CULTURAL RESOURCES ASSESSMENT OF THE SYCAMORE CANYON BUSINESS PARK BUILDINGS 1 & 2, RIVERSIDE COUNTY, CALIFORNIA

USGS Riverside East, CA 7.5' Quadrangle

Submitted to
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National Archaeological Database (NADB)
Type of Study: Literature Search, Intensive Pedestrian Survey, and Significance Evaluation
Sites Revisited: CA-RIV-8750 (P-33-016713), CA-RIV-8751 (P-33-016714), and CA-RIV-8752 (P-33-016715)
USGS 7.5' Quadrangle: Riverside East, CA
Acreage: 72 acres
Level of Investigation: Section 106 of the NHPA, CEQA, City of Riverside Municipal Code Title 20
Key Words: Sycamore Canyon; Box Springs; Riverside County; Section 106; CEQA; 72 acres surveyed; three cultural resources; prehistoric bedrock milling sites; cultural landscape

CONTENTS

List of Figures

List of Tables

EXECUTIVE SUMMARY

At the request of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ) performed a cultural resources assessment of a 72-acre (ac) parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately east of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended, and the City of Riverside's Cultural Resource Ordinance (City of Riverside Municipal Code Title 20). In addition, the proposed Project may be considered an undertaking per 36 *Code of Federal Regulations* (CFR) 800.16[y] and as such, would be subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966 (as amended).

This report summarizes the methods and results of the cultural resources investigation of the areas of the proposed Project. This assessment included archaeological and historical background research, communication with Native American tribal representatives, an intensive pedestrian (Phase I) survey, and an evaluation of significance of the identified cultural resources within the Project area. The purpose of the investigation was to determine the potential of the proposed Project to impact historic properties as defined by the NHPA and/or historical resources under CEQA.

Æ conducted a California Historical Resources Information System (CHRIS) records search in May 2015 at the Eastern Information Center (EIC), located at the University of California, Riverside. The records search encompassed the Project area, along with a 1-mile (mi) buffer. The CHRIS database indicates that at least 24 cultural resources projects have been conducted within 1-mi of the Project area, including several surveys that were conducted within the current Project area. The CHRIS database also indicated that 123 cultural resources had been recorded within the 1-mi radius of the Project area, including 110 prehistoric archaeological sites, five historical archaeological sites, two multicomponent archaeological sites, four built-environment resources, and two isolated occurrences. Three of these known prehistoric cultural resources (CA-RIV-8750, -8751, and -8752) are located within the Project area.

Æ also requested a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) located in Sacramento, California in May 2015. The NAHC responded that no SLF resources are known to exist within the Study area, but cautioned that the absence of specific site information does not indicate the absence of such resources. The NAHC provided a list of regional Native Americans who have knowledge of cultural resources within the Project area. A letter was subsequently sent to all of the listed tribes and individuals requesting information regarding cultural resources in the Project area. Tribal communities listed on the NAHC list include: Pala Band of Mission Indians, Pauma & Yuima Reservation, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, Sobaba Band of Mission Indians, Pauma Valley Band of Luiseño Indians, San Luis Rey Band of Mission Indians, and La Jolla Band of Mission Indians. Responses were received from the Pala Band of Mission Indians, Rincon Band of Mission Indians, Sobaba Band of Mission Indians, and the Pauma Valley Band of Luiseño Indians.

During the intensive pedestrian survey of the Project area, the three previously recorded cultural resources were re-identified and the current conditions of the sites documented. Significance evaluations indicate that none of the cultural resources are recommended as eligible for listing on the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP) or as a City of Riverside Designated Cultural Resource. Field notes documenting the current investigation are on file at Æ's Pasadena office. A copy of the final report will be placed on file at the EIC.

1
INTRODUCTION

Hillwood Investment Properties proposes to construct a 1.3 million square foot (ft^2) warehouse project within the Sycamore Canyon Business Park in the City of Riverside, Riverside County, California. The proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project) includes the construction of two warehouse buildings located on a 72-acre (ac) parcel of land. Applied EarthWorks, Inc. (Æ) was retained by Albert A. Webb Associates to conduct a cultural resource assessment of the Project area in accordance with Section 106 of the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA), and City of Riverside's Cultural Resource Ordinance (City of Riverside Municipal Code Title 20).

1.1 PROJECT LOCATION AND DESCRIPTION

The Project area is located in the Sycamore Canyon Business Park in the Sycamore Canyon/Canyon Springs neighborhood in the eastern portion of the City of Riverside in Riverside County, California (Figure 1-1). Comprising approximately 72 ac, the Project site is situated west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive. Specifically, the Project area is located in Section 4, Township 3 South, Range 4 West, San Bernardino Baseline and Meridian, as depicted on the Riverside East, CA 7.5' U.S. Geological Survey (USGS) quadrangle map (Figure 1-2).

The Project area consists of a roughly rectangular-shaped parcel that is bounded by residential uses to the north, northwest, and northeast, large-scale light industrial uses to the east and south, and the Sycamore Canyon Wilderness Park to the west. The Project site is located on land designated and zoned for light industrial uses, and is situated at the base of a series of low-lying hills that extend south from the Box Spring Mountains. A secondary, unnamed drainage runs through the Project area in a roughly north-to-south direction emptying into the Sycamore Canyon Creek approximately 0.5 mile (mi) southwest of the Project area. Elevations range from approximately 1,540 to 1,620 feet (ft) above mean sea level (amsl).

The proposed Project consists of the grading, construction, and operation of a total approximately 1.3 million ft^2 of light industrial office and warehousing contained within two buildings on site, which will be subdivided into two parcels. Specifically, Building 1 will be sited within the southern three-quarters of the Project site (Parcel 1) and will consist of 10,000 ft^2 of office space, 950,920 ft^2 of warehouse, 72 dock doors along the east and west side of the structure, 408 parking stalls, and 346 trailer stalls. Building 2 will be sited along the northern quarter of the Project site (Parcel 2), and will consist of 10,000 ft^2 of office space, 337,704 ft^2 of warehouse, 48 dock doors along the south side of the structure, 281 parking stalls, and 80 trailer stalls. Building 1 will be approximately 41 ft in height from grade, and Building 2 will be approximately 37 ft in height from grade.

The Project site will also include sand filter water quality basins and a detention basin along the southern perimeter of the site, and water quality bioretention and bioinfiltration basins along the eastern perimeter of the site on Parcel 1, and another sand filter water quality basin in the northeastern perimeter of the site on Parcel 2. Access to Parcel 1 will be provided by two proposed

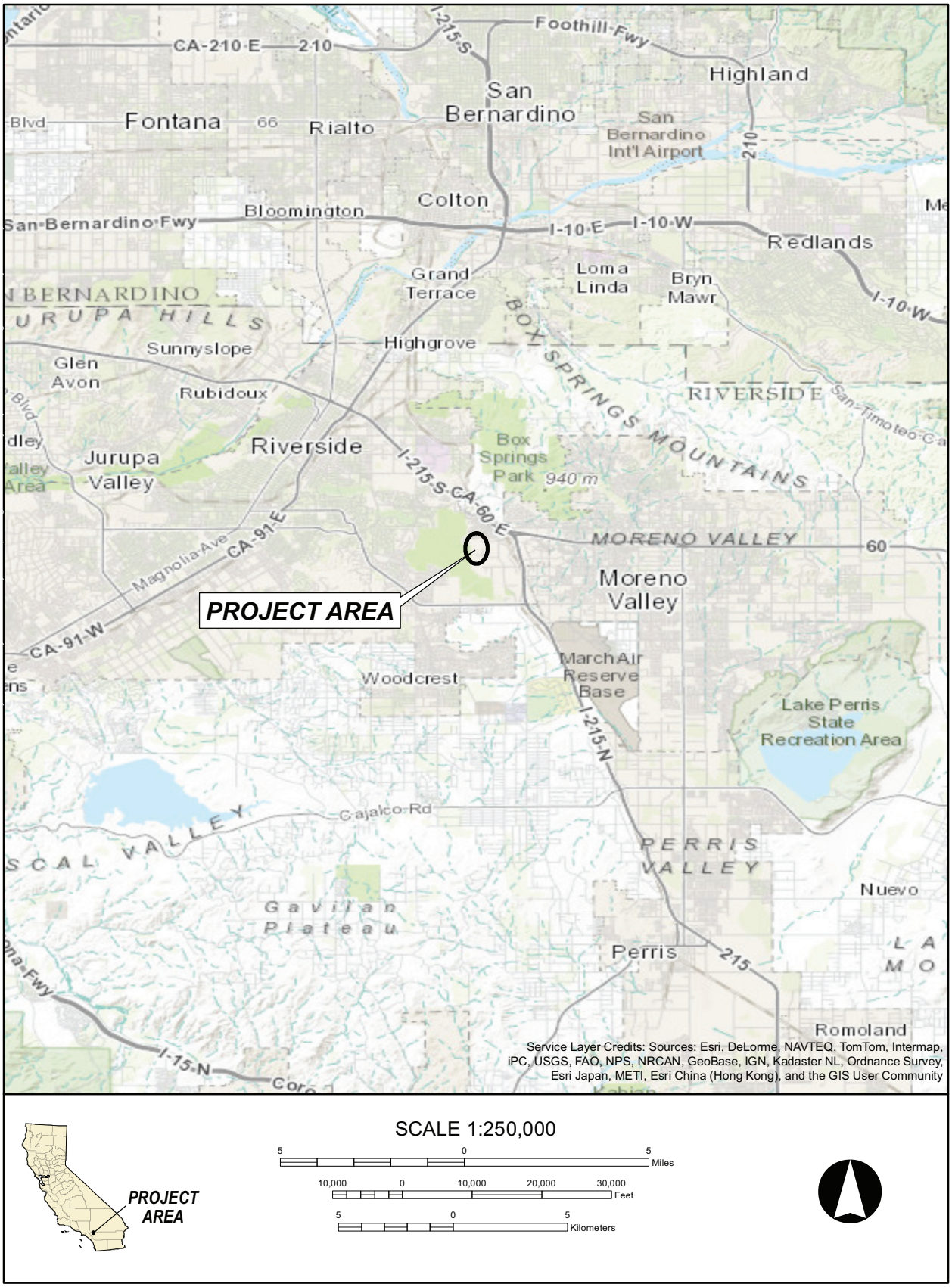

Figure 1-1 Project vicinity map.

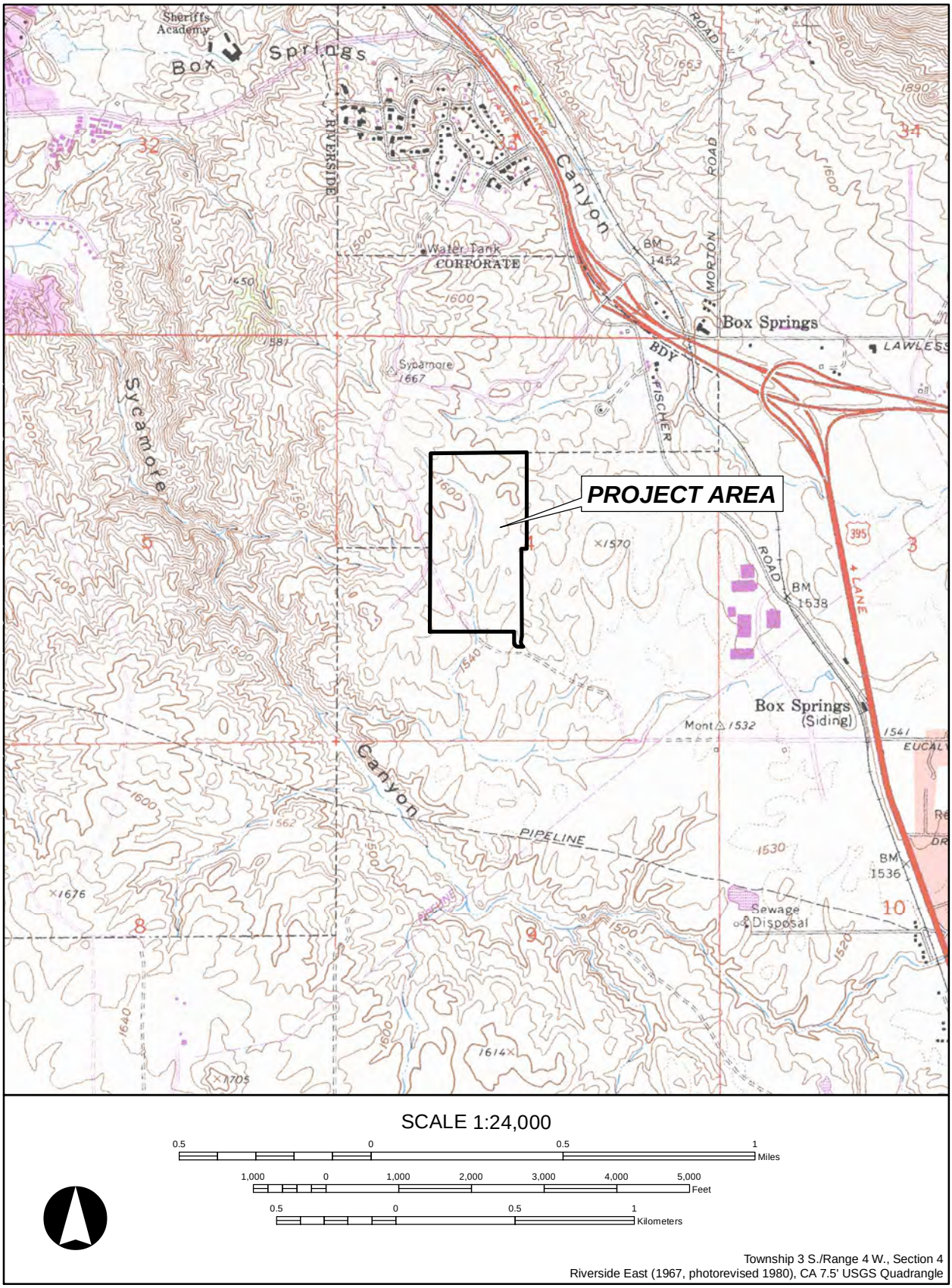

Figure 1-2 Project location map.

driveways from Lance Drive, and access to Parcel 2 will be provided by one proposed driveway from Lance Drive. On-site landscaping will also be provided around the perimeters of Parcels 1 and 2.

1.2 AREA OF POTENTIAL EFFECT

There currently are no participating federal agencies that are required to consider this Project an "undertaking" per Code of Federal Regulations [CFR], Title 36, Part 800.16(u). However, there are components of the Project that may require federal permits to impact regulated waters, which are governed by the U.S. Army Corps of Engineers (USACE). The standards employed in this analysis are intended to be consistent with NHPA regulations (36 CFR 800) should a federal agency become involved with the Project in a manner that requires the agency to comply with the NHPA If the proposed Project becomes an undertaking, an Area of Potential Effect (APE) will be defined. A variety of ground-disturbing activities are expected to occur during the development of the Project area; these activities include grading and trenching for the prepartion and construction of building sites, excavation for sand filter water quality basins and a detention basin, utility installations, and construction of driveways.

1.3 REGULATORY CONTEXT

This section discusses the relevant state and local statutes, ordinances, or policies that govern the conservation and protection of cultural resources that must be considered during the decision-making process for projects that have the potential to impact cultural resources. As previously stated, this report is prepared to manage historical resources consistent with CEQA Guidelines and historic properties as defined by the NHPA. As previously stated, there is currently no participating federal agency that are required to consider this Project an "undertaking" per Code of Federal Regulations [CFR], Title 36, Part 800.16(u). However, the USACE may become involved with the Project in a manner that requires the agency to comply with the NHPA. For this reason, a summary of the federal laws and regulations that govern cultural resources is also provided below.

1.3.1 Federal

National Historic Preservation Act (NHPA)

Federally issued permits may require a project to be considered an "undertaking" per 36 CFR § 800.16 (y), subject to compliance with Section 106 of the NHPA of 1966, as amended. The NHPA established a national policy for historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer, provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic Preservation (ACHP).

National Register of Historic Places

The NHPA of 1966 established the NRHP as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36

CFR § 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels.

If a cultural resource is determined to be an eligible historic property under 36 CFR § 60.4, then Section 106 requires that the effects of the proposed undertaking be assessed and considered in planning the undertaking. Ordinarily, cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP, unless they satisfy certain conditions. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

1.3.2 State

California Environmental Quality Act (CEQA)

The proposed Project is subject to compliance with CEQA, as amended. Therefore, cultural resources management work conducted as part of the proposed Project shall comply with the CEQA Statute (PRC 21000–21777) and Guidelines (14 CCR 15064.5), which directs lead agencies to first determine whether cultural resources are historically significant resources. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment (PRC 21084.1).

The cited statutes and guidelines specify how cultural resources are to be managed in the context of proposed projects, such as the Sycamore Canyon Business Park Buildings 1 & 2 Project. Briefly, archival and/or field surveys are conducted, and identified cultural resources are inventoried and evaluated in prescribed ways. Prehistoric and historical archaeological resources as well as historical built-environment resources such as standing structures and other built-environment features deemed "historically significant" must be considered in project planning and development.

1.3.3 Local

City of Riverside General Plan (2025)

The City of Riverside General Plan 2025 was adopted in 2007 and addresses the seven state-mandated elements of general plans (land use, housing, circulation, open space, conservation, noise, and safety) (City of Riverside 2007). The General Plan is intended to achieve the land use, circulation, and other goals of the City in order to reflect the community's current values for growth over the long-term.

With regard to cultural resources, the Historic Preservation element of the City of Riverside General Plan contains seven objectives with associated policies to protect the City's historical and paleontological resources (City of Riverside 2007:HP-25 to HP-29). These include:

> **Objective HP-1: To use historic preservation principles as an equal component in the planning and development process.**
>
> > **Policy HP-1.1:** The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.2: The City shall assume its direct responsibility for historic preservation by protecting and maintaining its publicly owned cultural resources. Such resources may include, but are not limited to, buildings, monuments, landscapes, and right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs, and gutters.

Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

Policy HP-1.5: The City shall promote neighborhood/city identity and the role of historic preservation in community enhancement.

Policy HP-1.6: The City shall use historic preservation as a tool for "smart growth" and mixed use development.

Policy HP-1.7: The City shall ensure consistency between this Historic Preservation Element and other General Plan elements, including subsequent updates of the General Plan.

Objective HP-2: To continue an active program to identify, interpret and designate the City's cultural resources.

Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.2: The City shall continually update its identification and designation of cultural resources that are eligible for listing in local, state, and national registers based upon the 50 year age guideline for potential historic designation eligibility.

Policy HP-2.3: The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Objective HP-3: To promote the City's cultural resources as a means to enhance the City's identity as an important center of Southern California history.

Policy HP-3.1: The City shall conduct educational programs to promote an understanding of the significance of the City's cultural resources, the criteria for historic designation, historic design review processes, building permit requirements,

and methods for rehabilitating and preserving historic buildings, sites, and landscapes.

Policy HP-3.2: The Planning Division shall promote an understanding and appreciation of the importance of historic preservation by the City's departments, boards, commissions, and elected officials.

Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting, and development activities.

Policy HP-4.1: The City shall maintain an up-to-date database of cultural resources and use that database as a primary informational resource for protecting those resources.

Policy HP-4.2: The City shall apply the California State Historical Building Code to ensure that City building code requirements do not compromise the integrity of significant cultural resources, at the property owner's request.

Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Objective HP-5: To ensure compatibility between new development and existing cultural resources.

Policy HP-5.1: The City shall use its design and plot plan review processes to encourage the new construction to be compatible in scale and character with cultural resources and historic districts.

Policy HP-5.2: The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.

Objective HP-6: To actively pursue funding for a first-class historic preservation program, including money needed for educational materials, studies, surveys, staffing, and incentives for preservation by private property owners.

Policy HP-6.1: The City shall provide financial incentive to promote the restoration, rehabilitation, and adaptive reuse of cultural resources.

Policy HP-6.2: The City shall use financial resources from state, federal and private programs that assist in the identification, designation and preservation of cultural resources.

Policy HP-6.3: The City shall ensure adequate funds in its budget for the staffing and maintenance of a historic preservation program in compliance with the California State Office of Historic Preservation's Certified Local Government program.

Objective HP-7: To encourage both public and private stewardship of the City's cultural resources.

Policy HP-7.1: The City shall apply code enforcement, zoning actions, and building safety/construction regulations as tools for helping to protect cultural resources.

Policy HP-7.2: The City shall incorporate preservation as an integral part of its specific plans, general plans, and environmental processes.

Policy HP-7.3: The City shall coordinate historic preservation with other activities within its government structure.

Policy HP-7.4: The City shall promote the preservation of cultural resources controlled by other governmental agencies, including those related to federal, state, county, school district, and other agencies.

City of Riverside Municipal Code

The following are the criteria for these resources as defined in the Cultural Resources Ordinance of the City of Riverside Municipal Code (Title 20, Ordinance 7108, 2010) as amended:

Landmark Criteria: This designation refers to any Improvement or Natural Feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

2. Is identified with persons or events significant in local, state or national history;

3. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

4. Represents the work of a notable builder, designer, or architect, or important creative individual;

5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;

6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;

7. Is one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or

8. Has yielded or may be likely to yield, information important in history or prehistory.

Resource or Structure of Merit Criteria: This designation refers to any Improvement or Natural Feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains sufficient integrity, and:

1. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the City;

2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;

3. Is connected with a business or use which was once common but is now rare;

4. A Cultural Resource that could be eligible under Landmark Criteria no longer exhibiting a high level of integrity, however, retaining sufficient integrity to convey significance under one or more of the Landmark Criteria;

5. Has yielded or may be likely to yield, information important in history or prehistory; or

6. An improvement or resource that no longer exhibits the high degree of integrity sufficient for Landmark designation, yet still retains sufficient integrity under one or more of the Landmark criteria to convey cultural resource significance as a Structure or Resource of Merit. (Ord. 7108 §1, 2010)

Historic District: The City of Riverside defines a Historic District as:

1. A concentration, linkage, or continuity of cultural resources, where at least fifty percent of the structures or elements retain significant historic integrity (a "geographic Historic District"), or

2. A thematically-related grouping of cultural resources which contributes to each other and are unified aesthetically by plan or physical development, and which have been designated or determined eligible for designation as a historic district by the Historic Preservation Officer, Board, or City Council, or is listed in the National Register of Historic Places or the California Register of Historical Resources, or is a California Historical Landmark or a California Point of Historical Interest (a "thematic Historic District").

In addition to either 1 or 2 above, the area also:

3. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

4. Is identified with persons or events significant in local, State, or national history;

5. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

6. Represents the work of notable builders, designers, or architects;

7. Embodies a collection of elements of architectural design, detail, materials or craftsmanship that represent a significant structural or architectural achievement or innovation;

8. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

9. Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship or association; or

10. Has yielded or may be likely to yield, information important in history or prehistory.

Neighborhood Conservation Area: An area that:

1. Provides a contextual understanding of the broader patterns of Riverside's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

2. Represents established and familiar visual features of a neighborhood, community, or of the City;

3. Reflects significant development or geographical patterns, including those associated with different eras of settlement and growth; or

4. Conveys a sense of historic or architectural cohesiveness through its design, setting, materials, workmanship or association.

Designation of Neighborhood Conservation Areas is no longer allowed. Those designated prior to May 2006 shall remain in effect and subject to this Title, and may be modified or dedesignated.

Sycamore Canyon Business Park Specific Plan

The Project area is located within the northwestern extent of the Sycamore Canyon Business Park Specific Plan area. Originally adopted in 1984, the Sycamore Canyon Business Park Specific Plan stipulates the development of a planned industrial park consisting of approximately 920 ac of industrial and commercial uses within a 1,400-ac project area. The Specific Plan calls for a multi-purpose use of the area that includes industrial, industrial support, retail business and offices, and open space. Since its approval, the Specific Plan has been subject to a number of amendments.

Environmental studies conducted in support of the Specific Plan identified potential effects on archaeological resources (City of Riverside 1982:63). In order to protect and preserve known resources, it was recommended that a portion of the Specific Plan area be designated as Open Space; the area was set aside as part of the proposed Sycamore Canyon Park (City of Riverside 1982: Appendix B).

1.4 REPORT ORGANIZATION

This report documents the results of a cultural resource assessment of the Project area. Chapter 1 has introduced the Project location and description and stated the regulatory context. Chapter 2 synthesizes the natural and cultural setting of the Project area and surrounding region. Chapter 3 presents a research design with Chapter 4 detailing the methods and procedures used in the cultural resources investigation, including the records searches, pedestrian survey, and significance evaluation. Chapter 5 presents the results of the assessment of cultural resources within the Project area. Management recommendations are included in Chapter 6, followed by bibliographic references (Chapter 7) and appendices.

2
SETTING

This chapter describes the prehistoric, ethnographic, and historical cultural setting of the overall Project area to provide a context for understanding the nature and significance of cultural properties identified within the region. Prior to a discussion of the cultural setting, the environmental setting of the area is summarized below, as the nature and distribution of human activities in the region have been affected by such factors as topography and the availability of water and biological resources.

2.1 ENVIRONMENTAL SETTING

The Project area sits at the base of a series of low-lying hills, south of the Box Spring Mountains, which separate the San Jacinto and Santa Ana watersheds. The Project area is underlain by the Val Verde Pluton, which is locally composed of tonalite bedrock and part of the southern California Batholith. An area of Cretaceous undifferentiated granodiorite has been mapped to the south of the Project area.

East of the Project area, very old fan deposits flank the west side of the San Jacinto Valley and form a low relief and nearly level plain, which are likely derived from the Val Verde Pluton and the Box Spring Mountains. Similarly, to the west is a very old fan deposit forming the eastern side of the Santa Ana Valley that is likely also derived from the Val Verde Pluton and the western slopes of the Box Spring Mountains. The Val Verde Pluton extends for approximately 13 mi south (Rogers 1965).

As the climate of the region is largely determined by topographic features, climate, in turn, largely dictates the character of the biotic environment exploited by native populations. The climate of the Project area is characterized as Mediterranean, with hot, dry summers and cool, moist winters. It has a semi-arid precipitation regime; significant changes in temperature and moisture occur based on elevation and exposure, particularly in the nearby mountains. The average annual rainfall ranges from 22.8 to 40.6 centimeters (cm) (9 to 16 inches) and the mean annual temperature varies from 59 to 65 degrees Fahrenheit (USDA 1971).

2.2 PREHISTORIC SETTING

The prehistoric cultural setting of the overall Project area provides a context for understanding the types, nature, and significance of the prehistoric cultural resources identified within the general Project area. Native American occupation of the inland valleys of southern California can be divided into seven cultural periods: Paleoindian (ca. 12,000–9500 years before present [B.P.]); Early Archaic (ca. 9500–7000 B.P.); Middle Archaic (ca. 7000–4000 B.P.); Late Archaic (ca. 4000–1500 B.P.); Saratoga Springs (ca. 1500–750 B.P.); Late Prehistoric (ca. 750–410 B.P.); and Protohistoric (ca. 410–180 B.P.), which ended in the ethnographic period. Due to the nature of the prehistoric archaeological sites identified within a 1-mi radius of the Project area (see Chapter 4), the prehistoric cultural setting discussed below begins at the Middle Archaic period.

