

## Appendix E-2

---

### Supplemental Cultural Resources Survey Results Memorandum



July 29, 2020

12122

Brandon Gallup, Project Manager  
Covington Group, Inc.  
14180 Dallas Parkway, Suite 730  
Dallas, Texas 75254

**Subject:** *Supplemental Cultural Resources Inventory for the for the Hesperia Commerce Center II Project, Hesperia, San Bernardino County, California*

Dear Mr. Gallup:

This report documents the results of a supplemental cultural resources inventory completed for the proposed Off-Site Utilities Alignments for the Hesperia Commerce Center II Project (Project), located in Hesperia, California for Covington Group, Inc. This supplemental inventory, completed in compliance with the California Environmental Quality Act (CEQA) and the City of Hesperia General Plan for cultural resources, includes a review of previous research completed by LSA (2019), a review of historic topographic maps and aerial images, and intensive pedestrian surveys.

## Project Location and Present Use

The proposed Off-Site Utilities Alignments are located in the eastern part of the City of Hesperia (City), in the Victor Valley/High Desert region of western San Bernardino County. The Off-Site Utilities Alignments are within public land survey system (PLSS) Sections 15 and 16 of Township 4 North, Range 5 West, within *Baldy Mesa*, CA 7.5-minute USGS Quadrangle (Attachment A: Figure 1, Project Location).

The Off-Site Storm Drain Alignment extends along Yucca Terrace Drive (bisected by US Highway 395) extending from the intersection of Yucca Terrace Drive and Merito Road, and terminating at a west-facing bank of the Oro Grande Wash to the east.

The Off-Site Sewer Alignment extends along Yucca Terrace Drive (bisected by US Highway 395) extending from the intersection of Yucca Terrace Drive and Merito Road, crossing under US Highway 395 and continuing approximately 2,200 feet along Yucca Terrace Drive, before turning in a 45-degree angle to the southeast and extending roughly 1,100 feet across Oro Grande Wash. Within the Oro Grande Wash, the sewer line will be located under the existing grade of the wash and installed via jack-and-bore techniques in order to avoid the jurisdictional limits of the ephemeral watercourse.

The Off-Site Water Alignment extends west from U.S. Highway 395, crosses the Oro Grande Wash and continues along Sultana Street, then travels north at Los Banos Avenue, terminating at Phelan Road.

Regional access to the Off-Site Utilities Alignments is provided by U.S. Highway 395 and Interstate (I) 15 (Attachment A: Figure 1, Project Location).

The Off-Site Utilities Alignments are situated along existing dirt access roads surrounded by vacant, undeveloped land, with a few residences along the Off-Site Water Alignment, and has been disturbed as a result of illegal dumping, trespassing, and unpermitted off-road vehicle use. These previously unpermitted activities have led to areas of exposed bare soils (where trails have formed) and several refuse piles sporadically along both the Off-Site Utilities Alignments. Ground surface cover consists of moderate native brush and shrub growth, with occasional Juniper and Joshua trees located throughout the site. The site's surface elevation ranges between approximately 3,522 and 3,602 feet above mean sea level (msl) and the local topographic gradient is approximately two percent towards the northeast with the southwestern corner of the site sloping moderately downward to the west. Land uses generally surrounding the Off-Site Utilities Alignments primarily consist of vacant land, along with some scattered residential, commercial, light industrial, and utility uses. The study area for the Off-Site Utilities Alignments includes the entire proposed Off-Site Utilities Alignments and a 500-foot buffer around the entire route.

## Project Description

The Project consists of the development of a three industrial/warehouse buildings totaling approximately of 3,745,429 square feet. The Off-Site Utilities Alignments would be constructed to support the Project.

### Off-Site Storm Drain Alignment

A new engineered stormwater drainage system would be constructed as part of the three-building industrial/warehouse development to collect and treat on-site stormwater. The Project and its new stormwater drainage system would be required to capture and treat all on-site stormwater generated by design storm events, as defined by both the City of Hesperia and County of San Bernardino. Stormwater from actual storm events that exceed these design storm events would be permitted to flow into the Oro Grande Wash by means of the Off-Site Storm Drain Alignment, which would be 96-inch-diameter storm drain pipe. This new storm drain alignment would exit the Project site in an easterly direction, traversing along Yucca Terrace Drive to the east, crossing under U.S. Highway 395 and continuing approximately 2,200 feet along Yucca Terrace Drive, before turning in a 45° angle to the southeast and extending roughly 175 feet before outletting into the bank of the wash. The Oro Grande Wash is a regional storm drain facility that is part of the City of Hesperia's Master Plan of Drainage, is located in the Project's off-site improvement area. The wash has an earthen bottom and is routinely maintained by the San Bernardino County Flood Control District. This flood control channel flows for approximately 9 miles to the north and northeast of the Project site, recharging the underlying groundwater basin (Upper Mojave River Valley Basin) before eventually draining into the Mojave River.

### Off-Site Sewer Alignment

Sanitary sewer service would be provided to the Project via a new connection with a new 12-inch-diameter sewer line located within an easement held by the City of Hesperia to master-planned sewer facilities in the City of Hesperia. Similar to new storm drain line, the new sewer alignment would exit the Project site in an easterly direction, traversing along Yucca Terrace Drive to the east, crossing under U.S. Highway 395 and continuing approximately 2,200 feet along Yucca Terrace Drive, before turning in a 45° angle to the southeast and extending roughly 1,100 feet across the wash. Within the Oro Grande Wash, the sewer line will be located under the existing

grade of the wash and installed via jack-and-bore techniques in order to avoid the jurisdictional limits of the ephemeral watercourse.

