

PHASE I ARCHAEOLOGICAL ASSESSMENT FOR THE WAALEW ROAD TRUCK AND TRAILER FACILITY PROJECT

**TOWN OF APPLE VALLEY,
SAN BERNARDINO COUNTY, CALIFORNIA**

APN 440-014-11

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November 1, 2024



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Report Date: November 1, 2024

Report Title: Phase I Archaeological Assessment for the Waalew Road Truck and Trailer Facility Project, Town of Apple Valley, San Bernardino County, California (APN 440-014-11)

Type of Study: Phase I Archaeological Assessment

USGS Quadrangle: Section 4, Township 5 North, Range 3 West of the USGS *Apple Valley North, California* (7.5-minute) Topographic Quadrangle

Acreage: Approximately 14.5 acres

Key Words: Pedestrian survey; *Apple Valley North* USGS Quadrangle, positive results; Site Temp-1; historic power pole; not CEQA-significant; no mitigation measures recommended.

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MANAGEMENT SUMMARY

At the direction of Lilburn Corporation, BFS A Environmental Services, a Perennial Company (BFS A), conducted a Phase I archaeological assessment for the Waalew Road Truck and Trailer Facility Project. The approximately 14.5-acre project is located southwest of the intersection of Waalew and Navajo roads in the town of Apple Valley, San Bernardino County, California (Assessor's Parcel Number [APN] 440-014-11). The project is situated within Section 4, Township 5 North, Range 3 West on the U.S. Geological Survey (USGS) *Apple Valley North, California* Quadrangle. As proposed, the project will develop the property for use as a truck and trailer parking facility.

The purpose of this investigation was to locate, record, and evaluate any archaeological resources within the project as part of the Town of Apple Valley environmental review process conducted in compliance with the California Environmental Quality Act (CEQA). The archaeological investigation includes an archaeological records search conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (CSU Fullerton) in order to assess previous archaeological studies and identify any previously recorded archaeological sites within the project or in the immediate vicinity. The records search did not identify any recorded resources within the property. However, nine resources (two prehistoric, one multicomponent, and six historic) are recorded within one mile of the project. A Sacred Lands File (SLF) search was also requested from the Native American Heritage Commission (NAHC), which was returned with negative results.

The archaeological survey was an intensive reconnaissance consisting of a series of survey transects across the project. The survey resulted in the identification of one circa 1940 power pole with associated power lines that bisect the property from east to west (Site Temp-1). No cultural materials were identified in association with the power pole. Additionally, no historic or prehistoric cultural materials were identified within the subject property. Given the site's lack of associated cultural materials, and the lack of historical development on the property according to archival research, Site Temp-1 was determined to lack CEQA significance and is not eligible for listing in the California Register of Historical Resources (CRHR). Site Temp-1 has been recorded on the appropriate California Department of Parks and Recreation (DPR) forms and submitted to the SCCIC at CSU Fullerton. A copy of this report will be permanently filed with the SCCIC at CSU Fullerton. All notes, photographs, and other materials related to this project will be curated at the archaeological laboratory of BFS A in Poway, California. Further, the subject property is located outside the Town of Apple Valley's determined area of high cultural resource sensitivity, within an area previously identified as undetermined cultural resource sensitivity. This Phase I archaeological assessment has identified the project as having "low cultural resource sensitivity." Therefore, no site-specific mitigation measures are recommended as a condition of approval of the Waalew Road Truck and Trailer Facility Project.

1.0 INTRODUCTION

1.1 Project Description

The Phase I archaeological assessment for the Waalew Road Truck and Trailer Facility Project was conducted in order to comply with CEQA and Town of Apple Valley environmental compliance procedures. The decision to request this investigation was based upon the cultural resource sensitivity of the locality, as suggested by known site density and predictive modeling. Sensitivity for cultural resources in a given area is usually indicated by known settlement patterns which, in southwestern San Bernardino County, were focused around freshwater resources and a food supply.

The approximately 14.5-acre project is located on the south side of Waalew Road, between Ramona Road to the west and Navajo Road to the East in the town of Apple Valley, San Bernardino County, California (Figure 1.1–1). The project, which comprises the entirety of APN 440-014-11, is situated within Section 4, Township 5 North, Range 3 West, as shown on the 7.5-minute USGS *Apple Valley North, California* topographic quadrangle map (Figure 1.1–2). The project proposes the construction of a 429-stall parking lot for commercial trucks and trailers, a guard structure, landscaping, and a trash enclosure. The project also includes the construction of a 50x557x1.5-foot stormwater runoff detention basin in the east portion of the lot (Figure 1.1–3).

1.2 Environmental Setting

The project is located in the vicinity of Apple Valley Dry Lake, which occupies the lowest part of a closed desert basin that is approximately nine miles wide and 18 miles long. Storm runoff originates in the mountains surrounding the valley of Apple Valley Dry Lake, but generally little reaches the playa basin (Busby 1975). Geologically, the project is mapped as late Pleistocene-aged old alluvial deposits, characterized as fine- to medium-grained sand and fine- to medium-sized gravel of inactive alluvial fans (Wirths 2024). According to percolation tests conducted prior to the survey in 2024, soils within the project consist of a combination of silty sands and clayey sands with intermittent pebbles from the surface to five feet below ground surface (Gupta and Flippin 2024).

The subject property is relatively flat, with average elevations ranging between 2,923 and 2,934 feet above mean sea level. Vegetation on the property is sparse, consisting of Creosote bush scrub community plants and non-native weeds. Nearest water resources include the Mojave River approximately five miles to the west and seasonal drainages from Bell Mountain to the north and west and Fairview Mountain to the east. Historically, water was accessed in the area via underwater wells. Any natural springs that might have been in the region, and associated seasonal drainages, are natural sources of water known to have been exploited by both the prehistoric and historic populations in the area (see cultural context below).

