

March 6, 2023

14279

Opher Benrimon
AP Investors Group LLC
9220 Winnetka Avenue
Chatsworth, California 91311

Subject: Final Archaeological Resources Assessment for the 1M Warehouse Project, Town of Apple Valley, San Bernardino County, California

Dear Mr. Opher Benrimon:

This letter report documents the cultural resources assessment conducted by Dudek for the 1M Warehouse Project (proposed Project), located within the Town of Apple Valley, San Bernardino County, California. The present study documents the results of a California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center (SCCIC), review historical maps and aerial photographs, review of a geotechnical report prepared for the proposed Project site, an archaeological pedestrian survey, analysis of the sensitivity of the proposed Project site to contain archaeological resources, as well as management recommendations. The Town of Apple Valley (Town) is the lead agency responsible for compliance with California Environmental Quality Act (CEQA).

Project Location

The approximately 68.2-acre proposed Project site is located in the northern part of the Town, within the Victor Valley Region of San Bernardino County. Specifically, the proposed Project site falls on public land survey system Sections 14, 15, 21, 22, and 23 of Township 6 North, Range 3 West on the *Apple Valley North*, CA 7.5-minute United States Geological Survey (USGS) Quadrangle (Appendix A: Figure 1, Project Location). The proposed Project site is bordered to the west by Central Road, to the east by Sycamore Lane and vacant land and residential uses, to the south by Lafayette Street and Apple Valley Fire Center, and to the north by Johnson Road and consists of Assessor's Parcel Numbers (APNs) 0463-241-02 and 0463-241-03 (Appendix A: Figure 2, Project Site).

Project Description

The proposed Project would include the construction of an industrial/warehouse building and associated improvements on approximately 68.2 acres of vacant land. The proposed Project would provide 1,080,125 square feet of industrial/warehouse space, up to 15,000 square feet of office space, and include associated improvements, such as 224 loading docks, 560 auto stalls, 317 tractor-trailer stalls, approximately 1,572 passenger vehicle parking spaces, including frontage landscaping and pedestrian improvements. Paved passenger vehicle parking areas would be provided along the southern and northern portions of the building, while tractor-trailer stalls and loading docks would be provided along the western and eastern portions of the building. Parking

areas would include designated areas for electric vehicles. Access to the proposed Project site would be provided by four driveways: two driveways would be located on Lafayette Street; one on Central Road; and one on Johnson Road. All of which would be 40 feet wide, full access driveways. A variety of trees, shrubs, plants, and land covers would be planted within the proposed Project frontage's landscape setback area, as well as within the landscape areas found around the proposed industrial/warehouse building and throughout the proposed Project site for a total of approximately 43,998 square feet of landscaping.

Given the vacant, undeveloped nature of the proposed Project site, both wet and dry utilities, including domestic water, sanitary sewer, and electricity, would need to be extended onto the proposed Project site as follows:

- New off-site water lines would be installed along Central Road and Johnson Road. The water lines would run from the intersection of Central Road and Lafayette Street to the intersection of Central Road and Johnson Road. Additionally, on Johnson Road, the newly constructed water lines would run from the intersection of Sycamore Lane and Johnson Road and would extend to the intersection of Somis Avenue and Johnson Road, approximately 0.25 miles west of the proposed Project site. The proposed warehouse building would connect to these water line improvements.
- New sewer lines would be installed along Central Road and Lafayette Street. The sewer line on Central Road would run from the northwest corner of the proposed Project site, at the intersection of Central Road and Johnson Road, to the southwest corner of the site, at the intersection of Central Road and Lafayette Street. Additionally, the sewer line along Lafayette Street would run from the proposed Project's southwest corner to the intersection of Rialto Avenue and Lafayette Street, approximately 0.75 miles west of the proposed Project site.

Additionally, a new engineered stormwater drainage system would be constructed on the Project site to collect and treat on-site stormwater.

In addition to the proposed construction and improvement activities discussed above, upgrades would be required with respect to electric power, natural gas, and telecommunication facilities (i.e., cable television services). These utilities would be part of a dry utility package that would be installed on site from their locations immediately fronting the proposed Project site to provide service to the proposed Project.

Based on the current proposed Project design and a review of the recommendations of the geotechnical report prepared for the proposed Project site, construction activities would include site preparation (e.g., vegetation clearing, grubbing, tree removal, discing), grading, building construction, trenching for the installation of utilities, and paving. The following depths of ground disturbance is anticipated during implementation of the proposed Project: between 4 to 14 feet across the proposed Project site and a maximum depth of 22 feet along the east side of the proposed Project site for the storm drain.

Environmental Setting

The currently vacant and undeveloped proposed Project site is situated within the geomorphic province of the Mojave Desert, which is bound to the northwest and south by the Transverse Ranges including the northern peninsular Tehachapi Mountains and the southern San Gabriel Mountains and San Bernardino Mountains. More specifically, the proposed Project site is within Victor Valley in the western Mojave Desert. Water sources near the

proposed Project site include the Oro Grande Wash, a tributary of the Mojave River, approximately 10 miles to the west; the Mojave River proper, approximately 9.5 miles to the southwest; the California Aqueduct, approximately 16 miles to the southwest; and Spring Valley Lake, an anthropogenic lake created for a country club, approximately 8 miles to the southwest. The proposed Project site is relatively flat with elevation ranges between approximately 3,130 and 3,170 feet above mean sea level (amsl) and slopes gently towards the southwest. There are no substantial topographical features in the proposed Project site; however, smaller ephemeral desert washes that drain toward the southwest are present.

Ground surface cover consists of moderate native brush and desert shrub growth with some Joshua trees. The proposed Project site has been subject to disturbance as a result of several dirt roads that intersect it and illegal dumping and trespassing activities.

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2023a), two (2) primary types of soils have been identified within the proposed Project site and off-site improvements primarily; these soils consist of Helendale-Bryman loamy sands, with 2 to 5 percent slopes, and include Cajon-Arizo Complex with 2 to 15 percent slopes. All available official soil descriptions are summarized below :

- **Helendale Series** (USDA 2023b): The Helendale series consists of very deep, well drained soils that formed in alluvium from granitoid rocks. These soils are found on fan piedmonts, fan remnants, alluvial fans and terraces with 0 to 15 percent slopes. A typical Helendale pedon extends from 0 to 106 inches below the ground surface (bgs).
- **Cajon Series** (USDA 2023c): The Cajon series consists of very deep, somewhat excessively drained soils that formed in sandy alluvium from dominantly granitic rocks. These soils are found on alluvial fans, fan aprons, fan skirts, inset fans and river terraces with 0 to 15 percent slopes. A typical Cajon pedon extends from 0 to 60 inches bgs.

A review of the United States Geological Society (USGS) mineral resources (USGS 2023a) online spatial data for geology revealed that native soils within the proposed Project site and off-site improvements are comprised of Older Quaternary alluvium and marine deposits from the Pleistocene epoch. The terminal Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use that have potential to preserve cultural material in context, depending on area-specific topographical setting.

