a national cemetery as a NRHP district, facilities and sections developed within the past 50 years are considered significant and are eligible for NRHP listing as contributing resources.

Because they contain a combination of resource types and cover substantial acreage, national cemeteries are considered historic districts for the purposes of NRHP listings and determinations of eligibility. Generally national cemeteries are significant under Criterion A for their association with significant events related to the nation's military history and the role of the Department of Veterans Affairs. Those having artistic or architectural significance as designed landscapes or for the design of memorials, monuments, or historic buildings, may also be documented under Criterion C.

Regardless of the date of acquisition or construction, the overall acreage within the boundaries of the cemetery that has been developed for cemetery purposes is considered one contributing site for NRHP purposes. This site includes commemorative sections of the cemetery containing existing graves and memorials, sections having the infrastructure necessary to receive new interments and memorials (for example, streets, utilities, pre-placed crypts, columbaria, and memorial walkways), and areas of the cemetery developed for administrative and maintenance purposes (offices, restrooms, garages, and maintenance yards). Unimproved acreage within the cemetery boundaries that is being held for future use is considered noncontributing. As additional sections are developed in the future, the NRHP documentation should be updated with continuation sheets describing the newly developed section and revising the description of the acreage considered contributing (NCA 2011).

1.3.4 California Environmental Quality Act (CEQA)

CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15064.5) *Determining the Significance of Impacts to Archeological and Historical Resources* requires that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

Lead agencies have a responsibility to evaluate historical resources against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change to a historical resource. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.

The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, the NRHP, as well as some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark

districts), or that have been identified in a local historical resources inventory, may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Generally, a resource shall be considered by the lead agency to be a "historical resource" if it:

1. Is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC §5024.1; CCR, Title 14, §§4850 et seq.).
2. Is included in a local register of historical resources, as defined in PRC §5020.1(k), or is identified as significant in an historical resource survey meeting the requirements of PRC §5024.1(g).
3. Is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (PRC §5024.1; CCR, Title 14, §4852).

CEQA requires that all private and public activities not specifically exempted be evaluated for the potential to impact the environment, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, or place, which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (Division I, PRC §5021.1(b)).

1.3.5 Integrity

In order to be eligible for listing in the NRHP and CRHR, a property must retain sufficient integrity to convey its significance. The NRHP publication *How to Apply the National Register Criteria for Evaluation*, NRHP Bulletin 15, establishes how to evaluate the integrity of a property: "Integrity is the ability of a property to convey its significance" (National Register of Historic Places 1997). The evaluation of integrity must be grounded in an understanding of a property's physical features and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, aspects of integrity:

1. **Location** is the place where the historic property was constructed or the place where the historic event occurred.
2. **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting** is the physical environment of a historic property and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.
4. **Materials** are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.
5. **Workmanship** is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory and can be applied to the property as a whole, or to individual components.

6. **Feeling** is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property's historic character.
7. **Association** is the direct link between the important historic event or person and a historic property.

1.3.6 Criteria for Assessing Visual Effects

Because there is no universally accepted yardstick for measuring visual effects and because those impacts do not always damage the defining characteristics of a historic property in any physical manner, assessing them can be difficult and complicated. If we are to consider that a historic property is affected when its historic significance and integrity have been diminished, determining how a project harms a resource's historical significance and integrity is essential to any assessment. In assessing the indirect effects for historic resources, the criteria for significance and the aspects of integrity are factors that require careful evaluation and can provide a defensible qualitative method for determining visual impacts on historic resources.

To ensure a thorough and complete analysis of visual effects, ASM augmented the nationally recognized guidance of Section 106 (36 CFR §800) regulations of the NHPA and SOI Standards with more specific guidance that has been developed by two state agencies—the Delaware State Historic Preservation Office (Delaware SHPO 2003) and the Wyoming Bureau of Land Management and Wyoming State Historic Preservation Office (Wyoming BLM 2006).

Definitions

For purposes of this analysis, the following definitions have been employed:

Historic Property or Historic Resource: a historic site, district, building, structure, or object that is either eligible for inclusion in the NRHP, or listed therein.

Adverse Visual Effect: an impact that negatively affects the integrity of the setting or feeling of a historic property, to the extent that significance and eligibility for listing in the NRHP are compromised. In particular, adverse visual impacts can be seen as negatively affecting the following characteristics of integrity: setting, feeling, or association.

Obstructive Visual Effects: any visual impact that carries the potential to obstruct any part of the view of a historic property, or the scenic view from such a resource. Adverse obtrusive impacts can obstruct all or a portion of a historic property and/or its viewshed, in turn negatively affecting the property's historic character.

Scenic Views: any scenic resources or resources that are visually and aesthetically important and that contribute to a historic property's significance.

Viewsheds: those areas visible from a specified location or locations.

Visual Effects: any aspect of a proposed undertaking that will be seen from or will be in the view of a historic property. A visual impact may be beneficial or adverse and may affect the historic property in an aesthetic or obstructive manner. The determination that a visual impact exists does not automatically imply that the impact is adverse.

Adverse Visual Effects

Adverse visual effects may be created when an undertaking is visible within the viewshed of the historic property, when it blocks a view toward the historic property, or when it introduces an element that is incompatible with the criteria under which the property is eligible.

Simply because an undertaking will be visible from a historic property does not mean it automatically will create an adverse visual effect. Therefore, it is necessary to evaluate the visual changes and alterations the undertaking will introduce to the resource. In assessing adverse visual impacts on a historic property, it is necessary to identify the criterion or criteria under which the resource is eligible and what qualities or characteristics of the resource contribute to its significance or eligibility. For example, if a resource is eligible for its innovative engineering qualities, visual effects on the property may not be adverse, whereas if the property is eligible on the basis of its architectural significance, an adverse effect very well may be created.

An adverse visual effect may be obstructive, which is to say it may block the view to or from a historic property; it may also not be obstructive and still create an adverse visual effect in that it introduces elements so incompatible with the criterion or criteria under which the property is eligible for listing that it diminishes the property's significance to a substantial degree. For example, a highway proposed to run alongside a historic rural church, while it would not directly obstruct the view to or from the building, might still introduce an element so incompatible with the rural setting of the property that it would have a diminishing impact upon the integrity of the property's setting.

Adverse visual effect should be determined on a case-by-case basis, weighing the following factors:

- **Significance.** A historic built-environment resource's historical significance and its key aspects of integrity must be taken into account in order to evaluate the project's impacts on the property's eligibility for listing in the NRHP.
- **Character-Defining Features.** The alteration of character-defining features at the project location (including open space) can affect the view from the historic built-environment resource and possibly the location, feeling, setting, and association of that resource.
- **Compatibility.** Whether in an open space or a developed area, the compatibility of the project with the character of the project's location and surrounding area, including historic resources, is important. The character of the historic property's site and architectural features should be the basis for determining the appropriate characteristics of the proposed project. The compatibility of the project is determined by:
    - Mass—the arrangement of the project's spaces;
    - Scale and proportion—the size and the proportion of the project to the surrounding structures and features;
    - Height—sometimes it may be necessary that a project height extend beyond that of the surrounding buildings and other features within view of the project; it is important that the height of the project not cause the line of sight to move so far up that the surrounding features are out of view, thereby detracting from the original view;
    - Shadows;
    - Color;
    - The degree to which the project would contribute to the area's aesthetic value;

- The degree of contrast, or lack thereof, between the project and the background, surrounding scenery, or neighborhood; and
- The amount of open space.

- **Obstructive Effects.** Whether a project is on or near a historic property, it can block the resource from being viewed, or block a view seen from that resource, thereby possibly diminishing its integrity. Determination of adverse obstructive effects should be made on a case-by-case basis, considering the following factors:
  - The historic property's significance. It is necessary to understand the resource's historic significance and its key aspects of integrity in order to evaluate the project's impacts on the resource's eligibility for listing in the NRHP.
  - Nature and quality of the view from the historic property. This includes such features as natural topography, settings, man-made or natural features of visual interest, and other historic property seen from the historic built-environment resource, any of which would contribute to its significance and integrity.
  - Extent of obstruction. This includes total blockage, partial interruption, or interference with a person's enjoyment and appreciation of a scenic view or historic property viewed from the historic property, to the extent it affects the integrity of the historic property.
  - Obstruction of a historic property. The project might obstruct the historic property from being viewed from the project site or other area. If the historic property is visually appreciated from surrounding viewpoints, obstructing its view may affect its feeling, setting, location, or association.

1.4 KEY PERSONNEL

NHPA regulations require that individuals working on the project be under the direction of personnel who meet or exceed the Secretary of the Interior's Professional Qualification Standards for Archaeology and Architectural History (48 Federal Register [FR] 44716). Given these criteria, Shannon Davis, M.A., RPH, served as Lead Architectural Historian, Laura Voisin George, M.A., served as Project Architectural Historian, and Sherri Andrews, M.A., J.D., RPA, served as the Lead Archeologist. Ms. Davis and Ms. Voisin George meet or exceed the Secretary of the Interior's Professional Qualification Standards for Architectural Historian and Historian, and both have extensive experience evaluating linear resources, including water conveyance systems, roads, railroads, and transmission lines. Ms. Andrews exceeds the Secretary of the Interior's Professional Qualification Standards for Archaeology and has extensive experience in Riverside County.

