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MATERIAL CULTURE
CONSULTING

Submitted to:

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E|P|D Solutions, Inc.
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CULTURAL RESOURCES ASSESSMENT

Iris Park Project

City of Moreno Valley, Riverside County, California

PHASE I CULTURAL RESOURCES ASSESSMENT:
IRIS PARK PROJECT
CITY OF MORENO VALLEY, RIVERSIDE COUNTY, CALIFORNIA

Prepared for:

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March 2020

Type of Study: Phase I Cultural Resources Assessment
Cultural Resources within Area of Potential Impact: None
Project Location: USGS 7.5' Topographic Quadrangle Sunnymead, Section 29 of Township 3 South, Range 3 West
APN: 312-020-025
Project Area: Approximately 10.8 acres
Date of Field Survey: March 6, 2020
Key Words: Archaeology, CEQA, Moreno Valley, Riverside County, Low sensitivity

MANAGEMENT SUMMARY

Passco Pacifica LLC (Proponent) proposes the construction of Iris Park, a proposed 81-lot single-family detached subdivision located on the south side of Iris Avenue, about 500 feet east of Perris Boulevard, on APN 312-020-025. The project site is triangular in shape and has a gross acreage of approximately 10.82 acres, including 3.02 acres that is planned for development by the City of Moreno Valley as a public park and trail over the California Aqueduct. The community will have two gated access points off Iris Avenue. Three small park areas are spread out on the site. Residential lots would range from 2,197 sq. ft. to 4,741 sq. ft. Homes would range from 1,848 sq. ft. to 2,201 sq. ft., with 3 to 5 bedrooms and 2.5 to 3 baths. Homes would be two stories, include a back yard approximately 12 to 14 feet deep, and have an attached two-car garage. Three architectural styles are proposed: Spanish, French, and Farmhouse. The project overall would provide 217 parking spaces, including 162 garage spaces and 49 spaces on private streets. Material Culture Consulting, Inc. (MCC) was retained by E|P|D Solutions, Inc. to conduct a Phase I cultural resource investigation of the Project Area. This assessment was conducted in accordance with the California Environmental Quality Act (CEQA) and Riverside County Guidelines, and included a cultural resources records search, a search of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC), outreach efforts with 21 Native American tribal representatives, background research, and a pedestrian field survey.

Yahaira Gonzalez, MCC Archaeologist, conducted a search of the California Historical Resource Information System (CHRIS) on February 25, 2020 at the Eastern Information Center (EIC), located on the campus of University of California, Riverside. The cultural resources records search identified twenty-six prior cultural resources investigations within a 1-mile radius of the Project Area. One of these studies intersects the Project Area. A total of five previously recorded cultural resources were identified within a 1-mile radius of the Project Area, yet none of these are documented within the Project Area. A review of historical aerial photographs and topographic maps indicate that prior to the 1990s, the Project Area was used for agricultural purposes. By the late 1990s, the surrounding area saw increased commercial and residential development that has continued up to the present day.

The SLF did not identify any previously known tribal cultural resources or sacred lands within the vicinity of the Project Area. The NAHC provided MCC with contact information for 21 tribes/individuals to reach out to for additional information on February 18, 2020. MCC sent letters on February 18, 2020 to all 21 Native American contacts, requesting any information related to cultural resources or heritage sites within or adjacent to the Project Area. Additional attempts at contact by letter, email, or phone call were made on March 4, 2020 and March 18, 2020. As a result of this outreach effort, MCC received seven responses from Native American Tribes or individuals. Several tribes responded with concerns about presence of nearby resources and presented requests for formal consultation with the Lead Agency. These results are summarized in the Native American Outreach and Background Research section of this report and all correspondence is found in Appendix C. MCC did not conduct formal consultation with any of the Native American representatives, and recommends that appropriate consultation take place as soon as possible between Riverside County, as lead agency, and all interested parties.

The pedestrian survey of the Project Area was conducted on March 6, 2020 by MCC Archaeologist Zachary White. During the course of fieldwork, survey conditions were fair and ground visibility was poor to good (10-80%) throughout the 10.8-acre Project Area, due to prior ground disturbance and vegetation coverage. The property has been disturbed due to vehicular activity and modern dumping activity. No cultural resources were identified during the investigation.

Based on the above findings, the probability of encountering significant cultural resources within the Project Area is considered low. MCC recommends no further mitigation measures prior to implementation of the Project. While we do not recommend additional mitigation, we do recommend including a condition of approval which addresses

inadvertent discoveries of cultural materials and/or human remains, should these be encountered during any phase of Project implementation.

A copy of this report will be permanently filed with the EIC at University of California, Riverside. All notes, photographs, correspondence and other materials related to this Project are located at MCC, Inc., located in Pomona, California.

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INTRODUCTION

Passco Pacifica LLC (Proponent) proposes the construction Iris Park, a proposed 81-lot single-family detached subdivision located on the south side of Iris Avenue, about 500 feet east of Perris Boulevard (Project), located in the City of Moreno Valley in Riverside County, California. Material Culture Consulting, Inc. (MCC) was retained by E|P|D Solutions, Inc. to conduct a Phase I cultural resource investigation of the Project Area. This assessment was conducted pursuant to all applicable State of California regulations regarding cultural resources, as well as guidelines established by the City of Moreno Valley. According to these regulations and guidelines, if development of a Project has the potential to result in significant impacts to cultural resources, a plan must be developed to mitigate those impacts to a level which is less than a significant. This assessment documents the potential for encountering cultural resources during development of this Project and provides recommendations on how to mitigate impacts to those resources.

PROJECT LOCATION AND DESCRIPTION

The Project is located in the City of Moreno Valley, Riverside County, California (Figure 1). Iris Park is a proposed 81-lot single-family detached subdivision located on the south side of Iris Avenue, about 500 feet east of Perris Boulevard, on APN 312-020-025 (Figures 2 and 3). The project site is triangular in shape and has a gross acreage of approximately 10.82 acres, including 3.02 acres that is planned for development by the City of Moreno Valley as a public park and trail over the California Aqueduct. The community will have two gated access points off Iris Avenue. Three small park areas are spread out on the site. Residential lots would range from 2,197 sq. ft. to 4,741 sq. ft. Homes would range from 1,848 sq. ft. to 2,201 sq. ft., with 3 to 5 bedrooms and 2.5 to 3 baths. Homes would be two stories, include a back yard approximately 12 to 14 feet deep, and have an attached two-car garage. Three architectural styles are proposed: Spanish, French, and Farmhouse. The project overall would provide 217 parking spaces, including 162 garage spaces and 49 spaces on private streets. Specifically, the proposed Project is located in Section 29, within Township 3 South, Range 3 West on the U.S. Geological Survey (USGS) Sunnymead 7.5' topographic quadrangle (San Bernardino Baseline and Meridian) (Figure 2).

PROJECT PERSONNEL

Tria Belcourt, M.A., RPA, served as the Principal Investigator for the study and supervised all work. Ms. Belcourt coordinated and oversaw the records searches, communicated with NAHC and Native American individuals, and provided quality control for this report. Ms. Belcourt is a Registered Professional Archaeologist (RPA) and Qualified Riverside County Archaeologist, with a M.A. in Anthropology from the University of Florida, a B.A. in Anthropology from the University of California at Los Angeles and over 16 years of experience in California archaeology (See Appendix A).

