# A PRELIMINARY CULTURAL RESOURCES INVESTIGATION FOR THE PROPOSED CITY OF NEEDLES WELL No. 16, IN THE CITY OF NEEDLES, SAN BERNARDINO CO., CALIFORNIA

(APNs 0660-081-23 and -32) (USGS Needles SW Quadrangle)

by,

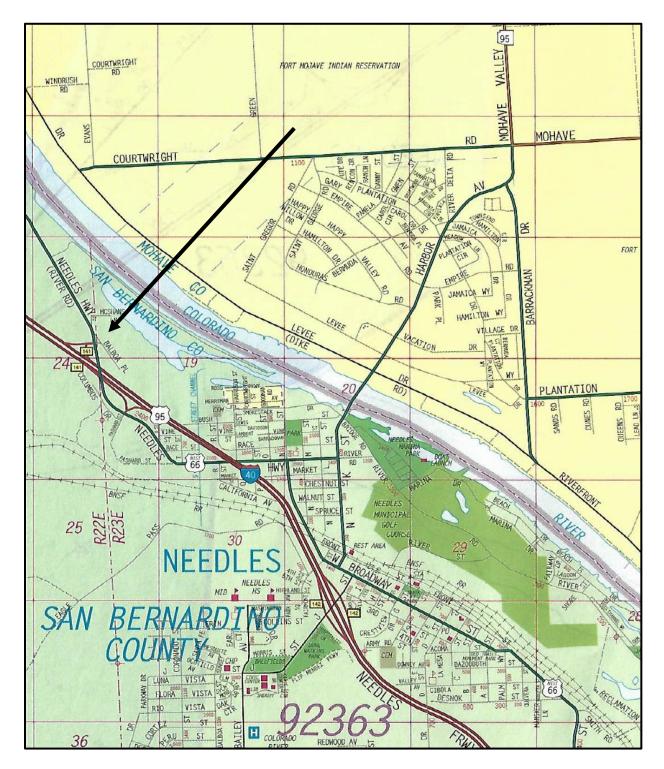
Jeanette A. McKenna, Principal McKenna et al., Whittier CA

# INTRODUCTION

This preliminary cultural resources investigation for the development of the Needles Well No. 16, City of Needles, San Bernardino County, California, was initiated by McKenna et al. at the request of Lilburn Corporation, San Bernardino, California, and completed for an addendum to the Environmental Assessment (EA/ND) completed for the 69 kV transmission line in the City of Needles (U.S. Department of the Interior 2007) to evaluate impacts associated with development of Well No. 16. This study has been limited to the completion of an updated archaeological records search and Native American Heritage Commission consultation to determine if impacts identified in the 2007 EA/ND would be substantially different. No field survey was conducted as part of this study. At the time of this investigation, the area of direct impacts was confirmed to be vacant but part of an existing substation facility operated by the City of Needles and, as yet, not utilized. McKenna et al. (Appendix A) completed this study to supplement and update the EA/ND related to the proposed well site.

## LOCATION AND PROJECT DESCRIPTION

The proposed project area is located within the City of Needles, San Bernardino County, California (Figure 1) and involves two Assessor Parcels (0660-081- 23 and -32; Figure



2). This project area is illustrated on the eastern extent of the USGS Needles SW quadrangle (Figure 3) and within Township 9 North, Range 23 East, Section 19 (SW <sup>1</sup>/<sub>4</sub>).

Figure 1. General Location of Project Area.

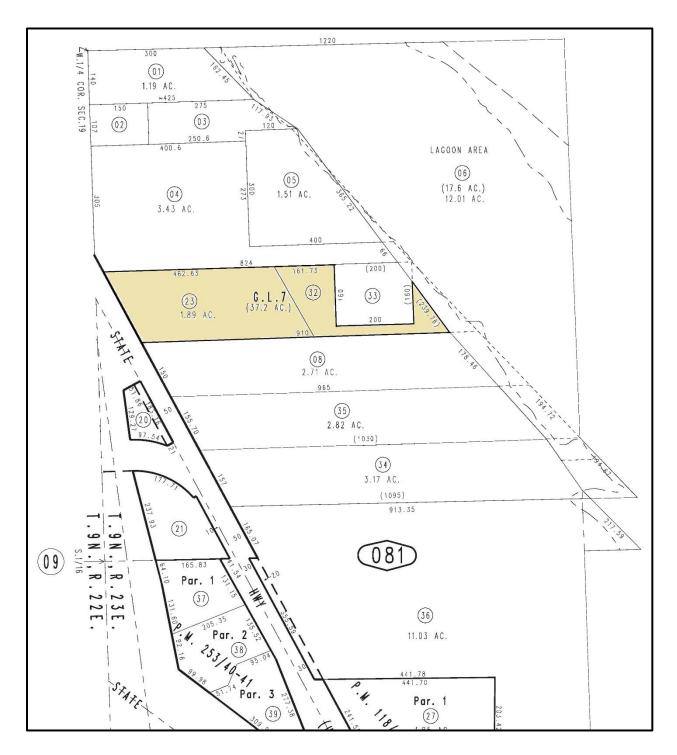


Figure 2. Assessor Parcel Map Illustrating the Location and Configurations of Parcels -23 and -32.

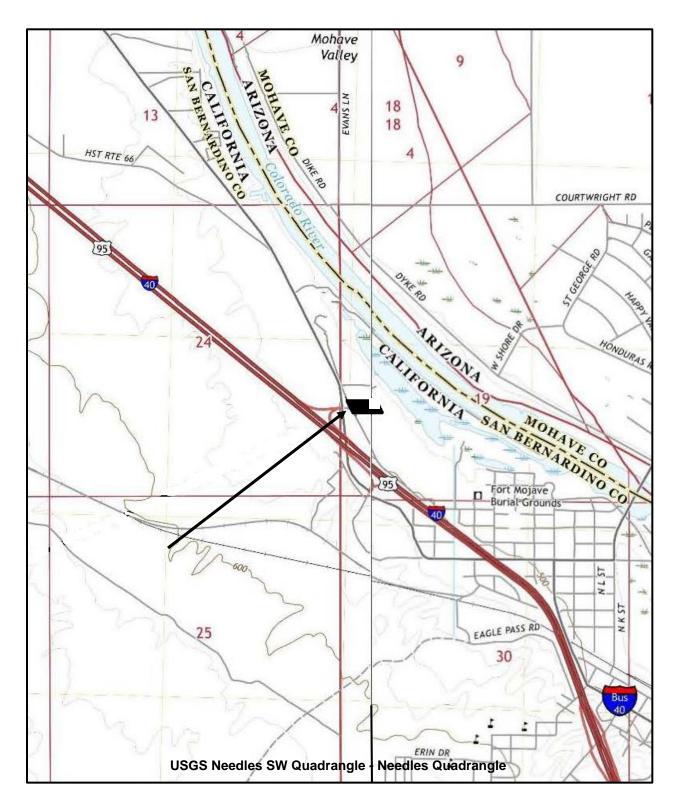


Figure 3. Specific Location of Project Area (USGS Needles SW and Needles Quadrangles, rev. 2018).