The data presented herein regarding the sequence of prehistoric use, adaptation, and occupation of the interior valleys and mountain localities of southern California are summarized from a synthesis of more than 10 years of archaeological research conducted at Diamond Valley Lake as part of the

Eastside Reservoir Project (ESRP), located approximately 34.9 km (22 mi) south-southeast of the Project area (Goldberg et al. 2001; McDougall et al. 2003). For the most part, the prehistory of the inland valleys of southern California that characterizes the Project area has been less thoroughly understood than that of the nearby desert and coastal regions. Prior to the ESRP cultural resources studies, no comprehensive synthesis had been developed specifically for the interior valley and mountain localities of cismontane southern California that characterizes the region. The following has been adapted from Horne and McDougall (2003).

2.2.1 Middle Archaic Period (ca. 7000–4000 B.P.)

The Middle Archaic saw a reversal of the weather patterns, which had prevailed throughout much of cismontane southern California for several millennia. By about 6000 B.P., local environmental conditions ameliorated while conditions in the deserts deteriorated, reaching maximum aridity of the postglacial period (Antevs 1952; Hall 1985; Haynes 1967; Mehringer and Warren 1976; Spaulding 1991, 1995). Spaulding (2001) proposes that a westerly air flow pattern returned to southern California, while the monsoonal weather patterns in the deserts retreated. As a result, the inland areas may have seen increased effective moisture, while the interior deserts, no longer receiving moist monsoonal flow and now in the rainshadow of the Transverse and Peninsular Ranges, became quite arid. This suggests that cismontane southern California, including the inland valleys of San Bernardino and western Riverside counties, may have been a relatively more hospitable environment than the interior deserts during the middle Holocene.

The ESRP study indicated an increase in prehistoric use and occupation after about 6000 B.P., in comparison to the earlier periods, in the inland areas of cismontane southern California (Goldberg et al. 2001). The more intensively used residential locations occur along alluvial fan margins, while less intensively used areas tend to be situated on arroyo bottoms or upland benches (Goldberg et al. 2001).

This interval has been described frequently as the "Milling Stone Horizon" because of the preponderance of milling tools in the archaeological assemblages of sites dated to this era (Basgall and True 1985; Kowta 1969; Wallace 1955). In the coastal and inland regions of southern California, this period of cultural development is marked by the technological advancements of seed grinding for flour and possibly the first use of marine resources, such as shellfish and marine mammals. The artifact inventory of this period includes crude hammerstones, scraper planes, choppers, large drills, crescents, and large flake tools. This assemblage also includes large leaf-shaped projectile points and knives; manos and milling stones used for hard-seed grinding; and likely nonutilitarian artifacts, such as beads, pendants, charmstones, discoidals, spherical stones, and cogged stones (Kowta 1969; True 1958; Warren et al. 1961).

2.2.2 Late Archaic Period (ca. 4000–1500 B.P.)

The Late Archaic period was a time of cultural intensification in southern California. The beginning of the Late Archaic coincides with the Little Pluvial, a period of increased moisture in the region. Effective moisture continued to increase in the desert interior by approximately 3600 B.P. and lasted throughout most of the Late Archaic. This ameliorated climate allowed for more extensive occupation of the region. By approximately 2100 B.P., however, drying and warming increased, perhaps providing motivation for resource intensification. Archaeological site types that typify this time period include residential bases with large, diverse artifact assemblages, abundant faunal remains, and cultural features, as well as temporary bases, temporary camps, and task-specific

activity areas. In general, sites showing evidence of the most intensive use tend to be on range-front benches adjacent to permanent water sources, such as perennial springs or larger streams, while less intensively used locales occur either on upland benches or on the margins of active alluvial fans (Goldberg 2001).

Data from Late Archaic component archaeological sites also suggest increased sedentism during this period, with a change to a semi-sedentary land-use and collection strategy. The profusion of features, and especially refuse deposits in Late Archaic components, suggests that seasonal encampments saw longer use and more frequent reuse than during the latter part of the preceding Middle Archaic period, with increasing moisture improving the conditions of southern California after ca. 3100 B.P. (Horne 2001; Spaulding 2001). Drying and warming after ca. 2100 B.P. likely exacted a toll on expanding populations, influencing changes in resource procurement strategies, promoting economic diversification and resource intensification, and perhaps resulting in a permanent shift towards greater sedentism (Goldberg 2001).

The subsistence base broadened during the Late Archaic period. The technological advancement of the mortar and pestle may indicate the use of acorns, an important storable subsistence resource. Hunted resources also presumably gained importance in the diet with an abundance of broad, leaf-shaped blades and heavy, often stemmed or notched projectile points found in association with large numbers of terrestrial and aquatic mammal bones. Other characteristic features of this period include the appearance of bone and antler implements and the occasional use of asphaltum and steatite. Most chronological sequences for southern California recognize the introduction of the bow and arrow by 1500 B.P., marked by the appearance of small arrow points and arrow shaft straighteners.

Technologically, the artifact assemblage of this period was similar to that of the preceding Middle Archaic; new tools were added either as innovations or as "borrowed" cultural items. Diagnostic projectile points of this period are still fairly large (dart point size), but also include more refined notched (Elko), concave base (Humboldt), and small stemmed (Gypsum) forms (Warren 1984). Late in the period, Rose Spring arrow points appeared in the archaeological record in the deserts, reflecting the spread of the bow and arrow technology from the Great Basin and the Colorado River region. This projectile point type was not found at the ESRP study area, and there is no evidence suggesting that the bow and arrow had come into use at this time in the inland regions of southern California.

2.2.3 Saratoga Springs Period (ca. 1500–750 B.P.)

Because paleoenvironmental conditions were little changed from the preceding period, cultural trends in the early portion of the Saratoga Springs period were, in large part, a continuation of the developments begun during the end of the Late Archaic period. However, the Medieval Warm, a period of even more persistent drought, began by 1060 B.P. Significantly warmer and drier conditions ensued. These climatic changes were experienced throughout the western United States (Jones et al. 1999; Kennett and Kennett 2000), although the inland areas of cismontane southern California may have been less affected than the desert interior. The Medieval Warm continued through the first 200 years of the Late Prehistoric period until approximately 550 B.P. (Spaulding 2001).

Although it has been anticipated that intensive use of the inland areas of cismontane southern California during the Medieval Warm may have been curtailed altogether, owing to inhospitable

climate and concomitant decline in water and food sources, this does not appear to be the case. While land-use and procurement strategies experienced profound changes during this time, the response to deteriorating conditions was not abandonment of the inland areas, but rather intensification. Climatic conditions of warming and drying that began ca. 2100 B.P., toward the end of the Late Archaic period, had already triggered an intensification process that established productive strategies for dealing with resource stress. With the onset of the Medieval Warm, those strategies were further refined and intensified (Goldberg 2001). The focal shift of prehistoric activity from alluvial fan margins to mountain-front benches adjacent to permanent water sources, which was initiated during the Late Archaic period, continues to be seen in the Saratoga Springs component archaeological sites (Goldberg 2001).

The frequency of refuse deposits and artifact and toolstone caches during the Medieval Warm is slightly higher than during the preceding Late Archaic period and much higher than during the latter portion of the subsequent Late Prehistoric period. The frequency of artifact and toolstone caches more than doubled during the Saratoga Springs period from the preceding period, while the frequency of human remains reached the highest point of any time in the archaeological record. The intentional caching of toolstone and ground stone tools suggests that people anticipated returning to the same locations. The midden-altered sediments, which appear for the first time during the Saratoga Springs period, support the continued re-use of desired locations (Horne 2001).

During the Medieval Warm, archaeological assemblages demonstrate the importance of plant foods as a primary food source than in any other prehistoric period; plant processing intensified and acorns apparently became an important staple (Klink 2001a). Faunal assemblages also show that resource stress was accommodated with similar strategies by intensifying the use of lagomorphs and by further expanding diet breadth, adding animals (i.e., medium-sized carnivores) to the diet that were rarely consumed during other periods of prehistory (McKim 2001). The most abundant evidence of trade also occurs during the Medieval Warm, suggesting that exchange was another mechanism for dealing with resource stress (Goldberg 2001).

2.2.4 Late Prehistoric Period (ca. 750–410 B.P.)

The Medieval Warm extended into the Late Prehistoric period, ending about 550 B.P. The cultural trends and patterns of land use that characterized the Medieval Warm Interval, including the portion that extends into the earlier part of the Late Prehistoric period, were discussed above. At the end of the Medieval Warm, however, and lasting throughout the ensuing Protohistoric period, a period of cooler temperatures and greater precipitation ushered in the Little Ice Age, during which time ecosystem productivity greatly increased along with the availability and predictability of water resources (Spaulding 2001).

During this time, Lake Cahuilla in the Coachella Valley began to recede (Waters 1983). As a result, the large Patayan populations occupying its shores began moving eastward to the Colorado River basin or westward into areas such as Anza Borrego, Coyote Canyon, the Upper Coachella Valley, the Little San Bernardino Mountains, and the San Jacinto Plain (Wilke 1976:172–183). The final desiccation of Lake Cahuilla, which had occurred by approximately 370 B.P. (A.D. 1580), resulted in a population shift away from the lakebed into the Peninsular Ranges and inland valleys to the west, such as the Project area, as well as to the Colorado River regions to the east.

With the return of more mesic conditions post-550 B.P., which resulted in less resource stress, studies at five residential sites comprising 16 separate components at ESRP indicate that that people returned to a less intensive, semi-sedentary land-use strategy similar to that identified during the Late Archaic period (Goldberg 2001). The number and frequency of artifact and toolstone caches were reduced; hearth features become slightly more common. Rock art also first appeared in association with Late Prehistoric components that post-date the Medieval Warm Interval. The decrease in the number of artifact and toolstone caches and the first appearance of rock art during this time suggest that residential sites are now occupied on a year-round basis (Horne 2001).

A reduction in emphasis on plant foods—especially acorns, which require intensive preparation—is also visible in the archaeological record, and likely accounts for the reduction in refuse deposits, fire-altered rock weights, and midden development visible toward the end of the Late Prehistoric period. The reduction in mortars, pestles, and other grinding tools after the Medieval Warm Interval suggests that the intensive procurement and processing of acorns and other plant foods was no longer as critical as previously; this pattern is further supported by a decline in the effort expended in shaping grinding tools (Klink 2001a). It is possible that the portable milling toolkit was supplemented substantially by bedrock milling features; however, bedrock features cannot be dated, and, therefore, cannot be assigned to any particular time period(s).

Percentages of projectile points also increased somewhat after the Medieval Warm Interval. Cottonwood Triangular points began to appear in inland assemblages at this time, and Obsidian Butte obsidian (located in the southeastern Salton Sea Basin and exposed by the dessication of Lake Cahuilla) becomes much more common, suggesting an increased focus on large mammals. However, the lower ratio of late-stage bifaces indicates that hunting methods returned to random-encounter strategies, rather than the logistical forays of the preceding period (Klink 2001b). Of particular note, faunal assemblages produced an anomalously high lagomorph index after the Medieval Warm, suggesting a very wet climatic regime with dense undergrowth well suited to cottontails (McKim 2001). Finally, the percentage of nonutilitarian artifacts declined considerably, suggesting that trade was no longer critical for assuring food supplies (Klink 2001c).

2.2.5 Protohistoric Period (ca. 410–180 B.P.)

The ameliorated, productive conditions of the Little Ice Age continued throughout the Protohistoric period. Generally speaking, sedentism intensified during the Protohistoric period, with small, but apparently fully sedentary villages forming. Increased hunting efficiency (through use of the bow and arrow) and widespread exploitation of acorns and other hard nuts and berries (indicated by the renewed abundance of mortars and pestles) provided reliable and storable food resources. This, in turn, promoted greater sedentism. Related to this increase in resource utilization and sedentism are sites with deeper middens, suggesting central-based wandering or permanent habitation. These would have been the villages, or rancherias, noted by the early nonnative explorers (True 1966, 1970).

The most striking change in material culture during this time is the local manufacture of ceramic vessels and ceramic smoking pipes. Although pottery was known in the Colorado Desert as long ago as 800 B.P., ceramic technology in the Project region appears to date to approximately 350 B.P. As well, abundant amounts of Obsidian Butte obsidian were imported into the region. Cottonwood Triangular points were supplemented by Desert Side-notched points. Late in this period, some

European trade goods (i.e., glass trade beads) were added to the previous cultural assemblages (Meighan 1954).

2.3 ETHNOGRAPHIC SETTING

Archival and published reports suggest the Project area is situated where the traditional use territories of the Serrano, Cahuilla, and Gabrielino overlap, just south of the present City of San Bernardino. All of these cultural groups belonged to cultural nationalities speaking languages belonging to the Takic branch of the Shoshonean family, a part of the larger Uto-Aztecan language stock (Bean 1978:576; Geiger and Meighan 1976:19). In the following sections, specific aspects of Serrano, Cahuilla, and Gabrielino ethnography and ethnohistory are explored. This information has been summarized from Bean and Vane (2001) and McCawley (1996); portions have been adapted from Horne and McDougall (2003).

2.3.1 Social Structure

Prior to the Mission period (i.e., prior to 1769), the Cahuilla and Serrano had nonpolitical, nonterritorial patrimoieties that governed marriage patterns as well as patrilineal clans and lineages. The words for these moieties mean "Coyote" and "Wildcat." These cultural groups had political-ritual-corporate units (clans) composed of three to 10 lineages, distinctly different, named, claiming a common genitor, with one lineage recognized as the founding lineage (Bean 1978:580; Bean and Vane 2004:13). Clans owned a large territory in which each lineage owned a village site and specific resource areas. Clan lineages cooperated in large communal subsistence activities (e.g., animal drives and hunts, controlled burning) and in performing rituals. Founding lineages often owned the office of ceremonial leader, the ceremonial house, and a ceremonial bundle (Bean and Vane 2001:V.A-2-5).

The Gabrielino had a more sophisticated political social structure. They, too, had a system of patrilineal lineages. Each lineage belonged to one of two "Coyote" or "Wildcat" moieties (Harrington 1942:32). Gabrielino lineages were capable of being split and reorganized into segmentary lineages, which served as mechanism for territorial expansion. Hunting and gathering territories were owned by the lineage; lineage membership gave individual families use rights. Unlike their Cahuilla and Serrano neighbors, the Gabrielino had a hierarchically ordered social class of elite, middle class, and commoners. Class membership played a major role in determining individual lifestyles, as it depended upon both ancestry and wealth (Bean and Smith 1978:543).

2.3.2 Subsistence and Domestic Resources

The Serrano, Cahuilla, and Gabrielino were, for the most part, hunting, collecting, and harvesting peoples. For the Serrano and Cahuilla, clans were apt to own land in valley, foothill, and mountain areas, providing them with the resources of many different ecological niches. Individual lineages or families owned specific resource areas within the clan territory. As in most of California, acorns were a major staple, but the roots, leaves, seeds, and fruit of many other plants were also used. Fish, birds, insects, and large and small mammals were available. Mountain sheep (*Ovis canadensis*), deer, and antelope were some of the large mammals hunted. Now extinct in this part of California, antelope were once numerous in the area (Harrington n.d.). As well, mountain lion, black bear, grizzly bear, deer, and wild boar were hunted. Similarly, the Gabrielino lineage ownership of land in valley, foothill, mountain, coastal, and estuary areas also offered a diverse array of food and other natural resources.

To gather food resources and to prepare them for eating, the Serrano, Cahuilla, and Gabrielino had an extensive inventory of equipment. The throwing stick and bow and arrow were the most important hunting tools for killing game, but snares, traps, slings, decoys, disguises, and hunting blinds were also part of the hunting technology. For fishing, nets, traps, spears, hooks and lines, and fish poisons were used. Many inland villages had access to creeks and rivers and to ancient Lake Cahuilla until its last dessication about 400 to 450 years ago, and during subsequent brief stands during the mid-1800s. Gathering required few tools: poles for shaking down pine nuts and acorns, cactus pickers, chia hooks, seed beaters, digging sticks and weights for digging sticks, and pry bars. Material culture items associated with transportation were mainly used to move food and included burden baskets, carrying nets, game bags, and saddle pads.

Food was usually stored in large storage baskets. Pottery ollas and baskets treated with asphaltum were also used to store and carry water and seeds. Wood, clay, and steatite were used to make jars, bowls, and trays. Skin and woven grass were used to make bags. Food processing required hammers and anvils for cracking nuts; mortars and pestles for grinding acorns and other hard nuts and berries; manos and metates for grinding seeds and berries; winnowing shells and baskets; strainers; leaching baskets and bowls; knives made of stone, bone, wood, and carrizo cane; bone saws; and drying racks made of wooden poles to dry fish. Basket mortars, with asphaltum used to attach an open-bottomed basket to a mortar, were important for food processing. Food was served in wooden and gourd dishes and cups and in basket bowls that were sometimes tarred. Wood, shell, and horn were used for spoons.

In addition to gathering and hunting, the mainland Gabrielino were involved in an extensive trade network that extended as far east as the Colorado River and as far west as San Nicolas Island (Davis 1961). With the Serrano, the Gabrielino traded shell beads, fish, sea otter skins, and soapstone vessels for deerskin and seeds (Heizer 1968; Strong 1929:95–96); the Cahuilla received beads, soapstone, and asphaltum from the Gabrielino in exchange for food, furs, hides, obsidian, and salt (Bean and Saubel 1972:133). In addition to forging alliances with neighboring groups, trade and exchange was also a means of offsetting food shortages during winter months and in times of resource stress (e.g., drought).

2.3.3 Shelter and Community Structures

In prehistoric times, Serrano, Cahuilla, and Gabrielino shelters are believed to have been dome-shaped; during post-contact times they tended to be rectangular (Harrington 1942:10). The entryway into the shelter was usually covered with hides or woven mats, and a smoke hole with a removable cover was present at the apex of the dome for smoke to escape. Serrano and Cahuilla shelters were made of brush, although some were wattled and plastered with adobe mud; Gabrielino shelters were made of reed. Most of the Serrano and Cahuilla domestic activities were performed outside the shelters within the shade of large, expansive ramadas; windbreaks, made of vertical poles covered with rush mats, provided open-air food preparation and cooking areas at Gabrielino settlements.

Within Serrano and Cahuilla villages, the chief's house was the largest and was usually next to the ceremonial house. Each village also had a men's sweat house and several granaries (Bean 1978:578; Bean and Vane 2001, 2004:7–13). At a typical Gabrielino settlement, a *yovaar*, an unroofed religious structure, was built in the center and surrounded first by the houses of the chief and elite members of society and then by the smaller houses of other community members; poor members

occupied simple lean-to style structures along the outskirts of the settlement (Boscana 1933). Sweathuts and granaries were also present in Gabrielino settlements.

2.3.4 Religion, World View, and the Sacred

The Serrano, Cahuilla, and Gabrielino, like other California Indians, understand the universe in terms of power, and power, believed to be sentient and to have will, was assumed to be the principal causative agent for all phenomena. Unusual natural phenomena are viewed as especially sacred, being the repositories of concentrations of power. Mountain tops, and especially particular mountain tops, are held sacred, as are unusual rock formations, springs, and streams. Rock art sites are sacred, having been the sites of ceremonies. Burial and cremation sites are also sacred, as are many other places of residual power. In addition, various birds, but especially eagles, condors, hawks, and other birds of prey and their symbolic representations, are revered as sacred beings of great power and were sometimes ritually killed and mourned in mortuary ceremonies similar to those for human elites. For this reason, bird cremation sites are sacred.

Because of these strong beliefs, rituals were a constant factor in the life of every Native American individual. Some rituals were scheduled and routine (e.g., birth, puberty, death, mourning, and the eagle ritual and first fruits rites), whereas others were sporadic and situationally performed (e.g., deer ceremony, bird dance, enemy songs, and the rain ritual) (Bean and Vane 2001:VII.A-3-10).

2.4 HISTORICAL SETTING

The history of the Project area provides a context for understanding local settlement from mission lands to the development of the modern urban landscape. It is the basis for the identification of the historic property types constructed during this settlement, and the evaluation of their significance as historical resources.

2.4.1 California History

Exploration of the California coast in the sixteenth and seventeenth centuries was the basis for the Spanish claim to the region. In the eighteenth century, Spain recognized that to strengthen its claim, it would have to settle Alta California to preclude encroachment by the Russians and British. Therefore, in the latter half of the eighteenth century Spain and the Franciscan Order founded a series of presidios, or military camps, and missions along the California coast, beginning at San Diego in 1769.

In 1821, Mexico opened the ports of San Diego and Monterey to foreign trade (Crouch et al. 1982:200). American ships docked at California ports to purchase tallow and hides, which were known as California banknotes. Americans also settled in California, some of them becoming citizens and owners of large ranchos.

Conflicts between the Californios and the central government in Mexico City led to a series of uprisings culminating in the Bear Flag Revolt of June 1846. However, Mexican control of California had effectively ended the year before when the Californios expelled Manuel Micheltorena, the last Mexican governor.

With the signing of the Treaty of Guadalupe-Hidalgo on February 2, 1848, California formally became an American territory, and two years later, on 9 September 1850, California became the

thirty-first state in the Union. Between those two years came a large influx of Americans seeking their fortunes; the catalyst for this influx was James Marshall's 1848 discovery of gold at Sutter's Mill. The population and wealth in the early statehood years were concentrated in the northern part of the state. Ranching was the main occupation in the southern counties; the flood and drought of the 1860s brought that era to a close, and the completion of the transcontinental railroad in 1869 opened California to agricultural settlement.

Southern California was promoted as an ideal agricultural area, with fertile soil and a mild climate. Books on California painted beautiful pictures that appealed to both Americans and Europeans. There were three land booms tied to railroad construction: (1) after the transcontinental railroad was completed, enabling easy travel to California; (2) late 1870s after the Southern Pacific was completed; and, (3) 1886–1888, when the Santa Fe transcontinental line was completed. Competition between the lines incited a rate war, and both tourists and potential settlers took advantage of the low fares to come to California (Lech 2004:222).

2.4.2 History of the City of Riverside

The Project area lies within the eastern limits of the City of Riverside. The development of Riverside, California and the growth of the citrus industry go hand in hand. Riverside was founded as a town in San Bernardino County in the 1870s and incorporated in 1883. It was located on the south bank of the Santa Ana River, its source of water. Advertised as a "Colony for California" the area was settled as an agricultural area by immigrants coming to the state to partake of the wonders listed in promotional literature. Riverside became a center of the citrus industry, and famous for its Washington navel orange. Competition with the neighboring city of San Bernardino resulted in the formation of the County of Riverside in 1893, with Riverside the seat of the newly established county.

A historical background for the history of the citrus industry in the City of Riverside is taken from Brown and Boyd (1922). Orange trees were first planted in Riverside in 1871, but the citrus industry that Riverside is famous for began three years later. In 1874, Eliza Tibbets received three Brazilian navel orange trees from a personal friend, William Saunders, who was a horticulturist at the United States Department of Agriculture. The trees came from Bahia, Brazil. The Bahia Orange did not do well in Florida, but its success in southern California was phenomenal.

Tibbets planted the trees and one of them died after it was trampled by a cow during the first year. After that unfortunate incident, the other two trees were transplanted to land owned by Sam McCoy. The trees were later transplanted again; one at the Mission Inn property in 1903 by President Theodore Roosevelt, (this tree died in 1922); the other was placed at the intersection of Magnolia and Arlington avenues. Eliza Tibbets was honored with a stone marker placed with the tree. That tree is reported to still stand to this day inside a protective fence.

The trees thrived in the southern California climate and the navel orange industry grew rapidly. Citrus became the primary agricultural product of the Riverside colony. Many growers purchased bud wood and then grafted the cuttings to root stock. Within a few years, the successful cultivation of many thousands of the newly discovered Brazilian navel orange led to a California Gold Rush of a different kind: the establishment of the citrus industry, which is commemorated in the landscapes and exhibits of the California Citrus State Historic Park in Riverside and the restored packing houses in Downtown Riverside's Marketplace district.

To cultivate large orchards, growers required the construction of major water conveyance systems. Beginning in the 1870s with the construction of the Southern California Colony Association's "Upper Canal" (established 1870) and the "Lower Canal" (established circa 1874), water arrived into the Riverside area from the Santa Ana River (HAER 1991:2-6). By 1882, there were more than half a million citrus trees in California, almost half of which were in Riverside.

As orchards began to dominate Riverside area agriculture, the need for larger water transport systems grew proportionately. To help meet the demand, the Gage Canal was built, tapping the waters of the Santa Ana River and bringing much needed irrigation into the region. Chinese laborers, credited with building the railroad grade for the California Southern Railway at Box Springs Canyon and Temecula Canyon, hand dug the canal, along with an expansive network of irrigation ditches, helping Riverside become famous for its citrus industry. Many towns had Chinese neighborhoods or "Chinatowns" and Riverside was no exception (Dillon 1995:41).

By 1886, water flowed from the head gates at Tequesquite Arroyo through the upper, 12-mile portion of the canal. By 1889, water flowed through the entire, 20.13 mile canal. Lands could now be irrigated with ease from the Santa Ana River 20 miles distant to the district of Arlington Heights in the City of Riverside. By the turn of the twentieth century, a significant cultural landscape evolved that consisted of more than 12,000 acres of orange groves (the largest situated in Arlington Heights and the district of Highgrove).

To facilitate the transportation of citrus crops from the grower to the consumer, the railroad industry routed several main and branch lines straight into the heart of the region. The Atchison Topeka & Santa Fe, the Union Pacific, and the Southern Pacific railroads laid track in and around Riverside and built or leased large networks of packing houses, icing plants, and storage. The development of refrigerated railroad cars and innovative irrigation systems established Riverside as the state's wealthiest city per capita by 1895.

Eventually, a world-class marketing organization known as the Southern California Fruit Exchange (the predecessor to Sunkist Growers) organized the Southern California citrus industry into an economic giant. The critical element supporting the entire industry consisted of Cahuilla Indians, Chinese, Mexican, Mexican-American, and Japanese laborers. The men and women who worked the orchards lived in small camps that usually consisted of small, wood-frame buildings erected near the larger orchards, the remains of which have all but disappeared from the landscape (HAER 1991, 7–13).

By 1940, the Riverside citrus industry had evolved into a major economic force. The 1943 U.S. Army map reveals that the Riverside/Arlington area was still a major citrus producer in the 1940s, with thousands of acres of citrus trees planted in the valley filling large tracts of land along Victoria Avenue, Dufferin Avenue, and Indiana Avenue. The 1960s was a period of rapid growth in the development of residential neighborhoods in the City of Riverside which pushed citrus development outward to the peripheral areas. The late 1990s and early 2000s marked another boom period in the growth of the region, in which more residential and commercial development rapidly consumed agricultural lands.

3
RESEARCH DESIGN

A research design is presented in this chapter which will serve as a basis for the evaluation of cultural resources identified within the Project area. The research is design is intentionally broad in scope and considers an array of research topics germane to the prehistory of interior southern California and western Riverside County.

3.1 PREHISTORIC RESEARCH THEMES

Research in the region has resulted in investigation of the ways that past human populations in the area have adapted to their environment, ascertaining when and how the environment and cultural behavior changed and explaining why particular adaptations occurred. Among the many interrelated elements of human adaptation are chronology, technology, subsistence, land use, and settlement strategies. These aspects of adaptation can be studied archaeologically and, thus, have been the focus of regional studies (Goldberg et al. 2001). These existing research designs will be used to establish the context within which site significance will be evaluated, and assess the potential effects or impacts the Project may have on the cultural resources identified. Major prehistoric themes particularly relevant to an assessment of cultural resources within the Project area include:

- **Chronology** – Does the site contain temporally significant artifacts (e.g., projectile points, ceramics, and beads) or artifacts with chronometric potential (organic material suitable for radiocarbon analysis or obsidian that can provide hydration readings)? When was the site occupied? How do artifacts conform to patterns observed for the temporal components defined in the region?