Sonia Sifuentes, M.Sc, RPA, provided co-authorship of this report. Julia Carvajal, M.A., managed the field survey and all GIS support for the project and report. Yahaira Gonzalez, B.A., conducted the records search and co-authored this report, and Zachary White, B.A., performed the pedestrian survey.

Figure 1. EPD Iris Park Project Vicinity (1:500,000)

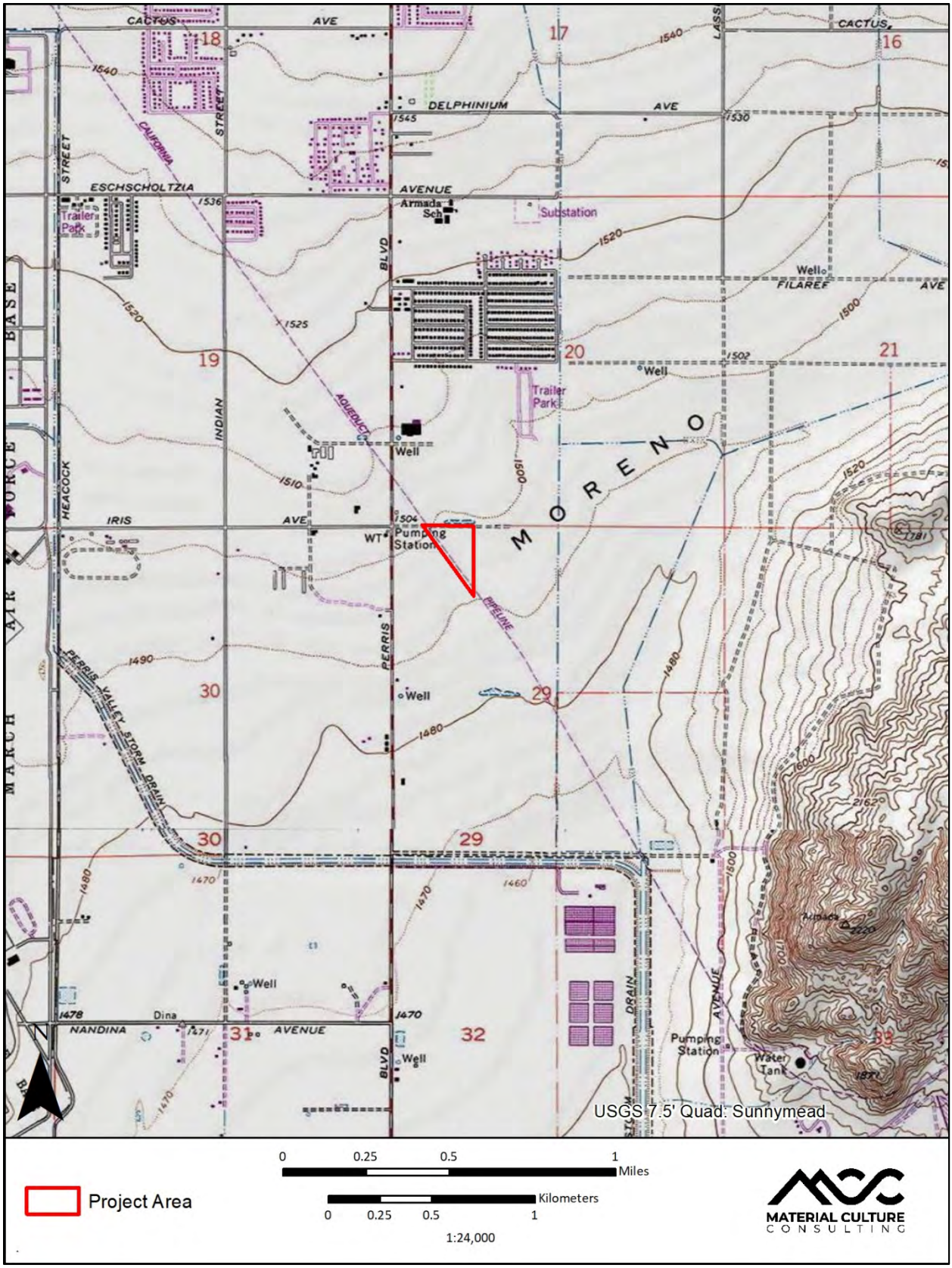


Figure 2. EPD Iris Park Project Area (1:24,000, as depicted on Sunnymead USGS 7.5 Minute Quadrangle)

Figure 3. EPD Iris Park Project Area (1:4,000, as depicted on aerial photograph)

ENVIRONMENTAL SETTING

The Project Area is located within the city limits of Moreno Valley in northwestern Riverside County. Riverside County is situated within the Peninsular Ranges Geologic Province, a northwest-southeast oriented complex of blocks separated by similarly trending faults (Norris and Webb 1978). Most geological formations found within this area are comprised the Southern California Batholith, a great mass of basement igneous rocks. The Project Area also lies within the Central Perris Block (Kenney 1999). The Perris Block is a structurally stable, internally cohesive mass of crustal rocks bounded on the east by the San Jacinto fault zone, bounded on the west by the Elsinore and Chino fault zones, and on the north by the Cucamonga fault zone (Norris and Webb, 1976; Morton and Matti, 1989), and on the south by a series of sedimentary basins (Morton and Matti 1989). This structural block is believed to have been active since Pliocene time (Woodford et al 1971).

Vegetation observed within the Project Area include invasive grasses and weeds and brittle bush observed along the southern portion. Non-native landscaping is present within the surround region, with a residential and commercial development located to the South-southwest and Northwest of the Project Area. The climate in the region is characterized as Mediterranean, with hot, dry summers and temperate, wet winters. The Project Area is located within a relatively flat valley, with elevations averaging approximately 456 m (1496 ft.) above mean sea level (AMSL). Vegetation in much of the area has been altered by historical and modern development, with introduced species of flora, including annual grasses, weeds, and sunflowers observed. Perris Reservoir and Russell Mountains are located approximately 2.59 miles southeast of the Project Area. Moreno Valley area enjoys a mild Mediterranean climate characterized by warm, dry summers and cool, moist winters.

PREHISTORIC CONTEXT

The earliest evidence of human presence of North America radiocarbon dates as early as 15,000 years before present (BP) (Waters et al. 2011). Most of the cultural material to this period derives from a site in present-day Salado, Texas. Known as the Buttermilk Creek Complex, this assemblage of over 15,000 artifacts underlaid a Clovis assemblage and provides evidence of occupation prior to the Clovis horizon (Waters et al. 2011). No projectile points have been recovered from the Buttermilk Creek Complex and Clovis Complex is still the earliest known emergence of this technology. In California, the oldest radiocarbon date is derived from a from a site located in Siskiyou County (Tule Lake Rockshelter/CA-SIS- 218A), which dates as early as 13,000 years BP (Jones and Klar 2007; Erlandson et al. 2014).

The chronological prehistory of inland southern California remains more elusive than the much-researched desert and coastal regions. Most researchers generally agree that the earliest occupation for the Riverside County area dates to the late Pleistocene/early Holocene (11,000 to 8,000 years ago). The regional prehistoric chronology discussed here includes San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, as they relate to the archaeological assemblages of the region. Other chronological classification utilized for southern California include King's Early Period, which does includes regional subtraditions of the La Jolla and Pauma Complexes, along with the Early Santa Barbara region subtradition (Oak Grove culture), and the Late Santa Barbara region subtradition (Hunting and Campbell traditions) (King 2001).