## Off-Site Water Alignment

Domestic, irrigation, and fire protection water services would be made via new connections to existing Hesperia Water District Company facilities located on the north side of the Project site. Existing 6-inch-diameter, 8-inch-diameter, and 12-inch-diameter water lines are located within U.S. Highway 395, Phelan Road, and the portions of Yucca Terrace Road immediately northwest of the Project site. Certain segments of these existing water lines will need to be upsized as a result of the Project. In addition, a new 12-inch-diameter water line will be installed within the remaining part of Yucca Terrace Road that is not currently served by water, as well as along the western Project boundary.

A new 16-inch-diameter transmission water pipeline will also be installed to provide adequate water service for the Project. This new 16-inch-diameter transmission water pipeline will begin at the intersection of U.S. Highway 395 and Sultana Street and traverse west along Sultana Street crossing the Oro Grande Wash to Los Banos Avenue. From there it will traverse north and connect to a new 12-inch-diameter water main along Phelan Road.

Because the new 16-inch-diameter transmission water pipeline will travel across the Oro Grande Wash and traditional trenching pipe installations will not be feasible, this new water pipeline will be installed using the jack and bore method as not to disturb the wash. This will be similar to the installation method of the proposed 12-inch diameter sewer main that will also be installed across the Oro Grande Wash, as discussed above. A pit will be constructed at each end of the wash and the pipe will be bored through from one pit to the other without disturbing the ground surface.

## Regulatory Context

### State

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

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

The purpose of the CRHR is to maintain listings of the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term historical resources includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR 15064.5[a]). The criteria for listing properties in the CRHR were developed in accordance with previously established criteria developed for

listing in the National Register of Historic Places. The California Office of Historic Preservation regards “any physical evidence of human activities over 45 years old” as meriting recordation and evaluation (OHP 1995:2).

#### California Register of Historic Resources

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

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

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

Under CEQA, if an archeological site is not a historical resource but meets the definition of a “unique archeological resource” as defined in PRC Section 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined as follows:

- An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
  - Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
  - Has a special and particular quality, such as being the oldest of its type or the best available example of its type
  - Is directly associated with a scientifically recognized important prehistoric or historic event or person

Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a “unique archaeological resource” under CEQA (PRC Section 21083.2) are viewed as not significant. Under CEQA, “A non-unique

archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects” (PRC Section 21083.2[h]).

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

#### California Environmental Quality Act

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

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

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5[b]). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is an “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- 1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- 2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- 3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (14 CCR 15064.5[b][2]).

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

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2[g]).



Impacts on nonunique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a nonunique archaeological resource qualifies as a tribal cultural resource (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

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

#### California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. PRC Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe. A tribal cultural resource is either:

- On the CRHR or a local historic register;
- Eligible for the CRHR or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project area, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

#### California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety

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

## Local

The City of Hesperia (City) General Plan contains the following goals and policies that address cultural resources and are applicable to the Project (City of Hesperia 2010):

### Conservation Element: Historical, Paleontological, and Cultural Resources

- **Goal: CN-5.** The City shall establish policies and procedures in compliance with state and Federal laws and regulations to identify and properly protect found historical, cultural and paleontological artifacts and resources.
  - **Policy: CN-5.1.** Encourage the preservation of historical, paleontological and cultural resources.
  - **Policy: CN-5.2.** In those areas where surveys and records indicate historical, cultural or paleontological resources may be found, appropriate surveys and record searches shall be undertaken to determine the presence of such resources, if any.
  - **Policy: CN-5.3.** All historical, paleontological and cultural resources discovered shall be inventoried and evaluated according to CEQA regulations and the California Office of Historic Preservation.
  - **Policy: CN-5.4.** The City shall coordinate with the Archeological Information Center at the San Bernardino County Museum in reviewing potential records and in preserving such artifacts as may be found.
  - **Policy: CN-5.5.** Through its CEQA and other environmental procedures, the City shall notify appropriate Native American representatives of possible development and shall comply with all State and Federal requirements concerning the monitoring and preservation of Native American artifacts and places.

## Background Research

### SCCIC Records Search

Results from a previous, recent records search covering the Off-Site Utilities Route and conducted by LSA (2019) was reviewed for the current Project. LSA conducted the referenced records search at the South Central Coast

Information Center (SCCIC) located at California State University, Fullerton on December 3, 2018. The records search included a review the SCCIC's collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation Site Records, and technical reports. Additional consulted sources included the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, and California Points of Historical Interest.

### Previously Conducted Cultural Resource Studies

At the time the records search was conducted, the SCCIC records indicated that 33 cultural resources investigations have been previously conducted within the Project's records search area between 1973 and 1990 (Attachment B: Previous Cultural Resource Investigations Bibliography).