Regulatory Context

Work for this Project was conducted in compliance with the California Environmental Quality Act (CEQA). The regulatory framework as it pertains to cultural resources under CEQA is detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC Sections 21083.2 and 21084.1), the CEQA Guidelines (14 CCR 15064.5), and California Public Resources Code (PRC) Section 5024.1 (14 CCR 4850 et seq.), properties expected to be directly or indirectly affected by a Project must be evaluated for California Register of Historical Resources (CRHR) eligibility (PRC Section 5024.1).

The purpose of the CRHR is to maintain listings of the state’s historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term historical resources includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR 15064.5[a]). The criteria for listing properties in the CRHR were developed in accordance with previously established criteria developed for listing in the National Register of Historic Places. The California Office of Historic Preservation regards “any physical evidence of human activities over 45 years old” as meriting recordation and evaluation (OHP 1995:2).

State

The California Register of Historical Resources

A cultural resource is considered “historically significant” under CEQA if the resource meets one or more of the criteria for listing on the CRHR. The CRHR was designed to be used by state and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

1. is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. is associated with the lives of persons important in our past;
3. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Under CEQA, if an archeological site is not a historical resource but meets the definition of a “unique archeological 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 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:
 - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
 - Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
 - Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing in the 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]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a Project are thus considered significant if the project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts 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 (PRC Sections 21083.2(a)–(c)).

Section 21083.2(g) defines a unique archaeological resource as 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.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on nonunique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a nonunique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery,

no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

Local

Town of Apple Valley General Plan

The Town of Apple Valley General Plan contains the following goals and policies that address cultural resources and are applicable to the Project (Town of Apple Valley 2009):

Open Space and Conservation Element of the General Plan

GOAL: That all elements of the Town’s cultural heritage, including archaeological and historic sites, artifacts, traditions, and other elements, shall be professionally documented, maintained, preserved, conserved, and enhanced.

- **Policy 1.A** Early in the planning process, the Town shall implement its obligation to identify, document and assess archaeological, historical, and cultural resources that proposed development projects and other activities may affect.
 - **Program 1.A.1** Where proposed development or land uses have the potential to adversely impact sensitive cultural resources, it shall be subject to evaluation by a qualified specialist, comprehensive Phase I studies and appropriate mitigation measures shall, as necessary, be incorporated into project approvals.
 - **Program 1.A.2** The Town shall implement the requirements of state law relating to cultural resources, including Government Code 65352.3, and any subsequent amendments or additions.
- **Policy 1.B** The Town shall establish and maintain a confidential inventory of archaeological and historical resources within the Town, including those identified in focused cultural resources studies.
- **Policy 1.C** The Town shall, to the greatest extent possible, protect sensitive archaeological and historic resources from vandalism and illegal collection.
 - **Program 1.C.1** Any information, including mapping, that identifies specific locations of sensitive cultural resources, shall be maintained in a confidential manner, and access to such information shall be provided only to those with appropriate professional or organizational ties.
- **Policy 1.D** Public participation in and appreciation of the Town’s cultural heritage shall be encouraged.
 - **Program 1.D.1** The Town shall implement a systematic program to enhance public awareness of Apple Valley’s heritage, engender wide-ranging support for its preservation, and enhance community pride.

- Program 1.D.2 The Town shall support the efforts of local cultural associations to obtain historical materials and artifacts, and to educate the public about the Town’s and region’s cultural heritage.

Background Research

SCCIC Records Search

On October 13, 2022 and December 6, 2022, Dudek conducted CHRIS records searches at the SCCIC, located at the California State University, Fullerton. The searches included any previously recorded cultural resources and investigations within a 0.5-mile radius of the proposed Project site. The CHRIS search also included a review of the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list.

Dudek reviewed the available SCCIC records to determine whether the implementation of the proposed Project would have the potential to impact any known and unknown cultural resources. The confidential records search results are provided in Confidential Appendix B.

Previously Conducted Cultural Resource Studies

Results of the CHRIS database records search indicate that six (6) previous cultural resource studies have been conducted within the records search area between 1991 and 2011. Of these studies, two (2) studies are mapped as adjacent to the proposed Project site and four (4) are mapped as overlapping the proposed off-site improvements. The CHRIS records search results indicate that although some studies address portions of the proposed offsite improvements for the Project the Project site has not been subjected to any previous archaeological investigations. Table 1, below, summarizes all previous cultural resources studies and is followed by a brief summary of reports that address the proposed Project site and/or the proposed off-site improvements.

Table 1. Previously Conducted Cultural Resources Studies Within a 0.5-Mile of the Proposed Project Site and Off-Site Improvements

SCCIC Report Number (SB-)	Authors	Year	Title	Proximity to/ Percentage Addressing Proposed Project Site	Proximity to/ Percentage Addressing Proposed Off-site Improvements
02778	Lerch, Michael K.	1993	Class III Cultural Resources Inventory of Proposed Drill Site Access Roads, Castle Mountain Venture, San Bernardino County, CA	Outside; 0 percent	Overlaps; ~10 percent

Table 1. Previously Conducted Cultural Resources Studies Within a 0.5-Mile of the Proposed Project Site and Off-Site Improvements

SCCIC Report Number (SB-)	Authors	Year	Title	Proximity to/ Percentage Addressing Proposed Project Site	Proximity to/ Percentage Addressing Proposed Off-site Improvements
03677	Robert and Laurie White	2001	A Cultural Resource Assessment of the 300 Acre Pluto Development, Inc Property, SE corner of Johnson Road & Dale Evans Pkwy, Town of Apple Valley, San Bernadino County, CA. 15PP.	Outside; 0 percent	Outside; 0 percent
04557	Dice, Michael	2002	An Archaeological & Paleontological Resources Assessment of 13,700' Navajo Road Sewer Project, Town of Apple Valley, CA. 39PP.	Outside; 0 percent	Overlaps; ~5 percent
04808	Smallwood, Josh	2007	Cultural Resources Technical Report: North Apple Valley Specific Plan and EIR, Town of Apple Valley, San Bernardino County, California.	Adjacent to the west; 0 percent	Overlaps; ~10 percent
05401	Jordan, Stacey C.	2007	Archaeological Survey Report for the Southern California Edison Company, Standing Rock 12kV Circuit Project, San Bernardino County, California.	Adjacent to the east; 0 percent	Outside; 0 percent
07116	Cisneros, Charles W.	2011	Cultural Resources Survey for the Apple Valley Airport Master Plan Project, San Bernardino County, California	Outside; 0 percent	Overlaps; ~20 percent

Notes: ~ denotes approximate.