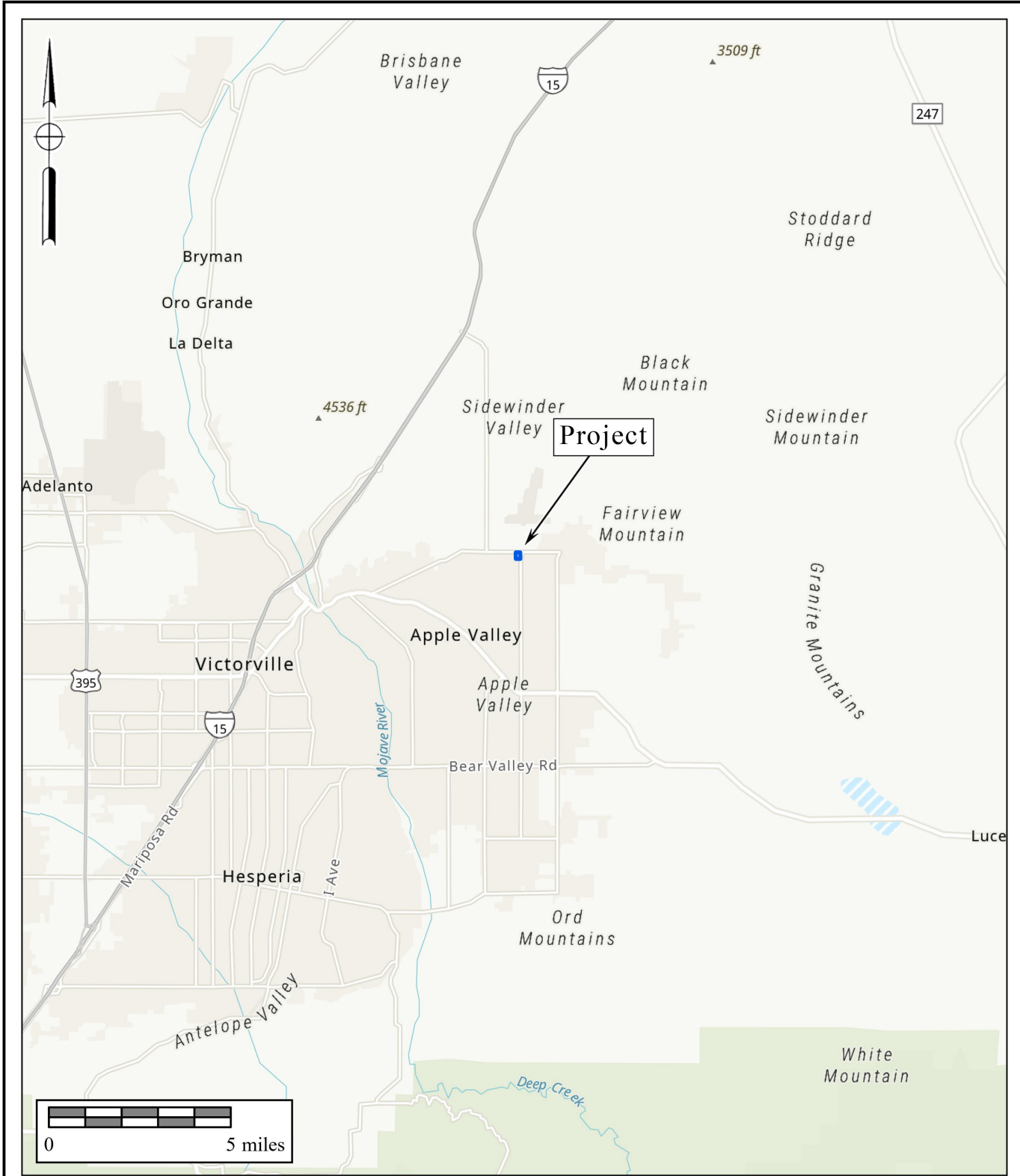


Figure 1.1-1
General Location Map
The Waalew Road Truck and Trailer Facility Project
ESRI World Topographic Map

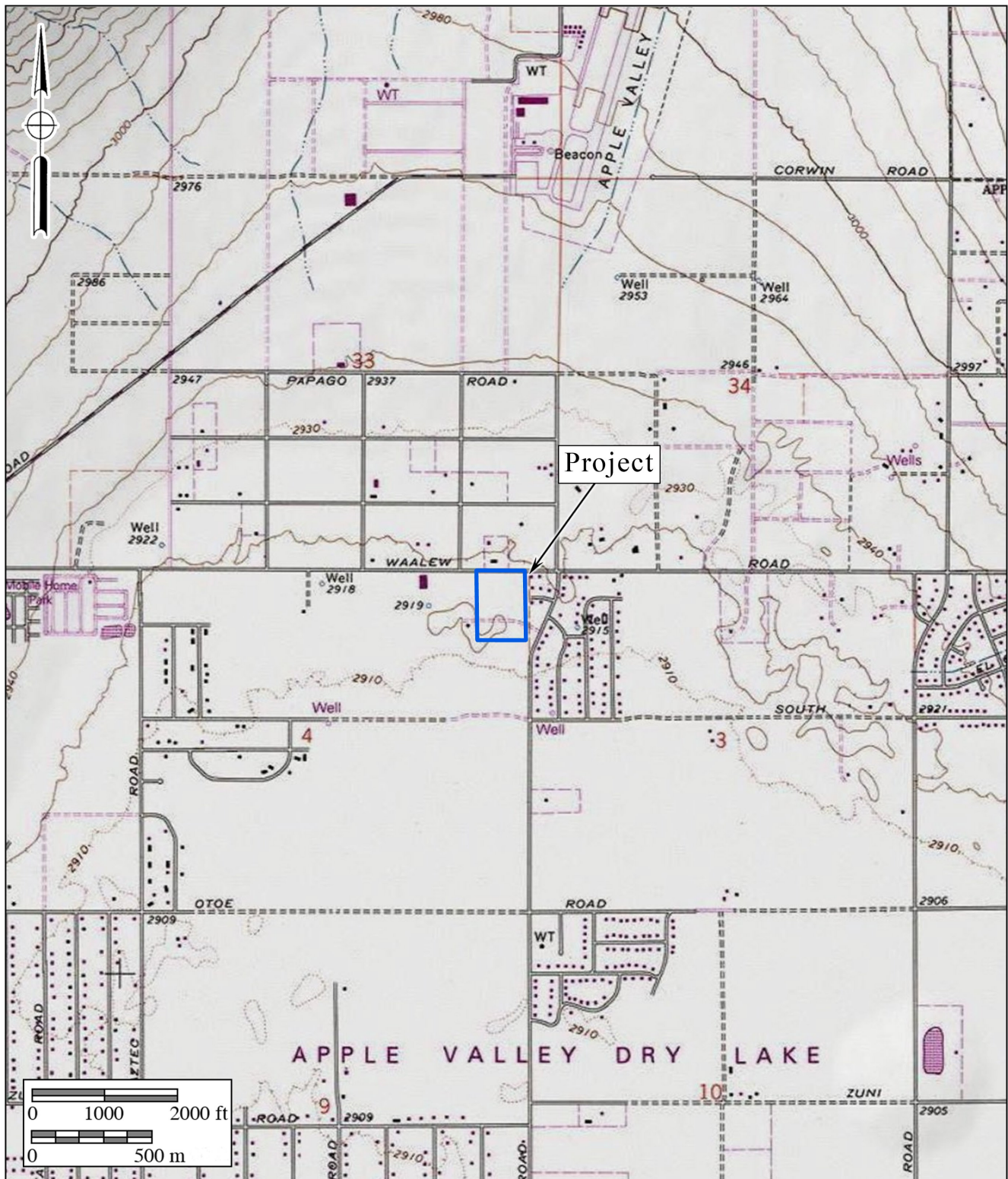
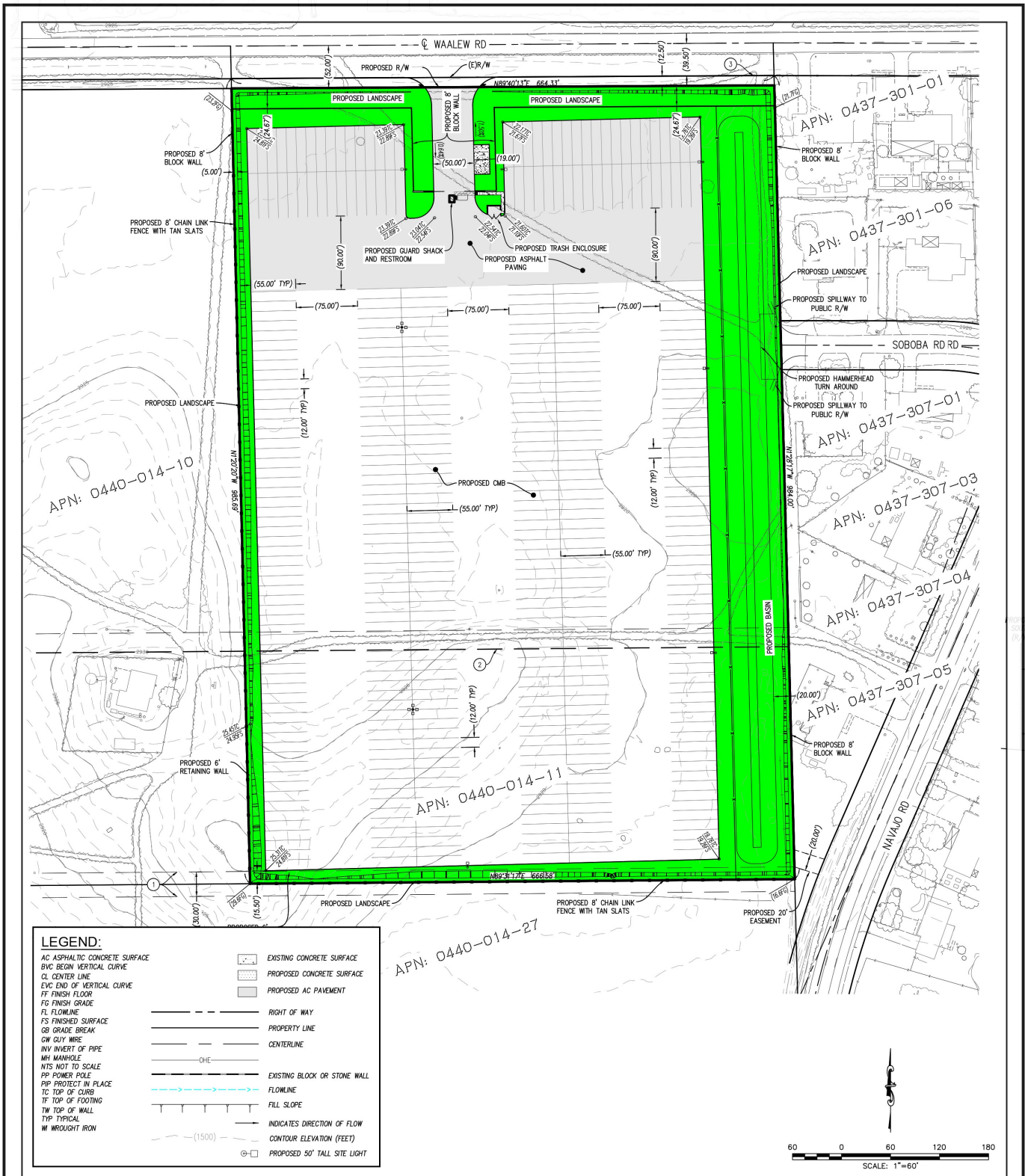