- **Technology of Tool Manufacture and Use** – Is there evidence to suggest tools were manufactured on site? Do lithic artifacts and technologies reflect expedient manufacture and use or a more curated pattern of technology? What does this tell us about land use and mobility?

- **Settlement Organization and Land Use** – What does the artifact assemblage suggest about the range of activities conducted at the site? Are there artifact types with morphological and stylistic attributes that have specific regional or geographic affinities? Does the assemblage allow for investigations into trade and exchange?

- **Subsistence Behavior** – Are plant or animal remains available at the site to inform on subsistence behavior? Are there indications that certain resource types were preferentially exploited? What does this tell us about the seasonality of site use?

3.2 A CULTURAL LANDSCAPE-BASED APPROACH TO BEDROCK MILLING SITES

Recent developments in landscape theory provide a means for archaeologists working in western Riverside County to define, discuss, and interpret cultural landscapes. Landscape refers broadly to culturally constructed space and the creation of meaningful places. Landscape includes natural-resource distributions and the relationship of human groups to those resources, but it also comprises

how natural resources and landmarks are incorporated into the cultural landscape as meaningful places to the people who lived there. For hunter-gatherer groups, this may include burial grounds, rock art sites, a built or modified environment that extends beyond a habitation site, rivers, mountains, or resource-collection areas that are culturally significant, or even habitation or activity sites that bear important cultural meaning.

Cultural landscape approaches have been useful for understanding cultural resources within the context of broader surroundings (Bender 1993; Cosgrove 1984; Fowles 2010; Gamble and Wilken-Robertson 2008; Hirsch and O'Hanlon 1995; Potter 2004; Rossignol and Wandsnider 1992; Tilley 1994; Ucko and Layton 1999). These approaches explicitly acknowledges the importance of both the natural environment—its features and its resources—and constructed places of meaning (the built environment). Within this theoretical construct, places are perceived, experienced, contextualized, and given meaning by people and their actions and these actions are both constrained and enabled by the natural and cultural resources composing the landscape. The cultural landscape is therefore created by human activity and structured by the distribution of resources on the land and the cultural perceptions of human relationships to those resources (Anschuetz et al. 2001; Potter 2004).

While sacred places, revered landforms, and residential sites are the most visible components of cultural landscapes, an equally important element is the activity area or "taskscape," which comprises places created and modified through repetitious activities that occur on the landscape (Ingold 1993; Perry and Delaney-Rivera 2011:106) and connected physically to other places through a patchwork of trails and relationally by the social and economic meanings associated with the specific task. Each task derives its meaning from its position within an ensemble of tasks, generally by groups working together (Ingold 1993; Robinson 2010). As such, individual tasks or activities represented at or near sites cannot be considered in isolation from the ensemble, an idea that resonates with local Native American views of the landscape (Applied EarthWorks, Inc. 2013).

The taskscape, then is a socially constructed space of human activity, understood as having spatial boundaries and delimitations for the purposes of analysis. One of the most prominent ensembles of tasks that have been documented in western Riverside County relates to subsistence-based procurement and processing activities. Subsistence-based procurement and processing tasks carried out by prehistoric inhabitants over several millennia left an indelible mark on cultural and modern landscapes, and remains an important unit of analysis for archaeological research. Site and non-site locations communicate direct and indirect evidence relating to subsistence-based tasks, which can be extracted from natural resource patches where wild foods were collected, hunting blinds and butchering locations, temporary camps, work camps, or seasonal camps like those associated with the acorn harvest. In areas like western Riverside County where bedrock outcrops are situated near valuable resource patches and permanent water sources, evidence of routine socioeconomic tasks related to subsistence are no more apparent than at bedrock milling sites ranging from isolated bedrock milling features exhibiting a single slick to dense clusters of milling features representing processing stations containing a variety of slicks, basin metates, and sometimes mortars.

In the past, these bedrock milling sites were evaluated in isolation from one another, labeled ubiquitous, redundant, and were well-documented in the archaeological literature. Many sites were thus determined not historically significant for the NRHP or the California Register of Historical Resources and were destroyed during project construction without further consideration. The

problem is not specific to bedrock milling sites, and was addressed in the *National Register Bulletin: Guidelines for Evaluating and Registering Archaeological Properties.*

> Overlooking the significance of small sites may skew our understanding of past lifeways as these sites not only receive less research attention, but are also destroyed without being recorded thoroughly because they are 'written off' as ineligible for listing in the National Register. Such losses point up the need to continuously reexamine historic contexts and allow new discoveries to challenge our ideas about the past [Little et al. 2000:21].

In the Sycamore Canyon area, the prevalence of bedrock milling sites suggests that these sites may constitute part of a meaningful taskscape within the larger cultural landscape. Delineation of a cultural landscape is beyond the scope of the current study and would require a cooperative effort between the Native Americans and cultural resource managers to determine the level of research needed to properly identify, record, and evaluate such a landscape for the CRHR, NRHP, or local designation. As such, the present study acknowledges the existence and significance of the concept of cultural landscapes and associated taskscapes based on scientific, academic, and tribal knowledge and Native American concerns and recommends that the cultural landscape concept be taken into account in current and future Project planning and decision-making processes.

4
METHODS AND PROCEDURES

The objectives of the cultural resource investigations of the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project were twofold: first, to complete a cultural resource inventory of the approximately 72-ac Project area in order to identify and document all cultural resources that may be impacted or adversely affected by the proposed Project; and second, to evaluate the significance of the identified cultural resources within the Project area in order to determine if they meet criteria for local, state, or national historic designation.

In order to accomplish these two objectives, Æ conducted records searches, Native American coordination, and archaeological field surveys. The methods used for each of the work efforts are described below. Results of these investigations provide baseline information with which to evaluate the significant associative and research value of each cultural resource as well as to assess their integrity. Research goals used in the evaluation process focused on a narrow array of problem domains by gathering and analyzing specific sets of data. As discussed in Chapter 3, research domains focused on basic questions related to prehistoric chronology, technology, subsistence, and land-use patterns.

4.1 BACKGROUND STUDIES

4.1.1 Cultural Resource Literature and Records Search

As part of the proposed Project, Æ staff conducted an archaeological literature and records search at the EIC, housed at the University of California, Riverside, on May 26, 2015. The objective of the records search was to determine whether any prehistoric or historical archeological or historical resources have been recorded previously within the Project area, or within a 1-mi radius. Sources consulted during the records search at the EIC include:

- National Register of Historic Places (NRHP);
- Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility (ADOE);
- Office of Historic Preservation Directory of Properties in the Historic Property Data File (HPD);
- California Historic Landmarks; and
- California Points of Historical Interest

4.1.2 Sacred Lands Files Search and Native American Coordination Efforts

Æ requested a Sacred Lands File (SLF) search from the NAHC located in Sacramento, California in May 2015. This SLF search encompassed the Project area and surrounding 1-mi buffer. In addition, letters requesting information on Native American cultural resources were sent on June 29, 2015 to Native American tribes and individuals whose contact information was provided by the NAHC. Tribal communities contacted as part of this effort include the Pala Band of Mission Indians, Pauma & Yuima Reservation, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, Sobaba Band of Mission Indians, Pauma Valley Band of Luiseño Indians, San Luis Rey Band of Mission

Indians, and La Jolla Band of Mission Indians. Follow-up telephone calls were conducted by Æ on July 13, 2015.

4.1.3 Historical Map Research

To obtain additional information on the history and development of the Project area, a number of historical maps were also consulted as part of the background study. These sources include the General Land Office (GLO) plat map for Township 3 South, Range 4 East (1855); USGS 15-minute (1:62,500 scale) topographic quad maps for Riverside, CA (1901, 1942); and USGS 7.5-minute (1:24,000 scale) topographic quad maps for Riverside East, CA (1955, 1967).

4.2 CULTURAL RESOURCE SURVEY

The intensive cultural resources pedestrian survey of the approximately 72 ac of land constituting the Project area was conducted by Æ archaeologists on May 19 and 20, 2015. Æ's staff archaeologist Robert Lichtenstein served as Field Supervisor, accompanied by Field Technician, Mark King. All fieldwork occurred under the direct supervision of Dr. Tiffany Clark, Æ's Principal Investigator for the Project. All key Project personnel meet the Professional Qualifications Standards outlined in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. Resumes of key personnel are provided in Appendix A.

The survey of the APE was conducted by the two-person crew walking parallel transects spaced at 10-meter (m) (33-ft) intervals. All areas likely to contain or exhibit archaeologically or historically sensitive cultural resources were inspected carefully to ensure that visible, potentially significant cultural resources were discovered and documented. Additionally, surveyors investigated any unusual landforms, contours, soil changes, features (e.g., road cuts, drainages), and other potential cultural site markers. A Daily Work Record was completed each day by the Field Supervisor that documented survey personnel, hours worked, weather, ground surface visibility, vegetation, soils, exposure/slope, topography, natural depositional environments, and identified cultural resources.

During the field inventory, systematic efforts were be made to characterize and define the areal extent of each cultural resource. For purposes of this survey, one or more cultural features or three or more artifacts greater than 45 years of age within a 30-m (98-ft) radius was deemed to constitute a cultural resource (or site). Cultural features or clusters of artifacts more than 30 m away from the nearest known cultural resource were generally considered a separate site area. Less than three prehistoric or historical artifacts within a 30-m radius, but outside of a known site, were considered to be an isolated find, and were recorded appropriately as such.

Æ personnel attempted to re-identify any cultural resources recorded previously within the Project area. During the revisit, the surface manifestation and condition was assessed for each cultural resource. Digital site overview photographs were also taken; in addition, digital overview photographs were taken of each activity locus, cultural feature, and temporally or functionally diagnostic artifacts. An updated site record was completed if the current site record was deemed inadequate or incorrect. No artifacts were collected during survey.

4.3 SIGNIFICANCE EVALUATION OF CULTURAL RESOURCES

4.3.1 NRHP and CRHR Significance Criteria

Æ evaluated each identified archaeological resource within the Project area for significance and eligibility for listing in the NRHP and/or the CRHR. To qualify for listing in the NRHP, a property must represent a significant theme in American history, archaeology, architecture, engineering, or culture, and it must be a good representative of that theme. Moreover, the property must retain integrity; that is, an ability to convey its association with important events, individuals, or themes by means of its physical characteristics. The National Park Service (NPS) (2002) established guidelines for evaluating NRHP eligibility. The basic steps in the evaluation process include:

- Classifying the property as a district, site, building, structure, or object;
- Determining the theme, period, and context within which the property is significant;
- Determining which NRHP significance criteria are applicable;
- Determining whether the property meets any exclusionary considerations; and
- Determining whether the property retains integrity [NPS 2002].

Similarly, the CRHR recognizes properties of local, state, or national importance with evaluative criteria and procedures similar to the NRHP standards.

A point worth emphasizing is that NRHP or CRHR eligibility is being assessed, but not determined, in this document. The professional evaluations offered here are subject to final concurrence by the federal, state, and local regulatory agencies. The lead federal agency that is responsible for an undertaking, in consultation with the State Historic Preservation Officer (SHPO), determines NRHP eligibility. If the SHPO and agency agree that a property is eligible or ineligible, it is treated as such for the purposes of Section 106 compliance. The Keeper of the NRHP also may become involved in the eligibility determination process if requested, or if an objection is raised by the Advisory Council on Historic Preservation. Similarly, the CEQA lead agency makes determinations regarding significance and eligibility for listing in the CRHR. Accordingly, the present task is to render a professional assessment rather than an administrative determination.

Significance Criteria. In the context of a federally permitted undertaking, the significance of cultural resources is measured against the NRHP criteria for evaluation (36 CFR 60.4):

> The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, association, and
>
> A. that are associated with events that have made a significant contribution to the broad patterns of our history;
>
> B. that are associated with the lives of persons significant in our past;
>
> C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic

values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that has yielded, or is likely to yield, information important to prehistory or history.

A property must meet one or more of these specific criteria to qualify as a good representative of a significant historical theme or pattern. It must be associated with important historical events or persons (Criteria A and B); convey important technical, aesthetic, or environmental values (Criterion C); or have potential to provide important scientific or scholarly information (Criterion D). Unless a site is of exceptional importance, it is not eligible for listing in the NRHP until it is 50 years of age.

Associative values are identified within the context of local, regional, and national history. Historical research is required to evaluate significant historical associations under Criteria A, B, and C. Criterion D, which is most often applied to archaeological sites, requires specification in terms of an archaeological context and research design. In addition to archaeological research potentials, sites may possess public and ethnic values which should be considered when evaluating significance (Hardesty 1988:109). For example, persons or their descendants associated with a particular site may retain strong connections with that place through memories or folklore. The importance of this aspect of significance lies not only in the strength of these associations as they contribute to the broad patterns of history, but also in the valuable yet ephemeral source of information such memories represent.

Finally, archaeological sites may have broader public significance insofar as they can serve to educate the public about important aspects of national, state, and local history. This evaluation also considers the resource in terms of its potential for public interpretation and education. These criteria, by which the NRHP eligibility of a resource is judged, are essential because they "indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2). Any action, as part of an undertaking, which could affect a significant cultural resource is subject to review and comment under Section 106 of the NHPA.

In addition to the NRHP criteria for evaluation, Section 15064.5(a)(3) of the CEQA Guidelines (as amended) states that a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations Section 4852). A site meets the criteria of eligibility for the CRHR if it:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(2) Is associated with the lives of persons important in our past;

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as "historical resources" under CEQA. Resources included in a local register of historical resources (pursuant to PRC Section

5020.1[k]), or identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]), also are considered "historical resources" for the purposes of CEQA. The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources, or identified in a historical resources survey, does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1. 3.

4.3.2 City of Riverside Designated Cultural Resources

Æ also evaluated each identified archaeological resource within the Project area to determine if they meet the criteria for local historic designation. The City of Riverside recognizes four types of Designated Cultural Resources: Cultural Heritage Landmark, Resource or Structure of Merit, Historic District, and Neighborhood Conservation Area. The following are the criteria for these resources as defined in the Cultural Resources Ordinance of the City of Riverside Municipal Code (Title 20, Ordinance 7108, 2010) as amended:

Landmark Criteria: This designation refers to any Improvement or Natural Feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

2. Is identified with persons or events significant in local, state or national history;

3. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

4. Represents the work of a notable builder, designer, or architect, or important creative individual;

5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;

6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;

7. Is one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or

8. Has yielded or may be likely to yield, information important in history or prehistory.

Resource or Structure of Merit Criteria: This designation refers to any Improvement or Natural Feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic, or artistic heritage of the City, retains sufficient integrity, and:

1. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the City;

2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;

3. Is connected with a business or use which was once common but is now rare;

4. A Cultural Resource that could be eligible under Landmark Criteria no longer exhibiting a high level of integrity, however, retaining sufficient integrity to convey significance under one or more of the Landmark Criteria;

5. Has yielded or may be likely to yield, information important in history or prehistory; or

6. An improvement or resource that no longer exhibits the high degree of integrity sufficient for Landmark designation, yet still retains sufficient integrity under one or more of the Landmark criteria to convey cultural resource significance as a Structure or Resource of Merit. (Ord. 7108 §1, 2010)

Historic District: The City of Riverside defines a Historic District as:

1. A concentration, linkage, or continuity of cultural resources, where at least fifty percent of the structures or elements retain significant historic integrity (a "geographic Historic District"), or

2. A thematically-related grouping of cultural resources which contributes to each other and are unified aesthetically by plan or physical development, and which have been designated or determined eligible for designation as a historic district by the Historic Preservation Officer, Board, or City Council, or is listed in the National Register of Historic Places or the California Register of Historical Resources, or is a California Historical Landmark or a California Point of Historical Interest (a "thematic Historic District").

In addition to either 1 or 2 above, the area also:

3. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

4. Is identified with persons or events significant in local, State, or national history;

5. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

6. Represents the work of notable builders, designers, or architects;

7. Embodies a collection of elements of architectural design, detail, materials or craftsmanship that represent a significant structural or architectural achievement or innovation;

8. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

9. Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship or association; or

10. Has yielded or may be likely to yield, information important in history or prehistory.

Neighborhood Conservation Area: An area that:

1. Provides a contextual understanding of the broader patterns of Riverside's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

2. Represents established and familiar visual features of a neighborhood, community, or of the City;

3. Reflects significant development or geographical patterns, including those associated with different eras of settlement and growth; or

4. Conveys a sense of historic or architectural cohesiveness through its design, setting, materials, workmanship or association.

Designation of Neighborhood Conservation Areas is no longer allowed. Those designated prior to May 2006 shall remain in effect and subject to this Title, and may be modified or dedesignated.

4.3.3 Contexts for Evaluation

The archaeological and historical contexts and research domains presented in Chapters 2 and 3, respectively, establish the framework within which decisions about significance are based (NPS 2002:9). The evaluation process essentially weighs the relative importance of events, people, and places against the larger backdrop of prehistory and history; the contexts provide the comparative standards and/or examples as well as the theme(s) necessary for this assessment. According to the NPS (2002:9), a theme is a pattern or trend that has influenced the history of an area for a certain period. A theme is typically couched in geographic (i.e., local, state, or national) and temporal terms to focus and facilitate the evaluation process.

Significance is based on how well the subject resource represents one or more of these themes, provides important scientific information about the theme, or helps to understand the important events or people associated with the resource and its inherent qualities. A resource must demonstrate more than just association with a theme; it must be a good representative of the theme, capable of illustrating or explaining the various thematic elements of a particular time and place in history.

4.3.4 Integrity

All properties change over time. Therefore, it is not necessary for a property to retain all of its historic physical features or characteristics in order to be eligible for listing in the NRHP or CRHR or as a City of Riverside Designated Cultural Resource. The property must, however, retain enough integrity to enable it to convey its historic identity; in other words, to be recognizable to a historical

contemporary. The NRHP recognizes seven aspects or qualities that, in various combinations, define integrity:

1. **Location**—the place where the historic property was constructed or the place where the historic event occurred.
2. **Design**—the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting**—the physical environment of a historic property.
4. **Materials**—the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. **Workmanship**—the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
6. **Feeling**—a property's expression of the aesthetic or historic sense of a particular period of time.
7. **Association**—the direct link between an important historic event or person and a historic property [NPS 2002:44-45].

These elements of integrity are most appropriately applied to built-environment resources (i.e., standing buildings, structures, and objects). Although location (as described above) is relevant for all types of resources, the other aspects of integrity are not readily applicable to most archaeological sites. Instead, physical properties—like vertical and horizontal structure—provide a more relevant measure of integrity for archaeological sites. To illustrate, a site is conventionally considered to possess integrity if its original stratigraphy remains generally unaltered such that the chronology of activity can be determined, and if indications of disturbance do not obscure the full range of activity that occurred at the site, as expressed in its features and artifacts. If both conditions are generally met, the site will have likely retained its ability to yield scientifically important information. To retain historic integrity, a property will always possess several, and usually most, of these aspects. In order to properly assess integrity, however, significance (why, where, and when a property is important) must first be fully established. Only after significance is established can the issue of integrity be addressed. To be eligible for listing in the NRHP or CRHR or as a City of Riverside Designated Cultural Resource, a resource must possess both significance and sufficient integrity.

4.3.5 Linkage

Under NRHP significance Criterion D and CRHR Criterion 4, the data potentials of a particular archaeological site are identified through the linkage of specific artifact classes present at the site with research themes such as those outlined in Section 2 above[1]. For example, charcoal or other organic remains suitable for radiocarbon dating, source-identified obsidian, projectile points, or other stylistic artifacts would permit the study of cultural chronology. Flaked stone tools and debitage may provide information on lithic technology, while faunal and floral remains provide information on

[1] Although this discussion focuses on data potential as it relates to NRHP Criterion D and CRHR Criterion 4, the ability of a resource to yield information important to history and prehistory is also relevant to the identification of Designated Cultural Resources as defined in the City of Riverside Municipal Code Title 20 (see Section 4.3.2).

food procurement, diet, seasonality, and the biotic environment. The presence of these kinds of remains in an undisturbed context would indicate a significant cultural deposit. If such remains are lacking, or if their contextual integrity has been seriously impaired by post-depositional disturbances, then the site likely would not be considered eligible under Criterion D/4.

A key factor in assessing archaeological data potentials is the capacity for chronological control of the cultural assemblage. Temporally diagnostic artifact forms, historical documents, datable carbon, source-identified obsidian specimens, and preserved stratigraphy are among the major sources of chronological data. Sufficient samples of obsidian debitage, even in the absence of diagnostic tool types, can also yield chronologically controlled data on raw material procurement, lithic reduction sequences, and tool manufacturing techniques through obsidian sourcing and hydration studies.

If site chronology and function can be defined, a site can usually provide data on land use and settlement patterns. These data are usually embodied in the locational, functional, and contextual information about the site. Similarly, almost all prehistoric sites have some potential to provide data on lithic technology, given chronological control of a sufficient sample of tools and/or debitage. However, if this information cannot be placed in a larger cultural context, the data is not considered of great importance; thus, sites having only limited settlement or technological data are not generally deemed significant or important under Criterion D/4. Likewise, sparse scatters of flaked or ground stone without temporal diagnostics have limited data potential due to the low density and low variability of the cultural assemblage and the lack of datable material.

Thus, archaeological sites in the Project area generally were judged to meet the NRHP/CRHR eligibility criteria under Criterion D/4 if they exhibited one or more of the following characteristics:

- Temporally discrete features, strata, or components;
- Variability in flaked and ground stone assemblages and faunal remains;
- Sufficient quantities of artifacts and debris to provide statistically valid samples;
- Internal spatial variability that might reflect functional differentiation in site use;
- Vertical or horizontal structure that might reflect discrete single component occupations or readily separable multicomponent occupations; and/or
- Documentation of important historical associations.

Sites with these characteristics were judged to contain the kinds of data useful for understanding the local chronological sequence, defining discrete cultural components, and learning how these relate to more well-known cultural sequences. At the next hierarchical level, such sites can provide information on dimensions of flaked and ground stone technology, prehistoric diet and subsistence, trade and exchange, and other regionally important research questions.

5
RESULTS OF THE CULTURAL RESOURCE ASSESSMENT

This chapter presents the results of the identification and evaluation of the cultural resources located within the Project area. The findings of the background studies are first detailed, followed by a discussion of the results of the Phase I pedestrian survey. Finally, an evaluation of significance is presented for identified cultural resources that have the potential to be impacted by the proposed Project.

5.1 RESULTS OF BACKGROUND STUDIES

5.1.1 Cultural Resource Literature and Records Search

Results of the records search indicate that no fewer than 31 cultural resources investigations have been conducted previously within 1 mi of the Project area (Table 5-1). Three of the previous investigations (RI-01537, RI-01721, and RI-07552) involved various portions of the current Project area. In total, 100 percent of the Project area has been previously surveyed for cultural resources. A copy of the EIC record search results is provided in Appendix B.

The investigations cited above resulted in the identification of 123 previously recorded cultural resources within 1 mi of the Project area (Table 5-2). The majority of these resources are prehistoric bedrock milling features with no associated artifacts (108 of the 123 resources or 88%). Other documented prehistoric resources include a small rock-shelter site, a trail with an associated artifact scatter, and two isolated lithic artifacts. Five archaeological resources date to the historic period and include the remnants of a railroad siding and refuse scatters. Two multicomponent archaeological sites, each consisting of prehistoric bedrock milling features with associated historic period remains, have also been identified within the record search area. Built-environment resources include the San Jacinto Valley Railway and three standing buildings, the latter of which are located along Sycamore Canyon Boulevard and Box Springs Road to the east of the Project area. A review of the NRHP, ADOE, HPD, and databases of the California Historic Landmarks and California Points of Historical Interest indicates no historic properties or landmarks have been recorded or listed within, or immediately adjacent to, the Project area.

Of the 123 identified cultural resources, three archaeological sites (CA-RIV-8750, -8751, and -8752), have been documented within the current Project area. All three resources represent prehistoric bedrock milling features that were recorded by Tang et al. (2007) as part of the Sycamore V and Sycamore 6&7 Projects survey. A description of each of these resources is provided below.

CA-RIV-8750 (P-33-016713). [redacted] The elevation of the site is 1,601 feet amsl. CA-RIV-8750 consists of two granitic boulders spaced 45 m apart, each with two grinding slicks. The two boulders were designated as Feature 1 and Feature 2. Feature 1 measures approximately 3.4 x 2.6 m in size with two slicks spaced 30 cm apart. Slick 1 is roughly circular in shape and measures approximately 25 x 23 cm. Slick 2 is similar in shape and measures approximately 17 x 15 cm. Neither of the slicks has any depth and both are polished only on the high points. Feature 2 measures approximately 5.3 x 3.1 m in dimension. Slick 1 on this boulder measures approximately 20 x 18 cm with Slick 2 measuring

approximately 26 x 18 cm. The two slicks are located roughly 1 m from one another and neither exhibits any depth.

No artifacts were observed on the surface of CA-RIV-8750. In order to assess the potential for subsurface archaeological deposits, Tang et al. (2007) excavated two shovel test pits, one near each of the bedrock milling features. Each test pit measured 30 cm in diameter with a maximum depth ranging between 25 and 30 cm. No prehistoric or historical artifacts were identified in either of the test pits.

Tang et al. (2007:18) suggest that CA-RIV-8750 represents a special-use area, possibly the result of a single visit by prehistoric Native Americans. Based on the findings of their study, they concluded that because CA-RIV-8750 lacks potential to yield important archaeological data for the study of regional history and does not qualify for listing on the CRHR or NRHP or as a City of Riverside Designated Cultural Resource.

CA-RIV-8751 (P-33-016714). [redacted] CA-RVI-8751 consists of a single granitic boulder measuring 4.8 x 2.5 m in size with two grinding slicks on its surface. Slick 1 measures 20 x 15 cm with Slick 2 measuring 18 x 14 cm. Both slicks are highly eroded with only the high points of each exhibiting any polish.

No artifacts were observed on the surface of CA-RIV-8751. In order to assess the potential for subsurface archaeological deposits, Tang et al. (2007) excavated two shovel test pits, one on either side of the bedrock milling feature. Each test pit measured 30 cm in diameter with a maximum depth ranging between 20 and 30 cm. No prehistoric or historical artifacts were identified in either of the test pits.

Tang et al. (2007:18) suggest that CA-RIV-8751 represents a special-use area, possibly the result of a single visit by prehistoric Native Americans. Based on the findings of their study, they concluded that CA-RIV-8751 lacks potential to yield important archaeological data for the study of regional history and does not qualify for listing on the CRHR or NRHP or as a City of Riverside Designated Cultural Resource.

CA-RIV-8752 (P-33-016715). [redacted] The site consists of a granitic boulder measuring 4.1 x 2.3 m with a single grinding slick on its surface. The slick measures approximately 23 x 18 cm and is highly polished with some evidence of light weathering.

No artifacts were observed on the surface of CA-RIV-8752. In order to assess the potential for subsurface archaeological deposits, Tang et al. (2007) excavated one shovel test pit immediately adjacent to the boulder containing the bedrock milling feature. The test pit measured 30 cm in diameter with a maximum depth of 30 cm. No prehistoric or historical artifacts were identified in the test pit.