Although the City owns both parcels (-23 and -32) the existing substation is located in Parcel -23 and the proposed well site is to be developed in the western extent of Parcel - 32 (Figures 4 and 5).

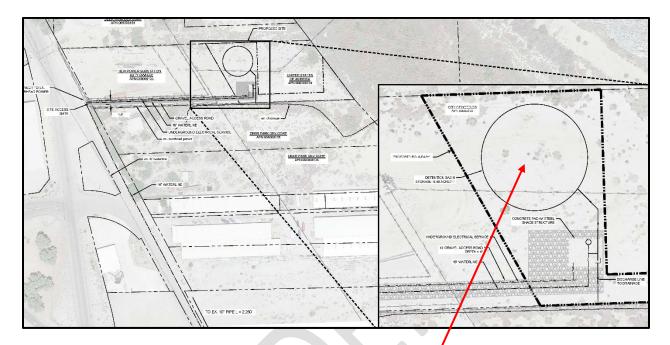


Figure 4. Proposed Development/Plan.



Figure 5. Aerial Photograph Illustrating the Project Area.

## ARCHAEOLOGICAL RECORDS SEARCH

A standard archaeological records search was completed through the California State University, Fullerton, South Central Coastal Information Center (CSUF-SCCIC) on May 15, 2017 (see Appendix B), for a property located west/northwest of the current project area. McKenna et al. used this research as a baseline for the current investigations and supplemented the data, as needed, for application to the current studies. The research was completed by Jeanette A. McKenna, Principal Investigator for McKenna et al. and included a review of all reported studies and recorded cultural resources identified in the northeastern corner of the USGS Needles SW Quadrangle. Areas to the east were identified as involving the State of Arizona and, therefore, data was not readily available through the CSUF-SCCIC. Rather, McKenna et al. relied on the negative finding presented by the Department of Energy (Luhrow 2006) for the EA/ND regarding the proposed 69 kV transmission line.

The project area is located just west of the Colorado River and near the northeastern corner of the USGS Needles SW Quadrangle. A very small portion of the project area extends onto the western extent of the USGS Needles Quadrangle (both revised in 2018). McKenna et al. limited the research to the California side of the Colorado River and addressed an area of five square miles of land – including the southern halves of Sections 13 and 14, all of Sections 23 to 26 (Township 9 North, Range 22 East), and those portions of Sections 19 and 30 of Township 9 North, Range 23 East). This research resulted in the identification of a minimum of fourteen cultural resources investigations (Table 1). Of these, nine involved linear surveys and one involved an archaeological testing program. The Luhnow study of 2006 involved the studies for the 69 kV transmission line and reported no resources.

A minimum of seventeen cultural resources were identified within one mile of the project area (Table 2). These were dominated by historic refuse scatters. Two sites, P-36-024496 and P-36-024499, were mapped as being relatively close to or adjacent to the project area.

Linder et al. (2011) recorded P-36-24496 as a "... highly disturbed, mostly redeposited, diffuse scatter of twentieth-century historic refuse occurring within graded and introduced fill sediments." This site was mapped as being located on the northeastern side of Needles Highway and north of the current project area (approximately 1/8<sup>th</sup> mile). Linder et al., determined this site was insignificant and no further actions were recommended.

P-36-024499 was recorded by Moslak et al. (2012) as "... the location and foundation ruins of a former truck stop. The truck stop may have included a service garage and associated

facilities. All of the buildings have been removed leaving only concrete pads and underground fuel storage tanks." This site is located north of the current project area and opposite P-36-24496 (separated by the highway). Moslak et al. concluded this site was insignificant and no further investigations were recommended.

Table 1. Cultural Resources Investigations Completed within One Miles of the Project Area.						
NADB	Citation	Description	Resources			
1060808	Leonard 1979	Pipeline Survey	Yes			
1090809	Reynolds 1979	SoCal Gas Pipeline	Yes			
1060810	Weber 1979	SoCal Gas Pipeline	Yes			
1060933	Hammond 1980	Borrow Pit Locations (2)				
1061110	Musser 1981	Drainage Channel Develop.				
1062772	Rafferty 1993	I-40 Powerline R-O-W	Yes			
1062890	Whitney-Desautels 1993	Needles Marina Project				
1063244	Middleton 1984	Gravel Quarry & Stockpile				
1063872	Wyss and Price 2000	Testing – CA-SBR-9998	Yes			
1066312	Luhrow 2006	69kV Transmission Line				
1067568	Eddy et al. 2013	HPSR – Needles Hwy. Improv.				
TBA	Brunzell 2007	Needles Highway Survey	Yes			
TBA	Smallwood et al. 2011	Needles Highway Improv.	Yes			
TBA	McKenna 2017	TTM 19848 (commercial)				

The archaeological records search for this area failed to identify National Old Trails Highway (Needles Highway) as a resource although the roadway is referenced in Eddy et al. (2013:42 and HPSR 2013:5). It is also known to have been recorded in numerous locales throughout San Bernardino County (see McKenna 2010 and 2017). National Old Trails Highway (P-36-002910(H) is cross-referenced as CA-SBR-2910(H) and as Route 66 (NHRP-E-OHP-3926). It has been recorded numerous times by various individuals at different locations across the County. Its condition varies, but its history remains the same and it is recognized as a nationally recognized cultural resource.

National Old Trails Highway/Route 66 enters California at the Colorado River crossing south of Park Moabi Regional Park, traverses the City of Needles and has, in places, been replaced by the modern Interstate 40 alignment. Abandoned or bypassed segments of the historic roadway are still present in some areas or demolished or redeveloped in other areas. The historic alignment (36-002910(H) has been identified as a National Register of Historic Places resource, a California Historical Resource; and a California Historical Landmark (No. 781).

of the Project Area.						
Resource No.	Citation	Description	Status			
P-36-000595	Bowers 1972	Sparse Flaked Tool Scatter	Outside			
P-36-009998	Wyss 2000	Lithic Scatter	Outside			
P-36-012508	Brunzell 2006	Sparse Historic Refuse Scatter	Outside			
P-36-012509	Brunzell 2006	Dense Historic Refuse Scatter	Outside			
P-36-024251	Smallwood 2011	Fender's Resort Motel	Outside			
P-36-024252	Smallwood 2011	3527 Needles Highway (SFR)	Outside			
P-36-024253	Smallwood 2011	3533 Needles Highway (SFR)	Outside			
P-36-024491	Linder et al. 2011	Hist. Refuse and Prehis. Lithics	Outside			
P-36-024494	Linder et al. 2011	Historic Refuse Scatter	Outside			
P-36-024495	Linder et al. 2011	RV Fueling Complex (1960-70s)	Outside			
P-36-024496	Linder et al. 2011	Historic Refuse Scatter	Adjacent			
P-36-024499	Moslak et al. 2012	Truck Stop Ruins	Adjacent			
P-36-029767	Goodman 2015	Historic Refuse and RR Grade	Outside			
P-36-029892	Ballester 2016	Historic Refuse Scatter	Outside			
P-36-029893	Ballester 2016	Historic Refuse Scatter	Outside			
P-36-029894	Ballester 2016	Historic Refuse Scatter	Outside			
TBA	McKenna 2017	Historic Refuse Scatter	Outside			