SB-02778

Class III Cultural Resources Inventory of Proposed Drill Site Access Roads, Castle Mountain Venture, San Bernardino County, CA (Lerch 1993) documents the results of a Class III intensive cultural resources inventory for a project within the jurisdiction of the Bureau of Land Management (BLM) and in compliance with Section 106 of the National Historic Preservation Act (NHPA). The inventory included a records search, literature review, and archaeological survey. The area of study overlaps approximately 10 percent of the current proposed off-site improvement area, south of Lafayette Street, and west and outside of the current proposed Project site. The study focused on areas of proposed access roads and mineral exploration drill-hole sites. No historic-period or prehistoric resources or historic properties were identified as a result of this study and as such, no recommendations for archaeological resources was required.

SB-04557

An Archaeological and Paleontological Resource Assessment of the 13,700-Foot Navajo Road Sewer Project, Town of Apple Valley, California (Dice 2002) documents the results of a Phase I cultural resources assessment for a proposed sewer project that consisted of an approximately 16-acre linear study area. The study was prepared in compliance with CEQA and Section 106 of the NHPA. The assessment included a records search and literature review for cultural resources, and a survey. The area of study overlaps approximately 5 percent of the current proposed off-site improvement area, at Lafayette Street, and west and outside of the current proposed Project site. As a result of the survey conducted in support of the sewer project, one (1) resource was newly identified, this resource is outside of the 0.5-mile records search buffer. The study concluded that there is a moderate potential for encountering subsurface cultural deposits during earthmoving activities and recommended archaeological monitoring. Additionally, the study recommends the development of an archaeological mitigation plan and discovery/treatment plan to be implemented during earth moving activities for the inadvertent discovery of archaeological resources and human remains.

SB-04808

Cultural Resources Technical Report, North Apple Valley Specific Plan and EIR, Town of Apple Valley, San Bernardino County, California (Tang et al. 2007) documents the results of a Phase I cultural resources assessment consisting of a records search, literature review, Native American coordination, and reconnaissance-level pedestrian survey. The study area encompassed an approximately 7.75-square-mile area, 2 miles along Central Road, which overlaps the current proposed off-site improvement area, and is adjacent to the west of the current proposed Project site. The cultural resources inventory did not identify any cultural resources or areas of sensitivity within the current proposed Project site or off-site improvement areas. The study determined that there is a low sensitivity for historic-period resources associated with settlement and land use patterns from the early twentieth century. As a result of the findings, the study recommended the following: a cultural resources study be completed for the areas selected for development within the Specific Plan boundaries 10 years after the results of the study's findings, including a current intensive-level survey; and review of previous investigations to determine the presence or absence of cultural resources within the Specific Plan area.

SB-05401

Archaeological Survey Report for the Southern California Edison Company, Standing Rock 12kV Circuit Project, San Bernardino County, California (Jordan 2007) documents the results of an archaeological survey report for a project in support of a proposed new pole installation, existing pole removal, and underground line extension on approximately 7.4 acres of private land for Southern California Edison (SCE) and was prepared in compliance with Section 106 of the NHPA. The inventory completed for the report includes a records search, literature review, and pedestrian survey. The area of study is adjacent to the proposed Project site to the east, however, does not address the proposed Project site (0 percent). As a result of the survey conducted in support of the SCE project, one (1) resource was newly identified given the field identifier "SCE 65.01", which is in the CHRIS database as resource P-36-013314. This resource is documented as a historic-period residential site consisting of two concrete foundations and trash scatter including metal, glass, and ceramic fragments. Of note, this resource is outside, but adjacent to, the current proposed Project site. The study concluded that the SCE project would likely impact resource P-36-013314 and therefore, recommended the following: monitoring of the resource by a qualified archaeologist during project construction activities; consultation with a qualified archaeologist in the event of an inadvertent discovery

of buried cultural deposits; projects in the vicinity to be halted until the resource can be evaluated for significance management recommendations are made; and the inadvertent discovery clause to be added to construction and engineering plans.

SB-07116

Cultural Resources Survey for the Apple Valley Airport Master Plan Project, San Bernardino County, California (Cisneros 2011) documents the results of a Phase I cultural resources assessment consisting of an archival records search, literature review, Native American coordination, and pedestrian survey. The study area encompassed an approximately 100-acre area, which overlaps approximately 20 percent of the current proposed off-site improvement area, at Lafayette Street, and west and outside of the current proposed Project site. As a result of the records search, 11 previously recorded cultural resources were identified within the study’s 0.5-mile records search buffer. Of these, one historic-period archaeological site (CA-SBR-6838H), which is located inside the current 0.5-mile study area, is documented as a rock feature was encountered during the pedestrian survey and the record was updated in the CHRIS database. Additionally, as a result of the pedestrian survey, four (4) newly identified cultural resources were encountered consisting of historic-period domestic refuse scatters that were given the following field identifiers: AVA-S-01, AVA-S-02, AVA-S-03, and AVA-S-04. The study found that all four (4) resources were ineligible for the CRHR and therefore, concluded no additional cultural resources work was required; however, the study recommended notifying a qualified archaeologist to evaluate any inadvertent cultural resource discoveries.

Previously Recorded Cultural Resources

The CHRIS records indicate that ten (10) cultural resources have been previously recorded within 0.5-mile of the proposed Project. Of these, one (1) is a prehistoric site, one (1) is a prehistoric isolate, five (5) are historic-period archaeological resources, two (2) are historic-period archaeological isolates, and one (1) is a multi-component resource, which consists of both historic-period and prehistoric archaeological components. The resource nearest the proposed Project site is a historic-period archaeological site (P-36-013314) located adjacent to the eastern portion of the proposed Project site. The remaining resources identified through the CHRIS records search are located to the north and southwest of the proposed Project site. Table 2, below, summarizes all previously recorded cultural resources identified within the records research radius followed by summaries of each.

Table 2. Previously Recorded Cultural Resources Within a 0.5-Mile of the Proposed Project Site and Off-Site Improvements

Primary (P-36-)	Trinomial (CA-SBR-)	Resource Age and Type	Resource Description	NRHP/CRHR Eligibility	Recording Events	Proximity to Proposed Project Site/Off-Site Improvements (~)
006838	006838H	Archaeological site: Historic-period	Rock feature	7R: Not evaluated	1990 (Sundberg and Des'Autels)	Project Site: 390 meters (1,280 feet) South

Table 2. Previously Recorded Cultural Resources Within a 0.5-Mile of the Proposed Project Site and Off-Site Improvements