The earliest sites known in the area are attributed to the San Dieguito culture, which consisted of a hunting culture with flaked stone tool industry (Warren 1967). Also known as the Paleo Indian Period, the environment during this period was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands (Moratto 1984). The material culture related to this time included scrapers, hammer stones, large flaked cores, drills, and choppers, which were used to process food and raw materials. During the archaeological investigations at the Eastside Reservoir, an early date of 7,380 +/- 300 before present from site CA-

RIV-5786 implies that people lived in the area at this time. Two other archaeological sites that date to this period are also within the vicinity of nearby Menifee: CA-RIV-2798/H, near the shoreline of Lake Elsinore; and CA-RIV-6069, located in San Jacinto Valley near Mystic Lake. These early sites revealed deep, intact deposits with a number of stone tools and features, which are more likely to be found along ancient lake terraces.

Around 8,000 years ago, subsistence patterns changed, resulting in a material complex consisting of an abundance of milling stones (for grinding food items) and a decrease in the number of chipped stone tools. The material culture from this time period includes large, bifacially worked dart points and grinding stones, handstones, and metates. Archaeologists initially designated this period as the Millingstone Horizon (Wallace 1955), which was later redefined as a cultural tradition named the Encinitas Tradition (Warren 1967). The Encinitas Tradition has various regional expressions including Topanga and La Jolla (Moriarty 1966). Naming conventions for this time period by archaeologists varied as some adopted a generalized Encinitas Tradition without regional variations, while others continued to use Millingstone Horizon, and still others used Middle Holocene (the geologic time period) to indicate this observed pattern (Sutton and Gardner 2010:1-2). Recently, this generalized terminology was criticized by Sutton and Gardner (2010) as suppressing the identification of cultural, spatial, and temporal variation, as well as the movement of peoples throughout space and time. It is these factors that are believed to be critical to an understanding of prehistoric cultural adaptation and change in this portion of southern California (Sutton and Gardner 2010:1-2).

The Encinitas Tradition characteristics include abundant metates and manos; crudely made core and flake tools; bone tools; shell ornaments; and very few projectile points, indicating a subsistence pattern focused on hunting and gathering a variety of floral resources. Faunal remains vary by location but include marine mammals, fish, and shellfish; as well as terrestrial animals, reptiles, and birds (Sutton and Gardner 2010:7). The Encinitas Tradition has been redefined to have four patterns (Sutton and Gardner 2010: 8-25). These include the Topanga Pattern in coastal Los Angeles and Orange counties; the La Jolla Pattern in coastal San Diego County; and the Sayles or Pauma Complex in inland San Diego County extending into western Riverside County, where the project is located. At approximately 3,500 years ago, Pauma Complex in the general Project vicinity adopted new cultural traits which transformed the archaeological site characteristics - including mortar and pestle technology, greater tool variety (including atlatl dart points and crescentics), and evidence of a more sedentary lifestyle (Warren et al. 1961; Meighan 1954).

At approximately 1,500 years before present, bow and arrow technology started to emerge in the archaeological record, which indicated changes in settlement patterns and subsistence systems. The local population incorporated new materials while retaining their day to day subsistence methods of the past, as evidenced by the archaeological record. The Palomar Tradition is attributed to this time, and is comprised of two larger patterns: the Peninsular Pattern in the inland areas of the northern Peninsular Ranges (e.g., San Jacinto and Santa Rosa mountains) and the northern Coachella Valley (Sutton 2010); and the San Luis Rey pattern of the Project Area. Archaeological sites from this time period are characterized by soapstone bowls, arrowhead projectile points, pottery vessels, rock paintings, and evidence of cremation sites. This shift in material culture assemblages is largely attributed to the emergence of Shoshonean (Takic-speaking) people who entered California from the east.

Recent investigations at the Eastside Reservoir project (Applied Earthworks 2001) refined the chronology for the past 1500 years into four stages: Saratoga Springs (1500-750 BP), Late Prehistoric (750-410 BP), Protohistoric (410-180 BP), and Historic (post-180 BP). The indications from this research show a large number of semi-residential sites during the Medieval Climatic Anomaly at the end of the Saratoga Springs period and ending by the Late Prehistoric (Applied Earthworks 2001). The increased use of the area suggests that the area may have had a more favorable environment than in surrounding regions.

ETHNOGRAPHIC CONTEXT

The Project Area has historically been situated between two Native American territories, the Luiseño people and the Cahuilla people, and is located south of the southern boundaries of Serrano traditional use area (Figure 4). The "Takic Expansion", which discusses the concept of migration phases of Takic/proto-Takic speaking peoples from the Great Basin into the desert and coastal Southern California regions, is believed to have occurred approximately 1000 to 600 years B.P (Koerper 1979; Moratto 1984; Laylander 2010). It is believed that both the Cahuilla and Luiseño ethnographic groups derived from this migration.

Cahuilla

The Cahuilla territory was bounded by the San Bernardino Mountains to the north, the Orocopia Mountains to the east, the Santa Ana River/the San Jacinto Plain and the eastern portion of Palomar Mountains to the west, and Borrego Springs and the Chocolate Mountains to the south (Bean 1978). The Project Area falls within the western region of the tribe's traditional territory, denoted by the San Gorgonio Pass. The Cahuilla existed within the most geographically diverse region, having exploited more than 500 native and non-native plants (Bean and Saubel 1972). The Cahuilla spoke a language that belongs to the Cupan group of the Takic subfamily of the Uto-Aztecan language family, a language family that includes the Shoshonean groups of the Great Basin (Bean and Shipek 1978).

The prehistoric Cahuilla occupation is characterized by structures within permanent villages that ranged from small brush shelters to dome-shaped or rectangular dwellings. Villages were situated near water sources, in the canyons near springs, or on alluvial fans at man-made walk-in wells (Bean 1972). There appears to be slight difference in subsistence tools between the Desert, Pass, or Mountain Cahuilla groups. The Desert Cahuilla used deep, wooden mortars with a long pestle whereas San Gorgonio Pass Cahuilla utilized shallower mortars with basketry rims (Kroeber 1908: 40, 43). Cahuilla granaries were usually raised on pole platforms two to four feet high, which resembled birds' nests, and were used to store mesquite (Kroeber 1908: 42).

In comparison with other Southern California tribes, the Cahuilla appeared to have had a lower population density and a less rigid social structure. The Cahuilla are patrilineal, with closely related patrilineages that share an assumed common ancestor which is important socially and ceremonially (Hudlow 2007). The office of lineage leader, also known as a *nét*, directed subsistence activities, settled conflicts, represented the clan regionally and was responsible for correct performances of ceremonies, with the official role of the chief passed from father to eldest son (Bean 1978; Hudlow 2007).

Initial contact with European explorers with the Cahuilla most likely occurred during the expedition of Juan Bautista de Anza in 1777 (Napton and Greathouse 1982). The presence of the San Gabriel Mission in the early 1800s led to more contact via baptisms (Napton and Greathouse 1982). It also led to the Native Americans moving away from traditional habitation sites to separate themselves from the influence of the Mission (Brumgardt 1977). The Cahuilla traditions may have been relatively stable until mission secularization in 1834, due to the policy of the Catholic Mission fathers, or padres, to maintain imported European traditional style settlement and economic patterns (Bean and Shipek 1978). After 1877, when the United States government established Indian reservations in the region and religious missionaries began conversion of the Native American populations in the region, traditional cultural practices were prohibited. Presently, the Cahuilla reside in nine separate reservations in Southern California, located in Imperial, Riverside and San Diego counties (Bean 1978).