1.5 REPORT ORGANIZATION

This report is divided into five chapters. Following this introduction, Chapter 2 provides an historical context for the Project area, related to the specific resources within the APE. Methodology and the records search summary are included in Chapter 3. Chapter 4 identifies the resources surveyed. Chapter 5 provides the evaluation of historical significance for all properties surveyed. Chapter 6 provides an assessment of effects/impacts on eligible historical properties/historic resources. The appendix contains the confidential records search results (Appendix A).

2.0 HISTORIC CONTEXT AND OVERVIEW

This chapter reviews the natural setting and historic context of the Project area including the Riverside National Cemetery. It provides a summary of previous reports and research conducted in the area.

2.1 NATURAL SETTING

The Project area is within an unincorporated area of Riverside County, southeast of the City of Riverside and southwest of the City of Moreno Valley, California. The overall terrain is relatively level on the north and east sides of the Project area, and gently rolling as it slopes to a higher elevation to the west. Immediately to the east of the Project area, the graded terrain slopes down to the BNSF Railroad line and adjacent Interstate 215; a bridge spans the railroad and interstate cut at Van Buren Boulevard. To the north of the Project is the Meridian Business Park master-planned commerce center, and the Riverside National Cemetery lies west of the Project alignment. March ARB is located on the east side of Interstate 215.

2.2 PREHISTORIC AND ETHNOHISTORIC CONTEXT

The Project area is located in a region intermediate between the desert regions to the east and the coastal region to the west. As such, it is likely to have been affected by population movements from both the coastal and desert regions. No geographically specific chronology or reconstruction of past lifeways has been developed for the local area, so the larger regional culture history will be applied. Various approaches to the regional cultural history can be found in Moratto (1984), Warren (1984), Chartkoff and Chartkoff (1984), and Fagan (2003). The largest body of archaeological investigations near the Project area comes from the Colorado Desert and the Coachella Valley (Bean et al. 1995; Schaefer 1994). Studies for the Eastside Reservoir Project (Goldberg 2001) have provided a baseline cultural chronology with applications to the western slopes of the Santa Rosa and San Jacinto mountains. These sources can be applied for the purposes of a general cultural history, especially for the Late Prehistoric period, if we can assume that Native American mobility and resource use practices extended across the environmental zones from the desert to the mountains, as we know from ethnohistoric sources. What cannot be assumed, however, is that patterns of social organization, settlement, territoriality, and seasonality were the same in the deep past. It is very likely they have changed over time with changing environmental conditions, resident tribal affiliation, and demographics.

The prehistoric chronology is divided into three periods, each characterized by differing patterns of socio-political organization, technology, resource focus, and land use. They include the Paleoindian, Archaic, and Late Prehistoric periods.

2.2.1 Paleoindian Period (ca. 12,000-8000 B.P.)

The Paleoindian period is represented by several archaeological complexes, including what are referred to as the related Fluted-Point and Western Pluvial Lakes traditions in the Mojave Desert, and the Paleo-Coastal tradition on the Pacific coastal plane. Among the best known archaeological complexes of tool types and settlement distributions in the desert is the Lake Mojave complex, while the coastal plain and Imperial Valley were host to the San Dieguito complex.

Small, highly mobile bands of hunters and gatherers depended on various game animals and an extensive rather than intensive pattern of plant exploitation. Sites tend to occur along former pluvial lakes and desert pavements, or along major stream channels. Milling tools are absent in the desert and rare on the coast, suggesting minimal use of hard seeds. The stone tool kit included foliate points or knives, long-

stemmed points, lanceolate bifaces, discoidals, burins, crescents, flake and core scrapers, choppers, hammerstones, cores, drills, gravers, and casual flake tools.

2.2.2 Archaic Period (8000-2000 B.P.)

Over the long duration of the Archaic period, there was a gradual shift from small, highly mobile hunters and gatherers practicing a forager pattern to larger groups with a diversity of settlement types involving residential bases, temporary camps, strategically located cache sites, and specialized resource collecting localities. This pattern reflects increasing intensification and a shift from foragers to collectors who practiced logistical patterns of mobility to accommodate seasonally available resources. Coincident with these changes were the diversification of food resources and new specialized technologies with which to exploit them. Projectile points reflect the shift to the use of atlatl and dart. Milling tools become ubiquitous and reflect increased exploitation of seeds and nuts. Larger residential base sites tend to occur at reliable water sources such as springs or tanks, with temporary camps near seasonal stream channels, extinct rivers, playas, high terraces above sinks, and rockshelters.

Some late Archaic sites are known, however, from the Colorado Desert that indicate occupations along the boundary between the low desert and Peninsular Ranges and at more favored habitats at springs and tanks. The most substantial Colorado Desert site is Indian Hill Rockshelter in Anza-Borrego Desert State Park where 1.5 meters of Archaic period deposits were excavated below a Late Prehistoric component (McDonald 1992). Most significant were 11 rock-lined cache pits and numerous hearths indicative of either a residential base or a temporary camp in which food and tool storage was integral to the hunting and gathering settlement-subsistence strategy. Also recovered were numerous Elko-eared dart points, flaked and milling stone tools, and three inhumations, one of which was radiocarbon dated to 4070 ±100 years before present (B.P.). Two similar rock-lined pits were excavated at a small rockshelter in Tahquitz Canyon near Palm Springs (Bean et al. 1995). The small quantity of artifacts at that site suggested strategically stored food and seed processing equipment of small mobile groups.

2.2.3 Late Prehistoric / Protohistoric Period (1500-250 B.P.)

The major archaeologically visible technological and cultural innovations of this period are the introduction of pottery making by the paddle-and-anvil technique, bow-and-arrow technology around 1200 B.P., a shift from inhumation to creation burial, and the introduction of floodplain agriculture on the Colorado River about the same time (Rogers 1945), although exact dating of early domesticates is lacking (Schroeder 1979). This was also the period when obsidian trade relations shifted from the Coso sources in the Mohave Desert to the Obsidian Butte source in the Salton Trough, when Lake Cahuilla did not submerge it. Ceramics and cultigens were introduced from either Mexico or through the Hohokam culture of the Gila River (McGuire and Schiffer 1982; Rogers 1945; Schroeder 1975, 1979).

The ancestral Cahuilla were certainly exposed to domesticates at an early time, although opinions differ on when they adopted horticulture as a substantial part of their economy. It may have been a secondary pursuit for the production of specialty foods and fibers or gourds in the prehistoric period, although that has not been established archaeologically, as yet. Agricultural intensification and ditch irrigation techniques may not have occurred until after exposure to the mission system in historic times (Schaefer 1995).

Bow-and-arrow technology, seed-beaters, and other sophisticated hunting and gathering technology may also be related to the spread of Numic and Takic peoples from the southern Great Basin. Late Holocene flooding of Lake Cahuilla may have accelerated contacts between people of the ancestral Yumans of the Colorado River and the ancestors of the Cahuilla in the Coachella Valley and Peninsular Ranges. Such contacts through ceremonial and economic exchange may have resulted in a cultural dynamic that formed the Patayan Pattern and the resulting cultures of the ethnohistoric period. Long-range travel to special

resource collecting zones and ceremonial locales, trading expeditions, and possibly some warfare are reflected by the numerous trail systems throughout the Colorado Desert. Pot drops, trailside shrines, and other evidence of transitory activities are associated with these trails (McCarthy 1982, 1993). Many of the pictographs, petroglyphs, and bedrock grinding surfaces in the Colorado Desert have also been associated with the Patayan pattern, although direct dating and cultural affiliation of such features is often difficult.

2.2.4 Ethnohistoric Period

The Project area is within the territorial boundaries of several Native American tribal groups. Ethnographic sources have indicated that these groups may have included the Luiseño of the Perris-Elsinore region, the Serrano of the San Bernardino Mountains, and the Gabrielino of the San Gabriel Valley. Additionally, a late influx of Cahuilla occurred during the nineteenth century. Boundaries between the tribes were fluid and changed somewhat over time. The Gabrielino name derived from their association with the San Gabriel Valley and the Mission San Gabriel Arcángel, while the Luiseño were named for their proximity to the Mission de San Luís Rey de Francia (Bean and Smith 1978a, 1978b).

These groups shared similar social organization and resource procurement strategies. Villages were based on clan or lineage groups, and the home sites are marked by midden deposits, often with bedrock mortars. During seasonal rounds to exploit available resources, small groups often ranged some distances in search of specific plants and animals. The gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.

Numerous plants and animals were utilized for food, shelter, and medicines (Kroeber 1976). Seeds were most often used followed by foliage, shoots, fruits, and berries. Mountain shrubs, ash, elder, and willow were used for shelters and tool materials such as bows. Fauna used as food sources included deer, rabbits, wood rats, squirrels, quail, and ducks. Animals specifically not used were dog, coyote, bear, tree squirrel, pigeon, dove, mud hen, eagle, buzzard, raven, lizards, frogs, and turtles (Kroeber 1976). Various styles of bows, bedrock mortars, portable mortars, pipes, chisels, metates, manos, and various forms of chipped stone tools were utilized as well. Prior to the establishment of the Mission system, Native Americans lived in larger villages, associated with smaller villages with limited activity areas and smaller populations. Seasonal migration was practiced across the area for both the exploitation of resources and based on seasonal weather conditions.

2.3 HISTORIC CONTEXT

2.3.1 Spanish and Mexican Periods

Spanish explorer Juan Rodríguez Cabrillo first discovered California in 1542, claiming it for the King of Spain. However, Spanish contact within the vicinity of the Project area did not take place until the 1770s when Father Garces traveled across the Mojave Desert and entered coastal southern California through the Cajon Pass (Walker 1968).