Primary (P-36-)	Trinomial (CA-SBR-)	Resource Age and Type	Resource Description	NRHP/CRHR Eligibility	Recording Events	Proximity to Proposed Project Site/Off-Site Improvements (~)
						Off-site Improvements: Outside
006842	006842H	Archaeological site: Historic-period	Domestic refuse scatter, dating 1907+	7R: Not evaluated	1990 (Sundberg and Des'Autels)	Project Site: 440 meters (1440 feet) south Off-site Improvements: Outside
012856	-	Archaeological isolate: Historic Period	Baking powder can, dating 1925-1950	7R: Not evaluated	2006 (Sanka)	Project Site: 780 meters (2,560 feet) southwest Off-site Improvements: Outside
012857	-	Archaeological isolate: Historic Period	Hole-in-top can, likely dating 1900+	7R: Not evaluated	2006 (Sanka)	Project Site: 180 meters (590 feet) southwest Off-site Improvements: Outside
013314	-	Archaeological site: Historic Period	Two concrete foundations and domestic refuse scatter	7R: Not evaluated	2006 (Tsunoda)	Project Site: Immediately adjacent to east Off-site Improvements: Outside
020978	013512	Archaeological site: Prehistoric	Lithic scatter	7R: Not evaluated	2009 (Fulton)	Project Site: 260 meters (850 feet) north Off-site Improvements: Outside

Table 2. Previously Recorded Cultural Resources Within a 0.5-Mile of the Proposed Project Site and Off-Site Improvements

Primary (P-36-)	Trinomial (CA-SBR-)	Resource Age and Type	Resource Description	NRHP/CRHR Eligibility	Recording Events	Proximity to Proposed Project Site/Off-Site Improvements (~)
020982	013516H	Archaeological site: Multi-Component (Historic-period and Prehistoric)	Remnants of residential structures and features; refuse; two basalt flakes.	7R: Not evaluated	2009 (Fulton)	Project Site: 290 meters (950 feet) north Off-site Improvements: Outside
020983	-	Archaeological site: Historic Period	Concrete footing and well head	7R: Not evaluated	2009 (Fulton)	Project Site: 80 meters (260 feet) north Off-site Improvements: Outside
020984	-	Archaeological site: Historic Period	Concrete footing	7R: Not evaluated	2009 (Fulton)	Project Site: 30 meters (100 feet) north Off-site Improvements: Outside
061206	-	Archaeological isolate: Prehistoric	Chert flake	7R: Not evaluated	1990 (Sundberg and Des'Autels)	Project Site: 490 meters (1610 feet) southwest Off-site Improvements: Outside

Notes: ~ denotes approximate.

P-36-006838/(CA-SBR-006838H)

P-36-006838 is a historic-period archaeological site measuring approximately 4.5 meters by 4.5 meters (15 feet by 15 feet) at an elevation of 3,060 feet above mean sea level (amsl) and is located approximately 390 meters (1,280 feet) south of the proposed Project site. P-36-006838 is documented as a “U” shaped enclosure comprised of a single course of more or less rectangular rocks”. The site was formally recorded in 1990 by Sundberg and

Des'Autels who noted the presence of modern trash in and around the enclosure. P-36-006838 has not been formally evaluated for the CRHR or NRHP.

P-36-006842/(CA-SBR-006842H)

P-36-006842 is a historic-period archaeological site measuring approximately 15 meters by 25 meters (49 feet by 82 feet) at an elevation of 3,040 feet amsl and is located approximately 440 meters (1440 feet) south of the proposed Project site. P-36-006842 is documented as consisting of bottles, glass fragments, dinner wares, a possible basin, canning jar seals, a tobacco can, coffee cups, a screen door, metal hinges, clothing, cartridge clips, three metal straps, ceramics, solarized glass and a KC Baking Powder can. The site was originally formally recorded in 1990 by Sundberg and Des'Autels who described the site as a domestic trash scatter likely dating to prior to 1915. The site record was updated in 2006 by Sanka who documented the date of the site as 1907+. P-36-006842 has not been formally evaluated for the CRHR or NRHP.

P-36-012856

P-36-012856 is a historic-period archaeological isolate located at an elevation of 3,020 feet amsl and is located approximately 780 meters (2,560 feet) southwest of the proposed Project site. P-36-012856 is documented as a "KC Baking Powder" can dating to ca. 1925-1950. The isolate was formally recorded in 2006 by Sanka. It is standard practice that isolated artifacts are not eligible for listing in the NRHP or the CRHR; therefore, P-36-012856 has not been formally evaluated for listing on the NRHP or the CRHR.

P-36-012857

P-36-012857 is a historic-period archaeological isolate located at an elevation of 3,020 feet amsl and is located approximately 180 meters (590 feet) southwest of the proposed Project site. P-36-012857 is documented as a Hole-in-top can, that appears to have been opened with a knife, and likely dates to after 1900. The isolate was formally recorded in 2006 by Sanka. It is standard practice that isolated artifacts are not eligible for listing in the NRHP or the CRHR; therefore, P-36-012857 has not been formally evaluated for listing on the NRHP or the CRHR.

P-36-013314

P-36-013314 is a historic-period archaeological site located immediately adjacent to the eastern boundary of the proposed Project site. P-36-013314 is documented as consisting of two concrete foundations with a scatter of various household-related refuse. The site was originally formally recorded in 2006 by Tsunoda, who described the site as containing two concrete "L" shaped foundations with a trash scatter including pieces of glass, ceramic, and metal. Tsunoda notes that most items appear to be modern, however, "some artifacts indicate older occupation of site, including some purple-colored glass pieces." Tsunoda further states that the artifact concentration measures approximately 100 meters north/south by 80 meters east/west (328 feet by 262 feet) and appears to extend further to the north. P-36-013314 has not been formally evaluated for the NRHP or CRHR.

P-36-020978 (CA-SBR-013512)

P-36-020978 is a prehistoric site measuring 92 meters by 61 meters (301 feet by 61 feet) at an elevation of 3,180 feet amsl and is located approximately 285 meters (935 feet) north of the proposed Project site. Resource P-36-020978 is documented as consisting of at least 35 flakes, four pieces of chert debitage and one tested chert

nodule. The site was originally formally recorded in 2009 by Fulton, who described the site as a sparse lithic scatter located where “common basalt and rare chert raw material present on the desert pavement was tested and underwent initial lithic reduction.” Three 1-x-1 meters test units were excavated where SCE pole installation was planned, not within areas where surface material was observed. The test units were negative for cultural material and decomposing granite substrate was encountered within the units at approximately 20 centimeters in depth. Fulton notes that “additional cultural material may extend beyond the observed boundaries.” P-36-020978 has not been formally evaluated for the NRHR or CRHR.

P-36-020982 (CA-SBR-013516/H)

P-36-020982 is a multi-component site consisting of both a historic-period and prehistoric archaeological component and is documented as measuring 114 meters by 70 meters (374 feet by 230 feet) at an elevation of 3,170 feet amsl and is located approximately 300 meters (984 feet) north of the proposed Project site. The prehistoric component of P-36-020982 is documented as two basalt flakes and the historic-period component is documented as including a cement walkway, a concrete house foundation, a rock wall, domestic refuse scatter, and structural debris. The refuse scatter included items such as church key opened cans, several hundred glass fragments (clear, amber, olive, milk colors) with bottle finishes, including screw top and crown cap closures. The site was originally formally recorded in 2009 by Fulton, who described the site condition as poor, stating that it had been extensively looted by hand and machinery. P-36-020982 has not been formally evaluated for the NRHR or CRHR.