Luiseño

The Spanish name Luiseño was used to identify Native Americans who were associated with the Mission San Luis Rey, since the Luiseño most likely had no known native term for their own nationality (Bean and Shipek 1978).

Extensive research has been accumulated that gives detailed accounts of the Luiseño (DuBois 1908, Sparkman 1908, Kroeber 1976, White 1963, and Bean and Shipek 1978). At the time of these ethnographies, the Luiseño maintained a sophisticated political organization structure, and their lands extended from western San Jacinto to the Pacific Ocean along several major waterways, including Temecula, Santa Margarita, and San Luis Rey Rivers (Bean and Shipek 1978). Neighboring tribes included the Cahuilla to the east, the Serrano to the north, and the Gabrielino to the west. Each of these groups are of the same Uto-Aztecan linguistic subfamily of Takic-speakers. The boundaries for territories fluctuate as new information evolves in ethnographic and ethnohistoric research, so there is a likelihood that there was quite a bit of overlap and intermarriage between groups over time.

The Luiseño organized themselves according to family groups or lineages, rather than forming exogamous moieties. Each lineage occupied land that they held in common, and they lived socially and politically separately from others (Bean and Shipek 1978). They typically resided in villages near reliable water sources and maintained special purpose camps close to the main villages. In the springtime, families would replenish food supplies by gathering local fruit, seeds, bulbs and roots. In the fall, families would move into the upland areas to gather acorns, prickly pear, toyon berries, and yucca. The Luiseño territory contained several species of oak that produced edible acorns. Acorns were stored and processed as needed by breaking the shell, grinding the meat into a powder, and leaching the tannic acid from the nut by using water. A porridge was made from the leached nuts and cooked with water using hot stones in baskets. The Luiseño used a wide variety of tools, including manos and metates, bone and shellfish hooks, stone and shell ornaments, bone awls, wooden throwing sticks, hammer stones, handstones, pestles, mortars, and drills, which are evident in late Prehistoric archaeological sites. Presently, there are six federally recognized Luiseño tribes with associated reservations within Southern California.

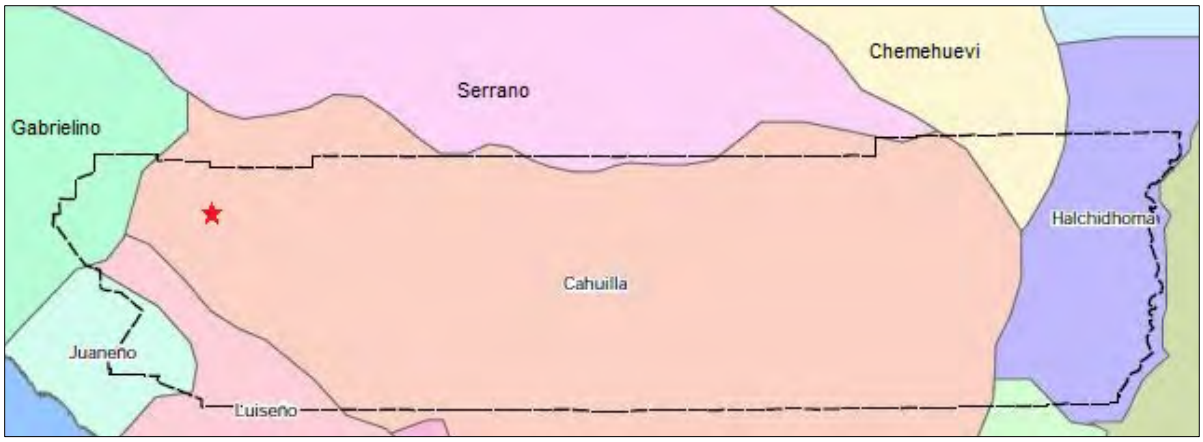


Figure 4. Traditional Tribal Areas in Riverside County and Project Area (derived from County of Riverside 2015)

Serrano

The Serrano has been defined as a Northern Uto-Aztecan language sub-family which resided in the mountains and deserts of interior southern California, known as the Mountain Serrano and the Desert Serrano (Sutton and Earle 2017). The Serrano's traditional use area is believed to located from the Cajon Pass of the San Gabriel/San Bernardino Mountains, as far east as Twentynine Palms, as far south as to Yucaipa, and as far north as Barstow (Bean and Smith 1978). Gifford (1971) categorizes the Serrano as a clan and moiety-oriented, or local lineage-oriented, group tied to traditional territories or use areas. Typically, a "village" consisted of a collection of families centered about a ceremonial house, with individual families inhabiting willow-framed huts with tule thatching. Considered hunter-gatherers, the Serrano exhibited sophisticated technologies devoted to hunting small animals and gathering roots, tubers and seeds of various kinds. Principal game animals included were deer, mountain sheep, antelope, rabbits, small rodents, and various birds (Bean and Smith 1978). The Serrano spoke a language

that belongs to the Takic subfamily of the Uto-Aztecan language family, with some evidence of similarity with the Gabrielino (of the Los Angeles Basin) (Miller 1984).

European influence on the Serrano was limited until 1819, with the establishment of an asistencia near present-day Redlands (Bean and Smith 1978). By 1834, most of the western Serrano population had been displaced, with those located northeast of San Gorgonio Pass continued to thrive. Today, Serrano descendants are found mostly on the Morongo and San Manuel reservations, which are a modern-day culmination of Serrano, Cahuilla, and Cupeno lineages.

HISTORIC CONTEXT

In 1769, Spanish settlers began to enter and colonize Alta California, which caused the region to undergo an immense change. As early as 1827, Anglo-Americans were migrating into Southern California. In the decades to come, California would be taken by the United States with the end of the Mexican-American War and subsequent events such as the Civil War and California Gold Rush continued to shape the history of California.

Spanish Period (1769 to 1821) to Mexican Period (1821 to 1848)
The Spanish period began in 1769 with Captain Gaspar de Portolá's land expedition, and ended in 1821 with Mexican Independence. During the Spanish Period, the influence of San Luis Rey Mission (1798) was apparent throughout the surrounding regions, with much of the area used for cattle grazing. At its peak, the Mission controlled multiple ranches and claimed control over what is now western Riverside County and northern San Diego County, including the Project Area. Most land was managed as outlying ranches known as asistencias. The asistencias allowed the Luiseño of the area to reside in their villages and not move onto the mission itself. However, after control of the area shifted to Mexico, secularization began throughout the area and the missions and their associated ranches began to decline. The Mexican government proceeded to push settlements of Mexican populations from the south by deeding large grants to individuals who promised to employ settlers. Small villages were established on some ranchos, while small towns appeared in areas between ranchos. The Project Area, however, was not part of any Mexican land grant and the general area that is now Moreno Valley was largely uninhabited during these periods.

American Period (1848 to present)
The Gold Rush of 1849 saw a tremendous influx of Americans and Europeans flooding into Southern California. The passage of the Homestead Act of 1862 increased the influx of settlers within the region. Eventually, Riverside County was settled by homesteaders and farmers, and quickly became a diversified agricultural area with citrus, grain, grapes, poultry, and swine being the leading commodities. This influx of settlers led to population pressures and increased conflicts with the local indigenous groups. The passage of the Act for the Governance and Protection of Indians in 1850 further degraded the position of the Luiseño and Cahuilla. By 1877, The Cahuilla were moved to reservations in a checkerboard pattern throughout the Palm Springs and Coachella Valleys in Riverside County (Napton and Greathouse 1982) which broke up reservation land into discontinuous patchwork pieces, restricting access by the tribe to sacred lands and traditional gathering places. The Moreno Valley area remained unclaimed public land until 1870, when a large tract of over 13,400 acres were purchased from the U.S. government in a single transaction (Tang and Hogan 2013).