The Mission San Gabriel de Archangel was established in 1771 and claimed what are now the San Gabriel and San Bernardino valleys. In 1819, a mission outpost, or asistencia, was established in the area of present-day Redlands (Dumke 1944; Hanna 1951; McWilliams 1973; Scott 1977). This outpost, part of Mission San Gabriel's Rancho San Bernardino, was established to expand the agricultural holdings of Mission San Gabriel. The asistencia was later moved to its current location, where construction began in 1830; it was abandoned soon after in 1834 (Lugo 1950). Although no missions were ever located in present-day Riverside County, Mission San Gabriel had far-reaching influence over the area that would become Riverside County.

The Mexican War of Independence ended in 1821, severing the Spanish hold on the Californias and secularizing former mission lands. A series of ranchos was granted throughout what is now Riverside County and much of the land was used for ranching activities. Although some land had been granted to Indians, most went to military men or merchants. Granting large ranch lands or ranchos remained as both a Spanish and a Mexican legacy in California. Land granted to Mexicans between 1833 and 1846 amounted to 500 ranchos primarily granted near the coast from San Francisco to San Diego. Mexican Governor Pío Pico granted a great number of those ranchos prior to 1846, quickly carving up Alta California to ensure Mexican land titles survived a United States (U.S.) victory in the Mexican-American War (1846-1848) (Christenson and Sweet 2008:7; Engstrand 2005:64-66; Robinson 1948:23-72).

2.3.2 Alessandro Valley and Moreno Valley

In the 1840s, the Project location was part of the vast Rancho San Jacinto, which was extended from Box Springs to the San Jacinto Mountains, and from the Badlands to Temecula. The land was used as pasture for cattle and sheep (Hamner 2003:5). In 1883, the California Southern Railroad's line between National City (near San Diego) and San Bernardino was built through the valley; this line later became part of the Santa Fe Railroad. During the Southern California real estate boom of the 1880s, the Project location was part of the large Alessandro Tract recorded in 1887. The town of Alessandro was established near present-day Van Buren Boulevard at the road to Temecula (now Interstate 215) and extended east at the present location of the north end of the March ARB runways (Moreno Valley Historical Society n.d.). The surrounding area became known as Alessandro Valley (Hamner 2003:5).

In 1890, the Bear Valley and Alessandro Valley Company purchased substantial acreage in the area, including land on both sides of the Santa Fe rail line, and began ambitious land and water development projects in the area. The entire valley was platted in 10-acre parcels for the production of citrus, grapes, and other fruit (Hamner 2003:6). The town of Moreno was founded approximately 5 miles to the east-northeast of Alessandro in 1893, and Riverside County was formed from San Bernardino and San Diego counties and included both Alessandro and Moreno. However, during a drought in the 1890s, the wells in Alessandro ran dry and resulted in the departure of most of the residents, with many of the buildings being moved to Riverside or demolished. By the early 1900s, there remained a small number of dry farms producing wheat, oats, and barley (Moreno Valley Historical Society n.d.).

Eli E. Hendrick, a civil engineer, manufacturer, and oil refiner in Pennsylvania, began making annual visits to southern California in the late 1880s and acquiring property in Los Angeles. In 1903, he also began buying land in Moreno Valley for a large orange grove and having new wells built. The extant buildings in Alessandro were used for the Hendrick Ranches, with its hotel serving as a bunkhouse for ranch hands. After Hendrick's death in 1909, the property passed to his heirs. Dry land grain was the main crop on the western portion of the estate, with citrus, alfalfa, and other irrigated crops on the other acreage (Hamner 2003:124-126).

2.3.3 March Field and Camp Haan

In 1918, the manager of the Hendrick Estate leased 640 acres of the property on the east side of the Santa Fe rail line to the U.S. government for the Alessandro Aviation Field. Shortly thereafter it was re-named March Field, in honor of Lt. Payton C. March who had been killed in a training plane crash in Texas, and by 1919 it was the location of the March Field Aviation School (Hamner 2003:125; Moreno Valley Historical Society n.d.).

In 1940, 1,500 acres on the west side of the rail line were leased by the U.S. government for the construction of an Artillery Anti-aircraft Replacement Training Center which was named Camp Haan, in honor of Major General William George Haan (Moreno Valley Historical Society n.d.; MJPA 2010:1-4).

The property was subsequently sold to the U.S. government, and the Hendrick Ranches' headquarters, scales, and its moveable property were moved to a new location (Hamner 2003:126).

The linear Camp Haan property included over 3 miles of frontage on old Highway 395 (present-day Interstate 215); the 1942 Riverside quad map shows the camp's street system located from present-day Cactus Avenue on the north to Nandina Avenue on the south (Figure 4). During its use as a camp, the army also provided for the graveling of adjacent county roads to alleviate traffic congestion on the nearby highways, the construction of a sewage disposal plant, and an almost-9-mile road linking the anti-aircraft training center with Arlington that was to be built with WPA funding (*Riverside Daily Press* 1941a, 1941b). By 1941, Camp Haan housed 8,000 soldiers in five identical regimental areas, each having its own regimental headquarters building, recreation hall, canteen, infirmary, and kitchen; the camp's 353 buildings also included six post exchanges, five chapels, a hospital, 18 miles of sewers, and 28 miles of streets (MJPA 2010:1-4). The soldiers were assigned to five-man tent houses with electric lighting and gas heat (*Riverside Daily Press* 1941c). The residential section of the camp appears to have been located north of Van Buren Boulevard, with a small number of buildings to the south of Van Buren, located west of present-day Lemay Boulevard and north of Meuse-Argonne Avenue (Figure 5). The camp was also used as an army service depot, a prisoner-of-war camp, and an 800-bed debarkation hospital for wounded service members returning from the Pacific theater of operation (MJPA 2010:1-4). At the termination of the war, Camp Haan was used as a separation point for soldiers returning from deployment.

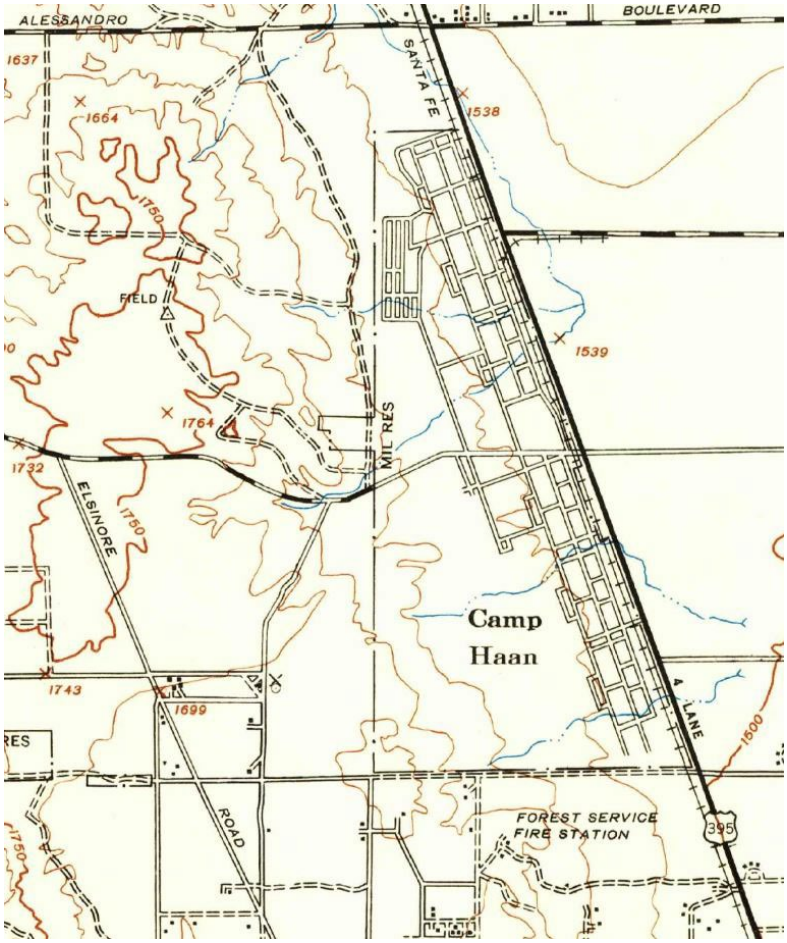

Figure 4. Riverside (CA) 1942 USGS quad map detail.

Figure 5. Camp Haan ca. 1940s, view to southeast. March Field is at upper left and the former community of Alessandro (present-day intersection of Van Buren Boulevard and I-215 / former Old Highway 395) at upper center of photo. Project APE extends from the center to the upper right of the photo.
Collection of Moreno Valley Historical Society.

Camp Haan was closed in 1946, and its parcels were returned to March Air Force Base (MJPA 2010:1-5). Almost all of the structures of the former camp were sold as surplus and moved or demolished; one Quonset hut remaining on the property was moved to the maintenance yard in 1977 (Jensen 2016:4; Marstel-Day 2018:21-22). Some of the former camp's land was developed as the General Old Golf Course and the Air Force Village West Retirement Community. The camp's former residential area was developed in 1953 as a subdivision called Arnold Heights that included 586 housing units and a chapel for military personnel (Figure 6) (Royston Hanamoto Beck & Abey n.d.:3; MJPA 2010:1-7).

