

Federal Criteria

A property would be considered eligible for listing in the National Register of Historic Places if it meets one or more of the following:

Criteria for Eligibility

- A. Is associated with events that have made a significant contribution to the broad patterns of our history;
- B. Is associated with the lives of persons significant in our past;
- C. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction;
- D. Has yielded, or may be likely to yield, information important to prehistory.

California State Criteria

California State has multiple levels of recognition for significant or important cultural resources: California Historical Landmark, California Point of Historical Interest, and/or California Register of Historical Resources.

California Historical Landmark (Landmark)

To be designated as a California Historical Landmark, a resource must meet at least one of the criteria listed below, have the approval of the property owner(s), be recommended by the State Historical Resources Commission, and be officially designated by the Director of California State Parks. The Criteria for Designation include:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California);
- Associated with an individual or group having a profound influence on the history of California;
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

California Point of Historical Interest (CPHI)

To be designated as a California Point of Historical Interest, a resource must meet at least one of the criteria listed below.

- The first, last, only, or most significant of its type within the local geographic region (City or County);
- Associated with an individual or group having a profound influence on the history of the local area;
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

California Register of Historical Resources (CRHR)

To be designated eligible for the California Register of Historical Resources, a resource must meet at least one of the criteria listed below.

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

Local Riverside Criteria

The City of Riverside also has multiple levels of recognition for cultural resources. Specifically, they may identify a resource as a City Landmark, Historic District, or Structure or Resource of Merit. Recently, the City eliminated designations of Neighborhood Conservation Areas. The remaining criteria are presented as follows:

Landmark Criteria (Chapter 20.50.010 - U)

“Landmark” means any improvement of 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;
8. Has yielded or may be likely to yield, information important in history or prehistory.

Historic District Designation Criteria (Chapter 20.50.010 – O)

“Historic District” means an area which contains:

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 thematic-related grouping of cultural resources which contribute to each other and are unified aesthetically by plan or physical development, and which have been designated to determined eligible for designation as a historic district by the Historic Preservation Officer or Qualified Designee, 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”.

Structures of Merit Designation Criteria (Chapter 20.50.010 – FF)

“Structure or Resource of Merit” means 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 or 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.
6. An improvement or resource that no longer exhibits the high degree of integrity sufficient for Landmark designation, yet still retains sufficient integrity

ty under one or more of the Landmark criteria to convey cultural resource significance as a Structure or Resource of Merit.

HISTORIC CONTEXT

A portion of the city's Historic Context Statement reads as follows:

Immigration and Ethnic Diversity:

A succession of diverse cultural groups was brought to the region by Riverside's famous Washington Navel Orange industry, each with their own perspectives and dreams. Early citriculture, a labor-intensive crop, required large available pools of labor in those days to succeed. Poor, but eager, immigrants from China, Japan, Italy, Mexico, and later the Dust Bowl of American flooded into Southern California to meet the labor demand in hopes of gaining their own fortunes. As a result, Riverside developed a substantial Chinatown and other ethnic settlements, such as Casa Blanca. A rich ethnic-socio-economic mix, the hallmark of today's California, had already developed in Riverside by World War II.

In the late 1880s, the project area was "... too far away from downtown and East Riverside ..." Hall 1992:42). Subdivision and building on the south side of town ... was slow, but consistent, and the further south the later the investments in income properties. Bringing this historical context into a tighter period, the 1920s were a time of post-1913 freeze and post-World War I recovery for Riverside. Again, citing Hall (1992:119-124):

"The years following the big freeze found Riversiders working harder and struggling to make a living. Citrus growers were constantly alert to ever-changing weather conditions even though they could not alter them. The year of 1916 began wet and stormy in the San Bernardino Valley where heavy rains measured ten inches. Due to the unusual amount of rain, three hundred families were forced to leave their San Bernardino homes ... The Santa Ana River flooded, and its force washed out all bridges leading into Riverside. Although the town became temporarily isolated from the outside world, commercial businesses carried on as usual, and local banks held their annual meetings ... [during World War I] Labor shortages were universal, and the citrus industry did not escape the need to hire

some women to fill the vacancies ... All Americans were forced to make wartime sacrifices ...the nation as a whole experienced great prosperity in the 1920s ...”