Figure 1.1–2
Project Location Map

The Waalew Road Truck and Trailer Facility Project
 USGS *Apple Valley North* Quadrangle (7.5-minute)



1.3 Cultural Setting

1.3.1 Prehistoric Period

The subject property straddles the traditional territory of multiple Native American groups including the Serrano. Although there may be considered a range of cultural variations among these groups, they all have language derived from a base Uto-Aztecan language stock. In the same instance, while they may have held differing worldviews and maintained variations in their social structures, how they exploited the natural resources of their territories remained similar.

The Mojave Desert is believed to have had limited prehistoric subsistence resources but has historically supported a long and occasionally dense population. Evidence of villages and camps, burials, quarries, rock features, and bedrock mortars has been documented at archaeological sites across the desert, some of which contain evidence of a lengthy prehistoric time span. Although early archaeological remains are not found frequently, when they are, they are generally located along the margins of former pluvial lakes or in areas of dune deflation. In contrast, artifacts on the desert floor may be sparse, widely scattered, and mixed with the desert pavements. For the region, archaeologists have reached a broad consensus regarding the general cultural chronology. The identified sequence includes the Paleo Indian Period, the Pinto Period, the Gypsum Period, the Saratoga Springs Period, and the Ethnohistoric Period

Paleo Indian Period (12,000 to circa 10,000 YBP)

Archaeologically, the Paleo Indian Period is associated with the terminus of the late Pleistocene (12,000 to 10,000 years before the present [YBP]). The environment during the late Pleistocene 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). However, by the terminus of the late Pleistocene, the climate became warmer, which caused the glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes (Moratto 1984; Martin 1967, 1973; Fagan 1991). The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location (Masters 1983).

Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. These people likely subsisted using a more generalized hunting, gathering, and collecting adaptation, utilizing a variety of resources including birds, mollusks, and both large and small mammals (Erlandson and Colten 1991; Moratto 1984; Moss and Erlandson 1995).

Lake Mojave Period (Late Pleistocene: 10,000 to 7,000 YBP)

The earliest documented evidence of human occupation in the Mojave Desert and surrounding areas comes from the Paleo Indian Period, a cultural expression referred to as the Western Pluvial Lakes Tradition (WPLT). The WPLT occurred in the western Great Basin and covered an area that stretched from the now arid lands of southern California to Oregon. A cultural adaptation to pluvial conditions (e.g., lakes, marshes, and grasslands) flourished for thousands of

years after circa 9000 B.C. but disappeared in response to the warming and drying trends of the Altithermal climatic period (Moratto 1984). One of the most well known expressions of the WPLT is the Lake Mojave Complex, which is thought to have covered a vast area including parts of the southwestern Great Basin and the Mojave Desert, and may have reached as far south as the San Diego area. Artifacts indicative of the Lake Mojave Complex include foliated points and knives, Lake Mojave points, Silver Lake points, and flaked-stone crescents. Similar artifacts have been subsequently recorded along the shoreline of many other pluvial lakes in the Mojave Desert. Archaeological studies by Mark Sutton (1988) suggested that, at the time of the Lake Mojave Complex, much of Antelope and Fremont valleys may have been covered by Pleistocene Lake Thompson. Davis (1978) argues the wetlands generated as a result of such Pleistocene lakes and would have been a great attraction to the region's early occupants. This would result in an adaptive strategy that was more generalized, focusing on hunting and the overall exploitation of wetland resources. In general, it is clear that cultures across California adapted to wetland environments generated by pluvial lake ecological systems (Moratto 1984).