2.3.4 National Cemeteries

[This section is excerpted from a March 1, 2016 letter from Margaret B. Jensen, NCA, to SHPO, initiating Section 106 Consultation for the Riverside Columbarium at Riverside National Cemetery.]

The first national cemeteries were established during the Civil War to accommodate the causalities of the war. Congress granted President Abraham Lincoln the ability "to purchase cemetery grounds and cause them to be securely enclosed, to be used as a national cemetery for the soldiers who shall die in the service of the country". The first 14 national cemeteries were established in 1862, and five years later, in 1867, the first National Cemetery Act went into effect. This act "provide[d] funds and specific guidance for the national cemeteries," including who would oversee the maintenance of national cemeteries and what features would be included as part of each property. Plans for cemeteries included standardized superintendents' lodges, perimeter walls, fencing, and headstones. For the most part, "locations for the national cemeteries were selected by assistant quartermaster generals within the regional departments of the Army," often near Civil War battle sites, field or general hospitals, former prisoner-of-war prison facilities, or post cemeteries. During the end of the nineteenth century and beginning of the twentieth century, the National Cemetery Act was amended and changed, resulting in the establishment of more national cemeteries.

The National Cemeteries Act of 1973 "transferred 82 of the Army's 84 national cemeteries to the custody of the VA." The Act also "authorized VA to acquire land so the existing cemetery system could grow." A study conducted in the 1970s recommended that the VA establish facilities for 10 standard federal regions

to "expand state Veterans' cemeteries". After this recommendation, four existing cemeteries were re-designated as regional national cemeteries and six new regional national cemeteries were established, including the Riverside National Cemetery in 1976. The new cemeteries were significantly larger than any previous national cemetery property, "almost doubling the size of the administration's cemetery portfolio". These "larger cemeteries take on a park-like appearance and incorporate features such as columbaria and committal shelters, and omit lodges and traditional rostrums."

In Southern California, there are four other national cemeteries. The Los Angeles National Cemetery in Los Angeles, 70 miles west of Riverside, is closed to new interments. Fort Rosecrans National Cemetery in San Diego, 115 miles southeast of Riverside, is also closed to new interments. Miramar National Cemetery, an annex to the Fort Rosecrans National Cemetery in San Diego, is open to full burial options. Bakersfield National Cemetery, approximately 120 miles northwest of Riverside National Cemetery in Arvin, and separated by a significant mountain barrier, is open to full burial options.

2.3.5 Riverside National Cemetery

In 1976, 740 acres of the former Camp Haan site were selected for a national cemetery. The irregularly U-shaped property, located south of Van Buren Boulevard and west of the Santa Fe rail line, surrounded the General Old Golf Course on its north, east, and south sides. The initial master plan's Site Description noted that piles of concrete rubble, the remnants of earlier construction, were visible in most of the Project area, particularly at the south end of the property; these extent push piles in the southern part of the property were noted during the site inspection for this CRTR. The initial master plan also noted on the site a row of mature eucalyptus trees lining Camp Haan's Avenue C (now Lemay Boulevard), as well as California Pepper Trees, Catalpa, Carob, Cottonwood and Arizona Ash (Royston Hanamoto Beck & Abey n.d.:6-7).

The initial Master Plan for the Riverside National Cemetery described its design as combining "the traditional elements of order and directness with freer forms and less structured spaces. The dignity of the burial and respect of memory is represented by the forms of the land, the masses of trees, and the scale of the landscape" (Royston Hanamoto Beck & Abey n.d.:9). The cemetery's roadways and circulation corridors were designed in recognition "that most of the visual experience in a cemetery 'park' takes place from the automobile rather than the pedestrian path, [and] the roadway system [was] designed to direct the eye toward important views and to reinforce the rich park-like setting." An innovative element of the Riverside National Cemetery's design was that its graves would be "identified by flat markers that blend with the landscape rather than the rows of upright gravestones traditionally used in military cemeteries" (Royston Hanamoto Beck & Abey n.d.:10). The initial phase of construction is the central section of the cemetery's extent as of 2018, and included the present-day main entrance and administration building, the grounds between Lemay Boulevard and Normandy Drive south to Manila Avenue, and a corridor extending west to the Maintenance Facility (Figure 7).

The architectural theme for the cemetery buildings was described in the initial master plan as being inspired by the indigenous southwest architectural style (Royston Hanamoto Beck & Abey n.d.:10).

The Air Force transferred an additional 181 acres to the Riverside National Cemetery in 2003 (Figure 8). Since its establishment in 1976, the developed portion of the Riverside National Cemetery has been expanded in phases. From its initial boundaries, the developed portion of the cemetery has been expanded west of the Administration building, east of Lemay Boulevard south to Korea Avenue, and between Lemay Boulevard and Normandy Drive south to Belleau Wood Drive. In 2016, 5,000 columbarium niches were developed. A cemetery expansion project, Phase 5, was under construction at the time of survey (Figure 9). Located in an undeveloped area at the southeast side of the cemetery property, east of Lemay Boulevard and south of Korea Avenue, this expansion will develop 43 acres of the cemetery, including additional sites for in-ground burial sites for caskets and cremains, and columbarium sites, as well as roadways and landscaping (see Figure 9).

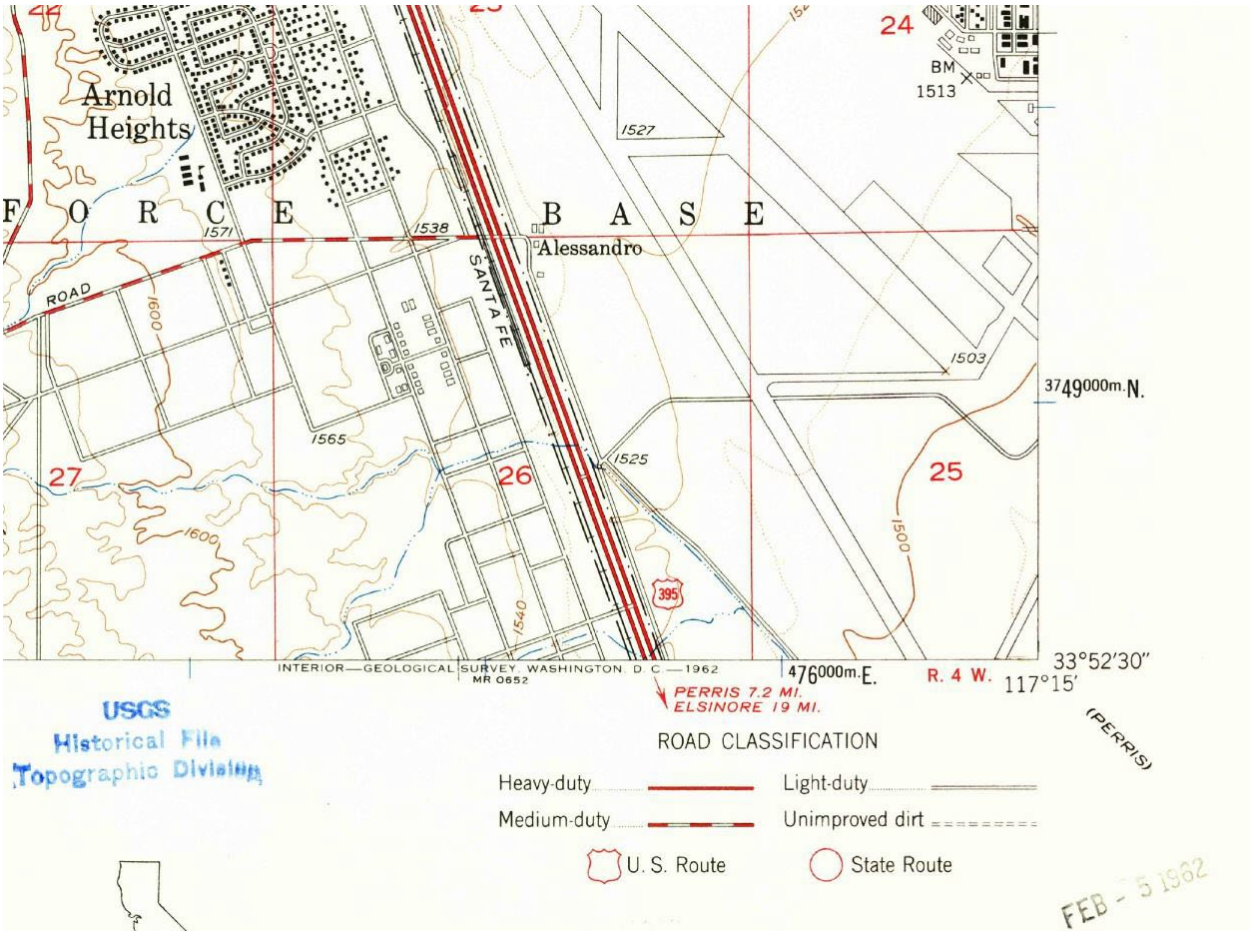

Figure 6. Riverside East (CA) 1953 USGS quad map detail.