The current project area was just outside the southern boundary of the City of Riverside until it was annexed (fairly recently) and the City boundary was redefined at La Sierra Avenue. The project area was always a citrus orchard and, although not currently maintained, remains an orchard.

It is peripheral to the “Arlington Heights” area, but still close enough to be associated with Victoria Avenue and the citrus industry. The property complements many of the early citrus orchards of south Riverside.

RESULTS AND FINDINGS

Evaluation - Federal Criteria:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history.

Historic research failed to associate the current project area with any events contributing to the broad patterns in our history. In fact, this property was always identified as a relatively small enterprise (citrus orchard) that provided supplemental income to persons living and working elsewhere. If this property was not under citrus, it would not have made any difference to the larger and more successful agri-business enterprises in the Riverside area and/or the Arlington Heights industry. Therefore, McKenna et al. has concluded this property fails to meet the minimum requirements for recognition under Criterion A.

- B. Is associated with the lives of persons significant in our past.

The improvements identified within the current project area have not been associated with any significant persons in our past. While the property, itself, can be traced to the Moulton and Praed holdings, neither man ever visited the property or was directly involved in any of the improvements. The subsequent owners were all average working families that used to grove for supplemental income. Therefore, McKenna et al. has deter-

mined that the existing improvements fail to meet the minimum requirements under Criterion B.

- C. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

There are no standing structures within the project area and none were ever present. Therefore, Criterion C is not applicable to this discussion.

- D. Has yielded, or may be likely to yield, information important to prehistory.

No evidence was found to suggest there are prehistoric or significant historic archaeological remains within the project area. Criterion D does not apply.

Evaluation – State Criteria

California Historical Landmark

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).

The improvements identified within the project area are not the first, last, or only examples of citrus orchards and/or irrigation systems or windmills supporting orchard development. Similar features can be identified throughout Southern California (and elsewhere). The development method is standard and financially reasonable, given the size of the property. These are modest improvements and improvements that required minimal maintenance. McKenna et al. has concluded these improvements do not meet the intent of “type” and, therefore, in this criterion does not apply.

- Associated with an individual or group having a profound influence on the history of California.

Research failed to associate the property and/or improvements with any individual or group meeting the minimum level of recognition or influence in California. Therefore, this criterion does not apply.

- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

The improvements identified within the project area are not considered prototypical and/or an outstanding example of an architectural movement. They are more aligned with industrial improvements and not associated with any pioneer designer or master builder. Therefore, the property cannot be considered for recognition as a Landmark under this criterion.

California Point of Historical Interest

- The first, last, only, or most significant of its type within the local geographic region (City or County).

The improvements identified within the project area are not the first, last, or only examples of the citrus industry improvements in the Riverside/Arlington Heights area or Southern California in general. As noted above, this property fails to meet the minimum requirements for recognition as a first, last, or unique type of feature(s). McKenna et al. has concluded this property does not qualify for recognition under this criterion.

- Associated with an individual or group having a profound influence on the history of the local area.

Research failed to associate the property and/or improvements with any individual or group meeting the minimum level of recognition or influence in local area. Therefore, this criterion does not apply.

- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

The improvements identified within the project area are not considered prototypical and/or an outstanding example of any construction/industrial movement. In addition, the property is not associated with any pioneer ar-

chitect, designer or master builder. Therefore, the property cannot be considered for recognition as a Landmark under this criterion.

California Register of Historical Resources

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

The improvements associated with the current project area cannot be associated with any broad pattern of local or regional history, or the heritage of California or the United States, as noted above. The improvements represent a small and relatively inconsequential investment by individuals and are not in the same category of the large land holders responsible for the development of the citrus industry in this geographical area. Further, the improvements cannot be associated with any significant event or contribution to the overall history of the area, state, or nation, as previously noted.

2. Associated with the lives of persons important to local, California or national history.

Research failed to associate the property and/or improvements with any individual or group meeting the minimum level of recognition or influence in local, state or national areas. Therefore, this criterion does not apply.