Pinto Period (7,000 to 4,000 YBP)

The Pinto Period dates to the end of the Pleistocene, when the severe and dramatic environmental change from pluvial to arid conditions began (Moratto 1984). Pinto Period sites are found mostly near ephemeral lakes and now dry streams and springs, suggesting that as the region began to dry, new subsistence adaptations were necessary. Projectile points associated with the Pinto Period are characterized as larger atlatl dart points, as opposed to arrowhead points, which were introduced later. This period has been described as a highly mobile desert economy, with an emphasis on hunting, supplemented by the use of processed seeds (Moratto 1984). However, the collections believed to represent the Pinto Period are largely lacking in well-developed milling technologies according to Moratto (1984). Pinto Period artifacts have been interpreted as indications of temporary or seasonal occupations by small groups of people. Sites of this period are generally small in scale and are typically absent of a developed midden. More recent studies (Sutton et al. 2007) suggest that the Pinto Period may have actually started in the early Holocene, overlapping the Lake Mojave Period. A series of radiocarbon dates from Little Lake, Pinto Basin, Twentynine Palms, and Fort Irwin suggests Pinto sites with antiquity of upwards of 9,000 years (Sutton et al. 2007), indicating these sites may be of greater antiquity than previously suggested.

Gypsum Period (4,000 to 1,500 YBP)

The presence of Humboldt Concave Base, Gypsum Cave, Elko Eared, or Elko corner-notched points are believed to be indicative of the Gypsum Period (radiocarbon dated from 4,000 to 1,500 YBP). The Gypsum Period reflects a more intensive desert occupation as temperatures began to regulate during the First Neoglacial episode at the beginning of the late Holocene (Warren 1984; Sutton et al. 2007). During this time, indications of trade with coastal populations are evidenced by the presence of shell beads in the archaeological record. An increase in milling

stones and manos has been found in association with this period, which indicates an increased use of hard seeds (Moratto 1984; Warren 1984; Sutton et al. 2007). In comparison to sites from the preceding periods, Gypsum Period sites are generally smaller, higher in frequency, and distributed across a range of environments. Further, Gypsum Period sites also display evidence of exploitation of *artiodactyls*, rabbits, and rodents, as well as a wide range of seeds. Adaptations resulting from better adapted technologies combined with what was likely more complex social organization likely facilitated the ease of adaptation to the warming and drying conditions that initiated circa 2,000 years ago. The continued use of the region during the Gypsum Period indicates an overall more successful adaptation to the warm and dry conditions during this period (Warren 1984; Sutton et al. 2007).

Several scholars associate this period with the division of the Uto-Aztecan language, approximately 3,000 to 2,500 years ago (Moratto 1984; Warren 1984; Sutton et al. 2007). The major language groups that emerged from this division are Numic, spoken by the Kawaiisu and Piute; Takic, spoken by the Kitanemuk, Serrano, Gabrielino, and other southern California Shoshonean speakers; Hopic, spoken in the southwest; and Tubatulabal, spoken by the Tubatulabal in the southern Sierra Nevada Mountains. A shift in settlement patterns toward a more sedentary lifestyle occurred during this period, characterized by the emergence of large permanent or semi-permanent village sites and associated cemeteries.

Saratoga Springs Period (1,500 to 800 YBP)

The Saratoga Springs Period is characterized by a transition from larger dart points to smaller arrow points. The presence of arrow points suggest that the bow and arrow were introduced to the Mojave Desert during the Saratoga Springs Period. This, combined with evidence from rock art motifs, leads scholars to argue for a shift from atlatls to use of the bow and arrow either during the end of the Gypsum Period or the beginning of the Saratoga Springs Period. This technological advancement likely improved overall hunting efficiency and possibly the carrying capacity for the local population (Warren 1984). This in turn may have resulted in a significant increase in population as suggested by archaeological data. During this period, the development of large village sites with cemeteries and well-developed middens indicates long-term occupations in comparison to previous periods.

This period also saw an increase in trade with Arizona and other areas of the southwest. Evidence in the archaeological record shows that Brown and Buff wares (pottery styles), characteristic of Arizona, made their way to the California desert by 900 A.D. It is also believed that the Anasazi mined turquoise in the eastern California desert about this time. While the presence of Hakataya influence may have extended as far north and west as the eastern Antelope Valley (Warren 1984), influence in the western Mojave appears to have been minimal. During the second half of the Saratoga Springs Period, the rise in temperatures and return to xeric conditions circa A.D. 700 likely led to population decline, and eventually the terminus of the Saratoga Springs complex circa A.D. 1100 (Sutton et al. 2007).

Ethnohistoric Period (800 YPB to the Time of European Contact)

During the Ethnohistoric Period, the Serrano, especially the Desert Serrano (Vanyume), occupied the project. The territory of the Vanyume was covered by small and relatively sparse populations focused primarily along the Mojave River southeast of the Kawaiisu. It is believed that the southwestern extent of their territory went as far as Cajon Pass and portions of Hesperia. Bean and Smith (1978) noted that it was uncertain if the Vanyume had a separate Takic-based language from the Serrano dialect. However, King and Blackburn (1978) suggest that the Vanyume and other Kitanemuk speakers once occupied most of Antelope Valley. The Vanyume maintained friendly social relations with the Mohave and Chemehuevi to the east and northeast (Kroeber 1976). As with the majority of California native populations, Vanyume populations were decimated around the 1820s by placement in Spanish missions and *asistencias*. It is believed that, by 1900, the Vanyume had become extinct (Bean and Smith 1978). However, given the settlement patterns reported for the Vanyume, it is more probable that the population was dispersed rather than completely wiped out.

The Serrano were primarily hunters and gatherers. Individual family dwellings were likely circular, domed structures. Vegetal staples varied with locality; acorns and piñon nuts were found in the foothills, and mesquite, yucca roots, cacti fruits, and piñon nuts were found in or near the desert regions. Diets were supplemented with other roots, bulbs, shoots, and seeds (Heizer 1978). Deer, mountain sheep, antelopes, rabbits, and other small rodents were among the principal food packages. Various game birds, especially quail, were also hunted. The bow and arrow was used for large game, while smaller game and birds were killed with curved throwing sticks, traps, and snares. Occasionally, game was hunted communally, often during mourning ceremonies (Benedict 1924; Drucker 1937; Heizer 1978). Manufactured goods included baskets, some pottery, rabbit-skin blankets, awls, arrow straighteners, sinew-backed bows, arrows, fire drills, stone pipes, musical instruments (rattles, rasps, whistles, bull-roarers, and flutes), feathered regalia, mats, bags, storage pouches, and nets (Heizer 1978). Food acquisition and processing required the manufacturing of additional items such as knives, stone or bone scrapers, pottery trays and bowls, bone or horn spoons, and stirrers. Mortars, made of either stone or wood, and metates were also manufactured (Strong 1971; Drucker 1937; Benedict 1924).

1.3.2 Historic Period

Traditionally, the history of the state of California has been divided into three general periods: the Spanish Period (1769 to 1821), the Mexican Period (1822 to 1846), and the American Period (1848 to present) (Caughey 1970). The American Period is often further subdivided into additional phases: the nineteenth century (1848 to 1900), the early twentieth century (1900 to 1950), and the Modern Period (1950 to present). From an archaeological standpoint, all of these phases can be referred to together as the Ethnohistoric Period. This provides a valuable tool for archaeologists, as ethnohistory is directly concerned with the study of indigenous or non-Western peoples from a combined historical/anthropological viewpoint, which employs written documents, oral narrative, material culture, and ethnographic data for analysis.