P-36-020983

P-36-020983 is a historic-period archaeological site located at an elevation of 3,165 feet amsl and is located approximately 50 meters (164 feet) north of the proposed Project area. P-36-020983 is documented as a concrete footing well head with a 7-inch diameter pipe extending vertically into the ground, and a second footing located 6.25 inches to the north. The footings contain lag bolts. The site was originally formally recorded in 2009 by Fulton, who described the foots with lag bots as most likely for anchoring a pump. P-36-020983 has not been formally evaluated for the NRHR or CRHR.

P-36-020984

P-36-020984 is a historic-period archaeological site located at an elevation of 3,164 feet amsl and is located approximately 25 meters (82 feet) north of the proposed Project area. P-36-020984 is documented as consisting of a concrete footing, measuring 87.5 inches by 87.5 inches, that had been capped by recent concrete. The site was originally formally recorded in 2009 by Fulton, who described the concrete footing as likely a foundation for a well. P-36-020984 has not been formally evaluated for the NRHR or CRHR.

P-36-061206

P-36-061206 is a prehistoric isolate located at an elevation of 3,040 feet amsl and is located approximately 490 meters (1,610 feet) southwest of the proposed Project site. P-36-061206 is documented as a chert flake. The isolate was formally recorded in 1990 by Sundberg and Des’Autels. It is standard practice that isolated artifacts are not eligible for listing in the NRHP or the CRHR; therefore, P-36-012857 has not been formally evaluated for listing on the NRHP or the CRHR.

Review of Historical Topographic Maps and Aerial Photographs

Historical topographic maps and aerial photographs were consulted through the Nationwide Environmental Title Research LLC and the USGS Historical Topographic Map Explorer (USGS) to better understand the natural or human-made changes to the proposed Project site and surrounding properties over time. Dudek reviewed topographic maps from 1932 to 2018 and aerial photographs from 1952 to 2020 as part of the archival research effort.

Historical Topographic Maps

A review of available topographic maps was conducted and included the following years: 1932, 1934, 1953, 1957, 1960, 1968, 1974, 1980, 1987, 1993, 2012, 2015 and 2018 (NETR 2023a, UCSB 2023b) Topographic maps depict not only elevation of the study area as well as the areas surrounding it, but they also illustrate the location of roads and some buildings. Although topographic maps are not comprehensive, they are another tool in determining whether a study area has been disturbed and sometimes to what approximate depth. Table 3, below, describes the changes of the proposed Project site and off-site improvements through the years.

Table 3. Historical Topographic Maps Review

Year	Description of Proposed Project Site	Description of Proposed Off-Site Improvements
1932	The earliest topographical map shows the proposed Project site as undeveloped, with a light road running east to west across the northern boundary (matching current day Johnson Road) and a trail running north to south along the western boundary (matching current day Central Road), and an unimproved road running north to southwest across the southeast corner (matching current day Sycamore Lane). There is a structure indicated outside of the proposed Project site, to the east.	Johnson Road is indicated, running east to west through the northern section of the off-site improvements. The unimproved road along the eastern boundary of the proposed Project site crossed the southeastern section of the off-site improvements. The remainder is undeveloped.
1934	There are no significant changes.	There are no significant changes.
1953	There are no significant changes within the proposed Project site. There is no longer a structure indicated to the east.	There are no significant changes.
1957	This map appears to show Central Road as a light duty road. Johnson Road and Sycamore Lane are indicated as unimproved roads. There is a structure in the northwest corner of the proposed Project site. There are two structures just outside the proposed Project site, to the southeast of where Sycamore Lane angles to the southwest across the proposed Project site.	There are no significant changes to the north area of the off-site improvements. Lafayette Street is indicated as an unimproved road to the west of Central Road.
1960	There are no significant changes.	There are no significant changes.
1968	There are no significant changes.	There are no significant changes.
1974	This topographical map no longer indicates structures. Johnson and Central Roads are indicated as light duty roads. Sycamore Lane is indicated trending north to south, as an	Johnson Road and Lafayette Street are indicated as unimproved roads to the west of Central Road. A wash crosses Johnson Road in the north section of the off-site improvements. The wash that crosses the

Table 3. Historical Topographic Maps Review

Year	Description of Proposed Project Site	Description of Proposed Off-Site Improvements
	unimproved road. A dry well is labelled, just outside the proposed Project site, to the east of where Sycamore Lane meanders to the southwest. The wash is indicated crossing the proposed Project site in the northwest corner.	proposed Project site also crosses Lafayette Street within the off-site improvements to the south.
1980	There are no significant changes.	There are no significant changes.
1987	There are no significant changes.	There are no significant changes.
1993	This map shows Central Road as a secondary highway. Johnson Road is noted as light duty to the east of Central Road, and unimproved to the west. Sycamore Lane no longer appears. The dry well to the east of the proposed Project site is still noted, and the wash is indicated across the northwest corner.	Johnson Road to the north and Lafayette Street to the south are both indicated as unimproved roads, west of Central Road. There are no significant changes.
2012	This topographical map no longer indicates structures. Johnson and Central Roads are indicated as light duty roads, as is Lafayette Street. Sycamore Lane is indicated trending north to south, as a light duty road.	Only the roads are indicated on this map, all as light duty roads. There are no significant changes.
2015	There are no significant changes.	There are no significant changes.
2018	There are no significant changes.	There are no significant changes.

Historical Aerial Photographs

A review of all available historical aerial photographs was conducted and included the following years: 1952, 1968, 1969, 1984, 1995, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020 (NETR 2023b). Through careful comparative review of historical aeriels, changes to the landscape of a study area may be revealed. Disturbance to the study area is specifically important as it helps determine if soils within the study area are capable of sustaining intact archaeological deposits. Additionally, historical aeriels have the potential to reveal whether a study area was subjected to alluvial deposits by way of alluvial erosion, flooding, debris flows or mudslides, as well as placement of artificial or foreign fill soils that may have buried intact archaeological deposits. Table 4, below, describes the changes of the proposed Project site and off-site improvements through the years.

Table 4. Historical Aerial Photographs Review

Year	Description of Proposed Project Site	Description of Proposed Off-Site Improvements
1952	The proposed Project site is a mostly undeveloped desert landscape with low lying shrubs and a wash crossing southwest to northeast. There is a structure in the northwest corner, near the intersection of Central Road and Johnson Road, marking the western and northern boundaries. There is another unimproved dirt road on the east boundary, that cuts to the southwest across the corner of the	The proposed off-site improvement areas are depicted as undeveloped desert land. The north section of the proposed off-site improvement area depicts Johnson Road. The southern section is undeveloped desert. The wash visible in the proposed Project site is visible in both areas of off-site improvements. There are washes trending southwest to northeast across the west sides of both off-site improvement alignments.