### Previously Recorded Cultural Resources

At the time the records search was conducted, the SCCIC records indicated that a total of 45 previously recorded cultural resources fall within Project's records search area (Confidential Attachment C: Previously Recorded Cultural Resources). Of these, 41 are historic period resources, including a trail and/or road segments, transmission lines, buildings and/or structures, refuse scatters, and isolated artifacts. The remaining four resources are prehistoric resources and include three isolated artifacts and one possible hearth feature. None of these resources overlap the Project's Off-Site Utilities Alignments.

### Review of Historic Aerials and Topographic Maps

Dudek consulted historic maps and aerial photographs to understand land use and possible previous development of the Project's Off-Site Utilities Route and surrounding properties. Topographic maps are available for the years 1902, 1906, 1912, 1923, 1936, 1942, 1945, 1957, 1963, 1969, 1970, 1980, 1985, 1988, 1999, 2012, 2015, and 2018 (NETR 2020a). Historic aerials are available for the years 1938, 1952, 1968, 1994, 1995, 2002, 2005, 2009, 2010, 2012, 2014, and 2016 (NETR 2020b).

### Topographic Maps

The first USGS topographic map showing the Off-Site Utilities Alignments dates to 1902 and shows the Off-Site Utilities Alignments as void of structures and undeveloped. The 1957 topographic map shows the road the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment runs along, currently known as Yucca Terrace Road, as a dirt road, as well as increased development (i.e. roads and structures) in the surrounding area. The topographic map from 1980 shows continued development increase in the surrounding area. The remaining topographic maps illustrating conditions from 1980 to 2016 show no significant change to the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment.

The first available USGS topographic map for the Project's Off-Site Water Alignment dates to 1902 and shows the proposed alignment area as undeveloped and within the Oro Grande Wash. An apparent road traveling northeast to southwest is shown to extend from an unnamed road representing present-day Phelan Road. By 1942, the northeast-southwest oriented road that extended from present-day Phelan Road is no longer depicted; however, in the 1945 map, the road is illustrated. By 1957, a road extending from Phelan Road is shown to travel roughly

northeast to southwest and then redirects in a southerly direction. The 1980 map appears to show a road that travels roughly south from Phelan Road and may represent the present-day Los Banos Avenue, Los Banos Avenue is bisected by the unnamed northeast-southwest oriented road shown in the 1902 through 1945 maps. The topographic map from 1988 depicts a subdivision that overlaps the north-south present-day Los Banos Road and includes what appears to be four buildings, with two buildings to the west and two buildings to the east of Los Banos Avenue; the unnamed road is no longer shown to bisect Los Banos Avenue. The 2012 map does not show the subdivision or buildings represented in the 1988 map; however, an unnamed road extending east from Los Banos Road is depicted and likely represents present-day Sultana Street. By 2015, Los Banos Road is officially named on the topographic map, though again, no subdivisions or buildings are shown. No significant changes are illustrated in the 2018 map.

## Historic Aerials

The first historic aerial of the Project's Off-Site Storm Drain Alignment and Off-Site Sewer Alignment dates to 1952 and shows the U.S. Highway 395 and Yucca Terrace Road as cleared paths, the rest of the alignment being undeveloped and void of structures. No changes were observed between 1952 and 2010. The historic aerial from 2010 shows an increase in development in the surrounding area. The remaining historic aerials show no significant change to the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment.

The first available historic aerial for the Project's Off-Site Water Alignment dates to 1938 and shows that the proposed alignment area is undeveloped, void of structures, with faint representations of well-traveled dirt roads. U.S. Highway 395 is represented to the east and the area where present-day Phelan Road would be located is not included in the 1938 aerial but is shown in the 1952 aerial. By 1968, Los Banos Avenue is shown extending from Phelan Road. The 1994 aerial shows subdivisions overlapping Los Banos Avenue and continuing to the east with graded areas associated with buildings depicted in the 1988 topographic map. The 2009 aerial shows an unnamed dirt road south of the subdivision traveling west-east through the Oro Grande Wash and likely represents present-day Sultana Street. South of this road is vacant land that appears to be heavily graded. No significant changes are shown in the remaining historic aerials for the Off-Site Water Alignment.

## Native American Coordination

### Assembly Bill 52

The Project is subject to compliance with AB 52 (California Public Resources Code [PRC] 21074), which requires consideration of impacts to "tribal cultural resources" as part of the CEQA process, and requires the City of Hesperia (the CEQA lead agency for the proposed Project) to notify any groups who have requested notification of the Project who are traditionally or culturally affiliated with the geographic area of the Project. On May 22, 2020, the City sent letters to tribal representatives of the Cabazon Band of Mission Indians, Torres Martinez Desert Cahuilla Indians, and San Manuel Band of Mission Indians inviting each tribe to engage in tribal consultation, if desired. A detailed discussion of AB 52 as it relates to the Project is included in the Project's Tribal Cultural Resources section of the Environmental Impact Report (EIR). Because AB 52 is a government-to-government process including consultation regarding sensitive information, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City.

## Cultural Resources Survey

### Methods

Dudek conducted an intensive pedestrian survey of the Project's Off-Site Utilities Route using standard archaeological procedures and techniques which met the Secretary of Interior's standards and guidelines for a cultural resources inventory. The intensive-level survey methods consisted of an intensive pedestrian survey conducted in parallel transects spaced no more than 2 meters (approximately 6 feet) apart, where feasible, over the entire Off-Site Utilities Alignments. Where transects were not feasible, a mixed approach (opportunistic survey) and reconnaissance survey (visual inspection) were utilized, selectively examining exposed ground surfaces, where possible. Within each transect, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. No artifacts were collected during the survey. Location-specific photographs were taken using an Apple 6th Generation iPad equipped with 8-megapixel resolution and georeferenced PDF maps of the proposed Off-Site Utility Alignments. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California, office and are available upon request.