Table 2 Cultural Resources Identified within One Mile

The recognition on the National Old Trails Monument (on file, San Bernardino County Museum Archaeological Information Center) reads:

Besides U.S. Highway 66 at the east side of Needles, a plaque, erected in 1923, commemorates the completion of the last portion of the National Old Trails Highway across the continental United States.

The monument indicates the desert crossing that was used by prehistoric Indians, by historic Indians, especially Mojaves, and pathfinders such as Garces in 1776 and Jedediah Smith in 1826 and 1827. The boulder in which the plaque is set came from Granite Springs near Needles, and is marked by ancient petroglyphs.

The western section of the National Old Trails Highway was opened between 1911 and 1914. Much of the history of San Bernardino County has been made along this trail. The general route of the present U.S. Highway 66 was originally a Mojave travel and trade trail from the Colorado River to the California coast. The first white men to whom it was shown were Father Garces, the Franciscan missionary, and Jedediah Smith, an American trapper. In 1854, also guided by Mojaves, Lt. Whipple surveyed it as a possible railroad route. Later, following much the same route, the Old Government Road was opened. Army forts were built at intervals along this road, and soldiers patrolled sections of it, for protection of immigrants, wagon freighters, and mail carriers traveling to and from California ... Today the Santa Fe Railroad and U.S. Highway 66 parallel portions of the ancient trail.

In the area of Needles, National Old Trails Highway/Route 66 has been recorded by Gallegos (1977), Van Bueren (1986), Gothar et al. 2004, and McDougall (2008). Gallegos noted this resource as being "... one of the earliest modern trans-United States automobile routes ..." dating to ca. 1911.

He described the 1911-1914 segment between Needles and Essex as a paved, two-lane state maintained highway (Smith, Burr, and Haenszel n.d.). Van Bueren (1986) described National Old Trails Highway/Route 66 as:

... a portion of old Highway 66 represented by a deteriorating asphalt alignment and segments of cement-mortared slate gutters ... the future location of Route 66 was first surveyed by the War Department in response to the westward migration brought about by the Gold Rush of 1849, as part of a network of federal wagon roads ... this wagon road became one of the best travelled overland routes from Chicago to Santa Monica, and was soon paralleled by a railroad line built through the Topock area in 1893 ... In 1926 the road, which had gradually been improved over the years, was officially designated as U.S. Route 66 (Pew 1977:26). By 1932 Route 66 was completely paved and its various segments connected into a continuous highway. It was a major migration route to California during the Dust Bowl of the Depression.

As summarized above, the various segments of National Old Trails Highway/Route 66 are disjointed, have been identified both north and south of the current Interstate 40 alignment, present in various forms - including paved and unpaved and improved and deteriorated conditions.

The USGS Needles SW Quadrangle (rev. 2018) illustrates National Old Trails Highway/ Route 66 running northeast of I-40 and intersecting with I-40 just southwest of the current project area. The 2017 survey by McKenna et al. identified the right-of-way for National Old Trails Highway/Route 66 (Figure 6). As previously noted, Eddy et al. (2013) determined this portion of the roadway, despite the recognition as a National Register, California Register, and California Historical Landmark, was not a contributing segment of the designation and, therefore, impacts along this alignment would not constitute an adverse environmental impact (Caltrans concurred).



Figure 6. Existing Segment of National Old Trails Highway/Route 66, Needles, San Bernardino County.

A paleontological overview for the area of Needles was prepared McLeod (2017). McLeod concluded "... the entre proposed project area has surface deposits composed of younger Quaternary Alluvium, derived as sand and gravel fluvial deposits from the Colorado River that currently flows immediately to the east. Typically these types of deposits do not contain significant vertebrate fossils in the uppermost layers, but at depth,

they have the potential to contain significant fossil vertebrate remains." McLeod recommended "substantial excavations" be monitored ... "closely to quickly and professionally" recover any fossil remains discovered while not impeding development."

Overall, the research completed at the CSUF-SCCIC resulted in a determination that the project area is more likely to yield evidence of historic archaeological resources; has a low potential for the presence of prehistoric archaeological resources; and exhibits a moderate to high potential for the presence of deeply buried paleontological resources.

# NATIVE AMERICAN CONSULTATION

The 2007 EA/ND for the 69 kV transmission line involved significant consultation between the various agencies, including, but not limited to:

Bureau of Indian Affairs (BIA) USDI – Fish and Wildlife Service, Phoenix, AZ California Office of Historic Preservation, Sacramento, CA California Governor's Office of Planning and Research, Sacramento, CA Arizona Department of Environmental Quality, Phoenix, AZ Western Area Power Authority, Phoenix, AZ Colorado River Board of California, Glendale, CA Native American Heritage Commission, Sacramento, CA Fort Mojave Indian Tribe, Needles, CA Chemehuevi, Chemehuevi Valley, CA Morongo Band of Mission Indians, Banning, CA San Manuel Band of Mission Indians, Highland, CA Serrano Band of Indians, Patton, CA

Since 2007, California has amended their requirements for consultation (SB-18 and AB-52) and, therefore, additional consultation has been initiated as a supplement to the earlier EA/ND documentation. The current project area is limited to a small area (1 ac. +/-) in Needles California, and McKenna et al. contacted the Native American Heritage Commission, Sacramento, California, to inquire into the current status of the Sacred Land Files and reported Native American resources in the area of Needles. The results were negative – no resources are listed in the NAHC files (see Appendix C). McKenna et al. sent letters to the local Native American community contacts in 2017 for the nearby property and, upon receipt of the updates NAHC listings, sent letters identifying the Well No. 16 property to the listed entities. As of this writing only one response has been received. The Quechan Indian Tribe of Yuma, Arizona, reported they had no comments and deferred to tribes closer to the project area. The local Native American representatives were informed of the City of Needles' status as the Lead Agency for direct government-to-government consultation, if deemed appropriate. Formal consultation should be completed as a supplement to the initial consultation presented in this document.