Table 4. Historical Aerial Photographs Review

Year	Description of Proposed Project Site	Description of Proposed Off-Site Improvements
	proposed Project site. The north half of the road is in alignment with current day Sycamore Lane.	
1968	Central Road and Johnson Road have been widened and improved. There appears to be a structure in the adjacent lot to the east, but no significant changes to the proposed Project site.	The north section of the proposed off-site improvement area has no significant changes. The south section now has a road running east to west, which matches the alignment for current day Lafayette Street.
1969	The structure in the northwest corner of the proposed Project site appears different, possibly damaged.	There are no significant changes.
1984	The unimproved road along the eastern boundary is now configured into a north-south alignment, matching current day Sycamore Lane; the meander to the southwest is now an offshoot. It appears that the structure in the northwest corner of the proposed Project site has been demolished; only the foundation is visible.	There are no significant changes.
1995	There is a small structure mid-site, just west and adjacent to Sycamore Lane.	There are no significant changes.
2005	There are no significant changes.	The north section of the proposed off-site improvement area now has a paved parking lot on the northwest corner of Center Road and Johnson Road. There are multiple trails leading away from the parking to a cluster of buildings just north of the off-site improvement buffer. There is a small structure north of Lafayette Street, at the west end of the off-site improvement. There are no other significant changes.
2009	There is now an unimproved road bisecting the southern half of the proposed Project site. It appears to be Llanto Road, and leads to a new structure, outside of the proposed Project site, to the east. There are no other significant changes.	In the north section of the proposed off-site improvements, there appears to be a fence line running along the north side of Johnson Road, east of Central Road. In the south section of the proposed Project site, there is now a large warehouse located on the northeast corner of Navajo Road and Lafayette Street. A portion of Lafayette appears to be paved near the structure.
2010	There are no significant changes.	There are no significant changes.
2012	There are no significant changes.	There are no significant changes.
2014	The small structure adjacent to Sycamore Lane appears to have collapsed.	There are no significant changes in the north section of the proposed off-site improvements. There is an additional warehouse or addition to the previous structure noted in 2009, doubling its size to the east. There are associated paved areas around the structures.
2016	There are no significant changes.	There are no significant changes.

Table 4. Historical Aerial Photographs Review

Year	Description of Proposed Project Site	Description of Proposed Off-Site Improvements
2018	There are no significant changes.	There are no significant changes.
2020	There are no significant changes.	There are no significant changes.

Geotechnical Report Review

GEOCON West, Inc. completed a geotechnical study for a large area, including the proposed Project site (completed March 29, 2022). The report, *Preliminary Geotechnical Investigation Proposed Industrial Development 565 Acres Apple Valley, California*, documents the subsurface geological conditions of parcels located in Apple Valley including the proposed Project site (GEOCON West, Inc. 2022). The report details the results of nine (9) subsurface exploratory borings (B1 through B9) on February 18, 2022, using a truck-mounted drill-rig equipped with an 8-inch diameter hollow stem auger, followed by 20 test pits excavated by backhoe on March 2 and 3, 2022. Of the nine (9) borings and 20 test pits, one (1) boring (B7) and three (3) test pits (TP-9, TP-14 and TP-15) addressed the proposed Project Site.

These subsurface exploratory investigations were placed at accessible locations within the proposed Project site. The subsurface exploratory excavations were advanced to depths between approximately 6 to 20 feet below ground surface (bgs) to determine subsurface geological conditions within the proposed Project site. According to the boring logs, wash deposits were encountered throughout all depths at location B7, described as layers of light brown, fine to coarse grained sand, silty sand and sand with gravel. Sediments encountered in at location T-9 is consists of wash deposits characterized as sand that is well-graded, light brown to brown, and fine to coarse-grained with some gravel. At locations T-14 and 15, sediments were described as alluvial deposits of poorly graded sand, silty sand and silt. Some of the sands had fine gravel.

The geological boring and trench investigations were terminated at each location based on subsurface refusal at varying depths, between approximately 6 to 20 feet bgs; however, no bedrock was encountered at any of the three (3) locations investigated. A summary of the subsurface investigative results is provided in Table 5, below.

Table 5. Summary of Subsurface Investigations - GEOCON West, Inc. 2022

Boring/ Test Pit No.	Location of Investigation	Depths of Fill Soils	Depths of Native Soils	Terminated/ Refusal Depth
B-7	Southwest area of proposed Project site	N/A	0±20 feet bgs	~20 feet bgs
TP-9	Northwest area of proposed Project site	N/A	0±6 feet bgs	~6 feet bgs
TP-15	Southeast area of proposed Project site	N/A	0±5 feet bgs	~5 feet bgs

Notes: ~ denotes approximate.

Field Survey

Methods

An intensive-level archaeological pedestrian survey of the proposed Project site was completed on December 1 and 2, 2022, by Dudek Staff Archaeologists, Brenda Rogers and Linda Kry using standard archaeological procedures and techniques. The survey area includes an approximate 68.2-acre proposed Project site and the off-site improvement areas. The intensive-level survey methods consisted of a pedestrian survey conducted in parallel transects, spaced no more than 15 meters apart (approximately 50 feet), where feasible. With respect to the off-site improvements along Lafayette Street and Johnson Road, each side of these roads were surveyed, within the limits of the proposed off-site improvements. The ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). In reference to metal cans, these resources are only considered if they are observed to be within discrete deposits or determined to be from a primary depositional location. Ground disturbances such as burrows, cut banks, terraces, trails and drainages were also visually inspected for exposed subsurface materials.

All fieldwork was documented using field notes and an Apple Generation 12 iPhone (iPhone) equipped with ESRI Collector and Avenza PDF Maps software with close-scale georeferenced field maps of the proposed Project site and off-site improvements, and aerial photographs. Location-specific photographs were taken using the iPhone's 12-mega-pixel resolution camera. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory.

Results

Proposed Project Site

The proposed Project site consists of open desert landscape, with a series of washes running generally northeast to southwest and low-lying desert scrubland vegetation, including occasional Joshua trees. At the time the pedestrian survey was conducted, the ground surface visibility ranged from good to excellent (90 to 100 percent). The parcel has been subjected to consistent disturbance due to opportunistic dumping, evidenced by the presence of modern refuse and structural debris piles and scatters across the proposed Project site, consisting of toys, household items, and other consumables. Other disturbances observed include recreational activities as evidenced by of several off-road vehicular tracks that traverse the proposed Project site in various directions. Also observed were widely dispersed historic-period refuse that appeared to have been deposited/distributed across the site through aeolian and/or alluvial forces.

Proposed Off-Site Improvements

Johnson Road

The proposed off-site improvements includes areas that straddle Johnson Road and Lafayette Street. There is evidence of a metal, barbed-wire fence that was removed that parallels Johnson Road on the north side; cut metal poles are still embedded in a line along Johnson Road. There are off-roading trails and a dry drainage on the south side of Johnson Road. No cultural resources other than modern trash were encountered on either side of Johnson Road, west of Central Road. Structural remnants consisting of a concrete foundation pad was observed at the southeast corner of the intersection of Central Road and Johnson Road, within the additional offsite improvements area; however, of note, the foundation is outside the proposed Project site.