Tang et al. (2007:18) suggest that CA-RIV-8752 represents a special-use area, possibly the result of a single visit by prehistoric Native Americans. Based on the findings of their study, they concluded that CA-RIV-8752 lacks potential to yield important archaeological data for the study of regional

Table 5-1
Previous Cultural Studies within 1-Mile of the Project Area

Author(s)	Date	Report #	Report Title
Drover, Christopher	1985	RI-00016	Environmental Impact Report: An Archaeological Assessment of the Canyon Springs, Trunk Sewer, Edgemont to East Riverside, Riverside County, California.
Drover, Christopher	1991	RI-0017	Environmental Impact Evaluation: An Archaeological Assessment of Orangecrest-Springs 69 KV Transmission line, City of Riverside, California
Gardner, Michael	1973	RI-0081	Golden Crest Residential Development: Expected Impact on Archaeological Resources
Bowles, Larry L.	1978	RI-00329	Environmental Impact Evaluation: Archaeological Assessment of Parcel 11,907
Archaeological Associates, Ltd.	1980	RI-00980	Archaeological Survey Report: A 358+/- Acre Parcel Located at the Intersection of Interstate 15E and Highway 60 in Riverside County, CA
Lerch, Michael K.	1982	RI-01525	Cultural Resources Assessment of the Kaplan Pit, Upper Sycamore Canyon Area, City of Riverside, California
Swenson, James D.	1982	RI-01537	An Archaeological Assessment of the Box Springs Industrial Park Specific Plan Study Area, Riverside County, California
Swenson, James D.	1982	RI-01538	An Archaeological Assessment of Sycamore Canyon Specific Plan Study Area, Riverside County, California
Archaeological Research, Inc.	1974	RI-01648	Archaeological Report – Project W.O. 5-3764, Box Springs Feeder
Lerch, Michael K.	1983	RI-01721	Cultural Resources Assessment of the Northern, Western, and Southern Extensions of the Sycamore Canyon Specific Plan, City of Riverside, California
Drover, Christopher	1984	RI-01823	An Archaeological Assessment of Parcel Maps 8412, 19835, and 20010 Near Riverside, California
Scientific Resource Surveys, Inc.	1984	RI-01895	Cultural Resources Survey of the Highlander Annexation Area Project
Perault, Gordon	1985	RI-02050	Preliminary Historic Inventory – March Air Force Base, California
McCarthy, Daniel	1987	RI-2171	Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California
Arkush, Brook S.	1989	RI-02497	Cultural Resources Assessment of 160 Acres of Land Surrounding the Henry J. Mills Filtration Plant Located in the City of Riverside, Riverside County, California
Drover, Christopher	1989	RI-02549	An Archaeological Assessment of Gateway Center – Long Beach Equities, Riverside County, California
Padon, Beth, and Scott Crownover	1990	RI-02753	Cultural Resources Assessment, Southern California Gas Company Proposed Line 5000 – Sycamore Canyon Segment, Riverside County, California
Wlodarski, Robert J.	1993	RI-03605	Draft Report: An Archaeological Survey Report Documenting the Effects of the RCIC I-215 Improvement Project in Moreno Valley, Riverside County to Orange Show Road in the City of San Bernardino County, California
Foster, John M., J. Schmidt, C. Weber, G. Romani, and R. Greenwood	1991	RI-03693	Cultural Resources Investigation: Inland Feeder Project, Metropolitan Water District of Southern California.
National Park Service, HAER	1993	RI-04813	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

Table 5-1 (continued)

Author(s)	Date	Report #	Report Title
Love, Bruce, Bai Tang, Daniel Ballester, and Mariam Dahdul	2002	RI-05894	Historical/Archaeological Resources Survey Report, Singletray Property and Nissan Facility, 5940, 5980, and 6090 Sycamore Canyon Boulevard, City of Riverside, Riverside County, California
Love, Bruce, Bai Tang, and Mariam Dahdul	2002	RI-05895	Historical/Archaeological Resources Survey Report, Cottonwood Avenue and Sycamore Canyon Boulevard Street Improvement Project and water Quality Basin Project Site, City of Riverside, Riverside County, California
Hogan, Michael, Bai Tang, Josh Smallwood, and Daniel Ballester	2003	RI-05995	Historical/Archaeological Resources Survey Report, Water Quality Basin "B" Project, in the City of Riverside
Tang, Bai, Michael Hogan, Mariam Dahdul, and Daniel Ballester	2003	RI-6018	Historical/Archaeological Resources Survey Report, Menifee Valley North Drainage Facilities Project, in and Near the Communities of Romoland and Homeland, Riverside County, CA
Bricker, David	1998	RI-06088	First Supplemental Historic Property Survey Report for the Improvement of Interstate Route 215/State Route 91/State Route 60, Riverside County, CA
Bonner, Wayne and Marnie Aislin-Kay	2007	RI-07497	Letter Report: Cultural Resource Records Search and Site Visit Results for Royal Street Communications, LLC Candidate LA2351C (Raceway Ford), 5900 Sycamore Canyon Blvd., Riverside County, California
Tang, Bai "Tom"; Michael Hogan	2007	RI-07552	Historical/Archaeological Resources Survey Report, Sycamore V and Sycamore 6 & 7 Projects, City of Riverside, Riverside County, California
Bodmer, Clarence, Daniel Ballaster, and John J. Eddy	2008	RI-07704	Phase I Archaeological Assessment; Assessor's Parcel No. 963-070-013, 30735 Magdas Coloradas Street, French Valley Area, Riverside County, California
Billat, Lorna	2007	RI-07859	Collocation ("CO") Submission Packet FCC Form 621, Project Name: Ca7284 Sprint Collo, Project
Wlodarski, Robert J.	2009	RI-08329	Letter Report: A Record Search and Pedestrian Survey for the Proposed Wireless Telecommunications Site LA6194 (LA6194) Located at 20375 Farley Avenue, Corona, California 92881
Greenberg, Gregory P.	2013	RI-09197	Cultural Resources Survey: Family Service Association/ CLV2713, 21250 Box Springs Road, Suite 212, Moreno Valley, Riverside County, California 92557

Table 5-2
Cultural Resources within 1-Mile of the Project Area

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-000998	CA-RIV-998	X			Prehistoric cupule boulder and 5 milling slicks on 2 boulders
33-001196	CA-RIV-1196	X			Prehistoric bedrock milling site
33-001197	CA-RIV-1197	X			Prehistoric bedrock milling site with one milling slick
33-001198	CA-RIV-1198	X			Prehistoric bedrock milling site
33-001199	CA-RIV-1199	X			Prehistoric bedrock milling site

Table 5-2 (continued)

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-001202	CA-RIV-1202	X			Prehistoric bedrock milling site with two milling features
33-001203	CA-RIV-1203	X			Prehistoric bedrock milling site with two milling features
33-001204	CA-RIV-1204	X			Prehistoric bedrock milling site with a single milling feature
33-001205	CA-RIV-1205	X			Prehistoric hunting blind in small rock shelter
33-001206	CA-RIV-1206	X			Prehistoric bedrock milling site
33-001319	CA-RIV-1319	X			Prehistoric bedrock milling site with 6 milling slicks
33-002425	CA-RIV-2425	X			Prehistoric bedrock milling site with associated lithic scatter; possible historical adobe structure remnants with refuse scatter
33-002427	CA-RIV-2427	X			Prehistoric bedrock milling site with 45 milling slick features on 12 boulders
33-002428	CA-RIV-2428	X			Prehistoric bedrock milling site with 1 milling slick feature
33-002429	CA-RIV-2429	X			Prehistoric bedrock milling site with 3 milling slick features on one boulder
33-002430	CA-RIV-2430	X			Prehistoric bedrock milling site with 1 milling slick feature
33-002431	CA-RIV-2431	X			Prehistoric bedrock milling site with 4 milling slicks on two outcrops
33-002432	CA-RIV-2432	X			Prehistoric bedrock milling site with 2 milling slicks on 2 outcrops
33-002433	CA-RIV-2433	X			Prehistoric bedrock milling site with 3 milling slicks on one outcrop
33-002434	CA-RIV-2434	X			Prehistoric bedrock milling site with 2 milling slicks on one outcrop
33-002435	CA-RIV-2435	X			Prehistoric bedrock milling site with 8 milling slicks on 4 outcrops
33-002436	CA-RIV-2436	X			Prehistoric bedrock milling site with 16 slicks on 8 boulders
33-002437	CA-RIV-2437	X			Prehistoric bedrock milling site with 3 slicks on 2 boulders
33-002438	CA-RIV-2438	X			Prehistoric bedrock milling site with 17 milling slicks on 9 boulders
33-002439	CA-RIV-2439	X			Prehistoric bedrock milling site with 12 milling slicks on 5 boulders
33-002440	CA-RIV-2440	X			Prehistoric bedrock milling site with 29 milling slicks on 9 boulders
33-002441	CA-RIV-2441	X			Prehistoric bedrock milling site with 2 milling slicks on 2 boulders
33-002442	CA-RIV-2442	X			Prehistoric bedrock milling site with 5 milling slicks on 4 outcrops
33-002443	CA-RIV-2443	X			Prehistoric bedrock milling site with 9 milling slicks of 4 boulders
33-002444	CA-RIV-2444	X			Prehistoric bedrock milling site with 3 milling slicks on one gneiss boulder

Table 5-2 (continued)

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-002445	CA-RIV-2445	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-002446	CA-RIV-2446	X			Prehistoric bedrock milling site with 3 milling slicks on 2 boulders
33-002447	CA-RIV-2447	X			Prehistoric bedrock milling site with 2 milling slicks on 2 boulders
33-002448	CA-RIV-2448	X			Prehistoric bedrock milling site with 1 very weathered milling slick
33-002450	CA-RIV-2450	X			Prehistoric bedrock milling site with 1 milling slick
33-002451	CA-RIV-2451	X			Prehistoric bedrock milling site with 1 milling slick
33-002452	CA-RIV-2452	X			Prehistoric bedrock milling site with 1 milling slick
33-002453	CA-RIV-2453	X			Prehistoric bedrock milling site with 3 milling slicks on 3 outcrops
33-002454	CA-RIV-2454	X			Prehistoric bedrock milling site with 9 milling slicks + ground stone artifact scatter
33-002455	CA-RIV-2455	X			Prehistoric bedrock milling site with 1 milling slick
33-002456	CA-RIV-2456	X			Prehistoric bedrock milling site with 1 milling slick
33-002457	CA-RIV-2457	X			Prehistoric bedrock milling site with 1 milling slick
33-002458	CA-RIV-2458	X			Prehistoric bedrock milling site with 2 boulders with 11 milling slicks, 1 mano
33-002459	CA-RIV-2459	X			Prehistoric bedrock milling site with 3 milling slicks on 2 boulders
33-002496	CA-RIV-2496	X			Prehistoric bedrock milling site with 21 milling slicks on 7 boulders
33-002460	CA-RIV-2460	X			Prehistoric bedrock milling site with 7 milling slicks on one outcrop
33-002461	CA-RIV-2461	X			Prehistoric bedrock milling site with 4 milling slick on one boulder
33-002462	CA-RIV-2462	X			Prehistoric bedrock milling site with 2 milling slicks on 2 schist boulders
33-002463	CA-RIV-2463	X			NEED RECORD
33-002464	CA-RIV-2464	X			Prehistoric bedrock milling site with 1 milling slick
33-002465	CA-RIV-2465	X			Prehistoric bedrock milling site with 5 milling slick on 2 outcrops
33-002466	CA-RIV-2466	X			Prehistoric bedrock milling site with 4 milling slicks on 4 boulders
33-002468	CA-RIV-2468	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-002469	CA-RIV-2469	X			Prehistoric bedrock milling site with 4 milling slicks
33-002470	CA-RIV-2470	X			Prehistoric bedrock milling site with 1 milling slick on low outcrop
33-002471	CA-RIV-2471	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder

Table 5-2 (continued)

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-002472	CA-RIV-2472	X			Prehistoric bedrock milling site with 3 milling slicks on one boulder
33-002473	CA-RIV-2473	X			Prehistoric bedrock milling site with 1 milling slick
33-002474	CA-RIV-2474	X			Prehistoric bedrock milling site with 1 milling slick
33-002475	CA-RIV-2475	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-002476	CA-RIV-2476	X			Prehistoric bedrock milling site with 4 milling slicks on 2 boulders
33-002477	CA-RIV-2477	X			Prehistoric bedrock milling site with 1 milling slick
33-002478	CA-RIV-2478	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-002479	CA-RIV-2479	X			Prehistoric bedrock milling site with 2 milling slicks on 2 boulders
33-002480	CA-RIV-2480	X			Prehistoric bedrock milling site with 3 milling slicks on one boulder
33-002481	CA-RIV-2481	X			Prehistoric bedrock milling site with 4 milling slicks on one boulder
33-002482	CA-RIV-2482	X			Prehistoric bedrock milling site with 7 milling slicks on 3 boulders
33-002483	CA-RIV-2483	X			Prehistoric bedrock milling site with 14 milling slicks on 8 outcrops
33-002484	CA-RIV-2484	X			Prehistoric bedrock milling site with 5 milling slicks on 2 outcrops
22-002488	CA-RIV-2488	X			Prehistoric bedrock milling site with 17 milling slicks on 4 outcrops
33-002491	CA-RIV-2491	X			Prehistoric bedrock milling site with 1 milling slick
33-002492	CA-RIV-2492	X			Prehistoric bedrock milling site with 1 basin milling slick
33-002493	CA-RIV-2493	X			Prehistoric bedrock milling site with 6 mortars on 3 boulders
33-002494	CA-RIV-2494	X			Prehistoric bedrock milling site with 6 mortars on 3 boulders and 9 possible mortar starts on one boulder
33-002495	CA-RIV-2495	X			Prehistoric bedrock milling site with 12 milling slicks on 2 boulders
33-002496	CA-RIV-2496	X			Prehistoric bedrock milling site with 4 milling slicks on 3 boulders
33-002497	CA-RIV-2497	X			Prehistoric bedrock milling site with 11 milling slicks on 6 boulders
33-002498	CA-RIV-2498	X			Prehistoric bedrock milling site with 1 milling slick
33-002506	CA-RIV-2506	X			Prehistoric bedrock milling site with 10 milling slicks on 3 boulders
33-002507	CA-RIV-2507	X			Prehistoric bedrock milling site with 6 milling slicks on 2 boulders
33-002508	CA-RIV-2508	X			Prehistoric bedrock milling site with 23 milling slicks on 13 boulders

Table 5-2 (continued)

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-002509	CA-RIV-2509	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-002510	CA-RIV-2510	X			Prehistoric bedrock milling site with 9 milling slicks on 3 boulders
33-002511	CA-RIV-2511	X			Prehistoric bedrock milling site with 3 milling slick on one boulder
33-002512	CA-RIV-2512	X			Prehistoric bedrock milling site with 14 milling slicks on 7 boulders
33-002513	CA-RIV-2513	X			Prehistoric bedrock milling site with 14 milling slicks on 7 boulders
33-002514	CA-RIV-2514	X			Prehistoric bedrock milling site with 1 milling slick
33-002515	CA-RIV-2515	X			Prehistoric bedrock milling site with 1 milling slick
33-002516	CA-RIV-2516	X			Prehistoric bedrock milling site with 1 milling slick
33-002517	CA-RIV-2517	X			Prehistoric bedrock milling site with 5 milling slicks on 4 boulders
33-002519	CA-RIV-2519	X			Prehistoric bedrock milling site with 3 milling slicks and one mortar on 3 outcrops
33-002520	CA-RIV-2520	X			Prehistoric bedrock milling site with 8 milling slicks on 4 boulders
33-002521	CA-RIV-2521	X			Prehistoric bedrock milling site with 1 milling slick
33-002522	CA-RIV-2522	X			Prehistoric bedrock milling site with 4 milling slicks on 2 boulders
33-002523	CA-RIV-2523	X			Prehistoric bedrock milling site with 3 milling slicks on one large boulder
33-002526	CA-RIV-2526	X			Prehistoric bedrock milling site with 2 milling slicks on 2 boulders
33-002527	CA-RIV-2527	X			Prehistoric bedrock milling site with 5 milling slicks on 2 boulders
33-002528	CA-RIV-2528	X			Prehistoric bedrock milling site with 1 milling slick
33-003078	CA-RIV-3078	X			Prehistoric bedrock milling site with 1 milling slick
33-003699	CA-RIV-3699	X			Prehistoric bedrock milling site with 2 milling slick on one boulder
33-004509	CA-RIV-4509	X			Prehistoric trial and activity area containing buffware ceramic sherds
33-003700	CA-RIV-3700	X			Prehistoric bedrock milling site with 5 milling slicks on 3 boulders
33-003781	CA-RIV-3781	X			Prehistoric bedrock milling site with 1 milling slick
33-003782	CA-RIV-3782	X			Prehistoric bedrock milling site with 1 milling slick
33-003815	CA-RIV-3815	X			Prehistoric bedrock milling site
33-003816	CA-RIV-3816	X			Prehistoric bedrock milling site
33-003817	CA-RIV-3817H	X			Historical railroad siding site
33-004195	CA-RIV-4195	X			Prehistoric bedrock milling site

Table 5-2 (continued)

Primary Number	Trinomial	Resource Type			Resource Description
		Site	Isolate	Built Environment	
33-004497	CA-RIV-4497/H	X			Prehistoric bedrock milling site with historical railroad siding, check dam, and refuse scatter
33-005710				X	Ancillary building
33-011825				X	Residential building
33-011826				X	Motel buildings
33-013608		X			Possible historic site
33-015656			X		Quartzite secondary flake
33-015657			X		Bifacial granitic mano
33-015743	CA-RIV-8196H	X			Historical San Jacinto Valley Railway
33-015888		X			Historical refuse scatter
33-015914		X			Prehistoric bedrock milling site with numerous milling features (13+)
33-015988		X			Prehistoric bedrock milling site with five milling slicks on one boulder
33-016713	CA-RIV-8750	X			Prehistoric bedrock milling site with 4 milling slicks on 2 boulders
33-016714	CA-RIV-8751	X			Prehistoric bedrock milling site with 2 milling slicks on one boulder
33-016715	CA-RIV-8752	X			Prehistoric bedrock milling site with 1 millings slick
33-017887	CA-RIV-9435	X			Prehistoric bedrock milling site with 3+ milling features on 2 outcrops
33-018668		X			Historical refuse scatter
33-024053	CA-RIV-11818H	X			Historical refuse scatter

history and does not qualify for listing on the CRHR or NRHP or as a City of Riverside Designated Cultural Resource.

5.1.2 Sacred Lands File Search and Native American Coordination Efforts

The search of the SLF by the NAHC failed to indicate the presence of Native American cultural resources within the immediate Project area (see Appendix C). The NAHC cautioned that the absence of specific site information does not indicate the absence of such resources. They recommended that other sources of cultural resources should be contacted for information on Native American cultural resources. The NAHC provided a list of regional Native Americans who may have knowledge of cultural resources within the Project area. Tribal communities listed on the NAHC list include the Pala Band of Mission Indians, Pauma & Yuima Reservation, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, Sobaba Band of Mission Indians, Pauma Valley Band of Luiseño Indians, San Luis Rey Band of Mission Indians, and La Jolla Band of Mission Indians.

Letters requesting information on Native American cultural resources that may be present in the Project area were sent to each of the listed tribes and individuals on June 29, 2015 (Appendix C). Three responses were received as a result of this initial coordination effort. Mr. Jim McPherson responded on behalf of the Rincon Band of Mission Indians and stated that the proposed Project is not located within the historic boundaries of the Rincon Band of Mission Indians. As such, the tribe

will defer to the Pechanga Band of Luiseño Indians or the Soboba Band of Luiseño Indians. A response was also received from Mr. Joseph Ontiveros of the Soboba Band of Mission Indians. He stated that the proposed Project is located within the Tribal Traditional Use Area and is in proximity to known village sites and a shared use area that was used for ongoing trade between the Luiseño and Cahuilla tribes. The Soboba Band of Luiseño Indians requested that: consultation be initiated with the project proponent and lead agency; the tribe be provided with copies of any archaeological resource documentation; the tribe be provided information regarding the progress of the project; the tribe act as a consulting tribal entity for the project; and a Native American monitor from the Soboba Band of Luiseño Indians be present during any ground disturbing proceedings, including surveys and archaeological testing. Mr. Chris Devers, Cultural Liaison for the Pauma Band of Luiseno Indians (Pauma & Yuima Reservation) stating that the tribe is concerned about the three cultural sites located within the Project area. He stated that even though the sites may be ineligible for the NRHP, they are evidence of an ancestral occupation and their protection and preservation is important. He requested that if the developer could complete the project and protect the milling areas, it would be greatly appreciated. He further requested that the ground disturbance activity be monitored by an archaeologist and Native American monitor.

Æ conducted follow-up telephone calls with the remaining Native American groups and individuals on July 13, 2015. Ms. Cami Mojado of the San Luis Rey Band of Mission Indians and Dr. Shasta Gaughen of the Pala Band of Mission Indians both stated that they were defer to local tribal groups in Riverside County. Mr. William Pink stated that there were sites of some significance in the area including burial sites, cupule boulders, and a large number of grinding slicks. He stated that the sites should be preserved.

On July 27, 2015, a letter response from Ms. Anna Hoover of the Pechanga Band of Luiseño Indians was received. Ms. Hoover stated that the area was located within a traditional Payómkawichum (Luiseño) cultural landscape. She noted that the Tribe is aware of more than 50 cultural sites located within a one-mile radius with a blue-line stream flowing though the Project area. Ms. Hoover suggested that the abundant water resources in the Sycamore Canyon area supported a dense habitation for likely hundreds of years if not longer. Furthermore, she stated that the features are associated with the Sycamore Canyon village complex which extends within at least a four-mile radius of the Project. Because of the sensitivity of the area, the Tribe requested the following: notification once the Project begins the entitlement process; copies of all applicable archaeological reports, site records, proposed grading plans, and environmental documents; government-to-government consultation with the Lead Agency; and monitoring during earthmoving activities by a Riverside County qualified archaeologist and a professional Pechanga Tribal monitor.

Finally, a follow-up letter dated October 16, 2015 was received from Dr. Shasta Gaughen of the Pala Band of Mission Indians Tribal Historic Preservation Office. Her letter confirmed that the Project is beyond the boundaries of the territory that the tribe considers its Traditional Use Area. Therefore, she stated the Pala Band of Mission Indians defers to the wishes of Tribes in closer proximity to the Project area. No other responses have been received from Native American groups as of May 10, 2016. A summary of all responses received from the information request is provided in Table 5-3.

Table 5-3
List of Native American Contacts and Record of Responses

Name	Date & Time of Contact	Responses
Shasta Gaughen, PhD, THPO Pala Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Follow up phone call with Dr. Gaughen. She stated that as the Project is in Riverside County, the tribe defers to local groups in the area.
	October 16, 2015	Received letter stating that the Project is beyond the boundaries of the territory that the tribe considers its Traditional Use Area. Therefore the Pala Band of Mission Indians defer to the wishes of Tribes in closer proximity to the Project area.
Randall Majel, Chairperson Pauma & Yuima Reservation	June 29, 2015	Scoping letter sent via United States Postal Service (USPS).
	July 13, 2015	See response from Charles Devers below.
Charles Devers, Cultural Committee Pauma & Yuima Reservation	June 29, 2015	Scoping letter sent via USPS.
	July 13, 2015	Email response received stating that even though the three cultural resources identified within the Project area are recommended as ineligible, they are evidence of an ancestral occupation. Mr. Devers further states that the protection and preservation of ancestral sites is important and if the developer could complete the project and protect the milling areas, it would be appreciated. The tribe would also request that the ground disturbance activity be monitored by an archaeologist and Native monitor.
Pauma & Yuima Reservation ATTN: EPA	June 29, 2015	Scoping letter sent via USPS.
	July 13, 2015	See response from Charles Devers above.
Mark Macarro, Chairperson Pechanga Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	June 29, 2015	Stated that the email recipient no longer works for the Pechanga Tribal Government Center.
Paul Macarro, Cultural Resources Manager Pechanga Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	See response from Anna Hoover below.

Name	Date & Time of Contact	Responses
Anna Hoover, Cultural Analyst Pechanga Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Left message on office voicemail.
	July 27, 2015	Received response letter from Ms. Hoover via email. The Tribe requested the following: notification once the Project begins the entitlement process, if it has not already; copies of all applicable archaeological records, site records, proposed grading plans and environmental documents; government-to-government consultation with the Lead Agency; and monitoring of earthmoving activities by a Riverside county qualified archaeologist and professional Pechanga Tribe monitor.
Bo Mazzetti, Chairperson Rincon Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	June 29, 2015	See response from Jim McPherson below.
Jim McPherson, Tribal Historic Preservation Officer Rincon Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	June 29, 2015	Mr. McPherson responded on behalf of the Tribe and stated that the proposed Project is not located within the historic boundaries of the Rincon Band of Mission Indians. As such, the tribe will defer to the Pechanga Band of Luiseño Indians or the Soboba Band of Luiseño Indians.
Rosemary Morillo, Chairperson Attn: Carrie Garica	June 29, 2015	Scoping letter sent via email.
Soboba Band of Mission Indians	July 6, 2015	See response from Joseph Ontiveros below.
Lavonne Peck, Chairwoman La Jolla Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Called and was referred to Nathan Stout, Tribal Administrator. Left message for Mr. Stout on his office voicemail.
Bennae Calac Pauma Valley Band of Luiseño Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Called and left message on voicemail. Ms. Calac returned call and stated that the Pauma Valley Band of Luiseño Indians shares the same response as Mr. Charles Devers of the Pauma & Yuima Reservation (see above).

Name	Date & Time of Contact	Responses
Joseph Ontiveros, Cultural Resources Department Soboba Band of Luiseno Indians	June 29, 2015	Scoping letter sent via email.
	July 6, 2015	Mr. Ontiveros stated that the proposed Project is located within the Tribal Traditional Use Area and is in proximity to known village sites and a shared use area that was used for ongoing trade between the Luiseño and Cahuilla tribes. The Soboba Band of Luiseño Indians requested that: consultation be initiated with the project proponent and lead agency; the tribe be provided with copies of any archaeological resource documentation; the tribe be provided information regarding the progress of the project; the tribe act as a consulting tribal entity for the project; and a Native American monitor from the Soboba Band of Luiseño Indians be present during any ground disturbing proceedings, including surveys and archaeological testing.
Tribal Council San Luis Rey Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Called and talked to Cami Mojada. She stated that the tribe would defer to the Soboba Band of Luiseño Indians or Pechanga Band of Luiseño Indians depending on which group was closer to the Project area.
Cultural Department San Luis Rey Band of Mission Indians	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	See response from Ms. Mojada above.
William J. Pink	June 29, 2015	Scoping letter sent via email.
	July 13, 2015	Mr. Pink stated there are some sensitive cultural resources in the areas including burial sites and cupule boulders. In addition, he noted there are a number of grinding slicks. He requested that the sites should be preserved.