Development of the City or Moreno Valley began during the late 19th century. In 1883, Frank E. Brown ventured from Redlands into the Moreno Valley region and secured a large acreage that were platted into ten-acre tracts (Ellis 1912). This attracted settlers and farmers into the region and the Town of Moreno was established in Brown's honor in 1890 (Ellis 1912; P&D Consultants 2006). However, due to water conflicts and litigations that ultimate went in favor of the City of Redlands, a period of drought forced the failure of most farmers in the area and lead to

an exodus from the Town of Moreno to other closer locations like Riverside, dubbing the area and town "The Valley/Town on Wheels" (Ellis 1912; Ghori 2014; City of Moreno Valley 2020).

Figure 5. Frank Brown, far right, during pipeline placement, circa 1891 (Ghori 2014)

In 1918, the construction of a military training airfield in the area brought in new community growth. Located approximately 1.30 miles west of the Project Area, it was originally called the Alessandro Aviation Field, with its official name changed to March Air Field in honor of an Army pilot who had died during a training crash (Ghori 2014). First encompassing 640 acres of land, March Air Field grew to encompass more than 7,000 acres, with the base supporting 85,000 troops at its height of activity (City of Moreno Valley 2020). In 1996, March was realigned as an Air Reserves Base and is still currently active.

Figure 6. Postcard of March Air Field, unknown date (Ghori 2014)

From the late 1950s to the late 1980s, the Riverside International Raceway operated within Moreno Valley. Established by Rudy Cleye, it was considered a dangerous track and circuit changes occurred in 1969 (Racing Circuits 2018). It hosted many prominent races, including NASCAR championships (Ghori 2014). By 1989, the land the track was on was sold to create housing and a shopping mall, located 4.5 miles northwest of the Project Area

(Racing Circuits 2018). By 1984, the communities of Edgemont, Sunnymead, and Moreno voted to incorporate after prior failed efforts, and the City of Moreno Valley was established (City of Moreno 2020).

RESEARCH DESIGN

The objectives of an archaeological assessment are to locate, interpret, and evaluate the effects and significance of past human activities within the study area. The indicators of such activities are represented by cultural resources, which can consist of many different types of materials, organizational, distributional, and structural evidence that includes stone tools, historic neighborhoods, historic-era can scatters, village sites, food waste, tool manufacturing waste, trails, stone alignments, petroglyphs, hearths, or human skeletal remains. All of these types of resources are known to exist within the general Project region. The scope of this study is to identify and evaluate the significance of cultural resources within the Project Area and determine protective measures that would minimize negative impacts to these resources if avoidance is not possible.

LEGAL COMPLIANCE BASIS

This project is subject to both state and local regulations, including CEQA and the Riverside County General Use Plan. CEQA declares that it is state policy to "take all action necessary to provide the people of this state with...historic environmental qualities." It further states that public or private projects financed or approved by the state are subject to environmental review by the state. All such projects, unless entitled to an exemption, may proceed only after this requirement has been satisfied. CEQA requires detailed studies that analyze the environmental effects of a proposed project. In the event that a project is determined to have a potential significant environmental effect, the act requires that alternative plans and mitigation measures be considered. CEQA includes historic and archaeological resources as integral features of the environment. The level of consideration may vary with the importance of the resource.

The Moreno Valley General Plan's Objective 7.6 is to "identify and preserve Moreno Valley's unique historical and archaeological resources for future generations" (City of Moreno Valley 2006). Five policies aim to promote this objective, including Policy 7.6.2, "implement appropriate mitigation measures to conserve cultural resources that are uncovered during excavation and construction activities" (City of Moreno Valley 2006).

RESEARCH THEMES WITHIN THE PROJECT AREA

Riverside County and the Perris Valley have a rich prehistoric and historic cultural heritage. Prehistoric sites are known to occur along intermittent drainages, as well as in the hills west of the Project Area and are often associated with boulder outcrops. Food processing sites, consisting of bedrock grinding and milling features, and ground stone artifacts (whole and fragmentary) are found within this region. The closest known sites such as these are located along the foothills and canyons to the west, indicating that certain areas may have been used more frequently or for extended periods. Prehistoric rock art sites are known to exist in the general region; however, no such sites have been identified in the records search of the Project Area.

Future archaeological research within the general Project Area has the potential to address research questions regarding settlement patterns, site structure, subsistence strategies, trade and distribution networks and tool technologies. Questions for the Project have been selected to contribute to the context and understanding of the prehistory and history of California. Based on the literature review, research questions fall into several prehistoric and historic domains. The prehistoric research domains are Chronology and Cultural Affiliation, Subsistence and Site Function, and Toolstone Procurement and Use. Historic research topics focus primarily on the domain of Community Development. Defining research questions also helps focus the documentation of resources during survey so that artifacts, features and other remains that can contribute to an understanding of regional history and prehistory are carefully noted.

CHRONOLOGY AND CULTURAL AFFILIATION

At prehistoric sites throughout Riverside County, chronometric data generally derive from time-sensitive artifacts (e.g., projectile points, beads, and ceramics) and artifacts/organic materials that can provide absolute dating (e.g., obsidian hydration, and calibrated radiocarbon dating). Time-sensitive and dateable artifacts can occur in surface and subsurface contexts, the former sometimes less reliable than the latter in terms of dating archaeological components. Dateable organic remains (e.g., bone, shell, fiber, loose charcoal) occur in multiple contexts within an archaeological site, which include but is not limited to food processing, shell bead manufacturing, and burials.

Chronological measurements using absolute or relative (e.g., stratigraphy and seriation) methods can be used to compare and contrast temporal adaptive patterns in human behavior. For the most part, sites that can be dated have greater information potential than undated sites as they can be placed in time and help refine our understanding of long-and short-term changes in prehistoric human adaptation.

Given the importance of chronological data to all archaeological interpretation, it will be critical to document the presence of any time-sensitive artifacts within the Project Area. Sites that can contribute valuable chronological data may be recommended eligible for listing on CRHR under Criterion (4), research potential.

SUBSISTENCE-SETTLEMENT PATTERNS

Subsistence is one of the most basic of human needs that has a direct effect on human behavior. Prehistoric subsistence procurement activities consist of any number of variables including: site location in relation to land form, water supply, and raw materials; site size; site function; and duration of occupation. Material culture, such as lithic and ground stone tools, ceramics, and faunal and botanical remains, provide data representative of subsistence-related activities and strategies.

The Project Area is within a larger settlement area used by the Luiseño and Cahuilla, with the these cultures and the Serrano utilizing the region for trade. Information on the nature and intensity of prehistoric use of the Project Area, including the types of sites present, their density, and environmental context, will contribute to a more complete picture of settlement and subsistence patterns in this part of California. Combined with chronological information (above), this information can also assist in determining adaptive changes over time. Sites that can offer valuable data concerning prehistoric subsistence-settlement patterns may be recommended eligible for listing on CRHR under Criterion (4), research potential.