European exploration along the California coast began in 1542 with the landing of Juan Rodríguez Cabrillo and his men at San Diego Bay. Sixty years after the Cabrillo expeditions, an expedition under Sebastián Vizcaíno made an extensive and thorough exploration of the Pacific coast. Although the voyage did not extend beyond the northern limits of the Cabrillo track, Vizcaíno had the most lasting effect upon the nomenclature of the coast. Many of his place names have survived, whereas practically every one of the names created by Cabrillo have faded from use. For instance, Cabrillo named the first (now) United States port he stopped at “San Miguel”; 60 years later, Vizcaíno changed it to “San Diego” (Rolle 1969). The early European voyages observed Native Americans living in villages along the coast but did not make any substantial, long-lasting impact. At the time of contact, the Luiseño population was estimated to have ranged from 4,000 to as many as 10,000 individuals (Bean and Shipek 1978; Kroeber 1976).

The historic background of the project area began with the Spanish colonization of Alta California. The first Spanish colonizing expedition reached southern California in 1769 with the intention of converting and civilizing the indigenous populations, as well as expanding the knowledge of and access to new resources in the region (Brigandi 1998). As a result, by the late eighteenth century, a large portion of southern California was overseen by Mission San Luis Rey (San Diego County), Mission San Juan Capistrano (Orange County), and Mission San Gabriel (Los Angeles County), which began colonizing the region and surrounding areas (Chapman 1921).

Native Californians may have first coalesced with Europeans around 1769 when the first Spanish mission was established in San Diego. In 1771, Father Francisco Garcés first searched the Californian desert for potential mission sites. Interactions between local tribes and Franciscan priests occurred by 1774 when Juan Bautista de Anza made an exploration of Alta California.

Serrano contact with the Europeans may have occurred as early as 1771 or 1772, but it was not until approximately 1819 that the Spanish directly influenced the culture. The Spanish established *asistencias* in San Bernardino, Pala, and Santa Ysabel. Between the founding of the *asistencia* and secularization in 1834, most of the Serranos in the San Bernardino Mountains were removed to the nearby missions (Beattie and Beattie 1951:366) while the Cahuilla maintained a high level of autonomy from Spain (Bean 1978).

Each mission gained power through the support of a large, subjugated Native American workforce. As the missions grew, livestock holdings increased and became increasingly vulnerable to theft. To protect their interests, the southern California missions began to expand inland to try and provide additional security (Beattie and Beattie 1951; Caughey 1970). In order to meet their needs, the Spaniards embarked upon a formal expedition in 1806 to find potential locations within what is now the San Bernardino Valley. As a result, by 1810, Father Francisco Dumetz of Mission San Gabriel had succeeded in establishing a religious site, or *capilla*, at a Serrano village called Guachama (Beattie and Beattie 1951; Beattie 1953; Strong 1929). San Bernardino Valley received its name from this site, which was dedicated to San Bernardino de Siena by Father Dumetz. Guachama was located in present-day Bryn Mawr in San Bernardino County.

These early colonization efforts were followed by the establishment of estancias at Puente (circa 1816) and San Bernardino (circa 1819) near Guachama (Beattie and Beattie 1951). These efforts were soon mirrored by the Spaniards from Mission San Luis Rey who, in turn, established a presence in what is now Lake Elsinore, Temecula, and Murrieta (Chapman 1921). The indigenous groups who occupied these lands were recruited by missionaries, converted, and put to work in the missions (Pourade 1961). Throughout this period, the Native American populations were decimated by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order (Cook 1976).

Mexico achieved independence from Spain in 1822 and became a federal republic in 1824. As a result, both Baja and Alta California became classified as territories (Rolle 1969). Shortly thereafter, the Mexican Republic sought to grant large tracts of private land to its citizens to begin to encourage immigration to California and to establish its presence in the region. Part of the establishment of power and control included the desecularization of the missions circa 1832. These same missions were also located on some of the most fertile land in California and, as a result, were considered highly valuable. The resulting land grants, known as “ranchos,” covered expansive portions of California and, by 1846, more than 600 land grants had been issued by the Mexican government. Rancho Jurupa was the first rancho to be established and was issued to Juan Bandini in 1838. Although Bandini primarily resided in San Diego, Rancho Jurupa was located in what is now Riverside County (Pourade 1963). A review of Riverside County place names quickly illustrates that many of the ranchos in Riverside County lent their names to present-day locations, including Jurupa, El Rincon, La Sierra, El Sobrante de San Jacinto, La Laguna (Lake Elsinore), Santa Rosa, Temecula, Pauba, San Jacinto Nuevo y Potrero, and San Jacinto Viejo (Gunther 1984). As was typical of many ranchos, these were all located in the valley environments within western Riverside County.

The treatment of Native Americans grew worse during the Rancho Period. Most of the Native Americans were forced off their land or put to work on the now privately-owned ranchos, most often as slave labor. Considering the brutality of the ranchos, the degree to which Native Americans had become dependent upon the mission system is evident when, in 1838, a group of Native Americans from Mission San Luis Rey petitioned government officials in San Diego to relieve suffering at the hands of the rancheros:

We have suffered incalculable losses, for some of which we are in part to be blamed for because many of us have abandoned the Mission ... We plead and beseech you ... to grant us a Rev. Father for this place. We have been accustomed to the Rev. Fathers and to their manner of managing the duties. We labored under their intelligent directions, and we were obedient to the Fathers according to the regulations, because we considered it as good for us. (Brigandi 1998:21)

Native American culture had been disrupted to the point where they could no longer rely upon prehistoric subsistence and social patterns. Not only does this illustrate how dependent the Native Americans had become upon the missionaries, but it also indicates a marked contrast in the way the Spanish treated the Native Americans as compared to the Mexican and United States ranchers. Spanish colonialism (missions) is based upon utilizing human resources while integrating them into their society. The ranchers, both Mexican and American, did not accept Native Americans into their social order and used them specifically for the extraction of labor, resources, and profit. Rather than being incorporated, they were either subjugated or exterminated (Cook 1976).

In 1846, war erupted between Mexico and the United States (Rolle 1969). In 1848, with the signing of the Treaty of Guadalupe Hidalgo, the region was annexed as a territory of the United States and, in 1850, California became a state and was divided into 21 counties. These events generated a steady flow of settlers into the area, including gold miners, entrepreneurs, health-seekers, speculators, politicians, adventurers, seekers of religious freedom, and individuals desiring to create utopian colonies (Rolle 1969; Caughey 1970). As the non-native population increased through immigration, the indigenous population rapidly declined from the high morbidity of European diseases, low birth rates, and conflict and violence. These dwindling native populations were eventually displaced into reservations.

A much larger population was now settling in California, primarily in the central valley, San Francisco, and the Gold Rush region of the Sierra Nevada mountain range (Rolle 1969; Caughey 1970). During this time, southern California grew at a much slower pace than northern California and was still dominated by the cattle industry that was established during the earlier Rancho Period.

By the late 1880s and early 1890s, there was growing discontent between San Bernardino and its neighbor 10 miles to the south, Riverside, due to differences in opinion concerning religion, morality, the Civil War, and politics, as well as fierce competition to attract settlers. After a series of instances in which charges were claimed about unfair use of tax monies to the benefit of only the city of San Bernardino, several people from Riverside decided to investigate the possibility of a new county. In May 1893, voters living within portions of San Bernardino County (to the north) and San Diego County (to the south) approved the formation of Riverside County. Early business opportunities were linked to the agriculture industry, but commerce, construction, manufacturing, transportation, and tourism also provided a healthy local economy.