A number of notable memorials have been constructed in the Riverside National Cemetery, including the National Medal of Honor Memorial (dedicated in 1999) at the southeastern end of the current cemetery property, located in the circle at the intersection of Lemay Boulevard and Belleau Wood Drive (Figure 10); and the Fallen Soldier/Veterans' Memorial (erected in 2000) (Figure 11), and Prisoner of War/Missing in Action Memorial (dedicated in 2005, located at the water feature/lake adjacent to the cemetery's main entrance kiosk (MJPA 2010:1-6). The Veterans' Memorial and POW/MIA Memorials feature bronze sculptures set within landscaped plazas. The Medal of Honor Memorial is composed of freestanding black marble walls defining a quadrangle with a rectangular fountain at the center, an entry court on its north side with the emblems of the U.S. military branches in its paving, and it is surrounded by a landscape element of squares planted with grids of columnar trees, representing units of service members standing at attention (Figure 12).

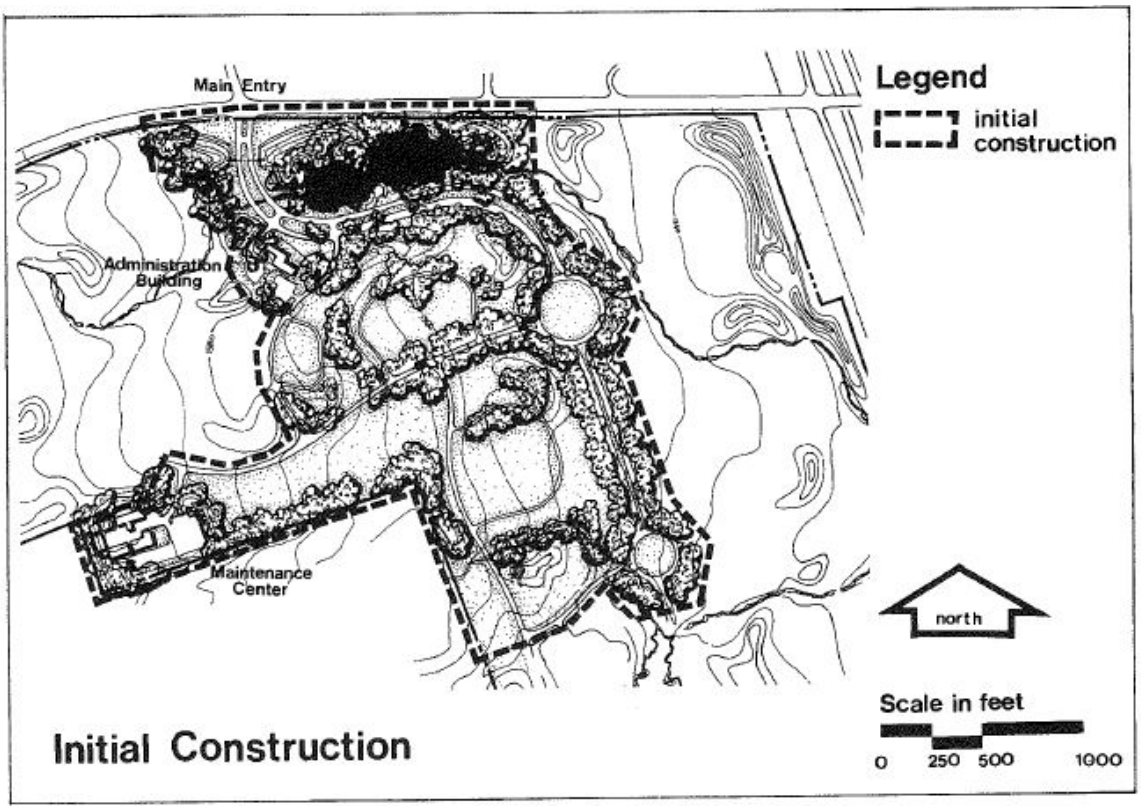

Figure 7. Riverside National Cemetery, initial construction.

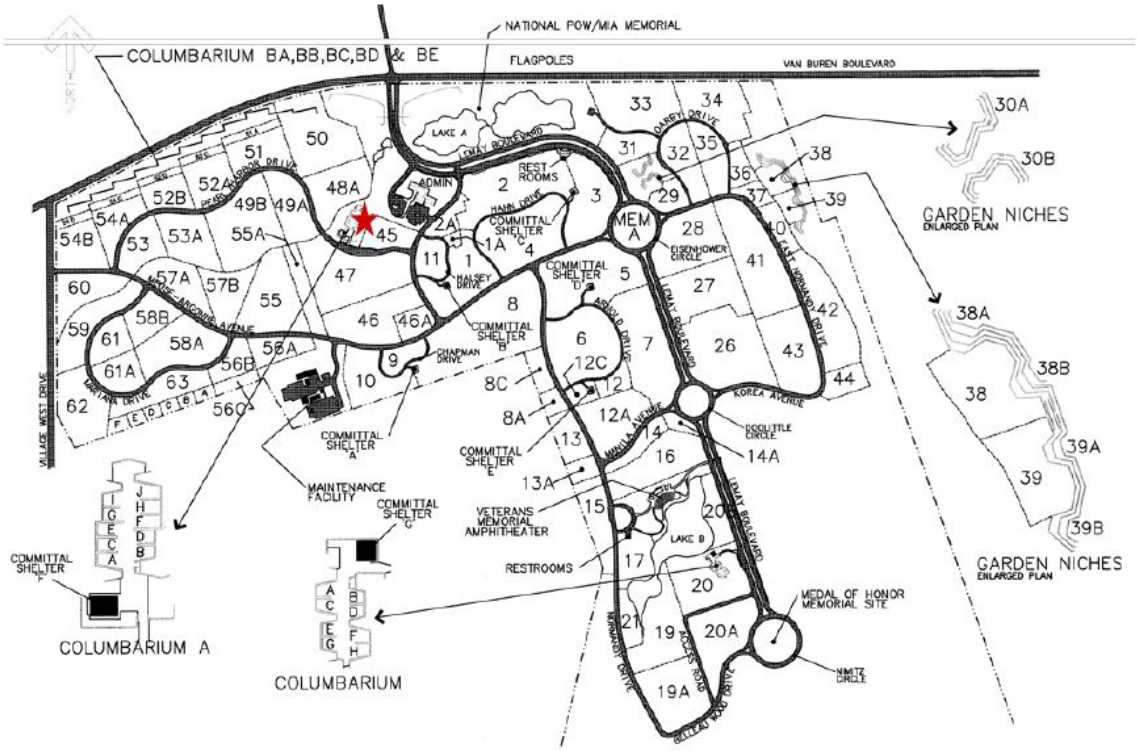

Figure 8. Riverside National Cemetery, developed section of cemetery in 2003.

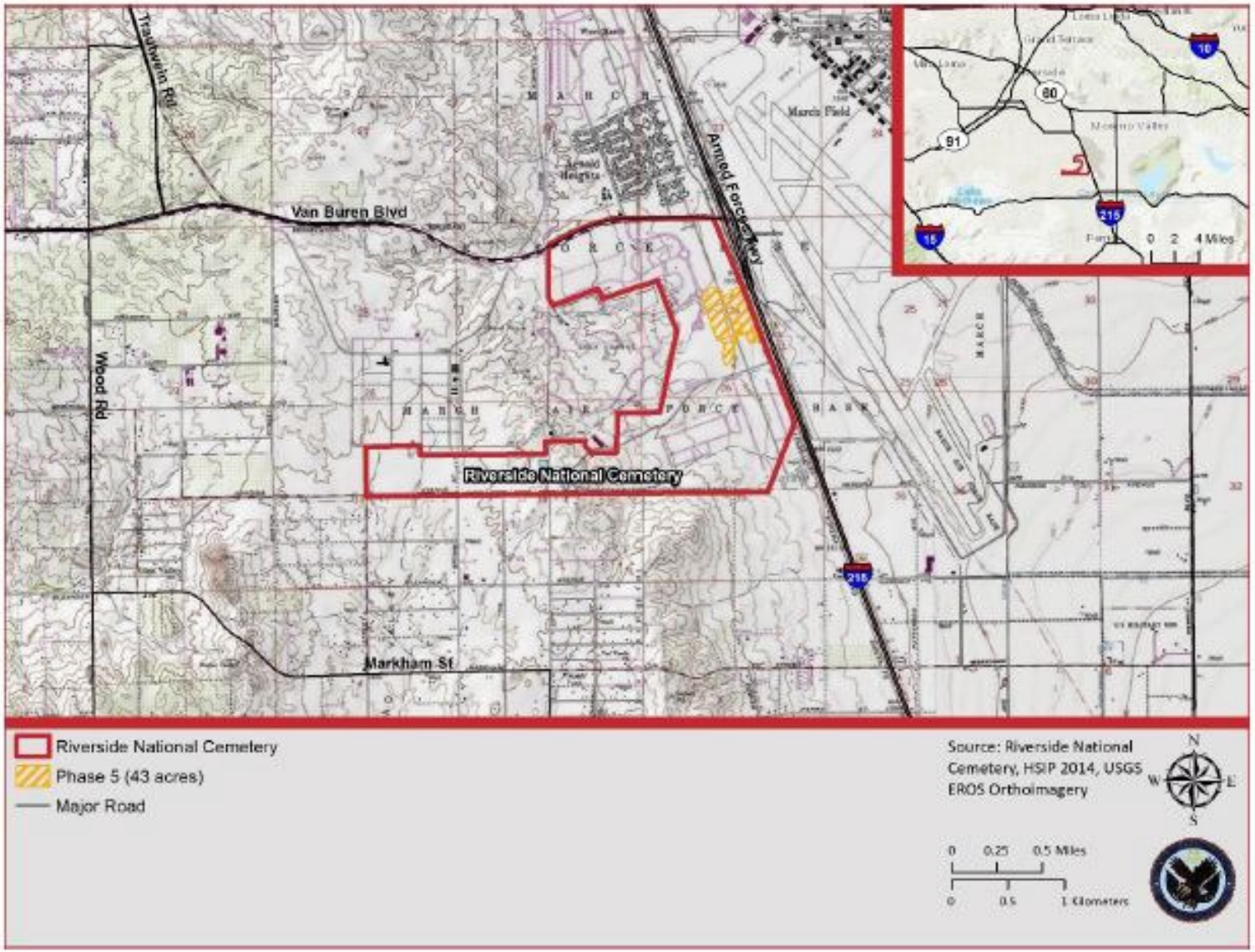

Figure 9. 2018 boundaries of Riverside National Cemetery.