TOOL-STONE PROCUREMENT AND USE

Basic patterns in lithic materials use can be useful for reconstructing the approximate geographic extent of past settlement and trade systems. Sites that offer valuable information concerning patterns of raw material procurement and use and tool manufacture may be recommended eligible for listing on CRHR under Criterion (4), research potential, particularly if they are accompanied by chronological data that may be used to place stone-working behaviors in time.

HISTORIC RESEARCH DOMAINS

Historic archaeological sites can offer important data concerning any number of historic themes and may be recommended eligible for listing on CRHR under Criterion (4), research potential. They may also be eligible under Criterion (1) if they can be linked to certain historical events that are important to California's past, Criterion (2) if they are found associated with persons important in history, or under Criterion (3) if they contain structural features that are distinctive of a particular historic period or demonstrate an exceptional aesthetic quality. For the purposes of this project, we plan to focus historic period research on the theme of community development and built environments. The historic research domains will specifically address the historic-era built environment within the project vicinity, as it is felt that this topic is important to our understanding of the history in Western Riverside County.

SIGNIFICANCE EVALUATIONS

The criteria for listing resources on the California Register of Historic Resources (CRHR) were expressly developed to be in accordance with previously established criteria developed for listing on the National Register of Historic Places and require similar protection to that which the National Historic Preservation Act Section 106 mandates for historic properties. According to Public Resources Code (PRC) Section 5024.1(c) (1-4), a resource is considered historically significant if it meets at least one of the following criteria:

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; or
4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of manufacture and use. Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Note that California Historical Landmarks with numbers 770 or higher are automatically included in the CRHR.

Sites with the potential to yield artifacts and other data that can address research questions may be evaluated as eligible for CRHR listing per Criterion (4). Some prehistoric sites may be evaluated as CRHR-eligible under Criterion (1) if they relate to culturally significant events or (mythological) persons (Criterion 2), or represent high artistic forms (e.g., rock art), per Criterion (3).

Under CEQA, if an archaeological site is not a significant "historical resource" but meets the definition of a "unique archaeological resource" as defined in PRC Section 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined in PRC Section 21083.2(g) as follows:
An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing on the NRHP or CRHR nor qualify as a "unique archaeological resource" under CEQA PRC Section 21083.2 are viewed as not significant. Under CEQA, "A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" [PRC Section 21083.2(h)].

Under CEQA, impacts to historical resources that alter the characteristics that qualify the historical resource for listing on the CRHR are considered to be a significant effect. The impacts to a historical resource are considered significant if: The Project activities physically destroy or damage all or part of a resource; change the character of the use of the resource or physical feature within the setting of the resource which contribute to its significance; or introduce visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource. If it can be demonstrated that a Project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (Section 21083.2 (a), (b), and (c)).

TRIBAL CULTURAL RESOURCES

Assembly Bill (AB) 52 (Gatto; Stats. 2014, ch. 532), enacted in September 2014, sets forth both procedural and substantive requirements for analysis of tribal cultural resources as defined in Public Resources Code (PRC) Section 21074, and consultation with California Native American tribes. Tribal cultural resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a tribe. A tribal cultural resource is one that is either: (1) listed on, or eligible for listing on the CRHR or local register of historical resources (see section below); or (2) a resource that the CEQA lead agency, at its discretion and supported by substantial evidence, determines is significant pursuant to the criteria in PRC Section 5024.1, subdivision (c) (see PRC Section 21074). Further, because tribes traditionally and culturally affiliated with a geographic area may have specific expertise concerning their tribal cultural resources, AB 52 sets forth requirements for notification and invitation to government to government consultation between the CEQA lead agency and geographically affiliated tribes (PRC Section 21080.3.1[a]). Under AB 52, lead agencies must avoid damaging effects to tribal cultural resources, when feasible, regardless of whether consultation occurred or is required.

Tribal cultural resources per PRC 21074 (a)(1)(A)–(B) are defined as either of the following:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

    b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

    a) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

    b) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

METHODS

CALIFORNIA HISTORIC RESOURCES INVENTORY SYSTEM AND CULTURAL BACKGROUND RESEARCH

On February 25, 2020, Yahaira Gonzalez, B.A., MCC Archaeologist, conducted a search of the California Historical Resource Information System (CHRIS) at the Eastern Information Center (EIC), located at the University of California, Riverside, Riverside County. The search identified any previously recorded cultural resources and investigations within a 1-mile radius of the Project Area. The CHRIS search also included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Inventory of Historic Resources. Additional background research included historical aerial photos and a search of the Bureau of Land Management General Land Office Records.

NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

MCC requested a search of the Sacred Lands File from the Native American Heritage Commission (NAHC) on February 4, 2020. The Commission responded on February 18, 2020, stating that there are no known sacred lands within a 1-mile radius of the Project Area. The NAHC provided contact information for 21 Native American tribes or individuals who could potentially provide additional information regarding the general Project vicinity. MCC subsequently sent letters on February 18, 2020 to the 21 Native American contacts, requesting any information related to cultural resources or heritage sites within or adjacent to the Project Area. Additional attempts at contact by letter, email, or phone call were made on March 4, 2020 and March 18, 2020. MCC did not conduct formal consultation with Native American representatives.

FIELD SURVEY

The survey stage is a necessary component of a project's environmental assessment phase to verify the exact location of each identified cultural resource, the condition or integrity of the resource, and the proximity of the resource to areas of cultural resources sensitivity. Zachary White, B.A., MCC Archaeologist, conducted the survey of the proposed Project Area on March 6, 2020. The survey consisted of walking parallel transects spaced at approximately 6-meter intervals over the Project parcel, while closely inspecting the ground surface. Transects were oriented East to West due to the triangular shape of the Project Area. All undeveloped ground surface areas within the ground disturbance portion of the Project Area were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools or fire-affected rock), soil discoloration that might indicate the presence of a anthrosol, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Existing ground disturbances (e.g. cutbanks, ditches, animal burrows, etc.) were visually inspected. Representative photographs were taken of the entire Project Area and are located in the Results section.

RESULTS

CALIFORNIA HISTORIC RESOURCES INVENTORY SYSTEM AND CULTURAL BACKGROUND RESEARCH

The cultural resources search identified 26 prior cultural resources investigations within a 1-mile radius of the Project Area. One of these studies intersects the Project Area (see Table 1).

Table 1. Previously Conducted Investigations within 1-mile Buffer of Project Area