#### SUMMARY

The data presented in the report represent the results of an updated archaeological records search and Native American consultation, as requested by the City of Needles. The project area was surveyed in 2006 (and reported in 2007) with negative findings. The current level of research has confirmed the project area to be moderated impacted by the development of the Firehouse Switchyard but is currently considered vacant land. Nearby resources have been dominated by the presence of historic refuse scatters and/or structural improvements. At least three of the recorded resources yielded evidence of prehistoric archaeological resources. Although disturbed, there is always a potential for the presence of additional cultural resources in buried contexts and/or visible on the surface as a result of post-2006 disturbances.

If cultural resources, including Native American resources, are encountered during project-related work activities, the crew(s) shall immediately stop work and take all reasonable steps to secure the location (with a buffer) to protect the resource(s) until the resource(s) can be inspected and evaluated. The Lead Agency shall be immediately notified of the find and the AMPS Project Manager (or designated representative) shall contact the Western Archaeologist (720-962-7253) and FMIT Natural Resource Director (928-346-1606) to arrange for the proper treatment of the resource(s). If the resource is of Native American origin, the appropriate tribal representative shall be notified by the Western Archaeologist and/or City of Needles. In consultation between the parties, the disposition of the resources and/or the need for an archaeological monitoring program will be determined.

McKenna et al. recommends the Lead Agency have a professional archaeological consultant on-call and a designated Native American representative available to assist in the assessment of any Native American resource(s). If an archaeological monitoring program is deemed necessary, both a professional archaeologist and Native American representative should be involved in the on-site activities. If, at any time, human remains or suspected human remains are identified within the project area, work must be halted in the immediate vicinity of the find and a buffer established around the find (minimum of 50 feet). The on-call archaeological consultant will oversee this level of protection with the assistance of the Native American representative. The Lead Agency must be immediately informed of the find. The Lead Agency must immediately notify the County Coroner and permit examination *in situ* (within 24 hours). The Coroner has the legal authority to examine the find and make a determination as to the nature of the remains:

- a) If the remains are determined to be human, the Coroner will determine whether the remains are of Native American origin. If so, the Coroner will contact the Native American Heritage Commission and the Commission will name the Most Likely Descendent (MLD). In consultation between the Lead Agency (City), MLD, and consulting archaeologist, the disposition of the remains will be determined. If there is a conflict, the Native American Heritage Commission with act as a mediator.
- b) If the remains are determined to be archaeological, but not of Native American origin, the Lead Agency (City) and archaeological consultant will determine the disposition of the remains and removal from the site.
- c) If the remains are determined to be of forensic value, the Coroner will arrange for the removal of the remains and oversee the analysis and disposition, per County protocol.

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Any questions or comments regarding this study should be directed to the author, Jeanette A. McKenna, Principal Investigator, McKenna et al., Whittier, California.

Jeanette U. McKenna

Jeanette A. McKenna, Principal, McKenna et al.

6/10/21 Date

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# **APPENDIX A:**

**Professional Qualifications** 

#### JEANETTE A. MCKENNA Owner and Principal Investigator McKenna et al., Whittier CA

Ms. McKenna specializes in the discipline of Cultural Resource Management: prehistoric archaeology, historic archaeology, historic architecture, and history. She holds a Master's Degree in Anthropology/Archaeology and was recently awarded an Honorary Doctorate of Letters (HonDL) by the International Biographical Centre of Cambridge, England. She is a past member of the Board of Directors for the Society of Professional Archaeologists (SOPA 1993-97) and was certified by the Society to conduct both prehistoric and historic archaeological studies. Ms. McKenna is also recognized by the California Office of Historic Preservation as qualified to complete historic architectural studies. Ms. McKenna was on the Board of Directors for SOPA when the Society established the Registry of Professional Archaeologists (RPA) and has been a Registered Professional Archaeologist since 1998. Ms. McKenna has over 39 years of professional experience as an archaeologist/cultural resource manager and has participated on over 1700 projects of various sizes and complexities. The majority of her work has been conducted as a Field Director, Project Manager, and/or Principal Investigator throughout California and the Greater Southwest.

#### **TECHNICAL CAPABILITIES**

- Vast experience in the greater Southwest, Great Basin, and Southern California regions. Familiar with the full range of cultural resource investigations and has completed projects within the public and private sectors, including environmental management firms, planning and engineering firms, and State and federal agencies.
- Active in the discipline of Cultural Resource Management since 1976; over 39 years of professional experience in Southern California, Arizona, and Nevada.
- Particular interest in the desert regions of California and Arizona, with specializations in the Protohistoric and Historic Contact Periods.
- Considerable experience in dealing with prehistoric cultural remains and working directly with Native American groups in archaeological training programs (Arizona State University; the Southern California Indian Center, Garden Grove).

#### **EDUCATION AND AFFILIATIONS**

B.A., Anthropology, 1977, CSU Fullerton M.A., Anthropology, 1982, CSU Fullerton HonDL, 2015, Int. Biog. Centre, Cambridge Lambda Alpha Lambda Honors Society Post Graduate Studies, Arizona St. Univ., 1982-85 Post Graduate Studies, UC Riverside, 1991-92 Certification Program: CEQA, Land Use and Environmental Planning, UC Riverside, 1997-98 Society of Professional Archaeologists (SOPA) Certification: Field/ Prehistoric Archaeology and Historical Archaeology (1984 to Present) Registry of Professional Archaeologists (RPA) Board of Directors, Society of Professional Archaeologists 1993-1997 (American Society of Conservation Archaeologists Representative) BLM California Permit (renewable) BLM Arizona State Permit (renewable) **Riverside County Registration No. 161** Arizona State Antiquities Permit (renewable) Curation, San Bernardino Co. Museum Curation, Arizona State University

#### SELECTED PROJECT EXPERIENCE

- Historic Architectural Studies for Renovation and Restoration, the Greek Theatre, Los Angeles CA
- Evaluation of Cultural Resources: Burbank and West Hollywood Redevelopment Project Areas, Los Angeles County, CA
- Historic Property Survey for the City of Whittier, Los Angeles County, CA
- Archaeological Investigations and Resource Evaluations for the Proposed Cajon Pipeline, San Bernardino and Los Angeles Counties, CA
- Archaeological Class I Investigations, Proposed Mojave Pipeline, San Bernardino County, CA
- Cultural Resources Investigations (Phases I, II, III, and Mitigation Monitoring) for the RIX/SARI Projects, Santa Ana Watershed Project Authority (SAWPA), San Bernardino and Riverside Counties, CA
- Phase I, II, and III Archaeological Investigations for the County Sanitation Districts of Los Angeles County, Puente Hills Landfill Solid Waste Management Facility Expansion Project, Whittier, CA
- Archaeological Mitigation Program, Phoenix Indian School Track Site Project. Arizona State University Office of Cultural Resource Management and the Bureau of Indian Affairs, Phoenix, AZ
- Archaeological and Testing Program for the Hidden Valley Golf Course and Van Buren Golf Course Properties, Riverside County, CA
- Cultural Resources Overview Studies for the Annexation of Unincorporated County Lands to the City of Ontario, CA
- Historic Property Survey Reports: Warner Bros. Main Lot Ranch Lot Properties, Burbank, CA
- Historic Archaeological Investigations for L.A. County Sheriff's Facility, Lancaster, CA.