### Results

Dudek archaeologist, Linda Kry, conducted an intensive-level pedestrian survey of the Project's Off-Site Storm Drain Alignment and Off-Site Sewer Alignment on June 5, 2020 and the proposed Off-Site Water Alignment on July 16, 2020. The survey footprint included the entirety of the Off-Site Utilities Alignments with a survey buffer of 8 feet from the centerline of the alignments.

The Off-Site Storm Drain Alignment and Off-Site Sewer Alignment survey generally follows the existing unpaved Yucca Terrace Road. Surface visibility within Yucca Terrace Road was unobstructed and provided for 100% visibility. Visibility within the areas to the north and south of the alignment, within the survey buffer, was hindered by desert grass and vegetation, as well as roadside refuse, and as such visibility along these areas was fair (50%). Boot and/or trowel scrapes in 10 to 15 meter intervals were implemented to identify subsurface conditions when necessary. All soils observed consisted of alluvial soils. The Off-Site Storm Drain Alignment and Off-Site Sewer Alignment involves uneven terrain as a result of the natural topography, including bioturbation and vehicular disturbances. As the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment traverses eastward and turns in a 45-degree angle towards the Oro Grande Wash, the terrain becomes steep and declines to approximately 45 degrees. The terrain of the Oro Grande Wash is undulating with numerous ephemeral and deep drainages that cut through the landscape in various directions. Because this portion of the survey is within a wash, all resources observed are disturbed and are likely not in primary depositional locations, meaning, they have been redeposited in arbitrary locations as result of natural wind and water activities. The eastern terminus of the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment intersects with a man-made earthen bank associated with the regional storm drain facility that is routinely maintained by the San Bernardino County Flood Control District. Modern refuse was observed scattered along the Off-Site Storm Drain Alignment and Off-Site Sewer Alignment, including consumables, auto parts, and miscellaneous metal items. No cultural materials were identified Project's Off-Site

Storm Drain Alignment and Off-Site Sewer Alignment during the survey; however, potential historical resources were observed that are within the survey buffer area. Because the survey buffer area does not represent the Project's Off-Site Utilities Alignments, no formal recordation or evaluation of the potential historical resources were conducted.

The Off-Site Water Alignment survey follows the existing unpaved Los Banos Avenue and Sultana Street and crosses the Oro Grande Wash to US Highway 395. Surface visibility, soils observed, and terrain within this survey alignment is generally the same as the Off-Site Utilities Alignments. No cultural materials were identified along the Off-Site Water Alignment, though modern consumables were observed.

## Summary and Recommendations

No cultural resources associated with the Off-Site Utilities Alignments were identified in this supplemental study, which included a review of previous records search results, archival map research and intensive pedestrian surveys. Although, the intensive pedestrian survey for the Off-Site Utilities Alignments did identify potential historical resources within the survey buffer, potential resources were observed outside the Project's Off-Site Utilities Alignments footprint and consisted of refuse piles that do not appear to be associated with potentially buried resources. The intensive pedestrian survey for the Off-Site Water alignment did not result in the identification of cultural resources. As a result, the probability of the Project to impact previously undocumented/unknown significant archaeological resources is considered low.

## Management Recommendations

Since it is not possible to completely rule out the presence of archaeological resources within the Project's Off-Site Utilities Alignments and based on the results of this supplemental study, the following recommendations are provided below to ensure that impacts to unanticipated archaeological resources and human remains during construction activities would be less than significant.

### Workers Environmental Awareness Program (WEAP)

A Workers Environmental Awareness Program (WEAP) training is recommended to be conducted by a qualified archaeologist at the construction kickoff meeting in order to ensure proper identification and treatment of inadvertent discoveries.

### Inadvertent Discovery of Archaeological Resources

In the event that potential archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the proposed Project's Off-Site Utilities Alignments, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted.



Mr. Brandon Gallup

Subject: Cultural Resources Inventory for the for the Hesperia Commerce Center II Project, Hesperia, San Bernardino County, California

---

### Inadvertent Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains, but no less than 100 feet from the discovery, shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant of the remains. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Please do not hesitate to contact me if you have any questions about this report by email at lkry@dudek.com or phone at (626) 590-1739, or Heather McDaniel McDevitt by email at hmcdevitt@dudek.com or phone at (805) 679-3087.

Sincerely,



Linda Kry, BA  
Archaeologist



Heather McDaniel McDevitt, MA, RPA  
Senior Archaeologist

cc: Collin Ramsey, Patrick Cruz, Dudek

Att: Attachment A: Figure  
Attachment B: Previous Cultural Resource Investigations Bibliography  
Attachment C: (Confidential) Previously Recorded Cultural Resources

## References

LSA (LSA Associates, Inc.). 2019. Cultural Resources Assessment, Hesperia Commerce Center II Project, City of Hesperia, San Bernardino County, California. Prepared for Covington Group, Inc. Prepared by Riordan Goodwin and Allegría Garcia, LSA Associates, Inc., Riverside, California.