A Brief History of Apple Valley

The beginnings of Apple Valley are tied to the 1861 San Bernardino Mountain goldrush, which resulted in the development of a wagon road connecting Holcomb Valley to the Cajon Pass Toll Road. By 1870, the area had been settled with permanent homesteads. When southern California experienced the land boom of the 1880s, the area was further developed with settlers making their way through the area via the newly completed Santa Fe Railroad. In the 1890s, the Appleton Land and Water Company (ALWC) was established. The ALWC planted acres of apple

orchards and constructed a valley-wide irrigation system east of the Mojave River, which further boosted the settlement to the region. The town grew slowly into the twentieth century, with a total of 14 major ranches along the Mojave River by the mid-1910s. Although prosperous through the 1920s, Apple Valley experienced economic hardship as a result of the Great Depression in the 1930s, which resulted in the failure of many of the orchards (Terra Nova Planning and Research, Inc. 2009). However, the ranch orchard owners shifted to take advantage of new revenue streams:

Many of the ranch owners began to take advantage of their isolated desert setting and marketed it to city-dwellers seeking health, relaxation, and recreation, converting their properties into dude ranches, retreats, and sanitariums, and the area attracted Hollywood film companies. (Terra Nova Planning and Research, Inc. 2009)

The ranch and orchard period of Apple Valley lasted into the 1940s. In 1945, the Apple Valley Building and Development Company (AVBDC) was established by Newton Bass, Bud Westlund, and the Apple Valley Ranchos enterprise. The AVBDC transformed “the sparsely settled desert lands into the area into a western-themed town of 11,000 residents” (Terra Nova Planning and Research, Inc. 2009) through the development of commercial and residential projects. In 1988, the Town of Apple Valley was Incorporated (Terra Nova Planning and Research, Inc. 2009).

1.4 Applicable Regulations

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of Apple Valley in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, the criteria outlined in CEQA provide the guidance for making such a determination. The Town of Apple Valley does not utilize an additional set of criteria for determining resource significance. The following sections detail the criteria that a resource must meet in order to be determined important.

1.4.1 California Environmental Quality Act

According to CEQA (§ 15064.5a), the term “historical resource” includes the following:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the CRHR (Public Resources Code SS5024.1, Title 14 CCR [California Code of Regulations]. Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies

must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- 3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Public Resources Code SS5024.1, Title 14, Section 4852) including the following:
 - a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b) Is associated with the lives of persons important in our past;
 - c) 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
 - d) Has yielded, or may be likely to yield, information important in prehistory or history.
- 4) The fact that a resource is not listed in, or determined eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Section 5020.1(j) or 5024.1.

According to CEQA (§ 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

- 1) Substantial adverse change in the significance of an historical resource 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.
- 2) The significance of an historical resource is materially impaired when a project:
 - a) 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 CRHR; or

- b) 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 Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, 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,
- c) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- 1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- 2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- 3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2(c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- 4) If an archaeological resource is neither a unique archaeological nor historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) states:

(d) When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the NAHC. Action implementing such an agreement is exempt from:

- 1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
- 2) The requirements of CEQA and the Coastal Act.

2.0 **RESEARCH DESIGN**

The primary goal of the research design is to attempt to understand the way in which humans have used the land and resources within the project through time, as well as to aid in the determination of resource significance. For the current project, the study area under investigation is located in the town of Apple Valley, San Bernardino County, California. The scope of work for the cultural resources study conducted for the Waalew Road Truck and Trailer Facility Project included the survey of an approximately 14.5-acre study area. Given the area involved and the presence of nearby archaeological sites, the research design for this project was focused upon realistic study options. Since the main objective of the investigation was to identify the presence of and potential impacts to cultural resources, the goal is not necessarily to answer wide-reaching theories regarding the development of early southern California, but to investigate the role and importance of identified resources. Nevertheless, the assessment of the significance of a resource must take into consideration a variety of factors, as well as the ability of a resource to address regional research topics and issues.

Although initial site evaluation investigations are limited in terms of the amount of information available, several specific research questions were developed that could be used to guide the initial investigations of any observed cultural resources. The basic research effort employed is focused upon gathering sufficient data to determine the boundaries of each resource, the depth, stratigraphy, and contents of any subsurface deposits, and the overall integrity of the site. Testing and recordation of the contents of the site would provide the basis to complete an analysis of spatial relationships of artifacts, features, and natural resources. Ultimately, this information forms the foundation to determine the cultural affiliation of the site, the period of occupation, site function, and potential to address more focused research questions. The following research questions take into account the small size and location of the project discussed above.

Research Questions:

- Can located cultural resources be associated with a specific time period, population, or individual?
- Do the types of any located cultural resources allow a site activity/function to be determined from a preliminary investigation? What are the site activities? What is the site function? What resources were exploited?
- How do located sites compare to others reported from different surveys conducted in the area?
- How do located sites fit existing models of settlement and subsistence for mountainous environments of the region?

Data Needs

At the survey level, the principal research objective is a generalized investigation of changing settlement patterns in both the prehistoric and historic periods within the study area. The overall goal is to understand settlement and resource procurement patterns of the project occupants. Therefore, adequate information on site function, context, and chronology from an archaeological perspective is essential for the investigation. The fieldwork and archival research were undertaken with the following primary research goals in mind:

- 1) To identify cultural resources occurring within the project;
- 2) To determine, if possible, site type and function, context of the resource(s), and chronological placement of each cultural resource identified;
- 3) To place each cultural resource identified within a regional perspective; and
- 4) To provide recommendations for the treatment of each cultural resource identified.

3.0 METHODOLOGY

The Phase I archaeological study of the project consisted of an institutional records search, archival research, an intensive cultural resource survey of the entire approximately 14.5-acre study area, and the preparation of this technical report. This study was conducted in conformance with Section 21083.2 of the California Public Resources Code and CEQA. Statutory requirements of CEQA (Section 15064.5) were followed for the identification and evaluation of resources. Specific definitions for archaeological resource type(s) used in this report are those established by the State Historic Preservation Office (SHPO 1995).

3.1 Archaeological Records Search

BFSA conducted an archaeological records search for the project and the surrounding area within a one-mile radius at the SCCIC at CSU Fullerton. Land patent records, held by the Bureau of Land Management (BLM) and accessible through the BLM General Land Office (GLO) website, were also reviewed for pertinent project information. In addition, the BFSA research library was consulted for any relevant historical information.

3.2 Survey Methods

In accordance with CEQA review criteria and the policies of the Town of Apple Valley, an intensive pedestrian survey of the project was conducted that employed a series of parallel survey transects spaced at 10-meter intervals to locate archaeological sites within the project. The archaeological survey of the project was conducted on October 17, 2024. The entire project was covered by the survey process, and photographs were taken to document the subject area's conditions during the survey (see Section 4.2). Ground visibility throughout the property was considered very good.