Figure 10. Medal of Honor Memorial, Riverside National Cemetery, interior and fountain, view to east.

Figure 11. Fallen Soldier/Veterans Memorial and plaza, Riverside National Cemetery, view to northeast.

Figure 12. National Medal of Honor Memorial, Riverside National Cemetery, landscape element, view to north.

3.0 METHODOLGY

The Secretary of the Interior has issued standards and guidelines for the identification and evaluation of historic properties (*Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* [48 FR 44720–44726]), which are used to ensure that the procedures utilized are adequate and appropriate. The identification and evaluation of historic properties are dependent upon the relationship of individual properties to other similar properties (NPS and ACHP 1998:18-20). Information about properties regarding their prehistory, history, architecture, and other aspects of culture must be collected and organized to define these relationships (NPS 2009), which is the intent of the Class III cultural resources inventory.

Survey techniques are loosely grouped into two categories, reconnaissance and intensive (BLM 2004; NPS 2009). The choice of survey category depends on the level of effort required for a particular project, which can vary depending on the nature of the properties or property types, the possible adverse effects on such properties, and agency requirements (NPS and ACHP 1998:18). The selection of field survey techniques and level of effort must be responsive to the management needs and preservation goals that direct the survey effort. For any survey, it is important to consider the full range of historic properties that may be affected, either directly or indirectly, and consider strategies that will minimize any adverse effects and maximize beneficial effects on those properties (BLM 2004; NPS 2009; NPS and ACHP 1998).

Intensive surveys are used to precisely document the cultural resources within a given area or when information is needed for particular properties for later evaluation and treatment decisions. Such surveys entail the documentation of the types of properties that are present, the precise locations and boundaries of all identified properties, the method of survey (including the extent of survey coverage), and data on the appearance, significance, and integrity of each property (NPS 2009).

3.1 FIELD METHODS

A targeted pedestrian architectural history field survey was completed on August 23, 2018, by Shannon Davis, Senior Architectural Historian, M.A., RPH, and Laura Voisin George, Architectural Historian, M.A., accompanied by Sherri Andrews, M.A., J.D., RPA, who served as the Project Archaeologist in support of development of a CRTR for the earlier Meridian Trunk Sewer Project. The trunk sewer project shared essentially the same APE as the current Project, and as it was fully surveyed at that time, it was determined that the 2018 survey was sufficient to support the current Project since it took place less than five years earlier and no significant changes have been made to the Project area. During the survey, ASM considered the potential for visual, auditory, atmospheric, and vibration impacts to nearby historic properties/historical resources during construction and operation and confirmed that due to the nature of the project and the area immediately surrounding the Project that the APE was sufficient.

The cemetery was the only historic property/historical resource identified within the survey area. During the survey, multiple photographs were taken of the cemetery, its setting, and viewsheds from the cemetery toward the Project area and from the Project area toward the resource. Architectural and landscape features within the cemetery, their condition, and historical integrity were noted. An architectural description of the cemetery is provided in Chapter 4. The NRHP-eligible Santa Fe Railroad line (now operated by the RCTC) is located to the east of the Project, with the southern end of the Project connecting to an existing drain at the railroad right-of-way; there will be no impact from the Project to this resource.

3.2 RESEARCH METHODS

Methods used to assess the presence of and potential for cultural resources within the proposed Project area included a search of existing records and a pedestrian field survey. ASM Architectural Historians Shannon Davis and Laura Voisin George reviewed the documentation and evaluation of the Riverside National Cemetery obtained from the NCA and only conducted limited additional research for this report. Additional research included a review of historical topographic maps, historic aerials and photographs, and records on Camp Haan at the Riverside Library.

3.3 RECORDS SEARCH RESULTS

A Class I records search request was submitted for the Meridian Trunk Sewer Project alignment and a 0.5-mile radius surrounding it to the California Historical Resources Information System (CHRIS) Eastern Information Center (EIC) on July 25, 2018, the results of which were received on August 4, 2018. Lead agency MJPA determined that a 0.5-mile search radius is appropriate since the project consists solely of underground improvements, and there should not be any aesthetic impacts to potential tribal cultural resources in the area as a result. The trunk sewer project shared essentially the same APE as the current Project, so it was determined that the 2018 records search was sufficient to support the current Project, both because it took place less than five years earlier and informed by the fact that the EIC has experiences a significant backlog in record processing as a result of the COVID pandemic such that a new search was unlikely to yield new results. The EIC records search was conducted to determine whether the Project area has been previously subject to survey as well as the presence or absence of cultural resources previously documented within the Project area. The search included all records and documents on file with the EIC, as well as the NRHP, the Office of Historic Preservation (OHP) Historic Property Directory, and the OHP Archaeological Determinations of Eligibility list.

A total of 30 previous reports were identified within 0.5-mi. of the current Project alignment as a result of the records search (Table 1), nine of which involve a small portion of the Project area; an additional nine reports provide overviews of cultural resources in the general project vicinity.

Table 1. Previous Cultural Resource Projects Conducted within the 0.5-Mile Records Search Radius

Report No. (RI-)	Year	Author(s)/Affiliation	Title
00002	1953	Rogers, M. J. / San Diego Museum of Man	Miscellaneous Field Notes – Riverside County
00535	1979	Bean, L. J., S. Brakke Vane, M. C. Hall, H. Lawton, R. Logan, L. Gooding Massey, J. Oxendine, C. Rozaire, and D. P. Whistler / Cultural Systems Research, Inc.	Cultural Resources and the Devers-Mira 500 kV Transmission Line Route (Valley to Mira Loma Section)
01410	1982	Hammond, S. R. / Caltrans District 8	Archaeological Survey Report for the Proposed Improvement of Route 194, from 0.5 Mile North of Van Buren to Route 60 Junction, 08-RIV-194, PM 34.7/38.3
01955	1977	Heller, R., T. Tetherow, and C. White / Wirth Associates	An Overview of the Sundesert Nuclear Project Transmission System Cultural Resource Investigation
02050	1985	Perault, G. / Fields and Silverman Architects	Preliminary Historic Inventory – March Air Force Base, California
02059	1983	Oxendine, J. / University of California, Riverside	The Luiseno Village During the Late Prehistoric Era: A Dissertation submitted in partial satisfaction of the requirements for the degree of Doctor of Philosophy in Anthropology
02084	1987	Hammond, S.R.	Negative Archaeological Survey Report: Route 215, P.M. 27.4/33.7

Report No. (RI-)	Year	Author(s)/Affiliation	Title
03189	1990	Peak and Associates and Brian F. Mooney Associates	Cultural Resources Assessment of AT&T's Proposed San Bernardino to San Diego Fiber Optic Cable, San Bernardino, Riverside and San Diego Counties, California
03243	1990	Tetra Tech, Inc.	Cultural Resources Investigations for a Proposed Realignment of Facilities from Los Angeles Air Force Base to March Air Force Base, Riverside County, California.
03510	1996	McDonald, M., and B. Giacomini / ASM Affiliates, Inc.	An Intensive Survey of Approximately 2,500 Acres of March Air Force Base, Riverside County, California
03604	1992	Jones, C. S. / California State University, Long Beach	The Development of Cultural Complexity among the Luiseno: A Thesis Presented to the Department of Anthropology, California State University, Long Beach in Partial Fulfillment of the Requirements for the Degree, Master of Arts
04762	1990	Barker, L. R., and A. E. Huston, editors / Division of National Register Programs National Park Service	Death Valley to Deadwood; Kennecott to Cripple Creek. Proceedings of the Historic Mining Conference, January 23-27, 1989, Death Valley National Monument
04767	2004	Hogan, M., B. Tang, J. Smallwood, and D. Everson / CRM TECH	Archaeological Testing and Site Evaluations, Specific Plan No. 341/466, near the City of Perris, Riverside County, California
04813	1993	National Park Service, Historic American Engineering Record	California Citrus Heritage Recording Project: Photographs, Written Historical and Descriptive Data, Reduced Copies of Measured Drawings for: Arlington Height Citrus Landscape, Gage Irrigation Canal, National Orange Company Packing House, Victoria Bridge, and Union Pacific Railroad Bridge
06088	1998	Bricker, D. / Caltrans District 8	First Supplemental Historic Property Survey Report for the Improvement of Interstate Route 215/State Route 91/ State Route 60, Riverside County, CA
07568	2007	McGinnis, P. / Tierra Environmental Services	Archaeological Survey Report of the I-215/Van Buren Boulevard Interchange Project, Riverside County, California
07817	2007	Tibbett, C., and B. Bell / LSA Associates, Inc.	Historic Resources Assessment, Arnold Heights Elementary School, 15801 Harmon Street, Unincorporated Area Adjacent to March Air Reserve Base, Riverside County, California
08167	2014	Hogan, M.	Van Buren Boulevard Street Improvement Project, Phase I
08272	1995	William Manley Consulting and Earth Tech / Michael Brandman Associates	Historic Building Inventory and Evaluation, March Air Force Base, Riverside County, California
08433	2007	Pollack, K. H. / Southern California Edison	Archaeological Assessment of Southern Half of Hammock 33kV Overhead DSP Project, March Air Reserve Base, Riverside County, California
08771	2010	Tang, B. “Tom” / CRM TECH	Preliminary Historical/Archaeological Resource Study Southern California Regional Rail Authority (SCRRA) Perris Valley Line Positive Train Control (PTC) Project
08915	2009	McGinnis, P. / Tierra Environmental Services	Cultural Resources Survey, Test, and Evaluation Report for the Meridian Specific Plan Amendment Riverside County, California
08938	2013	Tang, B. “Tom” / CRM TECH	Archaeological Field Survey, Van Buren Boulevard Widening/Improvement Project, near March Air Reserve Base, Riverside County, California
09223	2013	Brunzell, D. / BCR Consulting	Cultural Resources Records Search for the Van Buren Boulevard Widening Improvements, March Air Reserve Base, Riverside County, California (BCR Consulting Project Number MRC1302)