NETR (Nationwide Environmental Title Research LLC). 2020a. Historic Topographic Maps: 1902, 1906, 1912, 1923, 1936, 1942, 1945, 1957, 1963, 1969, 1970, 1980, 1985, 1988, 1999, 2012, 2015, and 2018. Accessed June 30, 2020. <https://www.historicaerials.com/viewer>.

NETR. 2020b. Historic Aerial Photographs: 1938, 1952, 1968, 1994, 1995, 2002, 2005, 2009, 2010, 2012, 2014, and 2016. Accessed June 30, 2020. <https://www.historicaerials.com/viewer>.



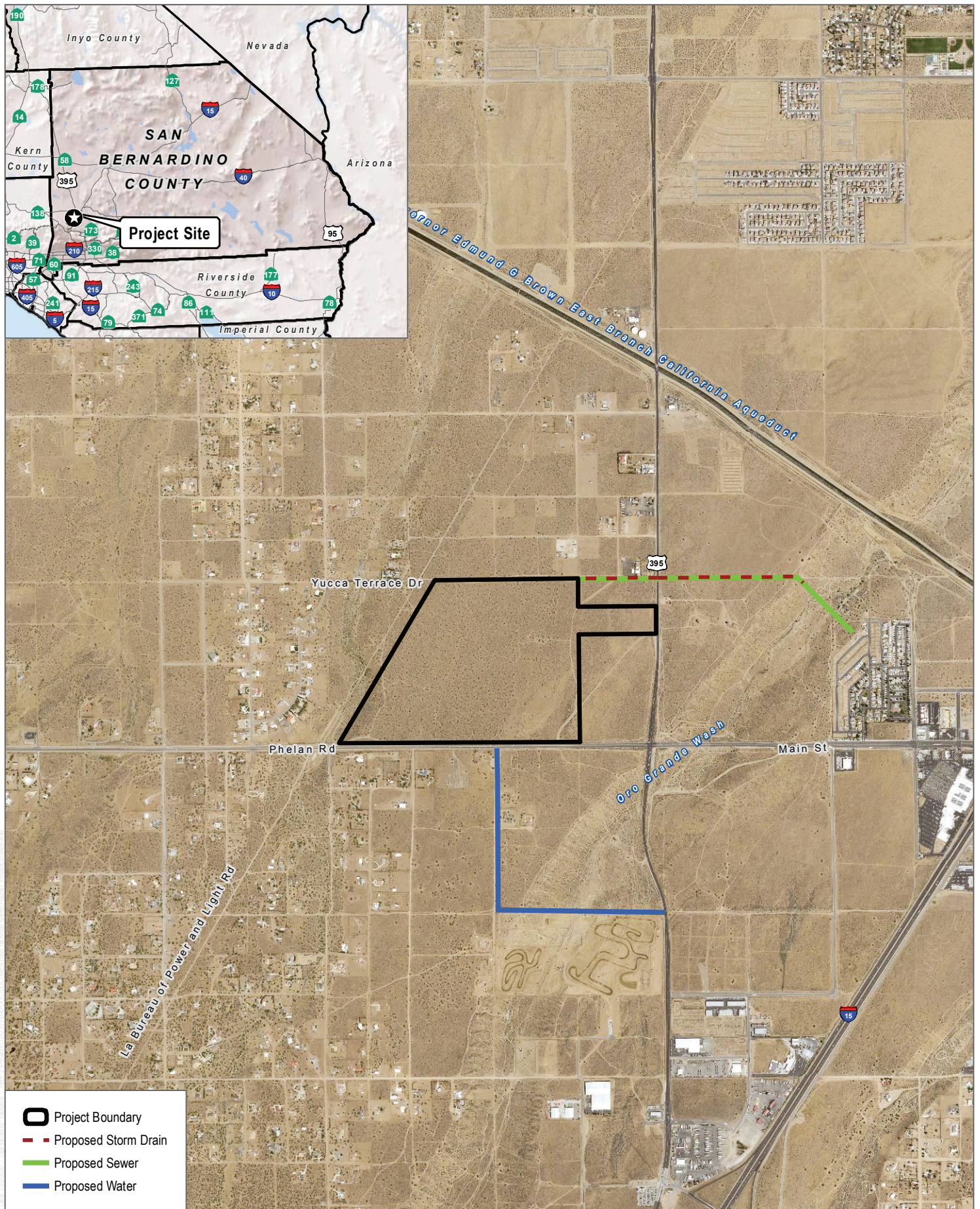


# Attachment A

---

Figure





SOURCE: USDA 2016

**Figure 1**  
**Project Location**  
Hesperia Commerce Center II





# Attachment B

---

## Previous Cultural Resource Investigations Bibliography

## Report List

CGI1801

| Report No. | Other IDs                              | Year | Author(s)   | Title   | Affiliation                              | Resources   |
|------------|--|------|---|---|--|---|
| SB-00191   | NADB-R - 1060191;<br>Voided - 73-12.2A | 1973 | SMITH, GERALD A.  | ARCHAEOLOGICAL, HISTORICAL AND PALEONTOLOGICAL SITE SURVEY FOR COUNTY SERVICE AREA NO. 70 IMPROVEMENT ZONE "J", ASSESSMENT OF IMPACT AND RECOMMENDATIONS  | SAN BERNARDINO COUNTY MUSEUM ASSOCIATION | 36-002208   |
| SB-01219   | NADB-R - 1061219;<br>Voided - 81-12.7  | 1981 | HALL, MATTHEW C.,<br>PHILIP J. WILKE,<br>DORAN L. CART, and<br>JAMES D. SWENSON | AN ARCHAEOLOGICAL SURVEY OF THE PROPOSED SOUTHERN CALIFORNIA EDISON IVANPAH GENERATING STATION, PLANT SITE, AND RELATED RAIL, COAL SLURRY, WATER AND TRANSMISSION LINE CORRIDORS, SAN BERNARDINO COUNTY, CALIFORNIA, AND CLARK COUNTY, NEVADA | ARCHAEOLOGICAL RESEARCH UNIT, UCR        | 36-001065, 36-001066, 36-001933, 