3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

The improvements identified within the project area are not considered characteristic of a "type" or distinctive method of construction. In addition, the property is not associated with the work of a master and there is no high artistic value. There are no standing structures. The property cannot be considered for recognition as a Landmark under this criterion.

4. Has yielded, or has the potential to yield information important to the pre-history or history of the local area, California, or the nation.

Research has failed to indicate this property has any potential to yield additional data considered important to understanding the prehistory or history of the area, state, or nation. Therefore, this criterion does not apply.

Evaluation – Local Criteria

Landmark Criteria

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

No data was found to suggest this property meets any of the elements of the criterion for recognition as a special element, as defined. The property is not aesthetically appealing. The property does not reflect significant engineering or architectural achievements. It has nothing to do with the natural history of the area and it cannot be associated with the city's cultural, social, economic, or political history, except in a very minor way (outside of the City for the most part). Rather, it is a relatively small property with common application and not different than much of the generic small agricultural properties identified on the peripheries of the City.

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

Research failed to associate the property and/or improvements with any individual or group meeting the minimum level of recognition or influence in local, state or national areas. Therefore, this criterion does not apply.

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.

The improvements identified within the project area are not considered characteristic of a "type" or distinctive method of construction. In addition, the property does not exhibit the valuable use of indigenous materials or craftsmanship. Therefore, the property cannot be considered for recognition as a Landmark under this criterion.

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

There is no evidence that this property is associated with a notable builder, designer, or architect. There are no standing structures and never were standing structures. Nor is it associated with a creative individual. Therefore, this criterion cannot be applied.

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

Again, there are not standing structures on the property and therefore, this criterion does not apply.

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.

The project area is not associated with transportation nodes or parks. It was individually developed and not a part of a larger plan for development or part of the larger orchard holdings. On a very minimal level, the improvements (orchard development) may be considered a cultural landscape, as it represents the historic alteration of the natural environment and the establishment of a man-made landscape (the orchard). McKenna et al, initially concluded the orchard did not qualify as a cultural landscape, as it is represented by replacement trees and not the original orchard. This initial conclusion suggested a lack of integrity and, therefore, not eligible for recognition. Delcamp (2014), however, recommended considering the orchard, irrigation system, and windmill as parts of the overall landscape and, in citing National Register Bulletin 30, points out that "... rural landscapes ... predominantly contain land, natural features and living plant materials that have lifespans. Because of these finite lifespans, Bulletin 30 states that ["] original plant materials may enhance integrity, but their loss does not necessarily destroy it."

Delcamp (2014) continues:

"... it is possible to come to the same conclusions [as McKenna's] that the project site is not a cultural landscape based on a more complex analysis ... and related historic

factors of area. Aerial maps from 1948 and as late as 1967 show the project site and the rest of the lots within the Moulton and Praed Subdivision planted to groves, presumably citrus. As such, the area appeared to be a contiguous westerly extension of the Arlington Heights area ... which is the key area connected to the city's citrus grove history ... Modifications to the site and the surrounding area have reduced the overall groves in the Moulton and Praed subdivision, reduced the project site grove's original acreage, isolated the grove, and made it discontinuous [sic] to the Arlington Heights area. By the 1980 aerial photos, a parcel map recorded in 1979 (9036) had resulted in approximately four acres of the adjacent Lot 6A being developed with four new residences on former groves ...; Also by 1980, another residential subdivision recorded in 1977 (5751) ... resulted in the construction of approximately 48 homes on former groves. In fact, all of the former groves immediately surrounding the project site had been developed with single family homes by 1980, thus making an island of the subject site ... Today, all of this section of the Moulton and Praed subdivision that was planted in groves has been developed – with the exception of the project site, another 4+ acre site east of Short Street, and a scattered remnant trees within backyards of single family residences ... all that remains of what was over 100 acres of groves by 1948 is an isolated 8.8 acre grove and another 4+ acres that remains directly west of Arlington Heights. The rest of the original subdivision has all been re-subdivided and developed as homes, and both La Sierra Avenue and Victoria Avenue had been improved which has altered the setting, character and feeling of the area. ***Therefore, based on the above analysis, the project site does not retain “the general character and feeling of its history period,” does not retain integrity as a cultural landscape, and is not significant under local Landmark criterion 6.*** (Emphasis added)

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.