3.3 Report Preparation and Recordation

This report contains information regarding previous studies, statutory requirements for the project, a brief description of the setting, research methods employed, and the overall results of the survey. The report includes all appropriate illustrations and tabular information needed to make a complete and comprehensive presentation of these activities, including the methodologies employed and the personnel involved. A copy of this report will be placed at the SCCIC at CSU Fullerton. Any newly recorded sites or sites requiring updated information will be recorded on the appropriate DPR site forms, which will be filed with the SCCIC.

3.4 Native American Consultation

BFSA also requested a SLF search from the NAHC to search for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within one mile of the project. This request is not part of any Assembly Bill (AB) 52 Native American consultation. The results of the SLF are discussed in Section 4.1. All correspondence can be found in Appendix D.

4.0 **RESULTS**

4.1 **Results of the Archaeological Records Search**

The results of the SCCIC records search (Appendix C) did not identify any recorded resources within the subject property. However, nine resources are recorded within one mile of the project, including two prehistoric lithic scatters, four historic trash scatters, one historic trash dump, one historic dude ranch property, and one multicomponent site consisting of a historic trash scatter and a prehistoric lithic scatter (Table 4.1–1). The SCCIC records search results also identified 27 previous studies within one mile of the project, none of which included the subject property.

Table 4.1–1

Cultural Resources Located Within One Mile of the Waalew Road Truck and Trailer Project

Site(s)	Description
SBR-0043 and SBR-1548	Prehistoric lithic scatter
SBR-6841H	Historic trash dump
SBR-6843H	Historic trash scatter
SBR-8545H	Historic dude ranch
SBR-13,782/H	Historic trash scatter and prehistoric lithic scatter
SBR-15,933H, SBR-15,934H, and SBR-15,935H	Historic trash scatter

BFSA also reviewed the following sources to help facilitate a better understanding of the historic use of the property:

- The National Register of Historic Places Index
- The Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility
- The OHP, Built Environment Resource Directory
- BLM GLO records
- USGS topographic maps
- Aerial photographs (1952 through 2023)

The historic maps and aerial photographs show that while the surrounding area was developed with farmhouses and agricultural fields by 1934, the subject property remained vacant until between 1959 and 1968. During this time, the northern portion of the property was developed with agricultural fields and dirt access roads cut through the property. By the early 2000s, however, this field was abandoned. Subsequent photographs and maps indicate the project has remained vacant since the early 2000s.

BFSA also requested a SLF search from the NAHC to search for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance in the project vicinity. The SLF search was returned with negative results. All correspondence is provided in Appendix D.

4.2 Results of the Field Survey

Principal Investigator Tracy A. Stropes, M.A., RPA directed the archaeological survey with assistance from staff archaeologist James Shrieve on October 17, 2024. The archaeological study included an intensive reconnaissance survey consisting of a series of parallel transects spaced 10 meters apart. The survey found the project to primarily consist of native desert sage scrub vegetation (Plate 4.2–1). Visibility was characterized as very good. Noted impacts to the property consisted of dirt access roads (Plate 4.2–3).



Plate 4.2–1: Overview of the project from the northwest corner, facing southeast.

The survey did not identify any prehistoric resources within the subject property. However, one historic power pole and associated power lines (Site Temp-1) were identified across the southern portion of the property (Figure 4.2–1; Plate 4.2–4). While no cultural materials were identified in association with the power pole, one nail was identified on the pole that retains a date stamp for 1940, indicating the pole was likely raised in or prior to 1940. The power pole located on the project is connected to power lines that link the pole to poles outside the project. These power lines bisect the project from east to west.



Plate 4.2–2: Overview of the Site Temp-1 power pole, facing west.

Site Temp-1 is not associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage (CRHR Criterion A), it is not associated with the lives of persons important in our past (CRHR Criterion B), it does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possesses high artistic values (CRHR Criterion C), and it has not yielded, or may be likely to yield, information important in prehistory or history (CRHR Criterion D). Therefore, Site Temp-1 does not qualify as a “historically significant” resource under CEQA criteria. The identified resource has been recorded on the appropriate California DPR forms (523 series) in accordance with the SHPO (1995)’s manual, *Instructions for Recording Historical Resources* (Appendix B).

Figure 4.2-1
Cultural Resource Location Map

(Deleted for Public Review; Bound Separately)

5.0 **RECOMMENDATIONS**

The Phase I archaeological assessment for the Waalew Road Truck and Trailer Facility Project was conducted in order to identify the presence of prehistoric and historic resources that might be impacted by the proposed project. The archaeological records research review indicates that although no cultural resources studies have been conducted that include any portion of the project, a total of 27 studies have been conducted within a one-mile radius of the project. These studies have resulted in the identification of a total of two prehistoric resources, six historic resources, and one multicomponent resource within the one-mile radius. None of these resources include any portion of the current project. The review of additional databases indicates the project remained vacant through the twentieth century, with the exception of an agricultural field in the northern portion of the project and associated access roads that were created between 1958 and 1968 and maintained until the early 2000s.

The pedestrian survey resulted in the identification of one power pole and associated power lines that were constructed in or before 1940 (Site Temp-1). No historic cultural materials were identified in association with the power pole. Additionally, no prehistoric cultural materials were identified within the project boundaries. The site has been evaluated as not eligible for the CRHR and is not considered a Historical Resource under CEQA criteria. As such, no site-specific mitigation is required for removal of Site Temp-1.

In addition, the project is located outside the area identified as “highly sensitive for both prehistoric and historic-period cultural resources” in the Town of Apple Valley General Plan (Terra Nova Planning and Research, Inc. 2009). Although the project is located in an area that was not previously surveyed and identified as “undetermined cultural resource sensitivity” (Terra Nova Planning and Research, Inc. 2009), the current Phase I archaeological assessment for the Waalew Road Truck and Trailer Facility Project has resulted in the determination that the subject property yields a low potential for the presence of buried cultural resources. As such, project-specific mitigation measures will not be recommended for this project, and no further archaeological study is recommended as a condition of permit approval.

Although no site-specific mitigation measures for cultural resources are recommended, in the event that any historic or prehistoric cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be engaged to discuss the discovery and determine if further mitigation measures are warranted. Should human remains be discovered, treatment of these remains shall follow California Public Resources Code 5097.9. Any human remains that are determined to be Native American shall be reported to the San Bernardino County sheriff-coroner and subsequently to the NAHC.

6.0 LIST OF PREPARERS AND ORGANIZATIONS CONTACTED

The Phase I archaeological assessment for the Waalew Road Truck and Trailer Facility Project was directed by Principal Investigator Tracy A. Stropes, M.A., RPA. The archaeological fieldwork was conducted by staff archaeologist James Shrieve. The report text and graphics were prepared by Jillian L.H. Conroy. Technical editing and report production was conducted by Payton Swanson. The archaeological records search was conducted at the SCCIC at CSU Fullerton.