# **APPENDIX B:**

Archaeological Records Search

Report List	List					
Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-00217	NADB-R - 1060217; Voided - 74-4.7	1974	BECKER, GILBERT	ARCHAEOLOGICAL SURFACE SURVEY AND ANALYSIS: PROPOSED TRACT NOS. 8858 AND 8859, BIG BEAR CITY, CALIFORNIA	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	
SB-00808	NADB-R - 1060808; Voided - 79-7.3(1)	1978	LEONARD III, N. NELSON	AN ARCHAEOLOGICAL ASSESSMENT OF THE PROPOSED PIPELINE ROUTE IN THE VICINITY OF NEEDLES, CALIFORNIA	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	36-002704
SB-00809	NADB-R - 1060809; Voided - 79-7.3(2)	1979	REYNOLDS, ROBERT E.	CULTURAL RESOURCES SURVEY: SOUTHERN CALIFORNIA GAS COMPANY, ALTERNATE B PIPELINE CORRIDORS, NEEDLES AREA, SAN BERNARDINO COUNTY, CALIFORNIA	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	36-003453, 36-003454, 36-003456, 36-003458, 36-003459, 36-003462, 36-003463, 36-003464, 36-003465, 36-003466, 36-003467, 36-003468, 36-003469, 36-003470, 36-003471, 36-003472, 36-003474
SB-00810	NADB-R - 1060810; Voided - 79-7.3(3)	1979	WEBER, TONY F.	AN ARCHAEOLOGICAL AND PALEONTOLOGICAL ASSESSMENT OF THE SOUTHERN CALIFORNIA GAS COMPANY'S ALTERNATE PIPELINE ROUTES IN THE VICINITY OF NEEDLES, CALIFORNIA	SAN BERNARDINO COUNTY MUSEUM ASSOCIATION	36-003453, 36-003454, 36-003456, 36-003458, 36-003459, 36-003462, 36-003463, 36-003464, 36-003465, 36-003466, 36-003467, 36-003468, 36-003469, 36-003471, 36-003472, 36-003473, 36-005557
SB-00933	NADB-R - 1060933; Voided - 80-3.2	1980	HAMMOND, STEPHEN R.	ARCHAEOLOGICAL SURVEY REPORT: TWO BORROW PIT AREAS, NEEDLES AREA		
SB-01110	NADB-R - 1061110; Voided - 81-3.10	1981	MUSSER, R.A.	CULTURAL RESOURCE ASSESSMENT OF THE PROPOSED RIGHT-OF-WAY FOR ACCESS ROAD AND DRAINAGE CHANNEL NEAR GAUT RESIDENCE AND FOR AMMENDMENT TO EXISTING GAUT LEASE		
SB-02772	NADB-R - 1062772	1993	RAFFERTY, KEVIN	A CULTURAL RESOURCE INVENTORY OF A 2.3 MILE LONG POWERLINE RIGHT-OF- WAY ALONG INTERSTATE 40 FOR THE CITY OF NEEDLES, SAN BERNARDINO COUNTY, CA	ARCHAEOLOGICAL RESEARCH OF S. NEVADA	36-006693
SB-02890	NADB-R - 1062890	1993	WHITNEY-DESAUTELS, NANCY A.	ARCHAEOLOGICAL SURVEY OF THE 30 ACRE NEEDLES MARINA PROJECT LOCATED WITHIN THE CITY OF NEEDLES, SAN BERNARDINO COUNTY, CALIFORNIA	SCIENTIFIC RESOURCES SURVEY	
SB-03244	NADB-R - 1063244	1984	MIDDLETON, J.G.	A CULTURAL RESOURCE SURVEY OF A GRAVEL QUARRY & STOCKPILE SITE, SECTION 14. 12PP	BUREAU OF RECLAMATION	

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Report No. Other IDs	Other IDs	Year	Year Author(s)	Title	Affiliation	Resources
SB-03872	NADB-R - 1063872	2000	2000 WYSS, MARILYN and BARRY A. RICE	CULTURAL RESOURCES INVESTIGATION AT CA-SBR-9998 NEAR NEEDLES IN SAN BERNARDINO COUNTY, CA. 25PP	APPLIED EARTHWORKS	36-002910, 36-009998
SB-06311						
SB-06312	NADB-R - 1066312	2006	2006 Luhnow, Glenda	Cultural Resources Survey of a Proposed 69kV Transmission Line from the Existing No Name Substation in Mohave County, Arizona, to the Proposed Firehouse Switchyard in Needles, San Bernardino County, California.	Archaeological Consulting Services, Ltd	
SB-07568	NADB-R - 1067568	2013	2013 Eddy, John J.	Historic Property Survey Report: Needles Highway Improvements Project: Segments N, 1 and 3 and Off-reservation Portions of Segment 2, San Bernardino County, California.		

SBAIC 5/15/2017 11:29:59 AM

# A PHASE I CULTURAL RESOURCES INVESTIGATION FOR A PROPOSED TENTATIVE PARCEL MAP NO. 19848, A COMMERCIAL DEVELOPMENT SITE IN THE CITY OF NEEDLES, SAN BERNARDINO CO., CALIFORNIA

- USGS Needles SW Quadrangle -

Prepared for:

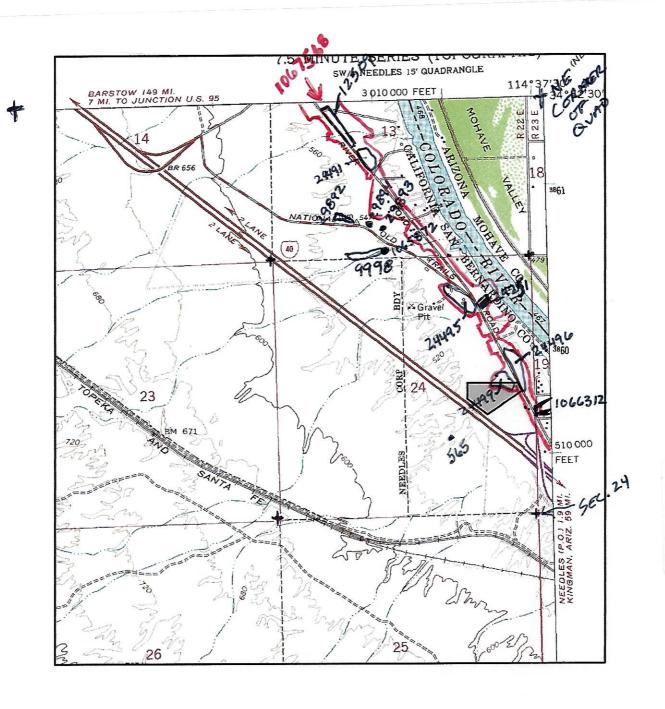
LILBURN CORPORATION Attn: Cheryl Tubbs 1905 Business Center Drive San Bernardino, California 92408