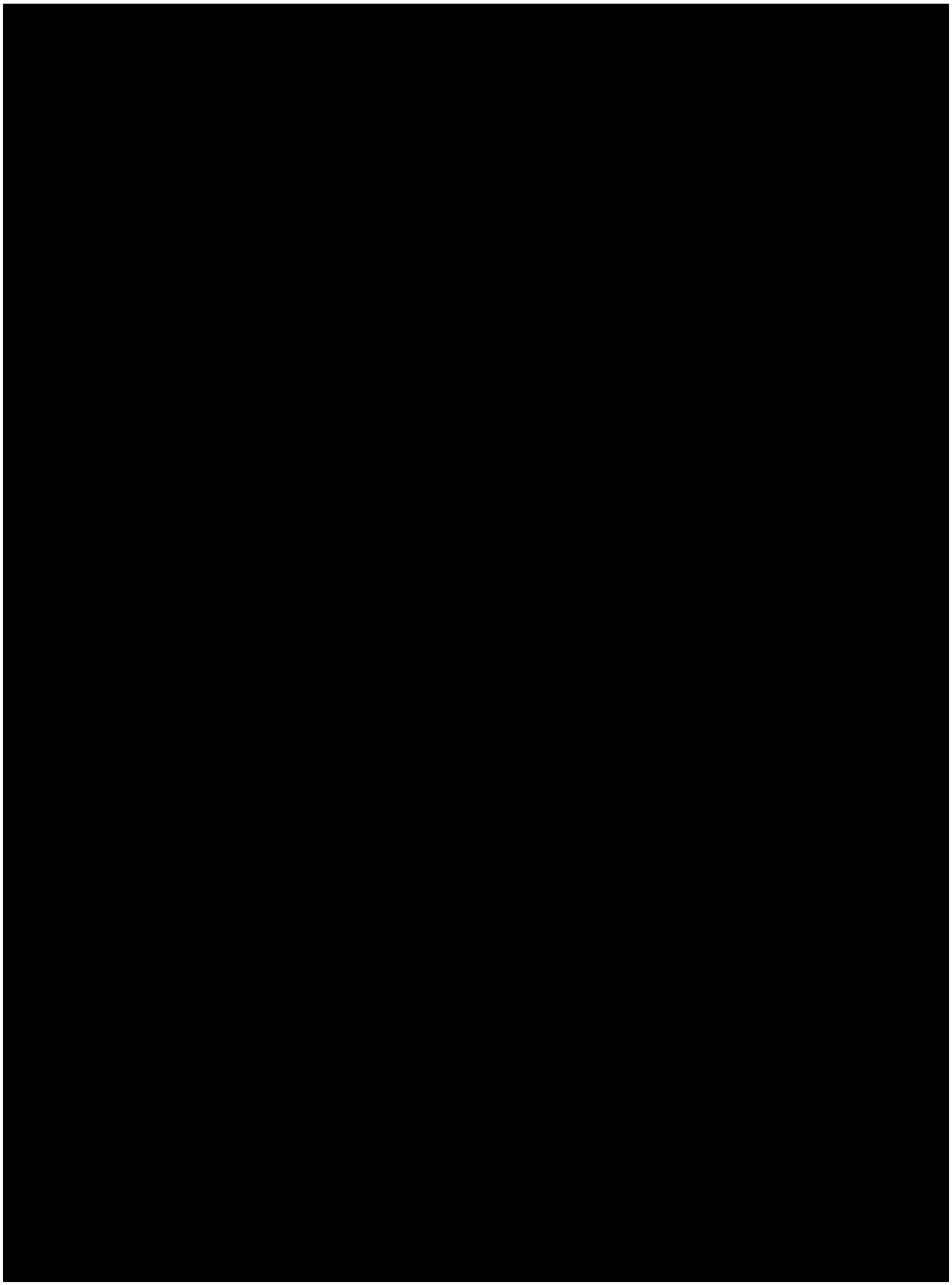

Figure 5-1 Survey coverage and cultural resource location map.

5.1.3 Historical Map Research

A review of the historical maps indicates that several roads and trails were present in the Project vicinity in the early 1900s. This includes one road that crosses the northern portion of the Project area in a northeast-to-southwest direction. Although the 1942 USGS 15-minute topographic quad map indicates that some of these roads continued to be in use into the early 1940s, the route traversing the Project area appears to have been abandoned by this time. The maps indicate that no buildings or structures were present within the Project area.

5.2 RESULTS OF CULTURAL RESOURCE SURVEY

Æ's intensive pedestrian survey resulted in the re-identification of the three cultural resources that had been previously documented within the Project area. No newly identified cultural resources were recorded during the Phase I survey. The locations of the three previously recorded cultural resources are shown in Figure 5-1. A description of each identified cultural resource is provided below; updated DPR 523 forms are included in Appendix D.

Various degrees of ground disturbance were observed within the Project area during the Phase I survey. The southeastern portion of the property has been extensively disturbed by grading activities that have resulted in the exposure of the underlying bedrock and the creation of several large spoils piles. This disturbed area largely lacked any vegetation or ground cover. The southwestern portion of the Project area also appears to have been previously disturbed with several piles of redeposited boulders and soil noted in the area. The remaining portions of the Project area exhibit linear furrows that suggest prior grubbing or vegetation removal activities. Much of this area is characterized by small scrubs and grasses, with drainage areas containing riparian flora that included cottonwood (*Populus* sp.), salt cedar (*Tamarix* sp.), and willow (*Salix* sp.) (Figure 5-2). Ground visibility throughout the survey area was good to excellent.

Figure 5-2 View of Project area, looking south towards drainage.

Soils across the Project area consist of a light brown, coarse sandy silt with small-to medium sized angular to subangular gravels of granite. These sediments are directly underlain by Cretaceous granitic rock of the Val Verde Pluton (Clifford and DeBusk 2015). Bedrock is found at very shallow depths with a number of outcrops noted in the west-central and northern portions of the Project area. With the exception of sedimentary materials found within the drainage wash, most of the Project area is characterized by little soil development.

5.2.1 CA-RIV-8750 (P-33-016713)

[redacted] Æ's revisitation to CA-RIV-8750 found that the original description and mapped boundary of the site provided by Tang et al. (2007) were fairly accurate. The prehistoric bedrock milling site measures 49 x 8 m and contains two granitic outcrops (Features 1 and 2) with grinding slicks. Feature 1, located in the northwestern extent of the site, measures approximately 3.4 x 2.6 m in size and contains two shallow slicks located approximately 30 cm apart from one another (Figure 5-3); Slick 1 measures 25 x 23 cm and Slick 2 measures 17 x 15 cm. Located approximately 33 m to the southeast, Feature 2 measures 5.3 x 3.1 m and contains two shallow slicks located roughly 1.0 m from one another; Slick 1 measures 20 x 18 cm and Slick 2 measures 26 x 18 cm. A relatively low degree of polish was observed on each of the four slicks. The terrain surrounding the site is relatively level with the ground surface characterized by a decomposed granitic soil. Inspection of the area failed to identify any surface artifacts associated with the grinding features.

Figure 5-3 View of Feature 1 at CA-RIV-8750, looking southwest.

The ground surface of the area surrounding the boulders has been disturbed by grubbing activities. The site also appears to have experienced extensive off-road vehicular use with tire marks and an informal two-track trail running through the area. A light scatter of refuse and construction debris was noted in the vicinity.

5.2.2 CA-RIV-8751 (P-33-016714)

[redacted] Æ's revisitation to CA-RIV-8751 found that the original description and mapped boundary of the site provided by Tang et al. (2007) were fairly accurate. The site consists of a single granitic boulder that contains two grinding slicks. The boulder measures 4.8 x 2.5 m in size. The grinding slicks are located approximately 35 cm from one another with Slick 1 measuring 20 x 15 cm and Slick 2 measuring 18 x 14 cm. Both slicks are shallow in depth with polished only on their high points; the slicks show some degree of weathering. An inspection of the surrounding area by the archaeologists failed to identify any artifacts associated with the grinding features.

The site is located immediately adjacent to a highly disturbed area that has been graded down to bedrock and leveled by mechanical equipment. These activities have resulted in the removal of native sediments in the areas south of the boulder outcrop. Grubbing activities have disturbed the ground surface in the northern portion of the site.

5.2.3 CA-RIV-8752 (P-33-016715)

[redacted] The site was originally recorded by Tang et al. (2007) as a single granitic boulder (4.1 x 2.3 m) that contained one grinding slick (23 x 18 cm) which was highly polished and showed evidence of weathering. During the revisit, a second grinding slick was identified on the top of an adjacent boulder; the boulder measures 5.3 x 4.1 m with a height of approximately 1.9 m. The newly identified grinding slick measures 22 x 30 cm and exhibits a very light polish with a moderate degree of weathering. As a result of this finding, the boundary of CA-RIV-8752 was expanded to encompass the boulder and second grinding slick; the new dimensions of the site are 6 m (N-S) x 10 m (E-W).

An inspection of the ground surface by the archaeologists failed to identify any artifacts that may be associated with the milling feature. The ground surface in the area surrounding the boulders has been disturbed by vegetation removal activities.

5.3 RESULTS OF EVALUATION OF RESOURCE SIGNIFICANCE

The three bedrock milling sites located within the Project area had been previously evaluated by Tang and others (2007), who found that none of the cultural resources appeared to meet eligibility requirements for listing on the NRHP or CRHR or as a City of Riverside Designated Cultural Resource. As stipulated in 36 CFR 800.4(c)(1), however, the passage of time, changing perceptions of significance, or incomplete prior evaluations, may require the reevaluation of previously evaluated resources. As part of the current study, each resource's research potential and criteria for recommended inclusion on the CRHR and NRHP or as a City of Riverside Designated Cultural Resource were reassessed. Results of this evaluation confirm earlier findings and suggest that none

of the prehistoric bedrock milling sites are eligible for listing on the CRHR or NRHP or as a City of Riverside Designated Cultural Resource.

5.3.1 CA-RIV-8750 (P-33-016713)

CA-RIV-8750 represents a prehistoric special-use area related to subsistence-based processing activities, most likely the processing of native seeds, plant fibers, and small mammals. The flat surfaces of the grinding slicks would have been most conducive to seed grinding rather than acorn processing, for which mortar cups are often utilized (Basgall and True 1985). The shallowness and low degree of polish associated with the two grinding slicks indicate that the features result from a small number of short-term processing episodes. No artifacts were found in association with the milling features during the revisit, which is consistent with the earlier findings by Tang and others (2007). Furthermore, the negative findings of the two shovel test pits excavated at CA-RIV-8750 by Tang and others (2007) indicate that the site lacks substantial buried cultural deposits.

Data from the earlier work at CA-RIV-8750, along with information obtained during the recent cultural resource survey, indicate that the site does not meet any of the criteria for listing on the NRHP or CRHR. CA-RIV-8750 is not associated with events that have made a significant contribution to the broad patterns of history and therefore is not recommended as eligible for listing under Criterion A/1. It is not associated with the lives of persons significant in the past and therefore is not recommended as eligible for listing under Criterion B/2. It also does not embody the distinctive characteristics of a type, period, or method of construction, and thus is not recommended eligible under Criterion C/3. The absence of surface artifacts and subsurface cultural remains indicates that the site is not likely to yield any additional information that can address research issues related to chronology, technology, settlement organization and land use, and subsistence behavior. As such, CA-RIV-8750 cannot be considered eligible for listing under Criterion D/4.

CA-RIV-8750 also does not appear to meet the criteria as a City of Riverside Designated Cultural Resource. It cannot be considered a Cultural Heritage Landmark as it is not an "exceptional example" of an archaeological resource. Furthermore, the site also lacks the data potential to contribute important information to the "broader understanding" of the archaeological heritage of the City of Riverside.

Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by the development of the nearby Sycamore Canyon Business Park to the east and housing development immediately to the north. Moreover, weed abatement activities in the area surrounding the bedrock milling outcrops have removed the native plant communities that would have been found prehistorically. Finally, the site's integrity has been further impaired by off-road vehicular use which has disturbed the native sediments in the immediate area surrounding the bedrock milling features.

5.3.2 CA-RIV-8751 (P-33-016714)

CA-RIV-8751 represents a prehistoric special-use area related to subsistence-based processing activities, most likely the processing of native seeds, plant fibers, and small mammals. The flat surfaces of the two grinding slicks suggest use as a seed processing locale. The shallowness and low degree of polish associated with the grinding slicks indicate that the features result from a small number of short-term processing episodes. No artifacts were found in association with the milling features during the revisit, which is consistent with the earlier findings by Tang and others (2007).

Furthermore, the negative findings of the two shovel test pits excavated at CA-RIV-8751 by Tang and others (2007) indicate that the site lacks substantial buried cultural deposits.

The site does not meet any of the four criteria for listing on the NRHP or the CRHR. CA-RIV-8751 is not associated with events that have made a significant contribution to the broad patterns of history and therefore is not recommended as eligible for listing under Criterion A/1. It is not associated with the lives of persons significant in the past and therefore is not recommended as eligible for listing under Criterion B/2. It also does not embody the distinctive characteristics of a type, period, or method of construction, and thus is not recommended eligible under Criterion C/3. Finally, the absence of surface artifacts and subsurface cultural remains indicate that the site is not likely to yield any additional information that can address research issues related to chronology, technology, settlement organization and land use, and subsistence behavior. As such, CA-RIV-8751 is not eligible for listing under Criterion D/4.

CA-RIV-8751 also does not appear to meet the criteria as a City of Riverside Designated Cultural Resource. It cannot be considered a Cultural Heritage Landmark as it is not an "exceptional example" of an archaeological resource. Furthermore, the site also lacks the data potential to contribute important information to the "broader understanding" of the archaeological heritage of the City of Riverside.

Although the site retains integrity of location, the integrity of setting, feeling, and association has been significantly impaired by the development of the nearby Sycamore Canyon Business Park. The site is located immediately adjacent to a highly disturbed area that has been graded and leveled by mechanical equipment. These activities have resulted in the removal of native sediments in the areas south of the bedrock milling feature outcrop. Grubbing activities have also disturbed the ground surface in the northern portion of the site.

5.3.3 CA-RIV-8752 (P-33-016715)

CA-RIV-8752 is a prehistoric special-use area related to subsistence-based processing activities, most likely the processing of native seeds, plant fibers, and small mammals. The shallowness of the two identified grinding slicks suggests that the site is associated with seed processing. The polished surface of one of the slicks suggests relatively intensive use of this feature. No surface artifacts were identified at the site during the revisit, which is consistent with the earlier findings by Tang and others (2007). Furthermore, the negative findings of the shovel test pit excavated at CA-RIV-8752 by Tang and others (2007) indicate that the site lacks substantial buried cultural deposits.

Data from the earlier work at CA-RIV-8752, along with information obtained during the recent cultural resource survey, indicate that the site does not meet any of the four criteria for listing on the NRHP or the CRHR. CA-RIV-8752 is not associated with events that have made a significant contribution to the broad patterns of history and therefore is not recommended as eligible for listing under Criterion A/1. It is not associated with the lives of persons significant in the past and therefore is not recommended as eligible for listing under Criterion B/2. It also does not embody the distinctive characteristics of a type, period, or method of construction, and thus is not recommended eligible under Criterion C/3. Finally, the absence of surface artifacts and subsurface cultural remains indicate that the site is not likely to yield any additional information that can address research issues related to chronology, technology, settlement organization and land use, and subsistence behavior. As such, CA-RIV-8752 is not recommended as eligible for listing under Criterion D/4.

CA-RIV-8752 also does not appear to meet the criteria as a City of Riverside Designated Cultural Resource. It cannot be considered a Cultural Heritage Landmark as it is not an "exceptional example" of an archaeological resource. Furthermore, the site also lacks the data potential to contribute important information to the "broader understanding" of the archaeological heritage of the City of Riverside.

Although the site retains integrity of location, the integrity of setting, feeling, and association has been impaired by the development of the nearby Sycamore Canyon Business Park. Furthermore, weed abatement activities have removed the native plant communities and disturbed the ground surface of the area surrounding the bedrock milling feature.

5.4 CULTURAL LANDSCAPES AND BEDROCK MILLING SITES

As previously discussed in Section 3.2, delineating the boundary of the cultural landscape that encompasses Sycamore Canyon and the surrounding area would require a cooperative effort between the Native Americans and cultural resource managers to determine the level of research needed to properly identify, record, and evaluate such a landscape for the CRHR, NRHP, or as a City of Riverside Designated Cultural Resource. Although this work is beyond the scope of the current Project, some preliminary observations may be offered regarding the role that the three bedrock milling sites (CA-RIV-8750, -8751, and -8752) may have played in the larger cultural landscape that characterized the area prehistorically.

It should be noted that bedrock milling features likely represent one of an unknown number of tasks that made up the subsistence-based procurement and processing task ensemble. Additional tasks may have included the actual gathering of small seeds, grasses, and possibly small game for processing on the bedrock features and ground stone metates using hand stones. Lithic reduction activities to produce tools used in food gathering and processing and the packaging of processed and unprocessed materials for transport back to the residential site may have also been tasks integrated into the subsistence regime.

Site distribution data suggest that subsistence-based procurement and processing tasks involving bedrock milling features may have been centered on the area immediately surrounding Sycamore Canyon. Specifically, the examination of known bedrock milling sites within a 1-mi radius of the Project area indicates that the highest densities of outcrop features are found within 0.25-mi of Sycamore Canyon Creek with the highest concentrations located on the terraces that border the creek. In contrast, secondary drainage areas, including the current Project area, exhibit far fewer bedrock milling sites. This finding suggest that while subsistence-based procurement and processing activities involving bedrock milling features were undertaken in secondary drainage areas, the intensity of such activities appears to be far less compared to Sycamore Canyon proper specifically and the Creek within. The peripheral nature of secondary drainages in subsistence-related tasks involving bedrock milling features is substantiated by the relatively small number of grinding slicks and the lack of evidence for long-term use of the bedrock milling features at CA-RIV-8750, -8751, and -8752 in the Project area.

The extant data suggest that if a cultural landscape was present in Sycamore Canyon that focused on prehistoric subsistence-based procurement and processing tasks, then CA-RIV-8750, -8751, and -8752 are not likely to be considered contributing elements to this landscape for two primary reasons. First, the locations of the three sites along a secondary drainage suggest that the processing activities that occurred at these loci were not an integral part of the larger subsistence regime that was centered on Sycamore Canyon. As such, the sites are not key contributors to the significance of the cultural landscape. Second, residential and commercial development of the area surrounding the sites has impacted the integrity of setting, feeling, and association of the three resources. As such, the resources do not retain a sufficient degree of integrity to enable them to convey their significance as it relates to subsistence-based procurement and processing activities within a larger cultural landscape.

6
MANAGEMENT RECOMMENDATIONS

The cultural resource assessment of the Project area identified three prehistoric bedrock milling sites (CA-RIV-8750, -8751, and -8752) that have the potential to be impacted by the implementation of the proposed Project. These archaeological sites were previously determined ineligible for listing on the NRHP and CRHR or as a City of Riverside Designated Cultural Resource. A reevaluation by Æ of the significance of the resources confirms earlier recommendations and suggests that none of the sites are historic properties per NHPA, historical resources under CEQA, or Designated Cultural Resources as defined by the City of Riverside. Furthermore, the findings of the current study indicate that the sites are not likely to be considered contributing elements to a subsistence-based procurement and processing cultural landscape that may have been present prehistorically within the Sycamore Canyon area. As no significant cultural resources will be affected or impacted by the proposed Project, no further treatment or management of CA-RIV-8580, -8751, and -8752 is recommended at this time.

In the unlikely event that potentially significant archaeological materials are encountered during Project-related ground-disturbing activities, all work must be halted in the vicinity of the discovery until a qualified archaeologist can visit the site and assess the significance of the find. As well, Health and Safety Code 7050.5, CEQA 15064.5(e), and PRC 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Finally, should additional Project-related actions be proposed that have the potential for additional ground disturbance within areas not considered by this cultural resource study, then additional cultural resource investigations and further consultation under the NHPA, CEQA, and the City of Riverside Cultural Resource Ordinance may be required.

7
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APPENDIX A

RESUMES OF KEY PERSONNEL

TIFFANY CLARK

Senior Prehistoric Archaeologist

Areas of Expertise

- Cultural resource management
- Prehistory of California and the American Southwest
- Ceramic analysis
- Faunal analysis

Years of Experience

- 20

Education

Ph.D., Anthropology, Arizona State University, 2006

M.A., Anthropology, Arizona State University, 1997

B.A., Biology, Occidental College, 1992

Registrations/Certifications

- Register of Professional Archaeologists (2011)

Professional Affiliations

- Society for California Archaeology
- Society for American Archaeology

Professional Experience

2013–	Senior Archaeologist/Project Manager, Applied EarthWorks, Inc., Pasadena, California
2011–2013	Cultural Resources Specialist, Sapphos Environment, Inc., Pasadena, California
2005–2013	Research Assistant (2005-2006), Consultant (2006-present), the Digital Archaeological Record Project (*tDAR*), Arizona State University, Tempe, Arizona
2000–2011	Materials Analyst (2008–2011), Project Director (2002–2007), Crew Chief (2000–2002), Desert Archaeology, Inc., Tempe, Arizona
2008–2009	Research Associate, Cotsen Institute of Archaeology, University of California, Los Angeles
1995–2000	Research Assistant, Arizona State University, Tempe, Arizona
1993–1995	Museum Aide, Anthropology Collections, Arizona State University, Tempe, Arizona

Technical Qualifications

Dr. Clark has more than 20 years of archaeological experience in cultural resource management. During this time, she has served as Principal Investigator, Project Manager, Materials Analyst, Field Supervisor, Crew Chief, and Field Technician for archaeological projects in California, Arizona, New Mexico, and Utah. She is qualified under the Secretary of Interior's Standards for Archaeology and is certified by the Register of Professional Archaeologists. She has supervised numerous pedestrian survey, testing and evaluation, and data recovery projects at both prehistoric and historic archaeological sites in desert environment regions of Southern California. In addition, she has prepared technical reports and documents for compliance with Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and the California Environmental Quality Act (CEQA). Dr. Clark has acted as a Project Manager on a number of projects in Riverside County. As part of these projects, she has supervised Phase I survey, conducted Native American outreach, and prepared the cultural resource technical reports.

Selected Project Experience

California Department of Transportation, U.S. 395 Widening Project, near Kramer Junction, California. Field Director, 2012–2014 for multiple phases of the project, including Phase I survey, Phase II testing, and CARIDAP and XPI studies along U.S. 395 near Kramer Junction, California. Client: California Department of Transportation (Caltrans) District 8.

I-10/Jefferson Street Interchange Improvement Project, Indio, California. Field Supervisor, 2013–2014. Phase III data recovery excavations at sites CA-RIV-6896, -6897, and 6898 located in Indio, California on behalf of the City of Indio, Caltrans, and Riverside County Transportation Department. Client: RBF Consulting and City of Indio.

Tapestry Specific Plan Project, San Bernardino County, California. Archaeological Surveyor (2013). Provided cultural resources services in support of the 9,367-acre Tapestry Project, a master-planned community development. Work efforts include Phase I surveys. Client: HELIX Environmental Planning, Inc.

Cypress Mountain Drive Bridge (49C0033) Replacement Project, San Luis Obispo County, California. Field Supervisor, 2013.

Test Excavations in CA-SLO-898 at the Halter Ranch Vineyard, San Luis Obispo County, California. 2012

Carrizo – Midway 230 kV Reconductoring Project, Field Director, 2011–2013. Phase III data recovery, Cultural and Paleontological Monitor. Client: PG&E.

Topaz Solar Farm Project, Carrizo Plain, San Luis Obispo County. Paleontological Monitor, 2011–2012. Client: First Solar.

High Speed Train Project, Palmdale to Sylmar, Los Angeles County, California. Field Supervisor, 2011. Phase I archaeological studies; site identification and recordation. Client: URS.

Horizon Wind Energy Rising Tree Wind Farm in Kern County, California. Field Technician (2010–2011). This project involved an intensive Class III pedestrian survey of 2,208 acres within the project APE. A total of 54 archaeological sites was identified, photographed, and recorded. Client: Horizon Wind Energy, LLC, Portland, Oregon.

Tehachapi Renewable Transmission Project (TRTP), Los Angeles County, California. Field Supervisor, 2008. Archaeological site assessment survey. Client: Aspen Environmental.

State Route 58 Realignment Project from the Kern County Line to Hinkley, San Bernardino County, California. Field Supervisor, 2007–present. Phase I archaeological and built-environment studies of three alternative corridors; site identification and recordation. Project was put on hold due to State Funding issues in 2003 and resumed as an on-going project in 2007. Client: Caltrans District 8.

Re-licensing of Caltrans borrow pit at Newberry Springs, San Bernardino County, California. Field Supervisor, 2006. Phase I archaeological studies, site identification and recordation. Client: Caltrans District 8.

State Route 79 Project Realignment Project, Riverside County, California. Field Supervisor, 2005–2013. Phase I archaeological and built environment studies of three project alternatives (2,698 acres); site identification and recordation. Client: CH2MHILL.

Anaverde LLC Development Project, Field Technician, Crew Chief, 2004. Phase III data recovery, Phase II site testing, and monitoring.

Logandale Trails Mitigation Project, Logandale, Nevada, Field Technician, 2003. Phase III data recovery.

Kern River II Natural Gas Pipeline Project, San Bernardino County, California. Spread 8; Nevada State line to Daggett Compressor Station. Field Technician, 2002–2003. Phase III data recovery and monitoring.

ROBERT J. LICHTENSTEIN

Associate Archaeologist

Areas of Expertise

- Cultural resource management
- California and Great Basin prehistory
- Mesoamerican prehistory and iconography

Years of Experience

- 20

Education

M.A., Archaeological Studies, Boston University, Boston, Massachusetts, 2000

B.S., Physics, Bridgewater State College, Bridgewater, Massachusetts, 1985

Registrations/Certifications

- Register of Professional Archaeologists (1999)

Professional Affiliations

- Society for American Archaeology
- Society for Archaeological Sciences
- American Institute of Archaeology

Professional Experience

2005–	Associate Archaeologist. Applied Earthworks, Inc., Hemet, San Luis Obispo, and Fresno, California.
2004	Field Technician. ArchaeoPaleo Resource Management, Inc., Venice, California.
2002–2003	Field Technician. Harry Reid Center for Environmental Studies, Las Vegas, Nevada.
2001	Crew Chief. Blue Creek Project, Maya Research Program, Blue Creek, Belize.
2000	Field Director (May–August). Blue Creek Project, Maya Research Program, Blue Creek, Belize.
1997–1998	Staff Assistant. Physics Department (Physics Lab Instructor), Bridgewater State College, Bridgewater, Massachusetts.
1994–1999	Crew Chief. Blue Creek Project, Maya Research Program, Blue Creek, Belize.
1991–1996	Biology Lab Technician (Level 2 Biofacility). Massasoit Community College, Brockton, Massachusetts.
1985–1986	Staff Assistant. Physics Department (Physics Lab Instructor), Bridgewater State College, Bridgewater, Massachusetts.

Technical Qualifications

Mr. Lichtenstein has been practicing archaeology for the past 20 years throughout California, Nevada, and Belize. He has served as field director, field supervisor, and crew chief for Applied EarthWorks' projects in Southern, Central Coast, Central Valley, and Sierra Nevada regions of California. Prior to joining Applied EarthWorks, Mr. Lichtenstein worked as field director for the Blue Creek Project in Belize, as a crew chief on Natural Resources Conservation Service surveys in the San Jacinto and San Bernardino Mountains as well as on Phase II investigations, including geomorphology, for a housing development in Riverside County. Mr. Lichtenstein has served as a field technician on survey and testing for numerous transportation projects as well as on data recovery mitigation projects private developments and public utilities. Additionally, he has served as an archaeological monitor for a variety of projects across southern California and Nevada. A member of the Register of Professional Archaeologists, Mr. Lichtenstein has written and contributed to numerous technical reports, papers, and articles.