CHRIS Report Number	Authors	Year	Title of Study	Affiliation	Distance from Project Area
RI-00146	Joan R. Smith	1974	Archaeological Impact Evaluation: Eastern Water District, Sewage Pipeline, Mariposa Avenue to Existing Reclamation Facility, Sun City	Archaeological Research Unit, U.C. Riverside	Within 1 - mile
RI-01843	Scientific Resource Surveys, Inc.	1984	Cultural Resource Survey Report On Wolfskill Ranch	Scientific Resource Surveys, Inc.	Within ¼ mile
RI-02171	McCarthy, Daniel F.	1987	Cultural Resources Inventory For The City Of Moreno Valley, Riverside County, California	Archaeological Research Unit, U.C. Riverside	Within 1 - mile
RI-03693	Foster, John M., James J. Schmidt, Carmen A. Weber, Gwendolyn R. Romani, And Roberta S. Greenwood	1991	Cultural Resource Investigation: Inland Feeder Project, Metropolitan Water District Of Southern California	Greenwood & Associates	Intersects Project Area
RI-04745	Erika Thal	2004	Letter Report: Proposed Cellular Tower Project(s) in Riverside County, California, Site Name/ Number: CA-8863A/ Iris	EarthTouch, Inc.	Within 1 - mile
RI-05035	Mckenna et al.	2005	Letter Report: Monitoring at the Site of the Proposed Indian Middle School in the City of Perris, Riverside County, California	Mckenna et al.	Within ½ mile
RI-05294	White, Laurie	2000	Letter Report: Records Search Results For Sprint PCS Facility RV37XC917C (SCE Alessandro Substation), City Of Moreno Valley, Riverside County, CA	Michael Brandman Associates	Within 1 - mile
RI-06081	Lorna Billat	2004	Letter Report: Proposed Cellular Tower Project in Riverside County, California, Site Name/Number: CA-8868A/ Lasselle	EarthTouch, Inc.	Within 1 - mile
RI-06140	Aislin-Kay, Marnie	2004	Letter Report: Records Search and Site Visit Results for Cingular Telecommunications Facility Candidate SC-313-01 (El Potrero Park), Arroyo Park and Laselle Street, Moreno Valley, Riverside County, CA	Michael Brandman Associates	Within 1 - mile
RI-06278	Ahmet, Koral, and Evelyn N. Chandler	2005	Cultural Resources Survey for a Proposed Bikeway in Moreno Valley, Riverside County, California	ECORP Consulting, Inc.	Within 1 - mile
RI-06693	Tang, Bai "Tom"	2007	Letter Report: Historical/Archaeological Resources Study: MVRWRF Bardenpho Plant Modification Project, City of Moreno Valley, Riverside County, California	CRM Tech	Within 1 - mile
RI-07127	Jordan, Stacey C.	2007	Archaeological Survey Report for Southern California Edison Company: Conversion of Overhead to Underground Project on the Rule 20C, Riverside County, California (WO#6577-7281, AI#6-7227)	Jones & Stokes	Within ½ mile
RI-07573	Sanka, Jennifer M.	2008	Phase I Cultural Resources Assessment and Paleontological Records Review, APN 486-070-007, Moreno Valley, Riverside County, California	Michael Brandman Associates	Within 1 - mile

Table 1. Previously Conducted Investigations within 1-mile Buffer of Project Area

CHRIS Report Number	Authors	Year	Title of Study	Affiliation	Distance from Project Area
RI-07618	Tang, B. and Hogan M.	2007	Identification and Evaluation of Historic Properties: Moreno Valley Regional Water Reclamation Facility Bardenpho Plant Modification Project	CRM Tech	Within 1 - mile
RI-08124	Wayne Bonner And Marnie Aislin-Kay	2008	Letter Report: Cultural Resource Records Search and Site Visit Results for Royal Street Communications Candidate IE24896A (Extra Space Storage), 16340 Perris Boulevard, Moreno Valley, Riverside County, California	Michael Brandman Associates, Irvine, California	Within ¼ mile
RI-08477	Kurt Heidelberg	2009	Archaeological Survey Report: for Southern California Edison's Service Pole Replacement on the Bazooka 12kV Transmission Line in Moreno Valley, Riverside County, California	AECOM, Inc.	Within ½ mile
RI-09077	Jeanette A. Mckenna	2014	A Phase I Cultural Resources Survey For The Proposed Walmart Supercenter on Approximately 22.28 Acres of Land In The City of Moreno Valley, Riverside County, California	McKenna et al.	Within ½ mile
RI-09311	Carrie D Wills	2014	Cultural Resources Records Search and Site Visit Results for Verizon Wireless Candidate "Gentian", 16015 North Perris Boulevard, Moreno Valley, Riverside County, California	First Carbon Solutions	Within ¼ mile
RI-09413	Brian F. Smith and Associates Inc.	2013	A Phase I Cultural resources Assessment for the Modular Logistics Center, Moreno Valley, Riverside County, California	Brian F. Smith and Associates Inc.	Within 1 - mile
RI-09528	Mary M. Lenich and Brian F. Smith		Phase I Cultural Resources Survey for the Moreno Valley Logistics Center Project City of Moreno Valley, County of Riverside	Brian F. Smith and Associates Inc.	Within 1 - mile
RI-09681	Carrie D. Wills and Sarah A. Williams	2016	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE953617 (Alessandro Substation) 15901 Kitching Street, Moreno Valley, Riverside County, California	Environmental Assessment Specialists, Inc.	Within 1 - mile
RI-09828	Elizabeth Wilk	2015	Addendum to FCC Form 620: Gogh/Ensite #25674 (284941), 15091 Kitching Street, Moreno Valley, Riverside County, California 92551, EBI Project #6115003214/ E-106 File Number 0006967049, FCC_2015_1005_009	EBI Consulting	Within 1 - mile
RI-09903	Sabrina R. Corcoran and Brian F. Smith	2016	Phase I Cultural Resources survey of the San Michele Business Center Project, City of Moreno Valley, County of Riverside	Brian F. Smith and Associates, Inc.	Within 1 - mile
RI-10498	David Brunzell	2018	Cultural Resources Assessment Moreno Valley Storage Project City of Moreno Valley, Riverside County, California	BCR Consulting LLC	Within 1 - mile
RI-10700	Don C. Perez	2015	Cultural Resources Survey Gogh / Ensite #25674 (284941)	EBI Consulting	Within 1 - mile
RI-10827	Sarah A. Williams and Carrie D. Wills	2019	Cultural Resource Records Search and Site Visit Results for AT&T Mobility Candidate CSL02876 (Iris Plaza), 16110 Perris Boulevard, Moreno Valley, Riverside County, California (EBI Project Number 6119000825)	HELIX Environmental Planning, Inc.	Within ¼ mile

A total of five previously recorded cultural resources were identified within a 1-mile radius of the Project Area, with none of these recorded within the Project Area. No previously recorded cultural resources have been

documented in the Project Area. Resources identified in the records search include one prehistoric resource and four historic resources (See Table 2). The closest mapped archaeological resource (P-33-023936/CA-RIV-011757) is located less than ½ mile northwest of the Project Area. P-33-023936/CA-RIV-011757 is a historic ranch/farm, known as the Barron/Lantz Holdings.

Table 2. Previously Recorded Resources within 1-mile Buffer of Project Area

Primary Number	Trinomial	Age	Attributes	NRHP/CRHR	Distance from Project Area
P-33-007920		Historic	HP02: Single family property	N/A	Within 1-mile
P-33-015301		Prehistoric	AP16: Other (Isolate)	N/A	Within 1-mile
P-33-023936	CA-RIV-011757	Historic	HP33: Ranch/farm	N/A	Within ½ mile
P-33-028072	CA-RIV-012673	Historic	AH04: Privies/dumps/trash scatters	N/A	Within 1-mile
P-33-028073	CA-RIV-012674	Historic	AH04: Privies/dumps/trash scatters	N/A	Within 1-mile

The complete results of the CHRIS resources records searches are included as Confidential Appendix B of this report.

Several additional sources were consulted for this project as well (Table 3). Additional sources did not identify significant potential for historic-era or prehistoric cultural resources.