Prepared by:

McKENNA et al. 6008 Friends Avenue Whittier, California 90601-3724 (562) 696-3852

Author and Principal Investigator: Jeanette A. McKenna, MA/RPA/HonDL

Job No. 05-17-06-1865 June 22, 2017

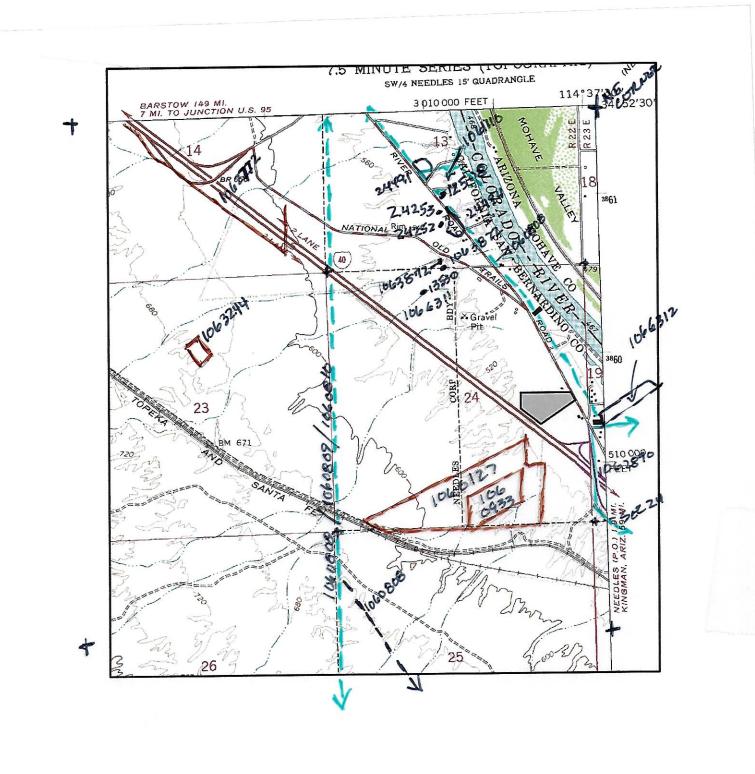


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NEEDLES SW QUAD

PROJIN NE



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# **APPENDIX C:**

Native American Consultation

# McKenna et al.

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA Reg. Professional Archaeologist Owner and Principal Investigator

## SACRED LANDS FILE & NATIVE AMERICAN CONTACTS LIST REQUEST

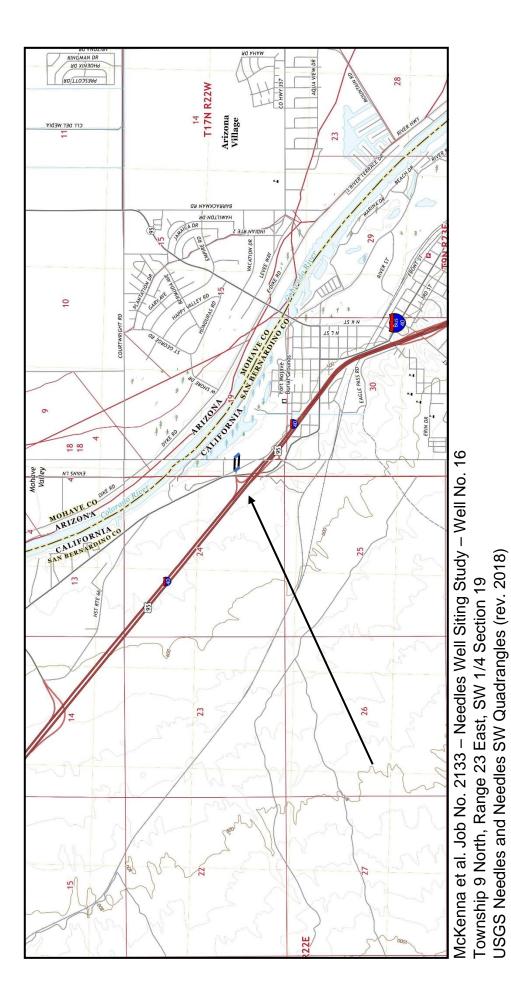
NATIVE AMERICAN HERITAGE COMMISSION 1550 Harbor Blvd., Suite 100 West Sacramento, California 95691 (916) 373-3710 (916) 373-5471 FAX or (916) 657-5390 FAX nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Date:	May 1	7, 2021			
Project: City of		Needles Well No. 16			
County: San Be		ernardino			
USGS Quadrangle: Needle		es SW (west) and Needles (east; rev. 2018)			
Township: <b>9 N</b>	Range:	23 E	Section(s):	19 (SW ¼)	
Company/Firm/Agene Contact Person: Street Address: City:	cy:	McKenna et al. Jeanette A. McK 6008 Friends Ave Whittier, CA		Zip: <b>90601-3724</b>	
Phone:		(562) 696-3852			
Cell:		(562) 754-7712			
Email:		jeanette.mckennaetal@gmail.com			
Project Description:			isting faciliti	h an existing power plant; area of es and within a relatively	



McKenna et al. Job No. 2133 – Needles Well Siting Study – Well No. 16 Township 9 North, Range 23 East, SW 1/4 Section 19 USGS Needles and Needles SW Quadrangles (rev. 2018) APNs 0660-081-23 and -32 (San Bernardino County)



APNs 0660-081-23 and -32 (San Bernardino County)





Needles Well Site Project, APNs 0660-081-23 and -32 (San Bernardino County).



CHAIRPERSON Laura Miranda Luiseño

VICE CHAIRPERSON Reginald Pagaling Chumash

SECRETARY Merri Lopez-Keifer Luiseño

Parliamentarian **Russell Attebery** Karuk

COMMISSIONER William Mungary Paiute/White Mountain Apache

COMMISSIONER Julie Tumamait-Stenslie Chumash

Commissioner [**Vacant**]

COMMISSIONER [Vacant]

COMMISSIONER [Vacant]

Executive Secretary Christina Snider Pomo

#### NAHC HEADQUARTERS

1550 Harbor Boulevard Suite 100 West Sacramento, California 95691 (916) 373-3710 nahc@nahc.ca.gov NAHC.ca.gov STATE OF CALIFORNIA

# NATIVE AMERICAN HERITAGE COMMISSION

June 2, 2021

Jeanette A. McKenna McKenna et al.