This style of development is not unique and does not represent the last remaining example of orchard development in the City, country, state, and region. In the City of Riverside, areas reflecting the orange/citrus industry still exist and functioning as income properties. McKenna et al. determined this property does not meet the criteria for identification as a last example and, therefore, this criterion does not apply.

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

Research has failed to indicate this property has any potential to yield additional data considered important to understanding the prehistory or history. Therefore, this criterion does not apply.

Historic District Designation Criteria

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”).

To be considered a district, the concentration of resources must retain significant historic integrity. In this case, the individual elements within the property are dominated by modern additions or alterations. Three historic features (orchard, irrigation system and wind machine; see previous discussion) are negligible, as they are not unique or directly linked (physically or otherwise) to any large system identified as significant. There is no “district” and therefore, this criterion cannot be applied to the current study area.

2. A thematic-related grouping of cultural resources which contribute to each other and are unified aesthetically by plan or physical development, and which have been designated to determined eligible for designation as a historic district by the Historic Preservation Officer or Qualified Designee, 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”).

The current project area has been determined ineligible for designation as a historic district; is not listed in or eligible for listing as a National Register property, California Register property, a California Landmark, or a California Point of Historic Interest (see previous discussions). The improvements are not consistent with the definition of a unique or rare resource. Therefore, McKenna et al. has concluded the property is not a "district" or part of a "district" and, therefore, not eligible for any protections under the definition of a "district."

Structures of Merit Designation Criteria

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

There is nothing unique about the location of this project area, nor are there any singular physical characteristics, view, or visual feature unique to the property. The neighborhood surrounding the property has been subject to significant alterations during the modern period with residential developments and road improvements. All but two small areas of citrus orchards remains in the area. The current project areas fails to meet the intent of this criterion and, therefore, McKenna et al. has determined the criterion cannot be applied.

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

There are no standing buildings on this property and the surrounding buildings are all of modern origin. This criterion cannot be applied to this property.

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

The only business associated with this property is citrus orchard development. While this activity was more widespread throughout the 20th century, the property is not being maintained as an active orchard, it is not a rare business enterprise and, therefore, this criterion cannot be applied.

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.

As presented above, the property does not meet the intent of the Landmark criteria. This property never met the criteria for Landmark status and, therefore, would not meet the criterion for Structure of Merit designation. Lack of integrity is a significant and applicable issue.

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

Research has failed to indicate this property has any potential to yield additional data considered important to understanding the prehistory or history. Therefore, this criterion does not apply.

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.

As noted above, integrity is not an issue with respect to this property meeting any of the minimum requirements for recognition as a Landmark. Therefore, the degree of integrity is not applicable to the consideration as a Structure of Merit. It is the professional opinion of McKenna et al. that this property does not meet the requirements for recognition as a Structure of Merit.

In summary, McKenna et al. prepared Table 4 to illustrate the property's failure to meet any of the criteria for recognition on the national, state, regional, or local level. McKenna et al. took all data into account, including comments presented with respect to the draft report, and attempted to assess the property on the facts and without bias or prejudice. In assessing the potential for listing properties, the criteria used for designation should be clear and unequivocal.

Here, there major issue was whether or not the property could qualify as a cultural landscape. McKenna et al. considered this potential and concluded none of the three identified features (orchard, irrigation system, or windmill) retained the integrity needed to be considered a cultural landscape.