Selected Project Experience

Valley South 115 kV Subtranmission Project, Riverside County, California. Project Manager (2014-present). Responsible for third-party review of cultural resource reports prepared for the Projects. Work efforts also included assisting in Native American outreach efforts and preparing environmental documents in support of the Project. Client: Aspen Environmental Group.

Assessor's Parcel No. 360-130-003 Project, City of Menifee, Riverside County, California. Project Manager (2016-present). Responsible for supervising Phase I archaeological survey of a 37-acre parcel located in the City of Menifee. Client: JPN Corporation, Inc.

Avenue 50 Bridge Project, City of Coachella, Riverside County, California. Project Manager (2015-present). Responsible for supervising the cultural and paleontological resource studies for a Caltrans local assistance project in the City of Coachella. The Project involved the delineation of an Area of Potential Effect, archaeological and built environment surveys, and preparation of an Archaeological Survey Report, Historical Resources Evaluation Report, Area of Potential Effect map, and Historic Property Survey Report. Client: Athalye Consulting Engineering Services Inc.

City of Riverside Sidewalk Improvement Projects, City of Riverside, Riverside County, California. Project Manager (2015-present). Responsible for supervising cultural resources studies for three sidewalk improvement projects in the City of Riverside. Each project included the preparation of an Area of Potential Effect map and Historic Property Survey Report. Client: HDR Engineering, Inc.

Tapestry Specific Plan Project, San Bernardino County, California. Co-Principal Investigator (2013-present). Provided cultural resources services in support of the 9,367-acre Tapestry Project, a master-planned community development. Work efforts include Phase I surveys, evaluations of significance, development of a Cultural Resources Management Plan, Phase I and II report preparation, Native American coordination, and the preparation of cultural resources sections for corresponding environmental documents. The work was done to comply with CEQA and Section 106 of the NHPA. Client: HELIX Environmental Planning, Inc.

Twenty-Nine Palms Band of Mission Indians Research Design, Riverside County, California. Co-Principal Investigator (2015-present). Supervised and assisted the preparation of a Research Design for the Twenty-Nine Palms Band of Mission Indians Tribal Historic Preservation Office (THPO). The purpose of this document is to guide future archaeological and cultural studies conducted on the Twenty-Nine Palms Band of Mission Indians Reservation or within the Tribe's Traditional Use Area. Client: Twenty-Nine Palms Band of Mission Indians.

Interstate-40 Median Improvement Project, San Bernardino County, California. Project Manager (2013-present). Supervised Phase I archaeological surveys of a 50-mile-long portion of the Interstate-40 (I-40) median between the towns of Barstow and Needles, consulted with the Native American Heritage Commission and designated Native American representatives, and prepared Archaeological Survey Reports and Historic Property Survey Report. Client: California Department of Transportation, District 8.

U.S. 395 Construct Median Buffer and Widen Shoulders Project, San Bernardino County, California. Principal Investigator (2013-present). Supervised Phase I archaeological surveys, resource evaluation, preparation of various cultural resources documents, agency coordination, and Native American consultation. Client: California Department of Transportation, District 8.

Interstate-10 Corridor Project, Los Angeles and San Bernardino Counties, California. Senior Archaeologist (2013-present). Directed archaeological field investigations, conducted Native American coordinated, and prepared cultural resources technical reports. Client: Parsons.

APPENDIX B

CONFIDENTIAL
RECORD SEARCH RESULTS

Confidential Appendix Removed

APPENDIX C

NATIVE AMERICAN COORDINATION

STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471

June 23, 2015

Tiffany Clark
Applied Earthworks, Inc.
133 North San Gabriel Blvd, Suite 201
Pasadena, CA 91107

Sent by Fax: (626) 204-5590
Number of Pages: 3

Re: Sycamore Canyon Business Park Project, Riverside County.

Dear Ms. Clark,

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 373-3712.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Government Program Analyst

Native American Contact List
Riverside County
June 23, 2015

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

(760) 742-3189 Fax

Pauma & Yuima Reservation
Randall Majel, Chairperson
P.O. Box 369 Luiseno
Pauma Valley CA 92061
(760) 742-1289 ext 317

(760) 742-3422 Fax

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula , CA 92593
pmacarro@pechanga-nsn.gov
(951) 770-8100

(951) 506-9491 Fax

Rincon Band of Mission Indians
Jim McPherson, Tribal Historic Pres. Officer
1 West Tribal Road Luiseno
Valley Center, CA 92082
vwhipple@rincontribe.org
(760) 297-2635

(760) 297-2639 Fax

Soboba Band of Mission Indians
Rosemary Morillo, Chairperson; Attn: Carrie Garcia
P.O. Box 487 Luiseno
San Jacinto , CA 92581 Cahuilla
carrieg@soboba-nsn.gov
(951) 654-2765

(951) 654-4198 Fax

Pauma Valley Band of Luiseño Indians
Bennae Calac
P.O. Box 369 Luiseno
Pauma Valley CA 92061
bennaecalac@aol.com
(760) 617-2872

(760) 742-3422 Fax

Pauma & Yuima
ATTN: EPA
P.O. Box 369 Luiseno
Pauma Valley CA 92061
kymberli_peters@yahoo.com
(760) 742-1289

(760) 742-3422 Fax

Rincon Band of Mission Indians
Bo Mazzetti, Chairperson
1 West Tribal Road Luiseno
Valley Center, CA 92082
bomazzetti@aol.com
(760) 749-1051

(760) 749-8901 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Sycamore Canyon Business Park Project, Riverside County.

Native American Contact List
Riverside County
June 23, 2015

San Luis Rey Band of Mission Indians
Tribal Council
1889 Sunset Drive Luiseno
Vista , CA 92081
cjmojado@slrmissionindians.org
(760) 724-8505

(760) 724-2172 Fax

San Luis Rey Band of Mission Indians
Cultural Department
1889 Sunset Drive Luiseno
Vista , CA 92081 Cupeno
cjmojado@slrmissionindians.org
(760) 724-8505

(760) 724-2172 Fax

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula , CA 92593
mgoodhart@pechanga-nsn.
(951) 770-6100

(951) 695-1778 Fax

William J. Pink
48310 Pechanga Road Luiseno
Temecula , CA 92592
wjpink@hotmail.com
(909) 936-1216
Prefers e-mail contact

La Jolla Band of Mission Indians
Lavonne Peck, Chairwoman
22000 Highway 76 Luiseno
Pauma Valley CA 92061
Rob.roy@lajolla-nsn.gov
(760) 742-3771

(760) 742-1704 Fax

Pauma & Yuima Reservation
Charles Devers, Cultural Committee
P.O. Box 369 Luiseno
Pauma Valley CA 92061
(760) 742-1289

(760) 742-3422 Fax

Pechanga Cultural Resources Department
Anna Hoover, Cultural Analyst
P.O. Box 2183 Luiseño
Temecula , CA 92593
ahoover@pechanga-nsn.gov
(951) 770-8104

(951).694-0446 Fax

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581 Cahuilla
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137
(951) 654-4198 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Sycamore Canyon Business Park Project, Riverside County.

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Bennae Calac
Pauma Valley Band of Luiseño Indians
P.O. Box 369
Pauma Valley, CA 92061

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Ms. Calac:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

Æ was contracted to perform a cultural resource assessment of the proposed area of potential impact. This assessment included archaeological and historical background research, an intensive pedestrian (Phase I) survey, and an evaluation of significance of identified cultural resources within the Project area. A record search at the Eastern Information Center (EIC) found that three archaeological sites (CA-RIV-8750, -8751, and -8752) had been previously identified within the Project area; all three sites consist of prehistoric bedrock milling feature outcrops. During the Phase I survey of the Project area, these cultural resources were revisited and their current conditions were documented. No other cultural resources were identified within the Project area during the fieldwork efforts.

The three bedrock milling sites had previously been determined ineligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). A reevaluation by *Æ* of the significance of the resources confirmed these earlier findings and suggests that none of the sites are historic properties as defined by the NHPA and/or historical resources under CEQA. Furthermore, the current study concluded that the sites are not likely to be considered contributing elements to a subsistence-based procurement and processing taskscape that may have been present prehistorically within the Sycamore Canyon area.

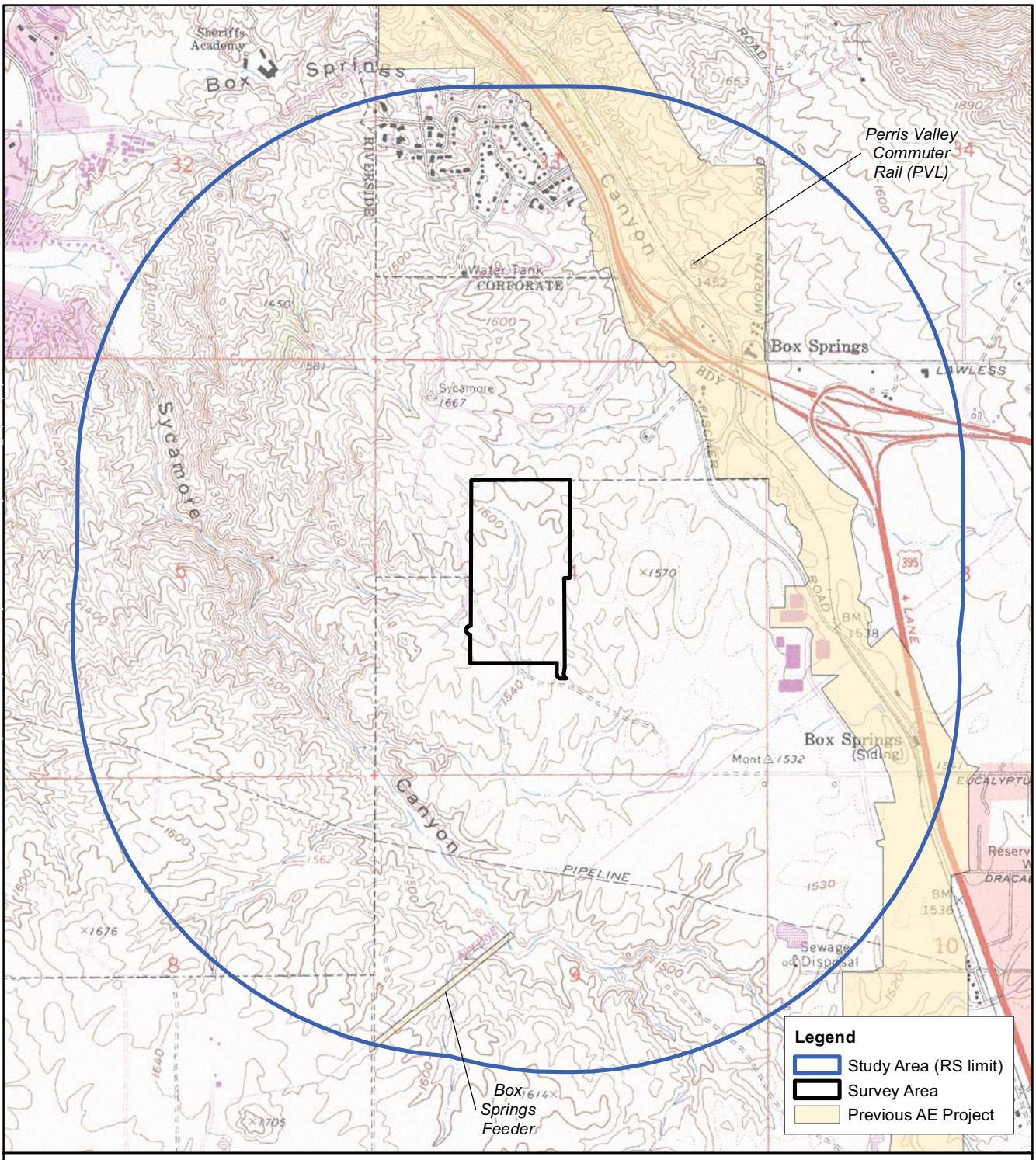
As part of the cultural resources assessment of the Project area, *Æ* requested a search of the *Sacred Lands File* by the Native American Heritage Commission (NAHC). The NAHC responded on June 23, 2015 stating that the search failed to indicate the presence of Native American cultural resources within the Project area or surrounding one-mile buffer. However, should your records show that sensitive Native American cultural resources exist within or near the Project area, please call me at (626) 578-0119 or e-mail me at tclark@appliedearthworks.com. If I do not hear from you within the next two

weeks, I will contact you with a follow-up telephone call.

Please be aware that your comments are very important to us, as well as to the successful completion of this Project. I look forward to hearing from you in the near future. Thank you, in advance, for taking the time to review this request.

Respectfully yours,

Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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T. 2 S./R. 4 W., Sections 23-24; T. 3 S./R. 4 W., Sections 3-5 & 8-10
Riverside East (1967, photorevised 1980), CA 7.5' USGS Quadrangle

Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Tribal Council
San Luis Rey Band of Mission Indians
1889 Sunset Drive
Vista, CA 92081

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Tribal Council:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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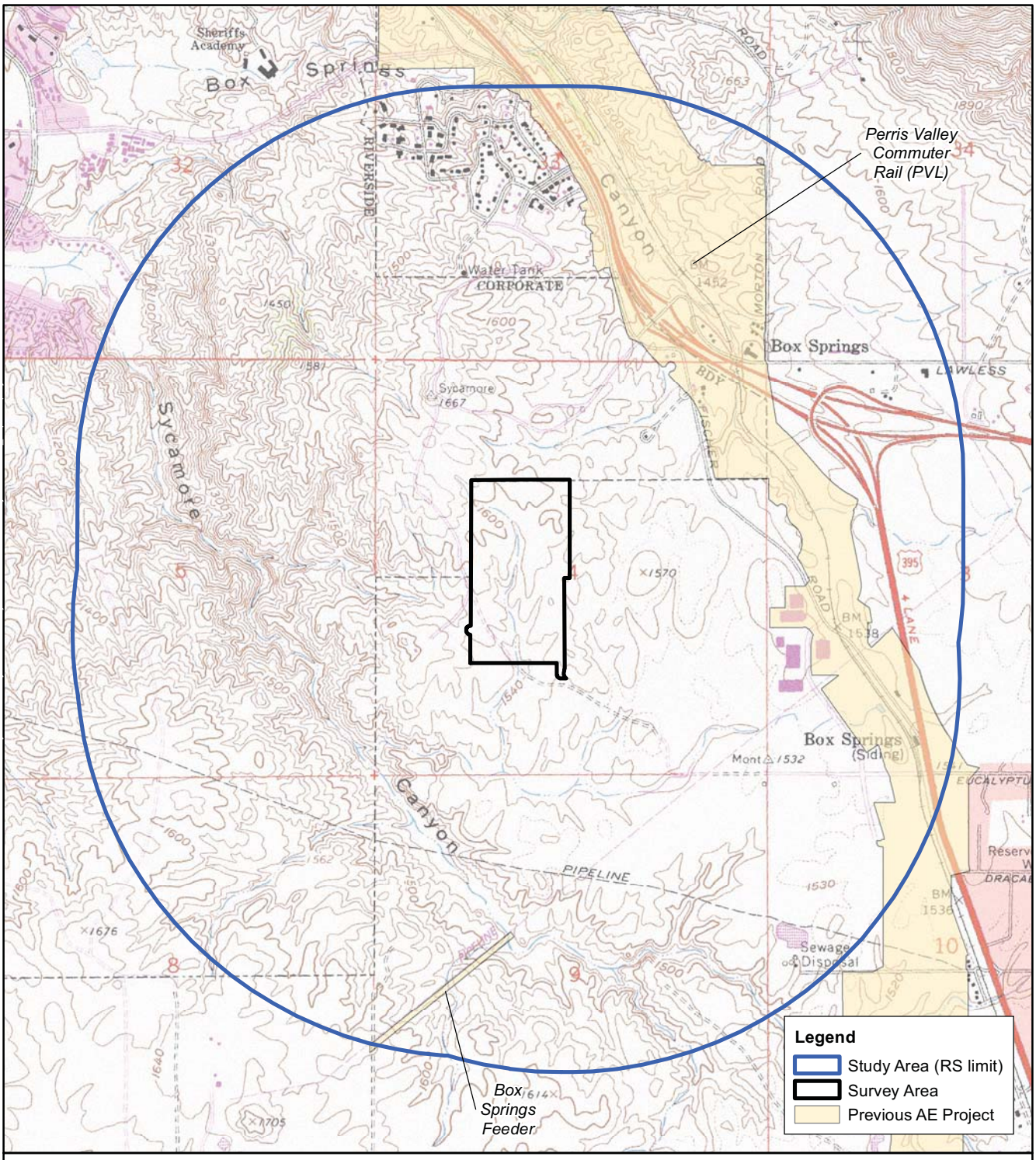
Please be aware that your comments are very important to us, as well as to the successful completion of this Project. I look forward to hearing from you in the near future. Thank you, in advance, for taking the time to review this request.

Respectfully yours,

Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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Riverside East (1967, photorevised 1980), CA 7.5' USGS Quadrangle

Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Cultural Department
San Luis Rey Band of Mission Indians
1889 Sunset Drive
Vista, CA 92081

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Cultural Department:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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As part of the cultural resources assessment of the Project area, *Æ* requested a search of the *Sacred Lands File* by the Native American Heritage Commission (NAHC). The NAHC responded on June 23, 2015 stating that the search failed to indicate the presence of Native American cultural resources within the Project area or surrounding one-mile buffer. However, should your records show that sensitive Native American cultural resources exist within or near the Project area, please call me at (626) 578-0119 or e-mail me at tclark@appliedearthworks.com. If I do not hear from you within the next two weeks, I will contact you with a follow-up telephone call.

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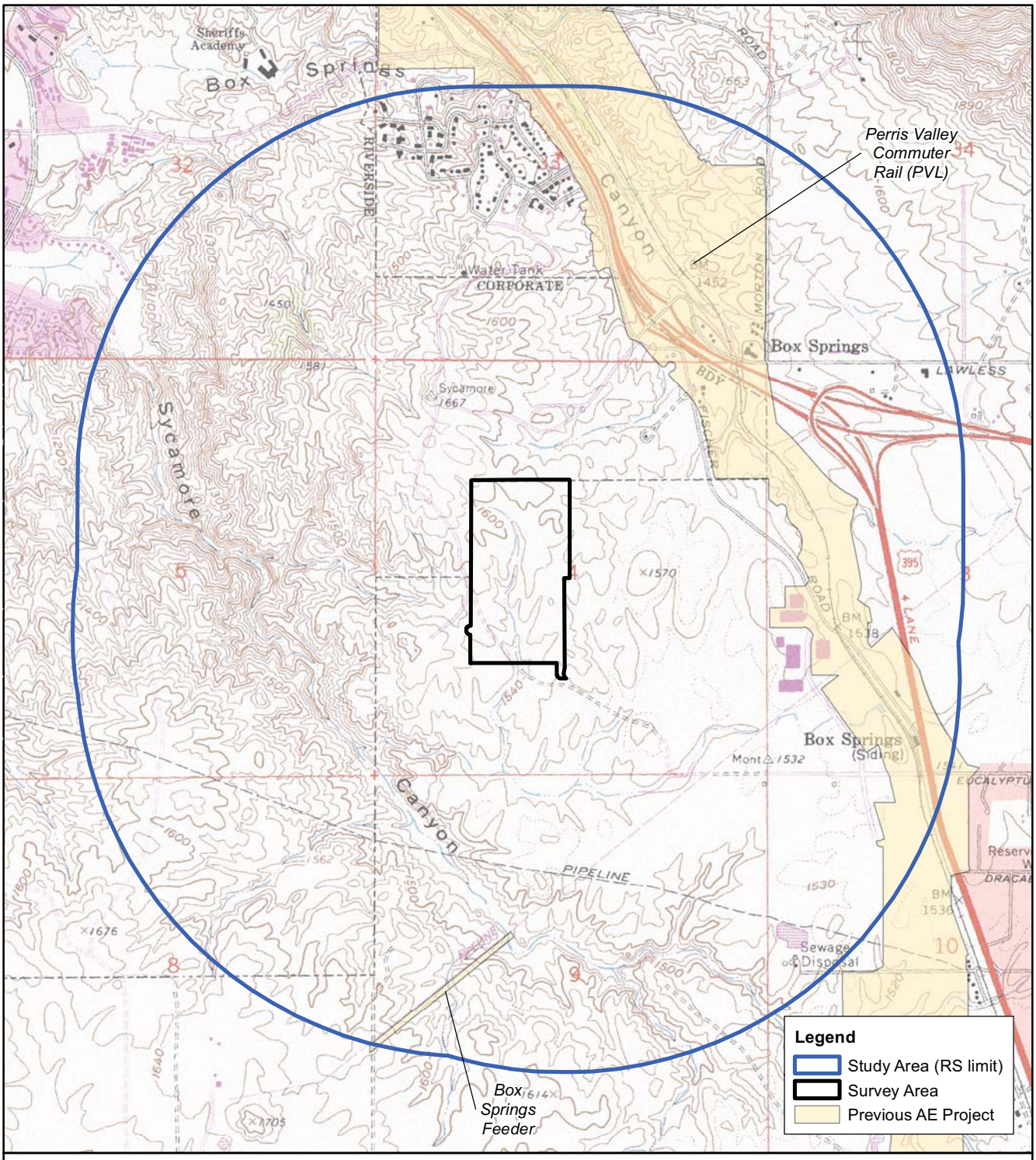
Respectfully yours,

Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

William J. Pink
48310 Pechanga Road
Temecula, CA 92592

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Mr. Pink:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (*Æ*), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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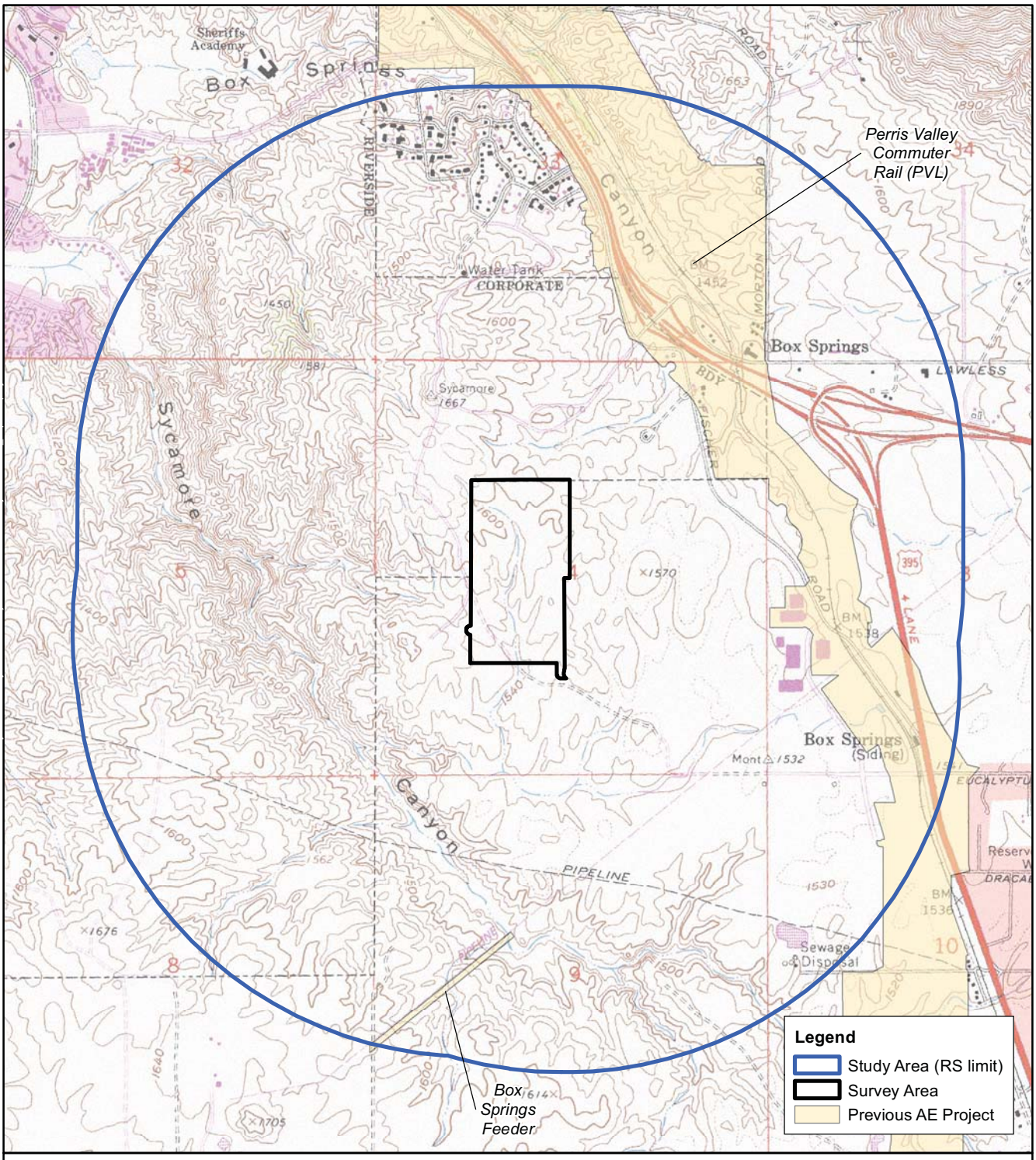
Please be aware that your comments are very important to us, as well as to the successful completion of this Project. I look forward to hearing from you in the near future. Thank you, in advance, for taking the time to review this request.