Report No. (RI-)	Year	Author(s)/Affiliation	Title
09708	2016	Jensen, M. B. / National Cemetery Administration	Letter Report: Section 106 Consultation for the Riverside Columbarium 5,000 Niches Project at the Riverside National Cemetery, Riverside, California
09892	2015	Hogan, M. / CRM TECH	Archaeological Monitoring Program Unit 4 and Mitigation Areas Tract No. 30857, the Meridian Project near March Air Reserve Base, Riverside County, California CRM TECH Contract No. 2832
09963	2017	Gilbert, R. H. / Environmental Intelligence, LLC	Confidential--Archaeological Survey Report for the Proposed Expansion of the Riverside National Cemetery Project, located in Riverside County, California
10093	1996	Urban Futures, Inc.	Environmental Impact Report for the March Air Force Base Redevelopment Project
10142	1990	Tetra Tech, Inc.	Draft Report Cultural Resources Investigations for a Proposed Realignment of Facilities from Los Angeles Air Force Base to March Air Force Base, Riverside County, California
10199	2014	Fulton, P. / LSA Associates, Inc.	Discovery and Monitoring Plan for the Mid County Parkway

The search also revealed that four resources have been previously documented within the 0.5-mile records search radius, with only one, the BNSF Railroad, adjacent to the Project alignment. The other three are remains of facilities related to March AFB that lie east of the railroad and highway (Table 2).

Table 2. Resources Previously Recorded within the 0.5-Mile Records Search Radius

Primary # (P-33-)	Trinomial (CA-RIV-)	Recorded by / Date	Description	Attribute Codes
015743	8196	Easter and Beedle, Applied EarthWorks, Inc. / 2005; Beedle, Applied EarthWorks, Inc. / 2006; Cooley, Jones & Stokes / 2007; Ballester, CRM TECH / 2008; Craft, Jones & Stokes / 2008; Hamilton and George, Applied EarthWorks, Inc. / 2009; Justus and Giacinto, ASM Affiliates / 2010; Justus and DeCarlo, ASM Affiliates / 2010; Cotterman and Denniston, ECORP Consulting / 2012; Wilson and Gibson, AECOM / 2012	BNSF Railroad; San Jacinto Valley Railway; Santa Fe Valley Railroad; Burlington Northern Santa Fe Railroad	AH7. Roads/trails/ railroad grades
024850	-	Smallwood, Applied EarthWorks / 2016	March AFB Facility 1616/1617	HP34. Military property
024851	-	Smallwood, Applied EarthWorks / 2016	March AFB Facility 1622	HP34. Military property
024852	-	Smallwood, Applied EarthWorks / 2016	Flood control channel	HP11. Engineering structure

3.4 HISTORICAL AERIAL PHOTOS AND MAPS

Historic aerials from 1966, 1967, 1978, 1994, 2002, 2005, 2009, 2010, and 2012 were analyzed on historicaerials.com, as were historic topographic maps dated 1901, 1905, 1911, 1927, 1939, 1942, 1955, 1959, 1960, 1962, 1969, 1974, 1980, 1984, 2012, and 2015.

The Project alignment is within lands formerly occupied by March Air Force Base; it now lies between the Riverside National Cemetery and the BNSF Railroad. Military structures and usages are apparent starting with the earliest 1966 aerial image. The beginnings of conversion of the area west of the Project alignment into the cemetery appear on the 1978 image, with the cemetery proper appearing on the next image, not taken until 1994. Early topographic maps show various roads and the railroad in the Project area, with military usages appearing beginning with the 1995 map, and conversion to the cemetery usage evident on the 1980 map.

4.0 SURVEY FINDINGS

4.1 ARCHAEOLOGICAL SURVEY RESULTS

The trunk sewer project shared essentially the same APE as the current Project, and as it was fully surveyed at that time, it was determined that the 2018 survey was sufficient to support the current Project since it took place less than five years earlier and no significant changes have been made to the Project area. The 2018 survey revealed that the entire Project alignment has undergone a significant amount of ground disturbance over time, beginning with its military use and continuing into the present day. Intensive pedestrian survey was undertaken within all accessible areas of the alignment. The BNSF Railroad parallels the eastern edge of the entire alignment. The majority of the alignment is adjacent to the eastern edge of the Riverside National Cemetery. The entire Project alignment was carefully inspected by intensive pedestrian archaeological survey for any sign of the presence of prehistoric or historic cultural materials. No previously undocumented resources were encountered within the Project alignment.

4.2 ARCHITECTURAL HISTORY SURVEY RESULTS

The developed portion of the Riverside National Cemetery is a roughly inverted L-shaped area encompassing the northern one-third of the property. The property is located on the south side of Van Buren Boulevard, and it is adjacent to the General Old Golf Course at the south and west sides of the developed section. Overall, the site is relatively level with a gradual slope toward the southwest. Low landscaped berms and ridges, and mature trees convey a feeling of a gently rolling terrain (Figure 13). A row of trees creates a screen at the east side of the property, and trees also line some of the roads within the cemetery. A manmade water feature/small lake is located adjacent to the main entrance (Figure 14).

From the cemetery's main entrance at Van Buren Boulevard, Lemay Boulevard curves to the east before becoming a north-south spine at the east side of developed cemetery area and passing through three memorial traffic circles. A number of loop roads branch from Lemay Boulevard to provide circulation through the cemetery and access to the gravesites, columbaria, buildings, and the amphitheater. The asphalt-paved loop roads have low concrete shoulders and speed humps (Figure 15).

The Riverside National Cemetery's initial master plan described its design elements as reflecting changing values and attitudes in the perception of the role of the individual in the military establishment, resulting in more informal and intimate designs for national cemeteries than in historic military cemeteries. Graves were identified by flat markers that blend into the landscape rather than the rows of upright gravestones that were traditionally used (Figure 16). Combining the traditional elements of order and directness with freer forms and less structured space, "[t]he dignity of the burial and respect of memory is represented by the forms of the land, the masses of trees, and the scale of the landscape" (Royston Hanamoto Beck & Abey n.d.:9-10). Similar to other regional national cemeteries established in the 1970s, its park-like appearance incorporates features such as columbaria and committal shelters and omits elements such as lodges and traditional rostrums (Figure 17) (Jensen 2016:2).

Buildings and structures associated with the cemetery are the administration building, a maintenance facility and yard, the Veterans Memorial Amphitheater, two restroom facilities, three columbaria structures, seven committal shelters, and two garden niche areas. These buildings and structures were noted to have been built over several decades following the cemetery's establishment in 1976 (Jensen 2016:6). Described in the cemetery's initial master plan as utilizing an architectural theme inspired by the indigenous southwest architectural style, the design of the administration incorporates forms and materials of contemporary Modern architecture (Figure 18) (Royston Hanamoto Beck & Abey n.d.:10).

Figure 13. Terrain at Avenue A gate of Riverside National Cemetery, northeast corner of developed cemetery, view to southeast.

Figure 14. Lake A east of Fallen Soldier/Veterans Memorial, Riverside National Cemetery, view to east.

Figure 15. Example of Riverside National Cemetery roadway, East Normandy Drive, view to north.

Figure 16. Riverside National Cemetery, flat grave markers near Korea Avenue, view to northeast.

Figure 17. Riverside National Cemetery, garden niches at northeast corner of cemetery, view to north-northeast.

Figure 18. Riverside National Cemetery, Administration Building, view to southeast.

The Riverside National Cemetery is also the location of the sculptural Fallen Soldier/Veterans' Memorial, erected in 2000, and the Prisoner of War/Missing in Action National Memorial, erected in 2004 near the cemetery main entrance; and the Medal of Honor Memorial, erected in 1999 at Lemay Boulevard's current southern terminus at Nimitz Circle.

A remnant of the Camp Haan-era Avenue A is extant on the developed cemetery property. A street sign indicates the service road exit from Van Buren Boulevard at the northeastern corner of the cemetery property is Avenue A. This service road immediately turns to the east, becoming an unnamed street that parallels the rail line on the eastern edge of the cemetery property, while a gravel-paved section of Avenue A continues into the cemetery property to Darby Drive (Figures 19 and 20).