Lafayette Street

The western end of Lafayette Street is developed with an existing warehouse building that is part of a distribution center. That section of Lafayette Street was paved, and there is a parking lot associated with the building, on the northeast corner of the intersection of Lafayette Street and Navajo Road. The remainder of Lafayette Street is an unimproved, dirt road. Like the proposed Project site, there are multiple washes crossing this area, and evidence of continual use for off-roading. Isolated modern and historic-period trash were noted in this area, found in washes that cross north to south. Portions of the south side of Lafayette Street were inaccessible due to fencing. In this case, transects were shifted north and surveyed with a smaller distance between lines. Occasional, isolated rusted metal cans were noted, but not thoroughly documented as they were not observed in discrete deposits or primary depositional locations. Modern trash, often found close to Lafayette Street, was found mixed with fragmentary historic-period glass. Locations of the scatters seemed to indicate dumping along the roadside, as well as post depositional movement due aeolian and/or alluvial forces.

Overall, all soils observed within all areas surveyed are consistent with the USDA's characterization of alluvial soils from the Helendale-Bryman Loamy Sands (loamy sands and sandy loams) and Cajon-Arizo Complex (gravelly sands) (USDA 2023). No historical resources or unique archaeological resources were identified within the proposed Project site or off-site improvement areas.

Sensitivity Analysis

No cultural resources were identified as a result of a review of the CHRIS database and pedestrian survey conducted under reliable conditions. Based on geotechnical testing results, soils present within the proposed Project site are native and not overlain with fill; however, evidence of ground disturbance to unknown depths is evidenced by both contemporary conditions observed during the pedestrian survey and through a review of the historic aerials. Additionally, evidence of natural modification through wind and water erosion and depositional event was observed. Proposed depths of ground disturbance are anticipated to extend between 4 to 14 feet across the proposed Project site and to a maximum depth of 22 feet along the east side of the proposed Project site for installation of the storm drain. In consideration of this study's findings relative to the proposed Project's depths of ground disturbance, the potential to find unknown cultural resources within the proposed Project site and off-site improvements, particularly within subsurface soils, is possible during Project implementation. Therefore, Dudek recommends the following management recommendations to ensure that any inadvertent discovery of archaeological resources will be treated

appropriately and in accordance with the CEQA regulations: Workers Environmental Awareness Program (WEAP) training, retention of an on-call archaeologist to address inadvertent discoveries, and an inadvertent discovery clause of archaeological resources and human remains implemented and included on all construction plans. These measures will ensure that potential Project impacts to archaeological resources and human remains would be less than significant.

Management Recommendations

Dudek recommends the following management considerations to ensure proper treatment of any unknown cultural resources that may be encountered as a result of Project construction. These recommendations would ensure the proper treatment of any cultural resources and human remains encountered during ground disturbing activities. With the proper implementation of these recommendations, the potential impact to cultural resources is considered to be less than significant.

Cultural Resource Monitoring and Inadvertent Discovery Plan. Prior to ground disturbance activities, the Applicant and/or subsequent responsible parties should retain a Principal Investigator/Archaeologist, meeting the Secretary of the Interior's Standards, and with experience in California prehistoric and historic resources (including experience within San Bernardino County preferred), to compose a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan). The purpose of the Plan is to outline cultural monitoring protocols and a program of treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources in accordance with CEQA throughout the duration of the Project. Existence and importance of adherence to this Plan should be stated on all Project site plans intended for use by those conducting the ground disturbing activities.

Workers Environmental Awareness Program (WEAP) Training. All construction personnel and monitors who are not trained archaeologists should be briefed regarding unanticipated discoveries prior to the start of construction activities. A basic presentation should be prepared and presented by a qualified archaeologist to inform all personnel working on the Project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker should also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the on-call archaeologist and if appropriate, Tribal representative. Necessity of training attendance should be stated on all construction plans.

On-Call and Periodic Archaeological Construction Monitoring. In consideration of the general sensitivity of the proposed Project site for cultural resources, a qualified archaeologist should be retained to conduct periodic spot monitoring as well as on call response in the case of an inadvertent discovery of archaeological resources. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, should oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits. The archaeologist should be responsible for maintaining monitoring logs. Following the completion of construction, the qualified archaeologist should provide an archaeological monitoring report to the lead agency and the SCCIC with the results of the cultural monitoring program.

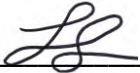
Inadvertent Discovery of Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet

of the find should immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. If the discovery is Native American in nature, consultation with and/or monitoring by a Tribal representative may be necessary.

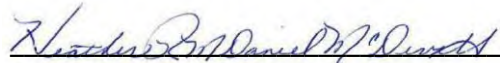
Inadvertent Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall follow all required protocols according to California Public Resources Code, Section 5097.98.

Should you have any questions relating to this report and the preliminary findings and recommendations, please do not hesitate to contact Linda Kry at lkry@dudek.com or Heather McDaniel McDevitt at hmcdevitt@dudek.com.

Sincerely,



Linda Kry, B.A., RA
Archaeologist



Heather McDaniel McDevitt, M.A., RPA
Archaeologist

Att.: *Appendix A: Figures*
Appendix B. (Confidential) SCCIC Records Search Information