36-002131, 36-002402, 36-002690, 36-002978, 36-003728, 36-003729, 36-004590, 36-004693, 36-004694, 36-004695, 36-004696, 36-004697, 36-004698, 36-004699, 36-004700, 36-004701, 36-004702, 36-004703, 36-004704, 36-004705, 36-004706, 36-004707, 36-004708, 36-004709, 36-004710, 36-004711, 36-004712, 36-004713, 36-004714, 36-004715, 36-004716, 36-004717, 36-004718, 36-004719, 36-004720, 36-004721, 36-004722, 36-004723, 36-004724, 36-004725, 36-004726, 36-004888 |
| SB-01220   | NADB-R - 1061220;<br>Voided - 81-12.7A | 1981 | BEAN, LOWELL JOHN,<br>SYLVIA BRAKKE VANE,<br>and JACKSON YOUNG                  | THE IVANPAH GENERATING STATION PROJECT: ETHNOGRAPHIC (NATIVE AMERICAN) RESOURCES  | CULTURAL SYSTEMS RESEARCH, INC.          | 36-000058, 36-000060, 36-000063, 36-000064, 36-000065, 36-000072, 36-000176, 36-000182, 36-000204, 36-000206, 36-000207, 36-000458, 36-000786, 36-000821, 36-000938, 36-000983, 36-001888, 36-001961, 36-002110, 36-002129, 36-002142, 36-002240, 36-002554, 36-002643, 36-002646, 36-002704, 36-002707, 36-003489, 36-004703, 36-004726  |
| SB-01474   | NADB-R - 1061474;<br>Voided - 84-12.2  | 1984 | SMITH, GERALD A. and<br>E. GARY STICKEL   | A CULTURAL RESOURCES ASSESSMENT OF THE PHELAN ROAD IMPROVEMENT PROJECT, HO9155, BALDY MESA AREA, SAN BERNARDINO COUNTY, CALIFORNIA  | SAN BERNARDINO COUNTY MUSEUM ASSOCIATION |   |
| SB-02202   | NADB-R - 1062202;<br>Voided - 90-11.6  | 1990 | MCKENNA, JEANETTE<br>A.   | A PHASE I ARCHAEOLOGICAL INVESTIGATION OF PROPOSED WATER PIPELINE ROUTES AND RESERVOIR/PUMPING LOCATIONS, IN THE BALDY MESA/PHELAN AREA, SAN BERNARDINO COUNTY, CALIFORNIA  | MCKENNA ET AL.                           |   |