Table 3. Additional Sources Consulted for the Project

Source	Results
National Register of Historic Places (1979-2002 & supplements)	Negative
Historical United States Geological Survey topographic maps (USGS 2012)	Some agricultural disturbance noted until 1990s, with increase development in the surrounding area since the 1990s
Historical United States Department of Agriculture aerial photos	Some agricultural disturbance noted until 1990s, with increase development in the surrounding area since the 1990s
California Register of Historical Resources (1992-2010)	Negative
California Inventory of Historic Resources (1976-2010)	Negative
California Historical Landmarks (1995 & supplements to 2010)	Negative
California Points of Historical Interest (1992 to 2010)	Negative
Local Historical Register Listings	Negative
Bureau of Land Management General Land Office Records	Negative

A review of historical aerial photographs and topographic maps indicate that prior to 1990s, the Project Area was agricultural (Figures 7 and 8). By the late 1990s, the surrounding area saw increased commercial and residential development that has continued up to the present day (Figure 9).

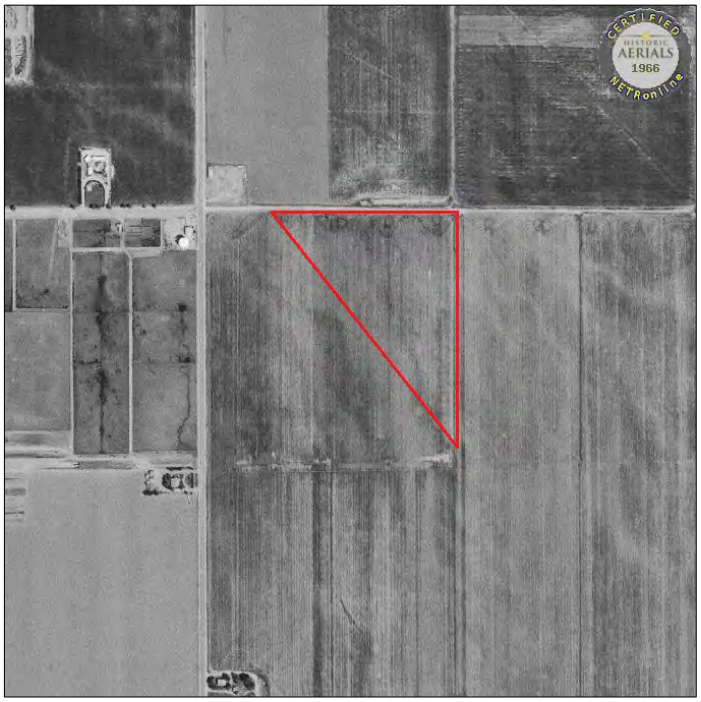


Figure 7. Project Area with agricultural activity (as depicted on 1966 aerial)

Figure 8. Project Area with some disturbance and increased surrounding development (as depicted on 2002 aerial)

Figure 9. Project Area with additional development to the south-southeast (as depicted on 2012 aerial)

NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

As a result of the effort to contact the 21 Native American Tribes or individuals identified by the NAHC, MCC received seven responses. These responses came in the form of letters, emails, and phone calls. Below is a summary of the responses provided by Native American Tribes.

On March 9, 2020, MCC received an email from Arysa Gonzalez Romero, Historic Preservation Technician for the Agua Caliente Band of Cahuilla Indians (ACBCI), who notified MCC that the Project is located within the tribe's Traditional Use Area. ACBCI THPO requested copies of any cultural resource documentation generated in connection with the report; copy of the record search; and description of proposed Project.

On February 26, 2020, MCC received an email from Travis Armstrong, Tribal Historic Preservation Officer for Morongo Band of Mission Indians (Morongo). Mr. Armstrong stated that Morongo had no additional comments to provide to MCC at this time but may provide other information to the lead agency during the AB-52 consultation process.

On March 17, 2020, MCC received an email from Molly Earp-Escobar, Cultural Planning Specialist for the Pechanga Band of Luiseno Indians, stating that the Project Area is not within reservation lands although it is within their ancestral territory. The tribe requested to be involved in the project.

On March 3, 2020, MCC received an email from Alexandra McCleary, Tribal Archaeologist for the San Manuel Band of Mission Indians, who stated that the Project is located outside of Serrano ancestral territory and tribe will not be requesting consulting party status

On March 18, 2020, MCC received an email from Jessica Valdez, Cultural Resource Specialist for the Soboba Band of Luiseno Indians, who notified MCC that the Project Area is considered sensitive by the people of Soboba, as

there are existing sites in the surrounding areas. An in-house database search identified multiple areas of potential impact. Specifics will be discussed in direct consultation with the lead agency

MCC contacted Mercedes Estrada from the Santa Rosa Band of Cahuilla Indians via phone call on March 18, 2020. Marina Hendon received the phone call and stated Ms. Estrada is no longer employed by the tribe. Additionally, Ms. Hendon stated that the tribe had no response regarding this project.

MCC contacted Michael Mirelez, Cultural Resource Coordinator for Torres-Martinez Desert Cahuilla Indians via phone call on March 18, 2020. During the phone call, Mr. Mirelez deferred to Soboba for any comments related to the proposed Project.

As of March 27, 2020, MCC has not received any additional responses from the remaining NAHC-listed groups or individuals we contacted for information. Should MCC receive additional responses once the final report is submitted, the information will be passed on to the Proponent to be added to the report as an addendum. The NAHC and Native American correspondence materials, including our communication attempts, are provided as Appendix C.

FIELD SURVEY RESULTS

During the course of fieldwork, survey conditions were fair (See Figures 10 through 13). Ground visibility in the entire Project Area was fair, ranging from less than 10 to 80% due to prior ground disturbance and overgrown vegetation within the Project Area. Disturbances within the Project Area include vehicular activity and modern dumping of concrete and bricks remnants. Soil observed during fieldwork was noted as light brown, fine-grain sandy loam consistent with alluvial fan deposits mapped in the area. No cultural resources were identified during the survey.

Figure 10. Overview of Project Area from northwestern corner, view towards east

Figure 11. Overview of Project Area from northern corner, view towards west

Figure 12. Representative photo of concrete and brick dumping observed within Project Area, view towards west

Figure 13. Overview of vehicular road within Project Area, view southeast

Figure 14. Overview of Project Area from southern boundary, view towards northwest

CONCLUSIONS AND RECOMMENDATIONS

The Phase I cultural resource assessment of the Project Area included a CHRIS records search, NAHC outreach, background research, and a field pedestrian survey. The record search indicated five previously recorded resources located within a 1-mile radius of the area, with no resources located directly within the Project Area. Based on the results of the cultural resources search and survey, the proposed Project Area is considered to have a low sensitivity for presence of significant prehistoric or historical archaeological deposits or features. MCC recommends ***No Mitigation is Needed***. While we do not recommend additional mitigation, MCC does recommend setting a plan in place to expediently address inadvertent discoveries and human remains (as described below), should these be encountered during construction activities. MCC also notes at least two Native American tribes, Soboba and Morongo, request to proceed with AB-52 consultation proceedings with the Project Proponent and the Lead Agency. MCC recommends that the consultation process be initiated as soon as possible, to avoid unnecessary delays to Project development and implementation.

INADVERTENT DISCOVERIES

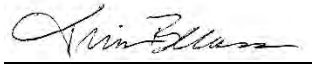
Despite actions taken to ensure that all cultural resources are located prior to construction, including record searches and field surveying, there is a possibility that undiscovered, buried archaeological resources might be encountered during construction. In the event that these resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

HUMAN REMAINS

Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial must cease and any necessary steps to ensure the integrity of the immediate area must be taken. The Riverside County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

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

Date: **March 27,2020**

Signed: 

Printed Name: **Tria Belcourt, M.A., RPA, Qualified Riverside County Archaeologist**
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