Via Email to: jeanette.mckennaetal@gmail.com

#### Re: City of Needles Well No. 16 Project, San Bernardino County

Dear Ms. McKenna:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were <u>negative</u>. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: <u>Andrew.Green@nahc.ca.gov</u>.

Sincerely,

Indrew Green

Andrew Green Cultural Resources Analyst

Attachment

#### Native American Heritage Commission Native American Contact List San Bernardino County 6/2/2021

#### Chemehuevi Indian Tribe

Sierra Pencille, Chairperson P.O. Box 1976 1990 Palo Verde Chemehuevi Drive Havasu Lake, CA, 92363 Phone: (760) 858 - 4219 Fax: (760) 858-5400 chairman@cit-nsn.gov

#### Colorado River Indian Tribes

Dennis Patch, Chairman 26600 Mojave Road Parker, AZ, 85344 Phone: (928) 669 - 9211 Fax: (928) 669-1925 amanda.barrera@crit-nsn.gov

#### Fort Mojave Indian Tribe

Timothy Williams, Chairperson 500 Merriman Ave Mojave Needles, CA, 92363 Phone: (760) 629 - 4591 Fax: (760) 629-5767 lindaotero@fortmojave.com

# Quechan Tribe of the Fort Yuma Reservation

Jill McCormick, Historic Preservation Officer P.O. Box 1899 Quechan Yuma, AZ, 85366 Phone: (760) 572 - 2423 historicpreservation@quechantrib e.com

# Quechan Tribe of the Fort Yuma Reservation

Manfred Scott, Acting Chairman Kw'ts'an Cultural Committee P.O. Box 1899 Quechan Yuma, AZ, 85366 Phone: (928) 750 - 2516 scottmanfred@yahoo.com

#### Twenty-Nine Palms Band of Mission Indians

Darrell Mike, Chairperson 46-200 Harrison Place Coachella, CA, 92236 Phone: (760) 863 - 2444 Fax: (760) 863-2449 29chairman@29palmsbominsn.gov

Chemehuevi

#### Twenty-Nine Palms Band of Mission Indians

Anthony Madrigal, Tribal Historic Preservation Officer 46-200 Harrison Place Chemehuevi Coachella, CA, 92236 Phone: (760) 775 - 3259 amadrigal@29palmsbomi-nsn.gov

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resource Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed City of Needles Well No. 16 Project, San Bernardino County.



Jeanette McKenna <jeanette.mckennaetal@gmail.com>

### City of Needles Well No. 16 Development, San Bernardino County, CA

2 messages

 Quechan Historic Preservation Officer < historicpreservation@quechantribe.com>
 Tue, Jun 8, 2021 at 9:48 AM

 To: Jeanette McKenna <jeanette.mckennaetal@gmail.com>
 Tue, Jun 8, 2021 at 9:48 AM

This email is to inform you that we have no comments on this project. We defer to the more local Tribes and support their decisions on the project.

Thank you,

H. Jill McCormick, M.A.

Quechan Indian Tribe

**Historic Preservation Officer** 

P.O. Box 1899

Yuma, AZ 85366-1899

Office: 760-572-2423

Cell: 928-261-0254

E-mail: historicpreservation@quechantribe.com





Jeanette McKenna <jeanette.mckennaetal@gmail.com> Tue, Jun 8, 2021 at 2:53 PM To: "Tubbs, Cheryl" <cheryl@lilburncorp.com>, "Natalie@lilburncorp.com" <natalie@lilburncorp.com>

[Quoted text hidden]

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Chemehuevi Indian Tribe Attn: Sierra Pencille, Chair P.O. Box 1976 Havasu Lake, California 92363

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Ms. Pencille:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

This project area is illustrated on the eastern extent of the USGS Needles SW quadrangle (Township 9 North, Range 23 East, Section 19 (SW ¼). The project area is currently vacant but has been impacted by some prior use by the City.

An archaeological records search confirmed this property was surveyed in 2007 as part of the larger investigations for the 69kV Transmission Line from the Existing No Name Substation in Mohave County, Arizona, to the Proposed Firehouse Switchyard in Needles (Luhrow 2006). Luhrow reported negative findings.

In addition to the Ludrow findings, the Native American Heritage Commission reported similar negative findings. As part of the overall project preparation and consultation processes, and as a supplement to the 2007 Environmental Assessment.

Sincerely,

Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Colorado River Indian Tribes Attn: Dennis Patch, Chair 26600 Mojave Road Parker, Arizona 85344

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Mr. Patch:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

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Sincerely,

Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Fort Mojave Indian Tribe Attn: Timothy Williams, Chair 500 Merriman Avenue Needles, California 92363

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Mr. Williams:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

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Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Quechan Tribe of the Fort Yuma Reservation Attn: Jill McCormick, HPO P.O. Box 1899 Yuma, Arizona 85366

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Ms. McCormick:

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Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Quechan Tribe of the Fort Yuma Reservation Attn: Manfred Scott, Acting Chair P.O. Box 1899 Yuma, Arizona 85366

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Mr. Scott:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

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Sincerely,

Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Twenty-Nine Palms Band of Mission Indians Attn: Darrell Mike, Chair 46-200 Harrison Place Coachella, California 92236

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Mr. Mike:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

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Sincerely,

Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 3, 2021

Twenty-Nine Palms Band of Mission Indians Attn: Anthony Madrigal, THPO 46-200 Harrison Place Coachella, California 92236

RE: City of Needles Well No. 16 Development, San Bernardino County, CA.

Mr. Madrigal:

McKenna et al. is initiating research pertaining to the development of the City of Needles Well No. 16. The project involves the development of a well within an existing Firehouse Switchyard on the east side of Needles Highway (US Route 66). The proposed project area involves two Assessor Parcels (0660-081- 23 and -32) though the well site development will be limited to Parcel -32.

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Sincerely,

Jeanette A. McKenna

Jeanette A. McKenna, Principal

### NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department 1550 Harbor Bivd., Suite 100 West Sacramento, CA 95691 (916) 373-3710



June 16, 2017

Jeanette McKenna McKenna et al.

Sent by E-mail: Jeanette.mckennaetal@gmail.com

RE: Proposed Cure Farms Commercial Development Project, City of Needles; Needles USGS Quadrangle, San Bernardino County, California

Dear Ms. McKenna:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. Please note that the intent of the reference codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public agencies** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

- 1. The results of any record search that may have been conducted at an information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
  - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
  - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
  - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

- 2. The results of any archaeological inventory survey that was conducted, including:
  - Any report that may contain site forms, site significance, and suggested mitigation measurers.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure in accordance with Government Code Section 6254.10.