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APPENDIX A

Qualifications of Key Personnel

Tracy A. Stropes, MA, RPA

Director/Principal Investigator

BFSA Environmental Services, A Perennial Company

14010 Poway Road • Suite A •

Phone: (858) 679-8218 • Fax: (858) 679-9896 • E-Mail: tstropes@bfsa.perennialenv.com



Education

Master of Arts, Anthropology, San Diego State University, California 2007

Bachelor of Science, Anthropology, University of California, Riverside 2000

Professional Memberships

Register of Professional Archaeologists

Society for California Archaeology

Archaeological Institute of America

Experience

Director/Principal Investigator
BFSA Environmental Services, a Perennial Company

March 2009–Present
Poway, California

Project Management of all phases of archaeological investigations for local, state, and federal agencies, field supervision, lithic analysis, National Register of Historic Places (NRHP) and California Environmental Quality Act (CEQA) site evaluations, and authoring/coauthoring of cultural resource management reports.

Archaeological Principal Investigator
TRC Solutions

June 2008–February 2009
Irvine, California

Cultural resource segment of Natural Sciences and Permitting Division; management of archaeological investigations for private companies and local, state, and federal agencies, personnel management, field and laboratory supervision, lithic analysis, Native American consultation and reporting, MRHP and CEQA site evaluations, and authoring/coauthoring cultural resource management reports.

Principal Investigator and Project Archaeologist
Archaeological Resource Analysts

June 2006–May 2008
Oceanside, California

As a sub consultant, served as Principal Investigator and Project Archaeologist for several projects for SRS Inc., including field direction, project and personnel management, lab analysis, and authorship of company reports.

Project Archaeologist
Gallegos & Associates

September 1996–June 2006
Carlsbad, California

Project management, laboratory management, lithic analysis, field direction, Native American consultation, report authorship/technical editing, and composition of several data recovery/preservation programs for both CEQA and NEPA level compliance.

**Project Archaeologist
Macko Inc.**

**September 1993–September 1996
Santa Ana, California**

Project management, laboratory management, lithic analysis, field supervision, and report authorship/technical editing.

**Archaeological Field Technician
Chambers Group Inc.**

**January 1993–September 1993
Irvine, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

**Archaeological Field Technician
John Minch and Associates**

**May 1992–September 1992
San Juan Capistrano, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

Professional Accomplishments

Mr. Stropes is a professional archaeologist with over 30 years of experience in cultural resource management. His experience includes over ten years in project management, report authorship, lithic analysis, laboratory management, Native American consultation, and editing for several technical reports for numerous projects throughout southern California. Mr. Stropes has conducted cultural resource surveys, archaeological site testing and evaluations for National Register eligibility and California Environmental Quality Act (CEQA) compliance, mitigation of resources through data recovery for archaeological sites, budget and report preparation, and direction of crews of all sizes for projects ranging in duration from a single day site visit to one year. Mr. Stropes is a Registered Professional Archaeologist and on the list of archaeological consultants qualified to conduct archaeological investigations southern California and the County of San Diego. He has served as project archaeologist for numerous projects and composed data recovery and preservation programs for sites throughout California for both CEQA and NEPA level compliance. He has acted as teaching assistant for archaeological field classes at several sites in Orange (Cypress College), Los Angeles (Cypress College), and San Diego Counties (San Diego State University). In addition, Mr. Stropes was employed to teach discussion sessions for introduction to cultural anthropology classes at SDSU. Internationally, Mr. Stropes has acted as field surveyor for the Natural History Foundation of Orange County & Institucion Nacional de Antropologia y Historia surveying and relocating several sites in northern Baja California. Mr. Stropes has served as the senior project archaeologist on the following select projects.

1900 and 1912 Spindrift Drive: An extensive data recovery and mitigation monitoring program at the Spindrift Site, an important prehistoric archaeological habitation site stretching across the La Jolla area. The project resulted in the discovery of over 20,000 artifacts and nearly 100,000 grams of bulk faunal remains and marine shell, indicating a substantial occupation area (2013-2014).

Ocean Breeze Ranch: An extensive CEQA and Section 106 archaeological investigation of 1,400 acres and 20 cultural resources, both prehistoric and historic, within the Bonsall neighborhood of the county of San Diego. The project included an assessment of sites for eligibility for listing on the California Register of Historical Resources, the County of San Diego Resource Protection Ordinance, and the National Register of Historic Places, which resulted in the identification of four CRHR-eligible, RPO-significant, and NRHP-eligible sites.

Citracado Parkway Extension: An ongoing project in the city of Escondido to mitigate impacts to an important archaeological occupation site. Various archaeological studies have been conducted by BFSA, including CEQA-level survey and testing programs and Section 106 historic resources studies, resulting in the identification of a significant cultural deposit within the project area (2009-present).

Otay Ranch Village 13: An extensive archaeological investigation of nearly 2,000 acres and 84 archaeological sites, both prehistoric and historic, within the county of San Diego, which included prehistoric habitation sites, quarry sites, resource processing sites, and extensive lithic scatters. The project included an assessment of sites for eligibility for listing on the National Register of Historic Places (2016-2018).

Westin Hotel and Timeshare (Grand Pacific Resorts): Data recovery and mitigation monitoring program in the city of Carlsbad consisted of the excavation of 176 one-square-meter archaeological data recovery units which produced thousands of prehistoric artifacts and ecofacts, and resulted in the preservation of a significant prehistoric habitation site. The artifacts recovered from the site presented important new data about the prehistory of the region and Native American occupation in the area (2017).

Cantarini Ranch: A Section 106 archaeological assessment and evaluation for the NRHP of 15 archaeological sites and three isolates, including NRHP-significant prehistoric temporary camp/habitation sites, in the city of Carlsbad (2015-2017).

Citracado Business Park West: An archaeological survey and testing program at a significant prehistoric archaeological site and historic building assessment for a 17-acre project in the city of Escondido. The project resulted in the identification of 82 bedrock milling features, two previously recorded loci and two additional and distinct loci, and approximately 2,000 artifacts (2018).

College Boulevard: A Section 106 archaeological assessment and evaluation for the NRHP of seven archaeological sites, including prehistoric temporary camp/habitation sites, bedrock milling feature sites, and both prehistoric and historic artifact scatters in the city of Carlsbad (2015).

The Everly Subdivision Project: Data recovery and mitigation monitoring program in the city of El Cajon resulted in the identification of a significant prehistoric occupation site from both the Late Prehistoric and Archaic Periods, as well as producing historic artifacts that correspond to the use of the property since 1886. The project produced an unprecedented quantity of artifacts in comparison to the area encompassed by the site, but lacked characteristics that typically reflect intense occupation, indicating that the site was used intensively for food processing (2014-2015).

8801 East Marginal Way Project: A cultural resources assessment in the city of Tukwila, Washington, that identified four historic structures/buildings, which were subjected to an evaluation of integrity and eligibility for listing as King County Landmarks or listing on the National Register of Historic Places or Washington Heritage Register. Additionally, an Archaeological Resources Monitoring/Inadvertent Discovery Plan was completed for the project, the purpose of which was to establish archaeological monitoring protocols to be used during ground-disturbing activities for the 8801 East Marginal Way Project (2019).

APPENDIX B

Site Record Form

(Deleted for Public Review; Bound Separately)

APPENDIX C

Archaeological Records Search Results

(Deleted for Public Review; Bound Separately)

APPENDIX D

NAHC Sacred Lands File Search Results

(Deleted for Public Review; Bound Separately)

APPENDIX E

Confidential Map

(Deleted for Public Review; Bound Separately)