Respectfully yours,

Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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Riverside East (1967, photorevised 1980), CA 7.5' USGS Quadrangle

Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Lavonne Peck, Chairwoman
La Jolla Band of Mission Indians
22000 Highway 76
Pauma Valley, CA 92061

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Ms. Peck:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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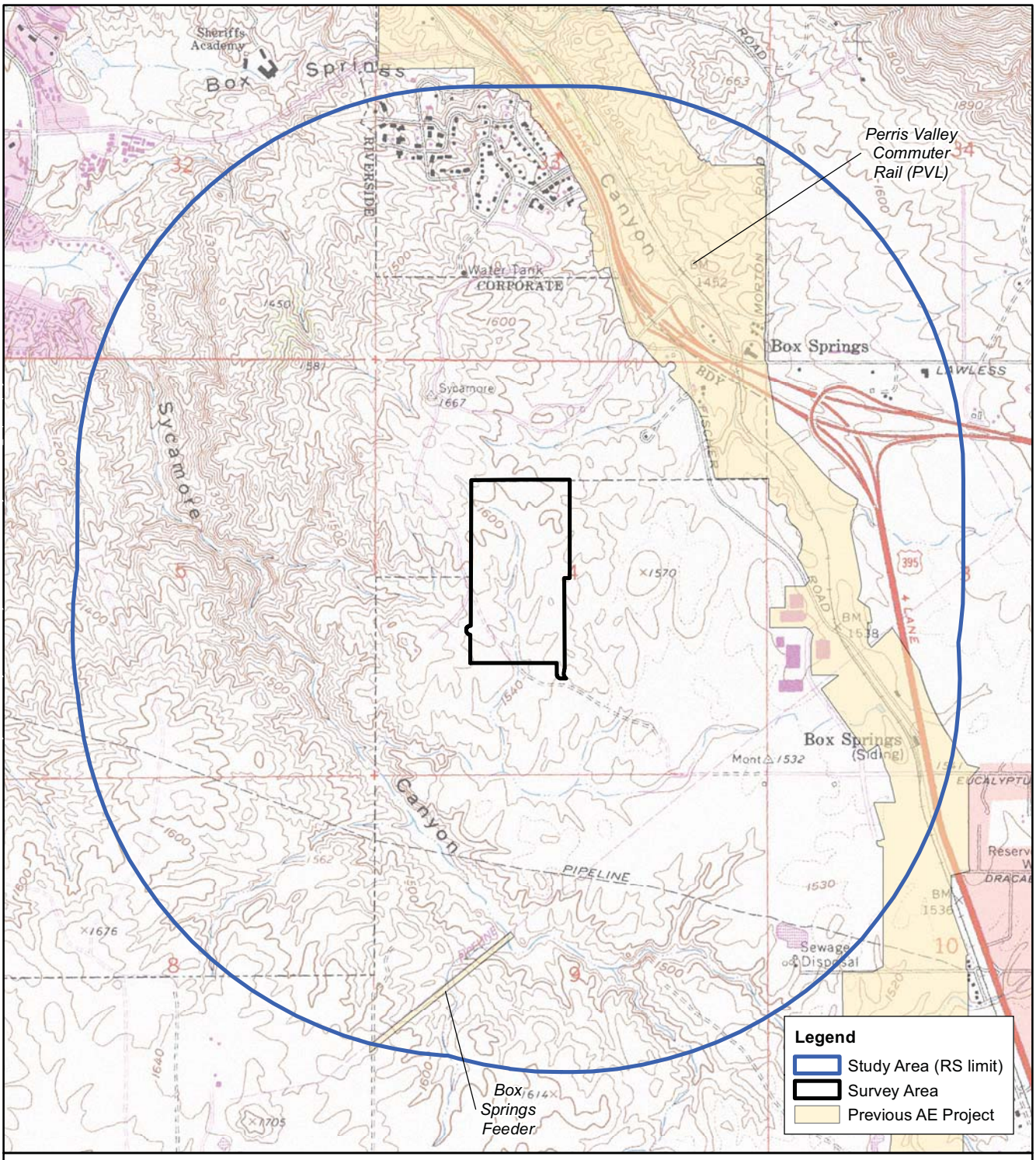
Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Pauma & Yuima
ATTN: EPA
P.O. Box 369
Pauma Valley, CA 92061

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

To Whom It May Concern:

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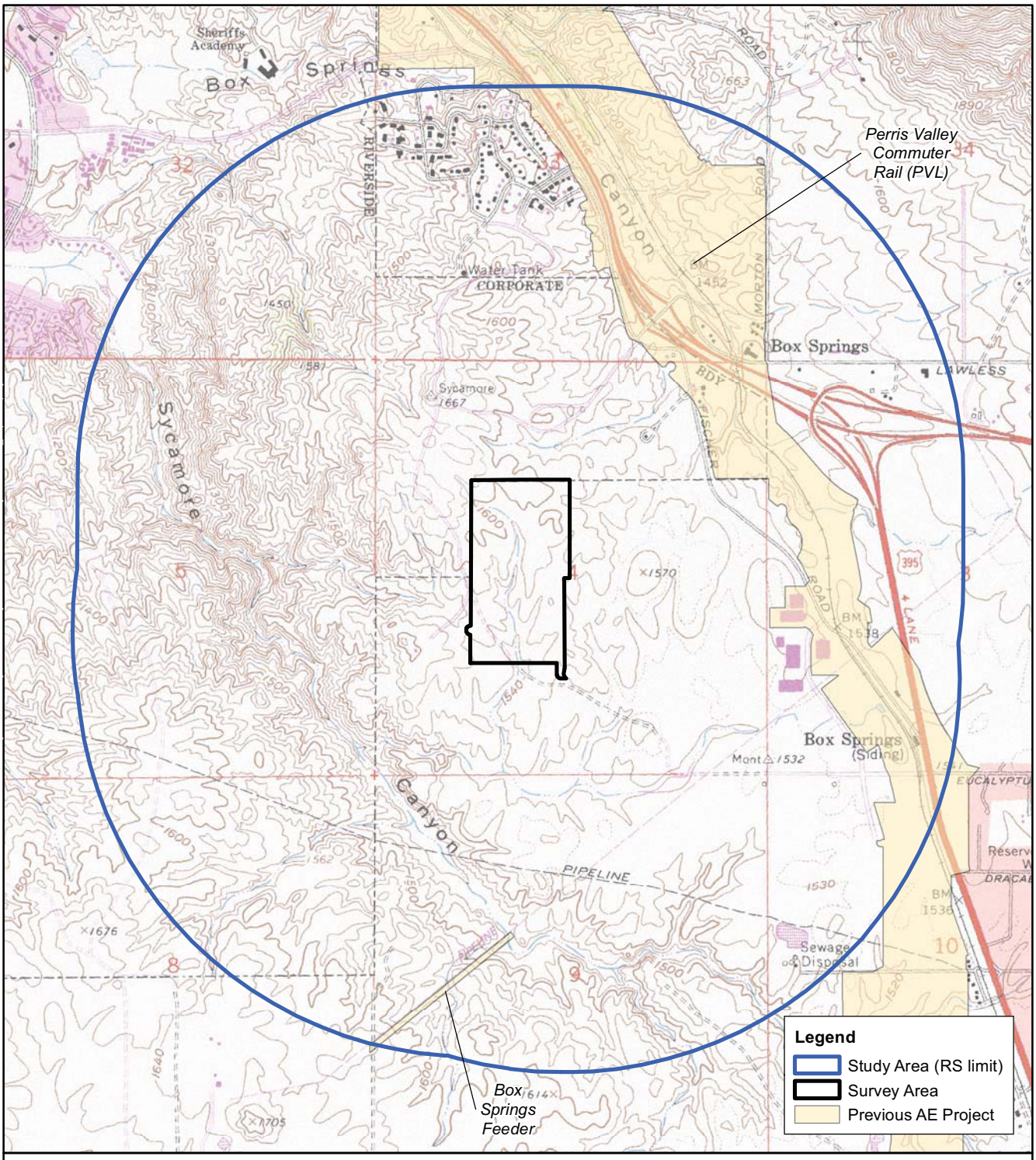

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133 N. San Gabriel Blvd, Suite 201
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June 29, 2015

Joseph Ontiveros
Cultural Resource Department
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Mr. Ontiveros:

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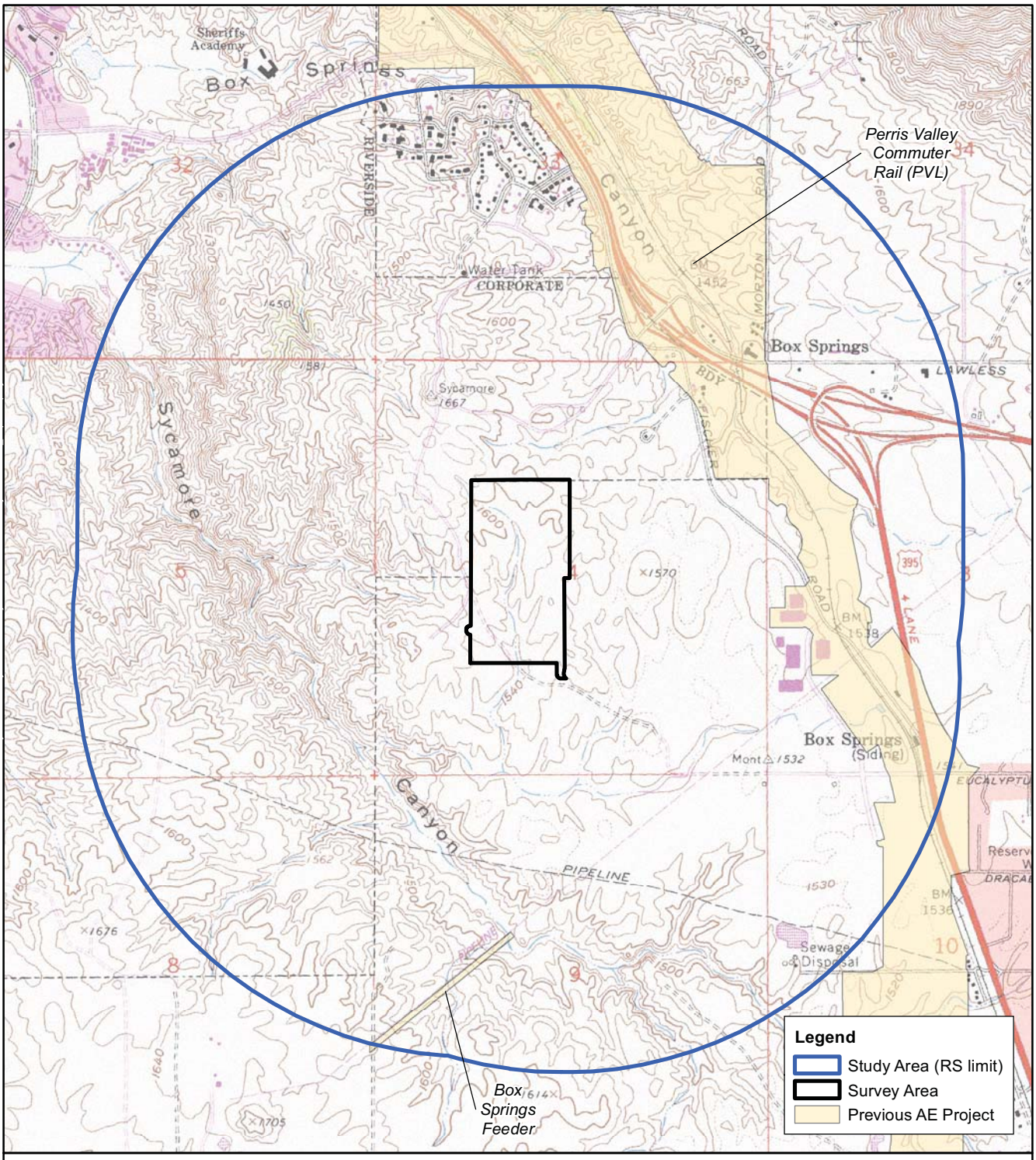

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June 29, 2015

Jim McPherson, Tribal Historic Preservation Officer
Rincon Band of Mission Indians
1 West Tribal Road
Valley Center, CA 92082

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Mr. McPherson:

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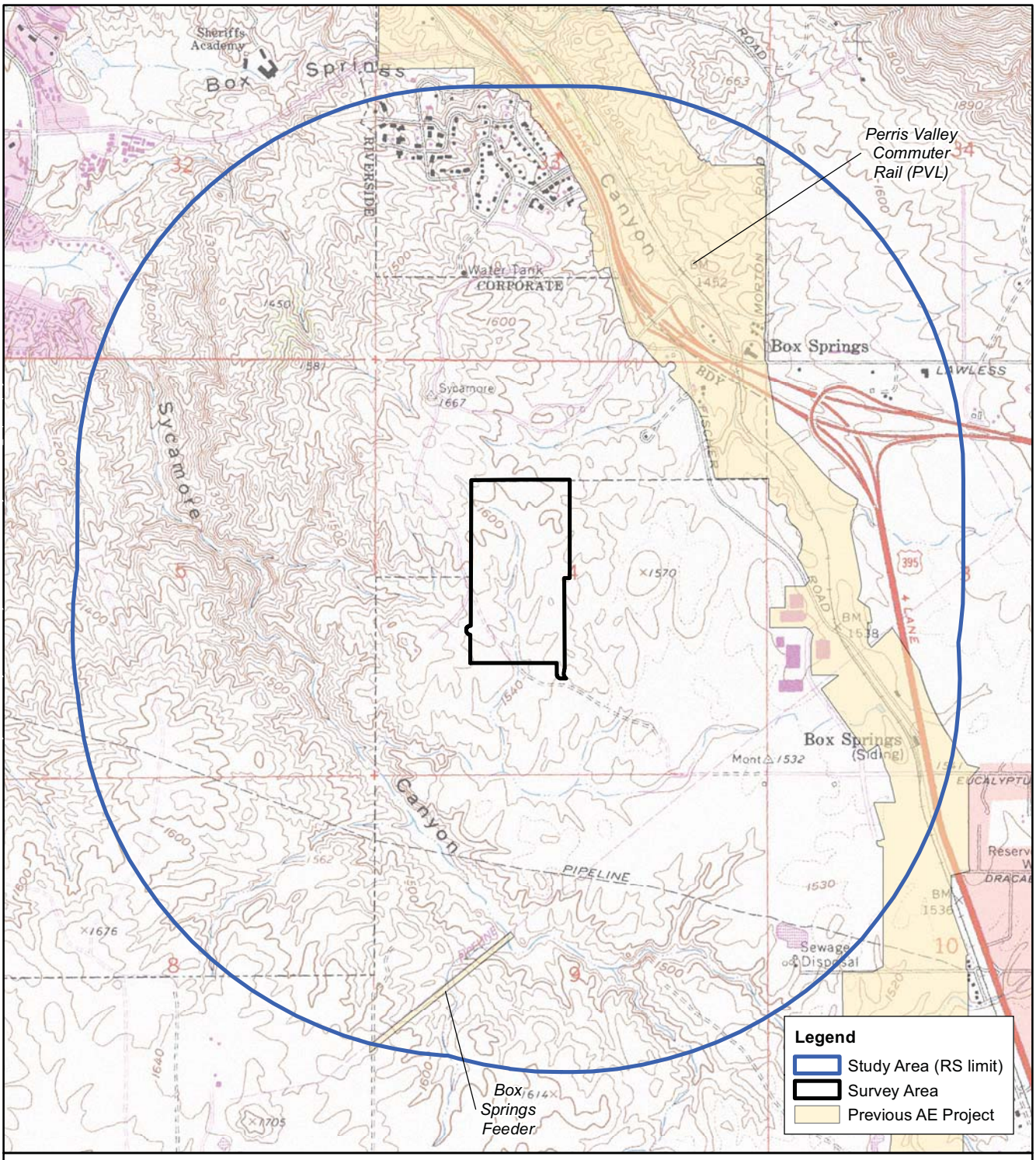

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June 29, 2015

Bo Mazzetti, Chairperson
Rincon Band of Mission Indians
1 West Tribal Road
Valley Center, CA 92082

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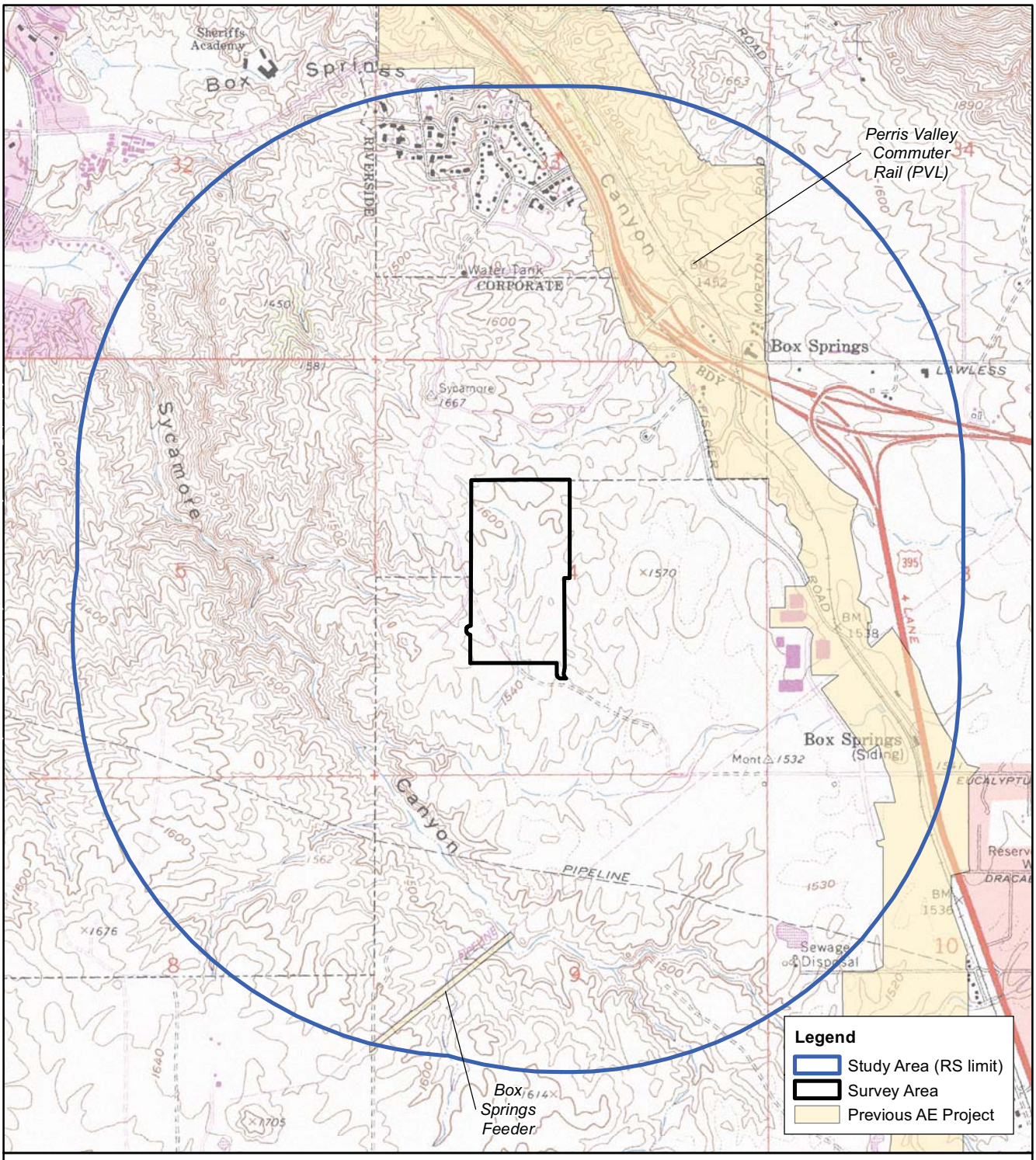

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June 29, 2015

Paul Macarro, Cultural Resources Manager
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

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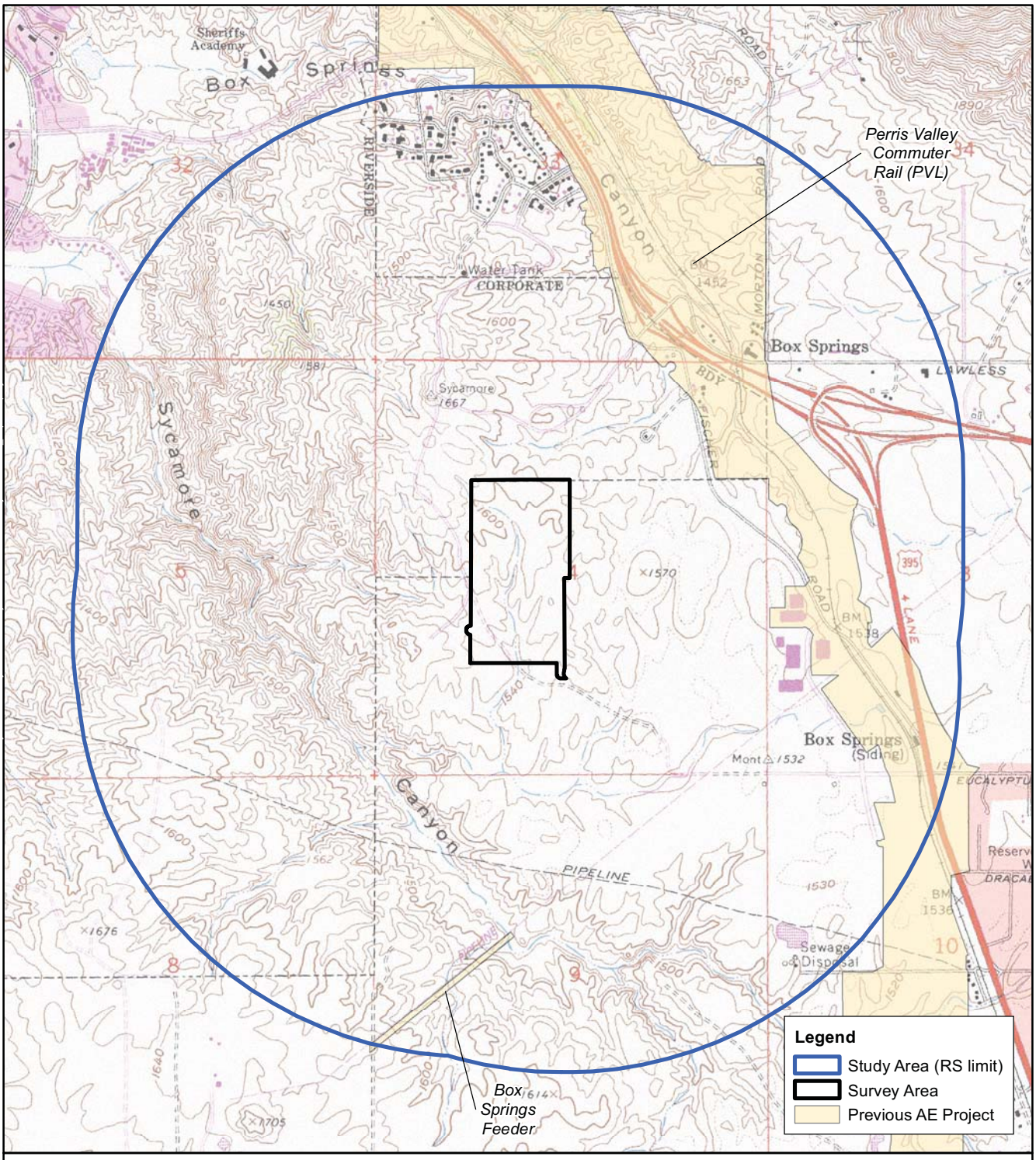

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June 29, 2015

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Pechanga Band of Mission Indians
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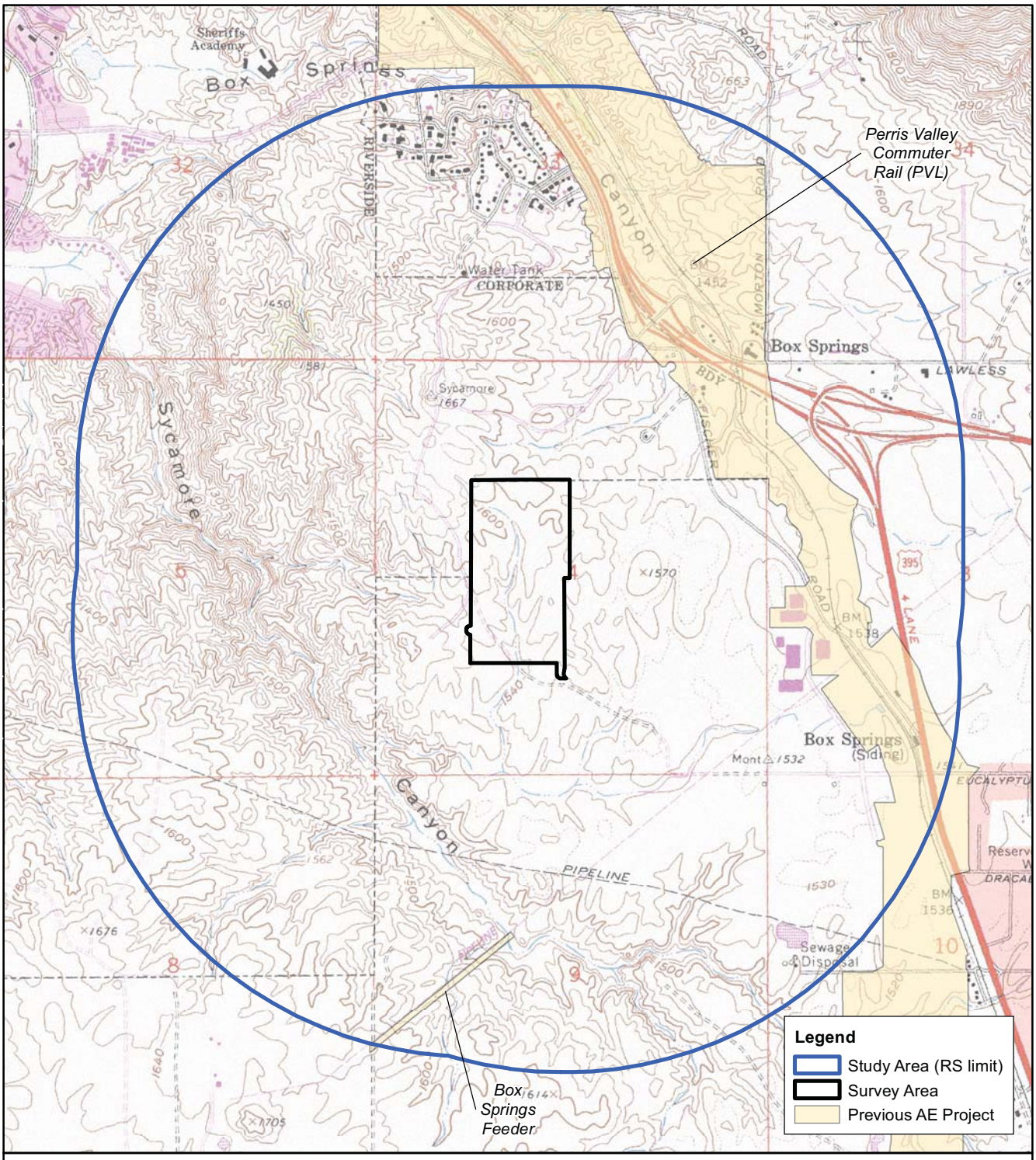

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Applied EARTHWORKS Inc.