- 3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. <u>A search of the SFL was completed for the project with negative results</u>.
- 4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

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Save Totton, M.A., PhD. Associate Governmental Program Analyst

#### Native American Heritage Commission Native American Contact List San Bernardino County 6/16/2017

#### **Chemehuevi Reservation**

Charles Wood, Chairperson P.O. Box 1976 Chemehuevi Valley, CA, 92363 Phone: (760) 858 - 4219 Fax: (760) 858-5400 chairman@cit-nsn.gov

#### Colorado River Indian Tribe

Dennis Patch, Chairman 26600 Mojave Road Parker, AZ, 85344 Phone: (928)669-9211 Fax: (928)669-1925 crit.museum@yahoo.com

#### Fort Mojave Indian Tribe

Timothy Williams, Chairperson 500 Merriman Ave Mojave Needles, CA, 92363 Phone: (760) 629 - 4591 Fax: (760) 629-5767

#### Twenty-Nine Palms Band of

Mission Indians Anthony Madrigal, Tribal Historic Preservation Officer 46-200 Harrison Place Coachella, CA, 92236 Phone: (760) 775 - 3259 Fax: (760) 863-2449 amadrigal@29palmsbomi-nsn.gov

#### **Twenty-Nine Palms Band of**

Mission Indians Darrell Mike, Chairperson 46-200 Harrison Place Chemehuevi Coachella, CA, 92236 Phone: (760) 863 - 2444 Fax: (760) 863-2449 29chairman@29palmsbominsn.gov

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Cure Farms Commercial Development Project, San Bernardino County.

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 16, 2017

Chemehuevi Reservation Attn: Charles Wood, Chairperson P.O. Box 1976 Chemehuevi Valley, CA 92363

RE: Commercial Development, Needles, CA.

Mr. Wood:

McKenna et al. is initiating the cultural resources investigations for the 10+/- acre commercial development project area in the City of Needles (see attached graphics). The project area is located between I-40 and Nation Old Trails Highway. Modern commercial developments are located nearby.

An archaeological records search has been completed at the California State University, South Central Coastal Information Center and this research confirmed the property was NOT previously surveyed for cultural resources, but both prehistoric and historic sites and isolates have been identified within one mile (California side of Colorado River). In general, the area is considered sensitive for additional evidence of cultural resources.

The Native American Heritage Commission has no sacred or religious sites mapped for this area. However, McKenna et al. would not rule out the potential for such resources, including burials, given the proximity of the river and the high level of sensitivity for occupation along the river.

Please review your records and inform me of any issues or concerns you may have and/or would wish addressed in the technical report. The City of Needles is acting as the Lead Agency and any AB-52 consultation should be directed to the City, directly. I appreciate you cooperation and participation in the continued efforts to protect all non-renewable cultural resources.

Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 16, 2017

Colorado River Indian Tribe Attn: Dennis Patch, Chairman 26600 Mojave Road Parker, Arizona 85344

RE: Commercial Development, Needles, CA.

Mr. Patch:

McKenna et al. is initiating the cultural resources investigations for the 10+/- acre commercial development project area in the City of Needles (see attached graphics). The project area is located between I-40 and Nation Old Trails Highway. Modern commercial developments are located nearby.

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History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 16, 2017

Fort Mojave Indian Tribe Attn: Timothy Williams, Chairperson 500 Merriman Avenue Needles, California 92363

RE: Commercial Development, Needles, CA.

Mr. Williams:

McKenna et al. is initiating the cultural resources investigations for the 10+/- acre commercial development project area in the City of Needles (see attached graphics). The project area is located between I-40 and Nation Old Trails Highway. Modern commercial developments are located nearby.

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History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 16, 2017

Twenty-Nine Palms Band of Mission Indians Attn: Anthony Madrigal, THPO 46-200 Harrison Place Coachella, California 92236

RE: Commercial Development, Needles, CA.

Mr. Madrigal:

McKenna et al. is initiating the cultural resources investigations for the 10+/- acre commercial development project area in the City of Needles (see attached graphics). The project area is located between I-40 and Nation Old Trails Highway. Modern commercial developments are located nearby.

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Jeanette A. McKenna

Jeanette A. McKenna, Principal

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA, HonDL Reg. Professional Archaeologist Owner and Principal Investigator

June 16, 2017

Twenty-Nine Palms Band of Mission Indians Attn: Darrell Mike, Chairperson 46-200 Harrison Place Coachella, California 92236

RE: Commercial Development, Needles, CA.

Mr. Mike:

McKenna et al. is initiating the cultural resources investigations for the 10+/- acre commercial development project area in the City of Needles (see attached graphics). The project area is located between I-40 and Nation Old Trails Highway. Modern commercial developments are located nearby.

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Jeanette A. McKenna

Jeanette A. McKenna, Principal

### **APPENDIX D:**

Paleontological Overview

Natural History Museum of Los Angeles County 900 Exposition Boulevard Los Angeles, CA 90007

tel 213.763.DINO www.nhm.org

Vertebrate Paleontology Section Telephone: (213) 763-3325

e-mail: smcleod@nhm.org

27 June 2017

McKenna et al. 6008 Friends Avenue Whittier, California 90601-3724

Attn: Jeanette A. McKenna

re: Paleontological resources for the proposed Cure Farms Commercial Development Project, Job # 17.1874, in the City of Needles, San Bernardino County, project area

Dear Jeanette:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for the proposed Cure Farms Commercial Development Project, Job # 17.1874, in the City of Needles, San Bernardino County, project area as outlined on the portion of the Needles USGS topographic quadrangle map that you sent to me on 13 June 2017. We do not have any fossil vertebrate localities that lie directly within the proposed project area boundaries, but we do have localities, albeit at some distance, from sedimentary deposits similar to those that may occur in the proposed project area.

From geologic mapping, it appears that the entire proposed project area has surface deposits composed of older Quaternary Alluvium, broadly derived as alluvial fan deposits from the Sacramento Mountains to the west. These deposits may not contain significant vertebrate fossils in the uppermost layers, but at depth they always have the potential to contain significant fossil vertebrate remains. Our closest vertebrate fossil localities from somewhat similar deposits are LACM (CIT) 208 and LACM 3414, quite southwest of the proposed project area in what is now Joshua Tree National Park near Pinto Wash on the northeastern flank of the Eagle Mountains. These localities produced a late Pleistocene fauna containing tortoise, *Gopherus*, horse, *Equus*, camel, *Tanupolama stevensi* and *Camelops*, and shrub ox, Ovibovini.



Shallow excavations in the older Quaternary Alluvium exposed throughout the proposed project area probably will not encounter any significant vertebrate fossils. Deeper excavations in the sedimentary deposits of the proposed project area, however, may well uncover significant vertebrate fossil remains. Any substantial excavations below the uppermost layers, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

Summel a. Mi Leod

Samuel A. McLeod, Ph.D. Vertebrate Paleontology

enclosure: invoice