## Report List

CGI1801

| Report No. | Other IDs                             | Year | Author(s)  | Title   | Affiliation                      | Resources  |
|------------|---------------------------------------|------|--|---|----------------------------------|--|
| SB-02476   | NADB-R - 1062476;<br>Voided - 91-11.6 | 1991 | MCKENNA, JEANETTE A.                                       | A PHASE I LINEAR SURVEY: CULTURAL RESOURCES INVESTIGATIONS FOR THE HESPERIA IMPROVEMENT DISTRICT, HESPERIA, SAN BERNARDINO COUNTY, CALIFORNIA   | MCKENNA ET AL.                   |  |
| SB-02674   | NADB-R - 1062674;<br>Voided - 92-7.5  | 1992 | SINGER, CLAY A.,<br>JOHN E. ATWOOD, and<br>BARBIE S. LANEY | CULTURAL RESOURCES SURVEY AND IMPACT ASSESSMENT FOR APN 404-281-36 IN THE BALDY MESA AREA OF SAN BERNARDINO COUNTY, CALIFORNIA  | C.A. SINGER &<br>ASSOCIATES      | 36-004272  |
| SB-02732   | NADB-R - 1062732                      | 1992 | PARR, ROBERT E.  | AN ARCHAEOLOGICAL ASSESSMENT OF TENTATIVE PARCEL MAP #14242 BALDY MESA, SAN BERNARDINO COUNTY, CA   | CSUB                             | 36-004179  |
| SB-02802   | NADB-R - 1062802                      | 1993 | BROCK, JAMES   | HISTORICAL STRUCTURES ASSESSMENT FOR THE PHELAN ROAD WIDENING PROJECT, BALDY MESA ROAD TO LOS BANOS ROAD, COUNTY OF SAN BERNARDINO, CA  | ARCHAEOLOGICAL<br>ADVISORY GROUP |  |
| SB-02803   | NADB-R - 1062803                      | 1993 | LOVE, BRUCE  | MAIN ST./I-15 INTERCHANGE, HESPERIA   | CRM TECH                         |  |
| SB-03020   | NADB-R - 1063020                      | 1993 | STURM, BRAD, D.<br>MCLEAN, K. BECKER,<br>and J. ROSENTHAL  | (DRAFT) ADELANTO-LUGO<br>TRANSMISSION PROJECT CULTURAL<br>RESOURCES ASSESSMENT  | WOODWARD-CLYDE                   | 36-002910, 36-004019, 36-004251,<br>36-004255, 36-004266, 36-004267,<br>36-004268, 36-004269, 36-004272,<br>36-004274, 36-004275, 36-004276,<br>36-004411, 36-006353, 36-006532,<br>36-006533, 36-007739, 36-007740,<br>36-007741, 36-007742, 36-007743,<br>36-007744, 36-007745, 36-007746,<br>36-007747, 36-007748, 36-007749,<br>36-007750, 36-007751, 36-007752,<br>36-007753, 36-007754, 36-007755,<br>36-007756, 36-007757, 36-007758,<br>36-007759, 36-007760, 36-007761,<br>36-007762, 36-007763 |
| SB-03110   | NADB-R - 1063110                      | 1996 | BROCK, JAMES and<br>CHRISTINE L. D'ORIO                    | HISTORIC PROPERTY SURVEY AND<br>HISTORIC ARCHITECTURAL EVALUATION<br>REPORT FOR THE WIDENING OF PHELAN<br>ROAD FROM BALDY MESA ROAD TO<br>STATE HWY 395, SAN BERNARDINO<br>COUNTY, CA. 68PP | ARCHAEOLOGICAL<br>ADVISORY GROUP | 36-004252, 36-004268, 36-004271,<br>36-004272, 36-007694, 36-007755,<br>36-007756, 36-008077, 36-008078,<br>36-008082  |
| SB-04036   | NADB-R - 1064036                      | 2004 | CERRETO, RICHARD<br>and CHRISTY MALAN                      | CULTURAL RESOURCE ASSESSMENT<br>FOR PARCEL 3, APN: 3064-591-17, CITY<br>OF HESPERIA, SAN BERNARDINO<br>COUNTY, CA. 18PP   | ANALYTIC<br>ARCHAEOLOGY          | 36-020263  |

## Report List

CGI1801

| Report No. | Other IDs        | Year | Author(s)   | Title   | Affiliation               | Resources  |
|------------|------------------|------|---|---|---------------------------|--|
| SB-04281   | NADB-R - 1064281 | 2004 | CERRETO, RICHARD, CHRISTY MALAN, and KATHERINE WARD               | CULTURAL RESOURCES ASSESSMENT FOR APN: 3064-481-12, CITY OF HESPERIA, SAN BERNARDINO COUNTY, CA. 16PP   | ANALYTIC ARCHAEOLOGY      |  |
| SB-04282   | NADB-R - 1064282 | 2004 | FULTON, PHIL  | CULTURAL RESOURCES ASSESSMENT: CINGULAR WIRELESS FACILITY NO. SB 333-01, HESPERIA, SAN BERNARDINO COUNTY, CA. 17PP  | LSA                       |  |
| SB-04285   | NADB-R - 1064285 | 2004 | GREEN, JULIA K.   | CULTURAL RESOURCES INVENTORY & EVALUATION: TIMBISHA SHOSHONE HOTEL & CASINO, SAN BERNARDINO COUNTY, CA. 22PP  | ECORP                     |  |
| SB-04289   | NADB-R - 1064289 | 2003 | WHITE, ROBERT S. and LAURA S. WHITE                               | A CULTURAL RESOURCES ASSESSMENT OF TEH SAN BERNARDINO COUNTY SPECIAL DISTRICTS CSA 70 ZONE J CASITA AVE WATER PIPELINE PROJECT NEAR HESPERIA, SAN BERNARDINO CO. 18PP | ARCHAEOLOGICAL ASSOCIATES | 36-004246  |
| SB-04290   | NADB-R - 1064290 | 1997 | HAMMOND, STEPHEN and DAVID BRICKER                                | THE REALIGNMENT OF US HIGHWAY 395 & MAIN ST IN THE CITY OF HESPERIA, SAN BERNARDINO COUNTY, CA. 26PP  | CALTRANS                  | 36-004179, 36-004267, 36-004268, 36-007545, 36-007755, 36-007756, 36-008077, 36-008082 |
| SB-04582   | NADB-R - 1064582 | 2005 | Duff, Gabrielle and Manuel R. Palacios-Fest                       | Archaeological and Paleontological Survey of the Ludwig Property, Hesperia, San Bernardino County, California.  |                           |  |
| SB-04796   | NADB-R - 1064796 | 2005 | BRUNZELL, DAVID   | CULTURAL RESOURCE ASSESSMENT VISTA DEL VALLE CITY OF VICTORVILLE SAN BERNADINO COUNTY, CALIFORNIA   |                           |  |
| SB-04927   | NADB-R - 1064927 | 2006 | Sander, Jay K.  | Cultural Resources Inventory of 147 Acres: Tract 17598, Phelan, San Bernardino County, California.  | Chambers Group, Inc       | 36-004272, 36-012631, 36-012632, 36-012633, 36-012634, 36-012635                       |
| SB-05466   | NADB-R - 1065466 | 2007 | TANG, BAI, SMALLWOOD, JOSH, DANIEL BALLESTER, and LAURA H. SHAKER | HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT: VICTOR VALLEY WATER DISTRICT PIPELINE PROJECT, CITY OF VICTORVILLE, SAN BERNARDINO COUNTY, CALIFORNIA              |                           | 36-007694  |