Table 4. Summary of Evaluations.																		
Federal Criteria		State Criteria						Local Criteria										
		Landmark		CPHI		CRHR		Landmark		District		Merit		Neigh.				
A	--	--	--	--	--	1	--	a	--	a	--	a	--	a	--			
B	--	--	--	--	--	2	--	b	--	b	--	b	--	b	--			
C	--	--	--	--	--	3	--	c	--	c	--	c	--	c	--			
D	--	Property fails to meet the minimum criteria for recognition as a state Landmark or Point of Historical Interest				4	--	d	--	d	--	d	--	d	--			
Property fails to meet the minimum requirements for federal recognition						Property fails to meet CRHR requirements	e	--	e	--	e	--	Does not qualify as a neighborhood					
							f	--	f	--	Does not qualify for merit							
							g	--	g	--								
							h	--	h	--								
							i	--	Not Applic.									
j	--																	

These three features date to different historic periods and can be attributed to different property owners. While each is related to the citrus industry, each served different purposes and reflect the “need” at the time of establishment. McKenna et al. has concluded the property, overall, is not a significant or important resource as defined in the various evaluation criteria. As a property failing to meet any of the criteria for recognition, McKenna et al. has also concluded there will be no adverse environmental impact if this property is redeveloped.

CONCLUSIONS AND RECOMMENDATIONS

Based on the paleontological overview for this area and information maintained by the County of Riverside Land Management and Transportation Agency, the project area is considered sensitive for paleontological resources that are likely to be found in a buried context. With a relative rating of “High A” by the County, McKenna et al. recommends that, in accordance with County guidelines, any earthmoving that exceeds the relative depth of five deep below the current surface be monitored for paleontological specimens. The paleontological monitoring program should be in concurrence with County guidelines and the Western Center, Hemet. Prior to any implementation, a PRIMP (Paleontological Resource Impact Mitigation Plan) should be prepared and approved. The extent of monitoring will be dependent upon the actual grading plans and in conjunction with City conditions with respect to the grading activities.

McKenna et al. contacted the Native American Heritage Commission and received a response that no sacred or religious sites are known for this area. Local Native Ameri-

can representatives were contacted via mail and two responses were received. The San Manuel Band of Mission Indians (Serrano) responded by acknowledging this area is outside the ancestral territory of the Serrano. The Soboba of San Jacinto responded with concerns for secondary impacts and requested to be consulted should Native American resources be identified. If resources are identified, the Soboba requested a representative of the Native American community being included in the remaining monitoring activities. At this time, McKenna et al. acknowledges the presence of Native American resources within one mile of the project area, but emphasizes no evidence of such resources was found within the project area. Therefore, McKenna et al. is not recommending archaeological or Native American monitoring. Should resources be uncovered as a result of site preparation, the find(s) must be assessed in accordance with current standards and guidelines and an archaeological monitoring program be initiated to address the remainder of the grading program (including tree removal).

The background research, field survey, and evaluation of the improvements within the current project area resulted in a conclusion that this property does not represent a significant or important historical resource(s) as defined by federal, state, or local guidelines. McKenna et al., having giving this study considerable time and analysis, including incorporation of City comments and concerns, has concluded the property is not a historical resource and the proposed redevelopment of the property will not result in any adverse environmental impact.

Further, the proposed redevelopment will not impact, directly or indirectly, any adjacent or nearby historical resources (i.e. the historically significant portion of Victoria Avenue or the Gage Canal). McKenna et al. prepared the DPR-523 forms to identify this property as a resource, but emphasizes the project site is not a significant resource and does not qualify as a "historical resource," as defined in CEQA and NEPA. In summary, the following mitigation measures are proposed:

- The paleontological monitoring program should be in concurrence with County guidelines and the Western Center, Hemet. Prior to any implementation, a PRIMP (Paleontological Resource Impact Mitigation Plan) should be prepared and approved. The extent of monitoring will be dependent upon the actual grading plans and in conjunction with City conditions with respect to the grading activities.
- McKenna et al. is not recommending archaeological or Native American monitoring. Should resources be uncovered as a result of site preparation, the find(s) must be assessed in accordance with current standards

and guidelines and an archaeological monitoring program be initiated to address the remainder of the grading program

At the discretion of the Lead Agency, additional mitigation measures may be proposed or required as a condition of approval for the proposed tract map.

CERTIFICATION

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

Jeanette A. McKenna

Jeanette A. McKenna, Principal Investigator, McKenna et al.

August 1, 2014

Date

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