The unnamed street that connects with Avenue A near its intersection with Van Buren Boulevard was previously documented in an earlier archaeological survey. However, aerial images confirm that this road was constructed within the past 50 years and as such does not need to be documented or evaluated as a potential historic property/historical resource.

Figure 19. Riverside National Cemetery, Avenue A at unnamed street, view to north.

Figure 20. Unnamed street at eastern edge of cemetery property, view to south.

5.0 EVALUATION OF ELIGIBILITY

The majority of the Project south of Van Buren Boulevard is located at the eastern edge of the Riverside National Cemetery property. National cemeteries administered by the VA are eligible for the NRHP because they have been designated by Congress as primary memorials to the military history of the U.S. Those areas within a designated national cemetery that have been used or prepared for the reception of remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present (NPS 1997). Thus, the Riverside National Cemetery is eligible for listing in the NRHP even though it has not yet attained 50 years of age (Jensen 2016:1).

Because it contains a combination of resource types and covers substantial acreage, a national cemetery is considered a historic district for the purposes of NRHP listing and determinations of eligibility (VA 2011:2). The areas of the property that have been developed for cemetery purposes are considered one contributing site under NRHP classification.

The areas of the cemetery adjacent to the Project site include:

- Commemorative sections of the cemetery containing existing graves and memorials
- Sections having the infrastructure necessary to receive new interments and memorials (for example, streets, utilities, pre-placed crypts, columbaria, and memorial walkways)
- Areas of the cemetery developed for administrative and maintenance purposes (offices, restrooms, garages, and maintenance yards)

In previous Section 106 consultation for the Riverside National Cemetery (Jensen 2016), the following character-defining features (CDF) were identified:

- Medal of Honor Memorial (1999)
- Fallen Soldier/Veterans' Memorial (2000)
- Prisoner of War/Missing in Action National Memorial (2004)
- Carillon donated by American Veterans (2000)

Smaller-scale features, such as grave markers, street signs, water fountains, curbs and culverts, and plantings are considered integral to the overall contributing site and its identity as a national cemetery (VA 2011). ASM recommends that additional CDFs of the Riverside National Cemetery include:

- Circulation pattern (streets, walkways)
- Amphitheater
- Overall landscape
- Areas of the cemetery developed for administrative and maintenance purposes (offices, restrooms, garages, and maintenance yards)

The period of significance for a national cemetery begins with the date of the earliest burials and extends to the present (VA 2011). Riverside National Cemetery's period of significance begins in 1976 with the transfer of the March AFB property for use as a veterans' cemetery. Present is used as the end date as the VA has determined that "present is most consistent with the Congressional intent of the federal laws establishing the national cemeteries and with the NRHP policies for evaluating properties of continuing importance" (Jensen 2016). ASM recommends that the developed section of the Riverside National Cemetery retains its integrity and its eligibility for listing in the NRHP.

The Meridian Storm Drain Expansion Project will be largely constructed adjacent to the developed section of the cemetery, with a very small portion at its south end near the cemetery's Phase 5 development area. Unimproved acreage within the cemetery boundary that is being held for future use is considered noncontributing. According to prior Section 106 consultation by the VA, once the new section for the reception of the remains of veterans and their dependents is complete, it will also be considered a contributing element of the Riverside National Cemetery (Jensen 2016:1). However, at the time of this Project's construction, this area of the cemetery property will still be noncontributing/not eligible for the NRHP.

5.1 NHPA HISTORIC PROPERTIES

Two NRHP-eligible resources are located within the Project area. The VA with concurrence from SHPO has previously determined that the Riverside National Cemetery is eligible under Criterion A for its memorial association with one or more events that have made a significant contribution to the broad patterns of national, state, or local history. Riverside National Cemetery represented changing attitudes and expressions of commemorating military service in the 1970s through its freer and more informal overall design, structures and roadways, and integral features such as grave markers. In consideration of the cemetery's eligibility under Criterion C as well, not enough time has passed nor sufficient scholarly assessment to determine the architectural significance of the property within the broader context. The NRHP-eligible Santa Fe Railroad line is situated to the east of the Project with the southern portion intersecting with an existing drain pipe at the railroad right-of-way; there will be no impact from the Project to this resource.

5.2 CALIFORNIA REGISTER OF HISTORICAL PLACES

California PRC §5024.1(d)(1) states that the CRHR shall include properties formally determined eligible for, or listed in, the NRHP. As the Riverside National Cemetery and the Santa Fe Railroad have been determined eligible for the NRHP, they are therefore eligible for the CRHR.

5.3 CEQA HISTORICAL RESOURCE

The Riverside National Cemetery and Santa Fe Railroad are eligible for the CRHR. CEQA defines a historical resource as any building determined to be eligible for listing in the CRHR. As such, the Riverside National Cemetery and the Santa Fe Railroad are historical resources under CEQA Guidelines 15064.5, because they meet the criteria outlined in PRC §5024.1; Title 14, CCR, §4850 et seq.

6.0 ANALYSIS OF EFFECTS/IMPACTS

6.1 NHPA EFFECTS

The criteria of adverse effect is defined by the NHPA in 36 CFR §800.5(a)(1).

> An adverse effect is found when an undertaking 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. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Examples of adverse effects on historic properties identified in 36 CFR §800.5(a)(2) include, but are not limited to:

i. Physical destruction of or damage to all or part of the property;

ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;

iii. Removal of the property from its historic location;

iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

vi. Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Most of the above examples are not applicable to the Meridian Storm Drain Expansion, specifically (ii), (iii), (iv), (vi), and (vii). The proposed Project does not propose to remove any properties from their historic locations nor change the character of any historic property's use or setting that contribute to its historic significance. The Project will not result in the neglect of any historic properties or transfer, lease, or sale of any historic properties within federal control.

Under example (i), the trenching and installation of the storm drain has the potential for physical destruction to any historic property within the APE. However, the installation of storm drain will include the excavation of trenches on the west side of the unnamed street. The trenching for the storm drain will occur in already-disturbed areas of the property and as such will not result in damage to or the destruction of any potentially eligible structures, objects, or other features of the cemetery or railroad.

In consideration of indirect effects, the trenching and storm drain installation will be performed by equipment that may temporarily introduce visual, atmospheric, or audible elements at the southeastern edge of the developed cemetery area. However, these changes will be temporary in nature, and will not result in an overall adverse effect to the NRHP-eligible developed section of the cemetery or the railroad alignment. As the sewer line will be subterranean, it does not have the potential to adversely impact the spatial relationship between the CDFs in the Riverside National Cemetery and the viewshed from those CDFs, nor will it impact the operation of the railroad.

6.2 CEQA IMPACTS

CEQA utilizes the term "impact" much in the same way that NHPA refers to "effects." PRC §21084.1 states that significant impacts may occur if "a project may cause a substantial adverse change in the significance to a historic resource." CEQA defines adverse impacts as a substantial adverse change to a historic resource, encompassing "demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired."

As identified in the preceding section, although the construction phase of the Meridian Storm Drain Expansion has the potential for physical destruction to historic resources, the installation will occur in already-disturbed areas of the properties and as such will not result in damage to or the destruction of any historical resources. Potential indirect impacts will be temporary in nature and will not result in an overall adverse impact to the CRHR-eligible developed section of the cemetery or the railroad.

7.0 MANAGEMENT SUMMARY AND RECOMMENDATIONS

In 2018, ASM performed an architectural history and archaeological survey, evaluation, and analysis of effects/impacts as part of the Meridian Trunk Sewer Line Project to identify and document cultural resource sites that are eligible or are potentially eligible for listing in the NRHP for the purposes of compliance with Section 106 of the NHPA, as amended (54 U.S.C. §300101); and for listing in the CRHR for the purposes of compliance with CEQA. A pedestrian survey within the truck sewer APE was completed by Shannon Davis, Senior Architectural Historian, M.A., RPH, and Laura Voisin George, Architectural Historian, M.A., on August 23, 2018, accompanied by Sherri Andrews, M.A., RPA, who served as the Project Archaeologist for this CRTR. The APE of the northern portion of this earlier Project is substantially the same as the APE for the current storm drain Project; because the prior study was conducted less than five years ago, in addition to other factors discussed earlier in the report, it was determined that the results of that study can be applied to the current Project.

As a result of the study, ASM identified two historic resources in the direct APE that have previously been recommended eligible for listing in the NRHP, the Riverside National Cemetery and the Santa Fe Railroad. When installed, the Project will be below ground, and as there is no potential for visual, auditory, or atmospheric effects beyond the temporary conditions at the Project's installation. As such, there is no broader indirect APE for the Project. ASM recommends that the developed section of the Riverside National Cemetery retains its integrity and its eligibility for listing in the NRHP, and that it is also eligible for listing in the CRHR.

ASM assessed effects and impacts under NHPA and CEQA to the eligible historic properties/historical resources within the direct APE. Minor direct effects from the Meridian Storm Drain Expansion are possible during the storm drain installation. However, the potential for direct effects would be temporary, and at the conclusion of the installation, the storm drain will be below ground. As such, there is no potential for an adverse effect pursuant to 36 CFR §800.5(b), and no significant adverse impact under CEQA (PRC §21084.1).

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APPENDICES

APPENDIX A

Confidential - Records Search Results