## Report List

CGI1801

| Report No. | Other IDs  | Year | Author(s)  | Title   | Affiliation                     | Resources  |
|------------|--|------|--|---|---------------------------------|--|
| SB-05698   | NADB-R - 1065698                                   | 2007 | Hogan, Michael   | Historical/Archaeological Resources Survey Report: US Highway 395 Realignment EIR, Victorville Area, San Bernardino County, California.   | CRM Tech                        | 36-004179, 36-004252, 36-004253, 36-004262, 36-004267, 36-004268, 36-004270, 36-004271, 36-004272, 36-004411, 36-004418, 36-006828, 36-007545, 36-007694, 36-008082, 36-010316, 36-012150, 36-012469, 36-013356, 36-013357, 36-013358, 36-013359, 36-013360, 36-013361, 36-013362, 36-013363, 36-013364, 36-013372, 36-013373, 36-013374, 36-013375, 36-013376, 36-013377, 36-013378, 36-013379, 36-013380, 36-013381, 36-013382, 36-013383, 36-013384, 36-013385, 36-013386 |
| SB-05818   | NADB-R - 1065818                                   | 2007 | Budinger, Fred E.  | An Archaeological Survey of 10-Acres (APN 3064-601-01) for the Proposed Holiday Inn Hesperia Project to located Southeas of the Intersection of Main Street and Mesa Linda Street in the City of Hesperia, San Bernardino County, California 92392.         | Tetra Tech, Inc                 |  |
| SB-06164   |  | 2007 | Sander, Jay  | Cultural Resources Inventory of APN 3064-561-12 Hesperia, San Bernardino County, California   | Chambers Group                  | 36-004266  |
| SB-06333   | NADB-R - 1066333                                   | 2005 | HORNE, MELINDA C.  | CULTURAL RESOURCES SURVEY FOR THE MOJAVE WATER AGENCY WATER BANKING PROJECT   |                                 | 36-000176  |
| SB-06602   | NADB-R - 1066602; OHP OTIS Report Nbr - FCC090824Q | 2009 | Wlodarski, Robert J.   | Cultural Resources Record Search and Archaeological Survey Results for the proposed Royal Street Communications, California, LLC, Site LAee28A (Vacant Lot TMO-Pine Colo) located at 9980 Lassen Street, Hesperia, San Bernardino County, California 92345. | HEART                           |  |
| SB-06859   | NADB-R - 1066859                                   | 2010 | Tang, Bai "Tom", Terri Jacquemain, Daniel Ballester, and Harry Quinn | Identification and Evaluation of Historic Properties: Town of Apple Valley and City of Hesperia Wastewater Reclamation Plants and Related Facilities Project, Victor Valley Area, San Bernardino County, California.  |                                 |  |
| SB-06860   | NADB-R - 1066860; Other - SCE                      | 2011 | Heidelberg, Kurt and Gabrielle Duff                                  | Archaeological Survey Report for Southern California Edison's Line Extension Project in Victorville, California.  | Inland Environmental Associates | 36-007545  |

## Report List

CGI1801

| Report No. | Other IDs        | Year | Author(s)   | Title  | Affiliation    | Resources  |
|------------|------------------|------|---|--|----------------|--|
| SB-07156   | NADB-R - 1067156 | 2011 | Tang, Bai "Tom", Daniel Ballester, and Nina Gallardo                    | Historical/Archaeological Resources Survey Report: Water Supply System Improvements Projects, Fiscal Years 2010/2011 – 2014/2015, Victorville Water District, San Bernardino County, California. | CRM TECH       | 36-000968, 36-002910, 36-006793, 36-007545, 36-007694, 36-009360, 36-010316, 36-012658 |
| SB-07493   | NADB-R - 1067493 | 2013 | Dahdul, Miriam, Daniel Ballester, John D. Goodman II, and Nina Gallardo | Historical/Archaeological Resources Survey Report: Westside Terraces Project, Assessor's Parcel No's 3064-441-01 to -03, City of Hesperia, San Bernardino County, California.                    |                |  |
| SB-08179   | Paleo -          | 2015 | Hogan, Michael  | Archaeological/Paleontological Monitoring Program, Tractor Supply Company Retail Facility Project, 12543 Main Street, City of Hesperia, San Bernardino County, CRM TECH Contract No. 2956        | CRM TECH       |  |
| SB-08205   | Paleo -          | 2015 | McKenna, Jeanette A.  | A PHASE I CULTURAL RESOURCES INVESTIGATION OF THE PROPOSED SUMMIT LEADERSHIP ACADEMY, HIGH DESERT CAMPUS, CITY OF HESPERIA, SAN BERNARDINO CO., CALIFORNIA                                       | McKENNA et al. | 36-010288  |





---

# Attachment C

---

(Confidential) Previously Recorded Cultural Resources