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O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Anna Hoover, Cultural Analyst
Pechanga Cultural Resources Department
P.O. Box 2183
Temecula, CA 92593

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Ms. Hoover:

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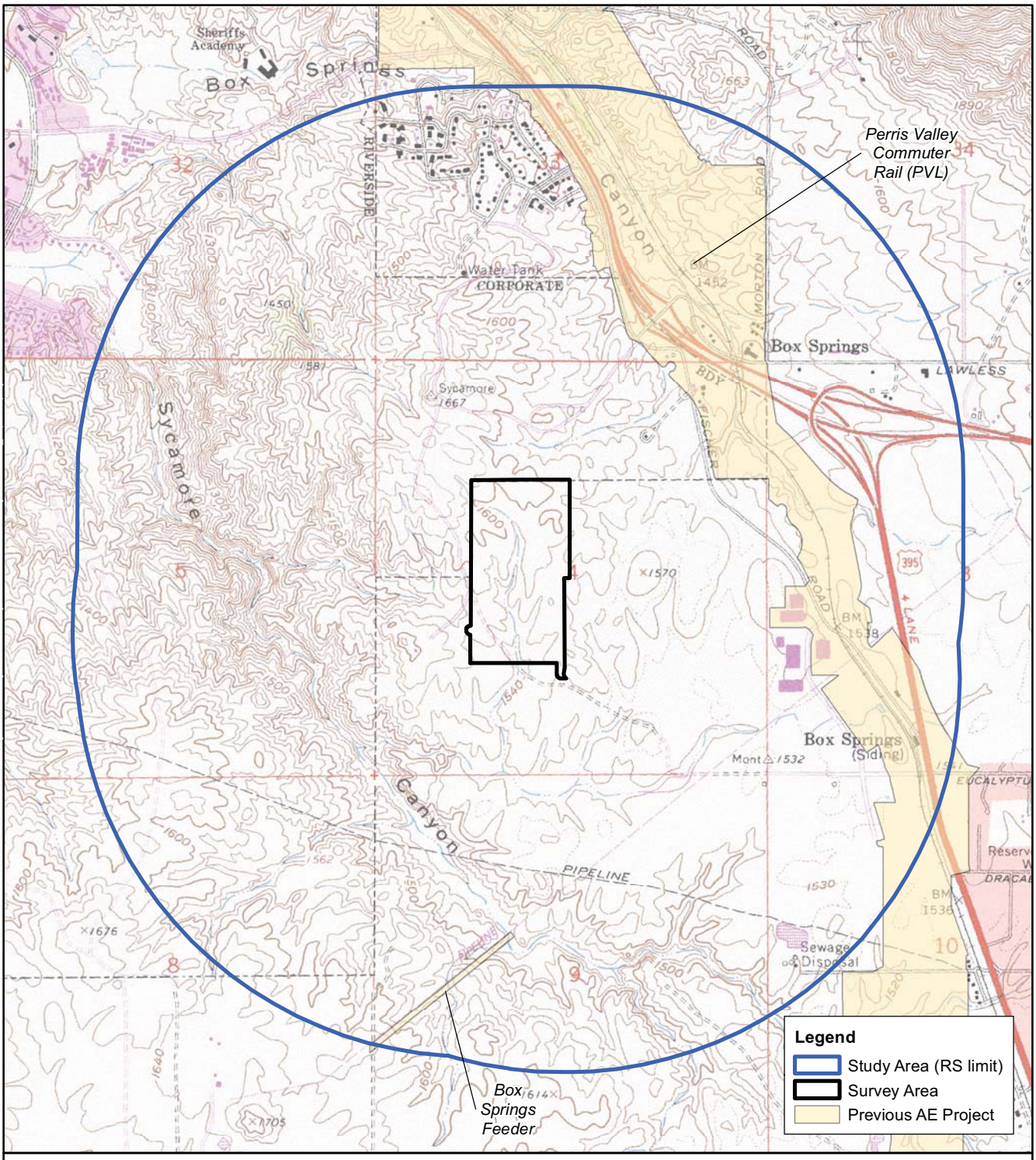
As part of the cultural resources assessment of the Project area, *Æ* requested a search of the *Sacred Lands File* by the Native American Heritage Commission (NAHC). The NAHC responded on June 23, 2015 stating that the search failed to indicate the presence of Native American cultural resources within the Project area or surrounding one-mile buffer. However, should your records show that sensitive Native American cultural resources exist within or near the Project area, please call me at (626) 578-0119 or e-mail me at tclark@appliedearthworks.com. If I do not hear from you within the next two weeks, I will contact you with a follow-up telephone call.

Please be aware that your comments are very important to us, as well as to the successful completion of this Project. I look forward to hearing from you in the near future. Thank you, in advance, for taking the time to review this request.

Respectfully yours,

Tiffany Clark, PhD, RPA
Senior Archaeologist
Applied EarthWorks, Inc.



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Riverside East (1967, photorevised 1980), CA 7.5' USGS Quadrangle

Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Shasta Gaughen, THPO
Pala Band of Mission Indians
PMB 50, 35008 Pala-Temecula
Pala, CA 92059

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Dr. Gaughen:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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As part of the cultural resources assessment of the Project area, Æ requested a search of the *Sacred Lands File* by the Native American Heritage Commission (NAHC). The NAHC responded on June 23, 2015 stating that the search failed to indicate the presence of Native American cultural resources within the Project area or surrounding one-mile buffer. However, should your records show that sensitive Native American cultural resources exist within or near the Project area, please call me at (626) 578-

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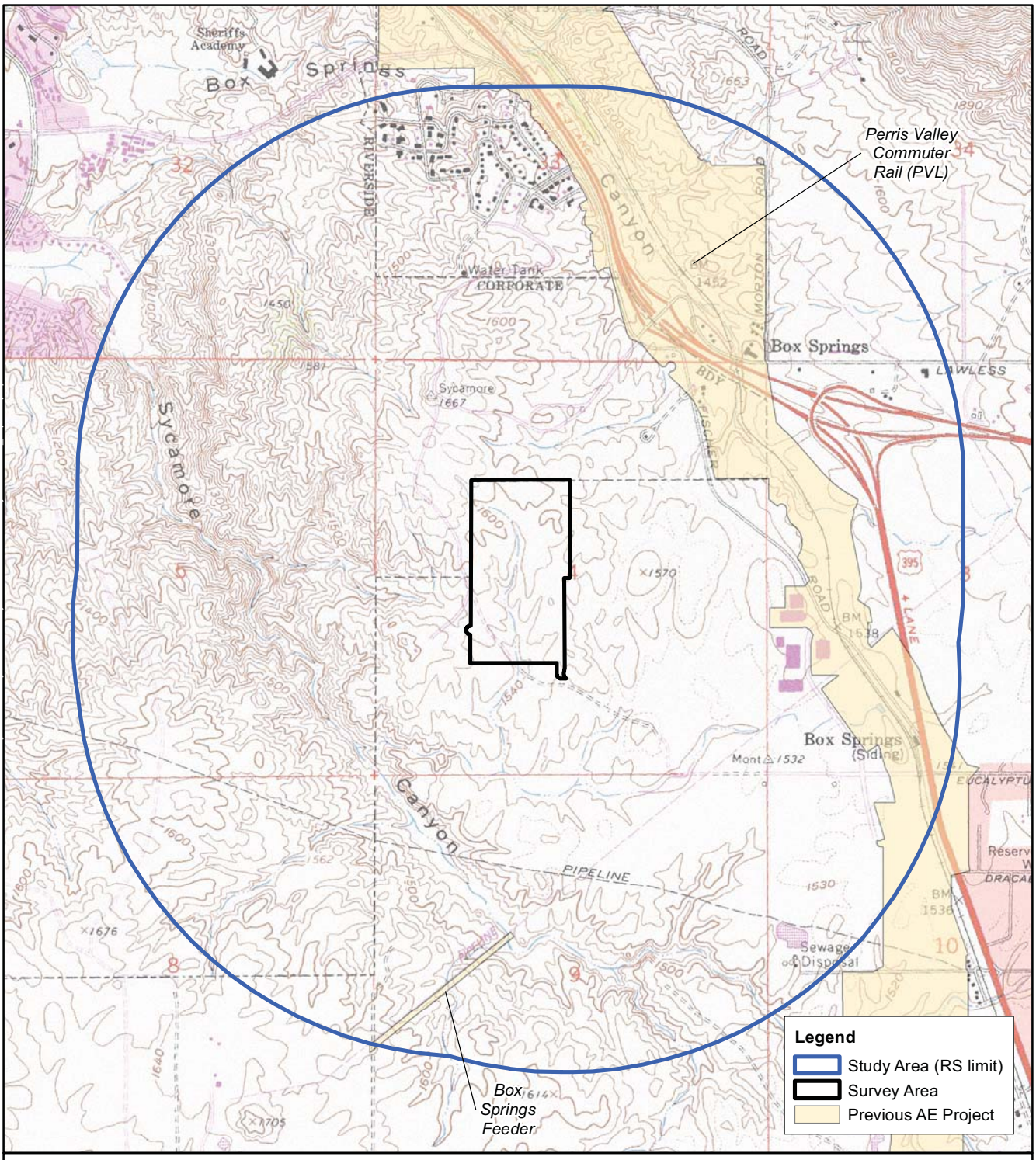

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June 29, 2015

Rosemary Morillo, Chairperson
Attn: Carrie Garcia
Soboba Band of Mission Indians
P.O. Box 487
San Jacinto, CA 92581

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Ms. Garcia:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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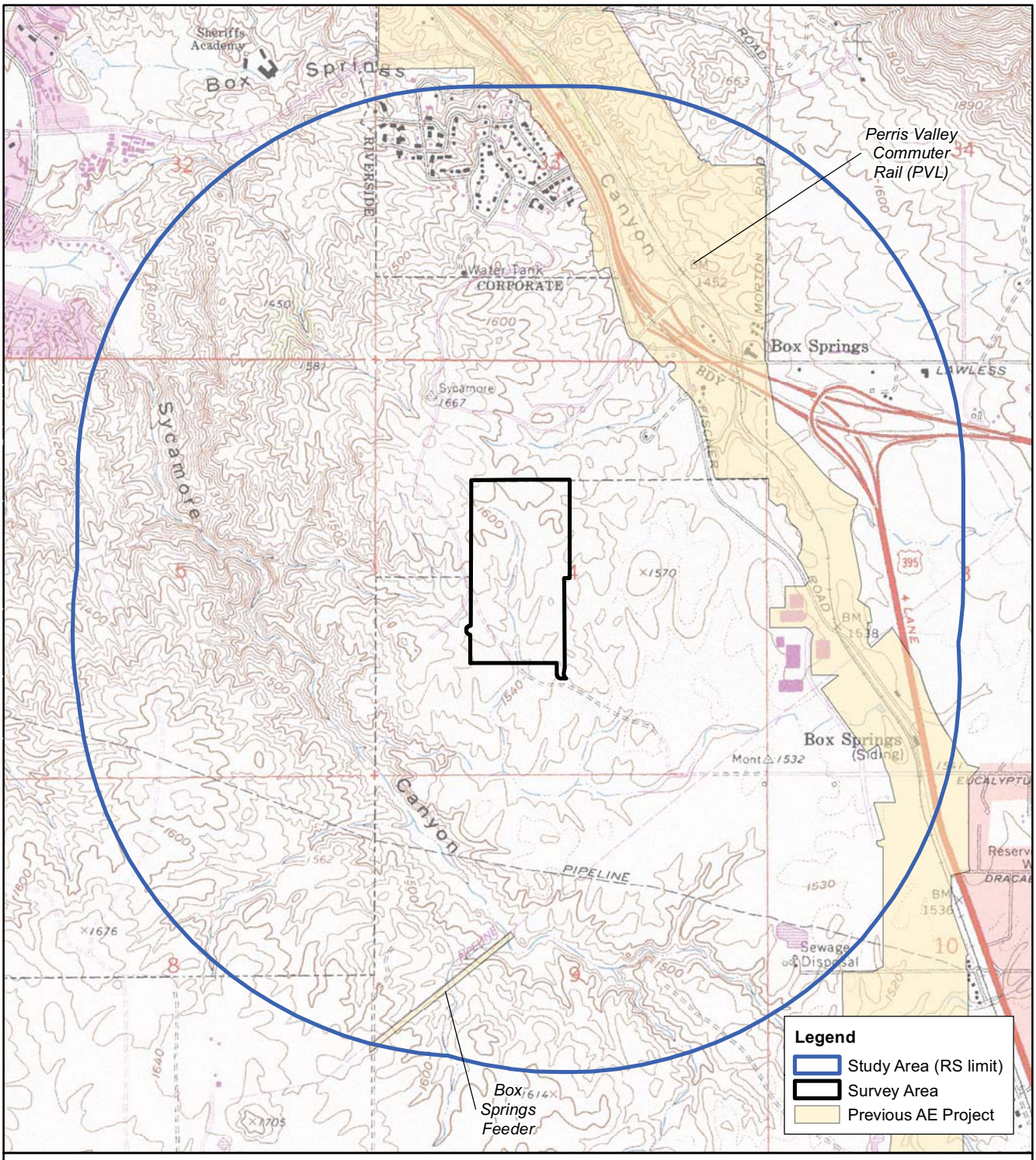
Senior Archaeologist
Applied EarthWorks, Inc.



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Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Randall Majel, Chairperson
Pauma & Yuima Reservation
P.O. Box 369
Pauma Valley, CA 92061

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Mr. Majel:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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Senior Archaeologist
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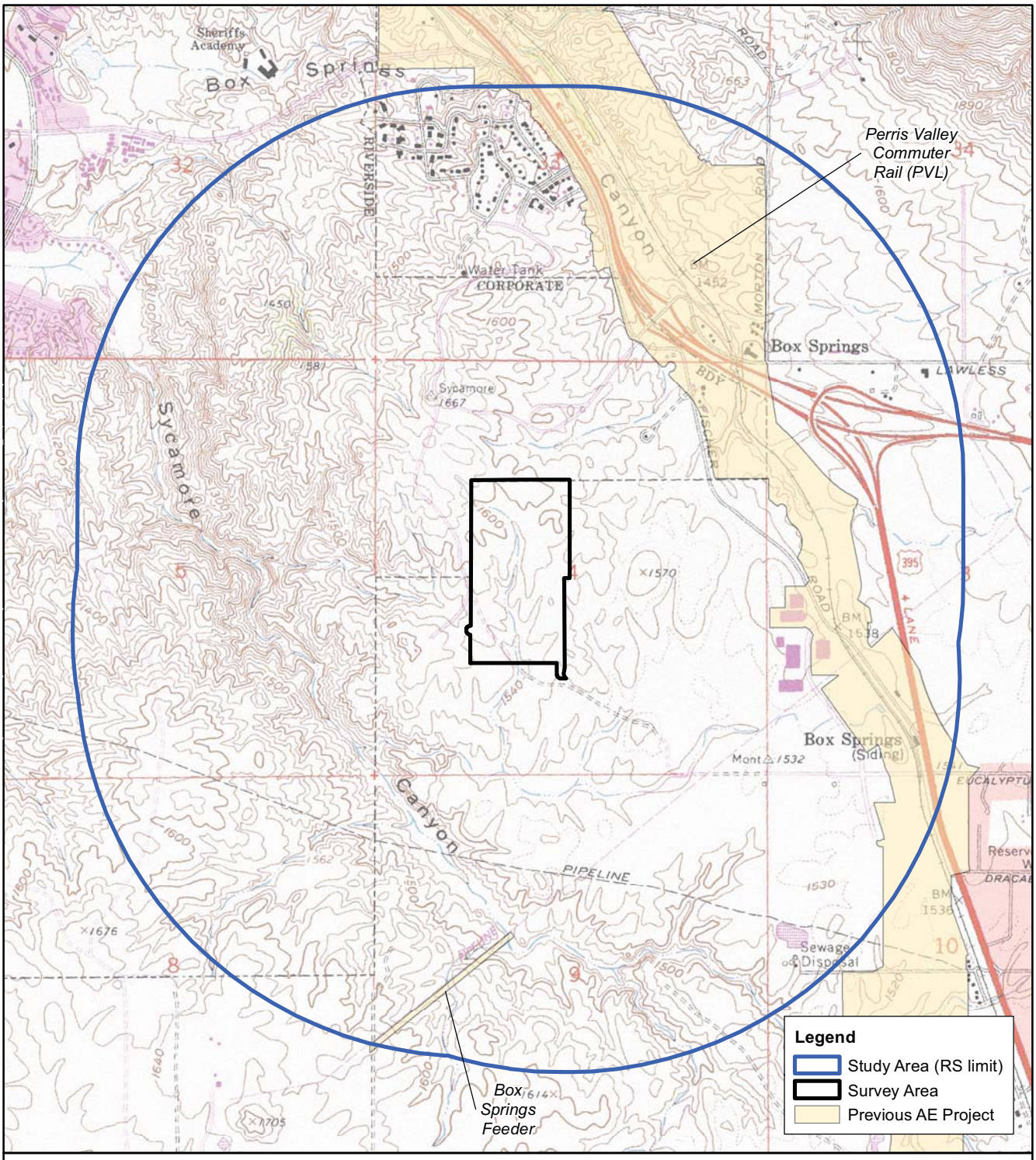

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Applied EARTHWORKS Inc.

133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107
O: (626) 578-0119 | F: (626) 204-5590

June 29, 2015

Charles Devers, Cultural Committee
Pauma & Yuima Reservation
P.O. Box 369
Pauma Valley, CA 92061

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, California

Dear Mr. Devers:

On behalf of Albert A. Webb Associates, Applied EarthWorks, Inc. (Æ), is conducting a cultural resources study of a 72-acre parcel for the proposed Sycamore Canyon Business Park Buildings 1 & 2 Project (Project), located west of Sycamore Canyon Boulevard at the western terminus of Dan Kipper Drive, west of Lance Drive, immediately easterly of Sycamore Canyon Wilderness Park, in the City of Riverside, Riverside County, California. The proposed Project involves the construction of two warehouse buildings (Buildings 1 & 2), which total 1.3 million square feet in size. The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended. The Project area shown on the attached map is located on the Riverside East, CA 7.5' USGS quadrangle map within Section 4, T2S/R4W, San Bernardino Baseline and Meridian (S.B.B.M.).

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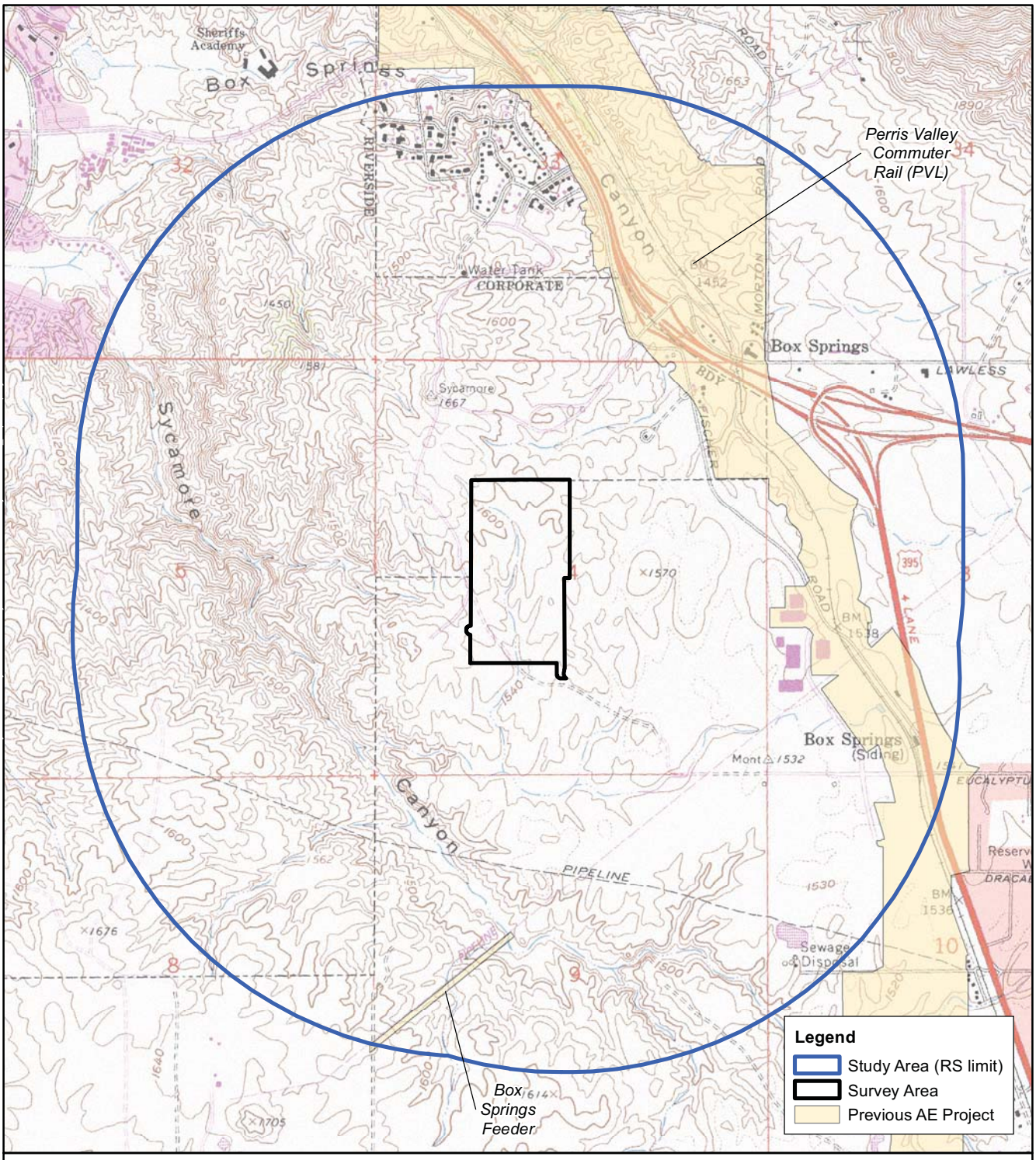
Senior Archaeologist
Applied EarthWorks, Inc.



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Records Search location map for the *Webb - Sycamore Canyon Business Park Project - AE #3171.*

July 6, 2015

Attn: Tiffany Clark, Senior Archaeologist
Applied EarthWorks, Inc.
133 North San Gabriel Blvd, Suite 201
Pasadena, CA 91107

SOBOBA BAND OF LUISEÑO INDIANS
EST. JUNE 19, 1883

Re: Cultural Resources Investigation for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, CA

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. This project location is in close proximity to known village sites and is a shared use area that was used in ongoing trade between the Luiseño and Cahuilla tribes, it is therefore significant to the people of Soboba. The Soboba Cultural Resource Department has assessed the cultural sensitivity of the project area and determined that not only is it culturally sensitive, but there is a possibility of encountering Native American Cultural Resources during ground-disturbing activities.

Soboba Band of Luiseño Indians is requesting the following:

1. To initiate a consultation with the project proponents and lead agency.

2. Copies of any archaeological and/or cultural resource documentation.

3. The transfer of information to the Soboba Band of Luiseño Indians regarding the progress of this project should be done as soon as new developments occur.

4. Soboba Band of Luiseño Indians continues to act as a consulting tribal entity for this project.

5. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseño Indians requests that Native American Monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department to be present during any ground disturbing proceedings. Including surveys and archaeological testing.

6. At this time, the Soboba Band does see a direct need for a Native American Monitor due to the high cultural significance of the area.

7. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

Sincerely,

Joseph Ontiveros, Director of Cultural Resources
Soboba Band of Luiseño Indians
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov

Cultural Items (Artifacts). Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

Treatment and Disposition of Remains.

A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.

B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.

C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.

D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.

E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes are to be treated in the same manner as human bone fragments or bones that remain intact

Coordination with County Coroner's Office. The Lead Agencies and the Developer should immediately contact both the Coroner and the Soboba Band in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

Non-Disclosure of Location Reburials. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

RINCON BAND OF LUISEÑO INDIANS

Culture Committee

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2621 or·(760) 297-2622 & Fax:(760) 749-8901

June 29, 2015

Tiffany Clark
Applied Earthworks, Inc.
133 N. San Gabriel Blvd., Suite 201
Pasadena, CA 91107

Re: Sycamore Canyon Business Park Buildings 1 & 2 Project

Dear Ms. Clark:

Thank you for inviting us to submit comments on the Sycamore Canyon Business Buildings 1 & 2 Project. This letter is written on behalf of the Rincon Band of Luiseño Indians. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is within the Aboriginal Territory of the Luiseño people, but is not within Rincon's Historic boundaries. We defer you to the Pechanga Band of Luiseño Indians or Soboba Band of Luiseño Indians who are closer to your project area

Please contact the Native American Heritage Commission and they will assist with a referral to other tribes in the project area.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Jim McPherson
Manager
Rincon Cultural Resources Department

From: Cultural
To: tclark@appliedearthworks.com
Cc: Dixon, Patti; Jeremy Zagarella
Subject: Sycamore Canyon Business Park, Buildings 1 & 2
Date: Monday, July 13, 2015 10:32:42 AM

Ms. Clark,

The Pauma Band of Luiseno Indians has received your June 29 letter for the Sycamore Canyon Business Park, Buildings 1 & 2. We are concerned about the 3 cultural sites you described in your letter. Even though they are ineligible on the NRHP, they are evidence of an ancestral occupation. The protection and preservation of ancestral sites is important to us as Native people. If the developer could complete the project and protect the milling areas, it would greatly appreciated. We would also request that the ground disturbance activity be monitored by an archaeologist and Native monitor. Please contact us if there are any questions or concerns.

Thank you,

Mr. Chris Devers
Cultural Liaison
Pauma Band of Luiseno Indians

PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office. Box 2183 • Temecula, CA 92593
Telephone (951) 308-9295 • Fax (951) 506-9491

July 27, 2015

VIA E-Mail and USPS

RE: Request for Information for the Sycamore Canyon Business Park Buildings 1 and 2, City of Riverside, Riverside County, CA. [Applied Earthworks Inc.]

Dear Ms. Clark;

The Pechanga Band of Luiseño Indians ("the Tribe") appreciates your request for information regarding the above referenced Project. After reviewing the provided maps and our internal documents, we have determined that the Project area is not within reservation lands although it is within our ancestral territory.

At this time, we are interested in commenting on and participating in this Project, as it is located within a traditional Payómkawichum (Luiseño) cultural landscape. The Tribe knows that there are 50+ cultural sites located within a one-mile radius and a blue-line stream flowing through the Property; these abundant water resources in the Sycamore Canyon area supported a dense habitation for likely hundreds of years, if not longer. Furthermore, there are sites immediately adjacent to the Project boundaries and additional sites that were destroyed during the construction of the adjacent industrial buildings.

According to your request letter, three milling features are located within the Project boundaries and the assessment has concluded that they are not a part of a larger landscape. The Tribe cannot concur with this determination, as we know that the features are associated with the Sycamore Canyon village complex that extends within at least a four-mile radius of the Project. While we do not have a name yet for this complex, we are confident that ongoing research will identify further information soon. The Tribe does not agree with the process of assessing the sites on an individual basis and believes that this is a piecemeal technique that CEQA does not support.

Because of the sensitivity of this area, the Tribe requests to consult directly with the Lead Agency. We further would be happy to meet with you to provide additional information about this area, if you require. Additionally, per CEQA and AB 52, avoidance is the preferred method regarding archaeological and cultural resources. Thus, we request that the archaeological study recommends avoidance of the sites impacted by the proposed Project. If avoidance is not possible, the Tribe will work together with the Lead Agency to develop appropriate mitigation measures to address the impacts.

The Tribe is dedicated to providing comprehensive cultural information to you and your firm for inclusion in the archaeological study as well as to the Lead Agency for CEQA review. At this time,

the Tribe requests the following so we may continue the consultation process and to provide adequate and appropriate recommendations for the Project:

1) Notification once the Project begins the entitlement process, if it has not already;
2) Copies of all applicable archaeological reports, site records, proposed grading plans and environmental documents (EA/IS/MND/EIR, etc);
3) Government-to-government consultation with the Lead Agency; and
4) The Tribe believes that monitoring by a Riverside County qualified archaeologist and a professional Pechanga Tribe monitor will be required during earthmoving activities. Therefore, the Tribe reserves its right to make additional comments and recommendations once the environmental documents have been received and fully reviewed. Further, in the event that subsurface cultural resources are identified, the Tribe requests consultation with the Project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed Project. We would like you and your client to know that the Tribe does not consider initial inquiry letters from project consultants to constitute appropriate government-to-government consultation, but rather tools to obtain further information about the Project area. Therefore, the Tribe reserves its rights to participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, and requests to be included in all correspondence regarding this Project.

Please note that we are interested in participating in surveys within Luiseño ancestral territory. Prior to conducting any surveys, please contact the Cultural Department to schedule specifics. If you have any additional questions or comments, please contact me at ahoover@pechanga-nsn.gov or 951-770-8104.

Sincerely,

Anna Hoover
Cultural Analyst

PALA TRIBAL HISTORIC PRESERVATION OFFICE

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax

PALA THPO

October 16, 2015

Tiffany Clark, PhD, RPA
Applied Earthworks, Inc.
133 N. San Gabriel Blvd, Suite 201
Pasadena, CA 91107

Re: Sycamore Canyon Business Park Buildings 1 and 2

Dear Mrs. Clark:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

APPENDIX D

CONFIDENTIAL
UPDATED ARCHAEOLOGICAL SITE RECORDS

Confidential Appendix Removed