cc: *Patrick Cruz, Armando Gonzales, Dudek*

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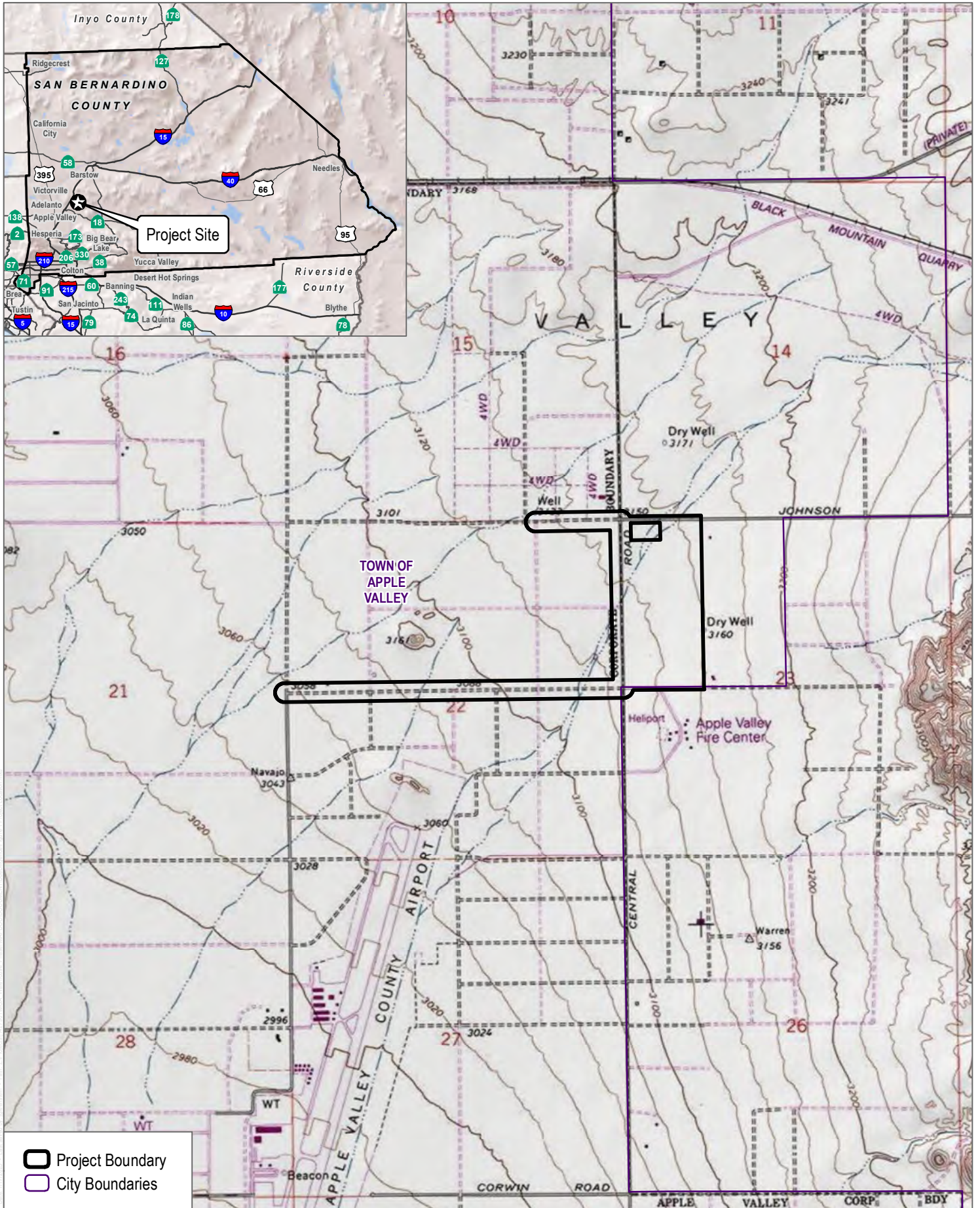
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Appendix A

Figures

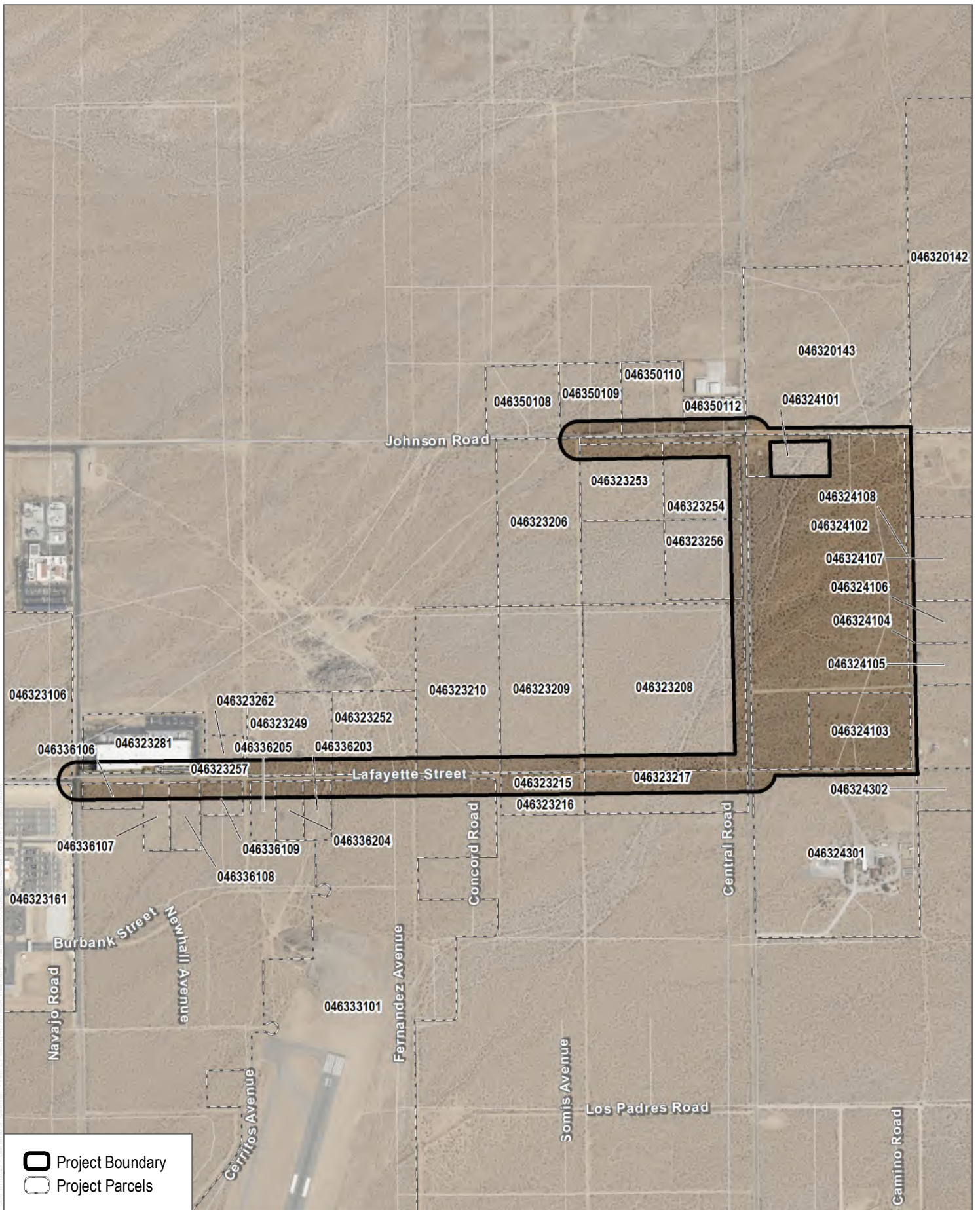


SOURCE: USGS 7.5 min Topographic Map Apple Valley North Quadrangle, Township 6N / Range 3W / Sections 13, 14, 23, 24

FIGURE 1

Project Location

Northwest Apple Valley Project



SOURCE: Bing Maps 2022; San Bernardino County 2022

DUDEK

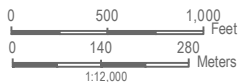


FIGURE 2
Project Site
 Northwest Apple Valley Project

Appendix B

CONFIDENTIAL SCCIC Records Search Results