#### **CULTURAL RESOURCES SURVEY REPORT**

## PRAIRIE VIEW MULTI-FAMILY RESIDENTIAL PROJECT

Assessor's Parcel Number 311-502-001 City of Perris, Riverside County, California

#### For Submittal to:

City of Perris
Development Services Department, Planning Division
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Perris, CA 92570

#### **Prepared for:**

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July 12, 2022 CRM TECH Project No. 3893A **Title:** Cultural Resources Survey Report: Prairie View Multi-Family Residential

Project, Assessor's Parcel Number 311-502-001, City of Perris, Riverside

County, California

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**USGS Quadrangle:** Perris, Calif., 7.5' quadrangle (Section 29, T4S R3W, San Bernardino

Baseline and Meridian)

**Project Size:** Approximately 13.4 acres

**Keywords:** Perris Valley area; Phase I historical/archaeological resources survey; no

"historical resource" under CEQA provisions

#### **EXECUTIVE SUMMARY**

Between May and July 2022, at the request of Tom Dodson & Associates, CRM TECH performed a cultural resources study on approximately 13.4 acres of vacant land in the City of Perris, Riverside County, California. The subject property of the study, Assessor's Parcel Number 311-502-001, is located on the north side of Dale Street between Wilson Avenue and Murrieta Road, in the southeast quarter of Section 29, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian as depicted in the United States Geological Survey Perris, California, 7.5' quadrangle.

The study is part of the environmental review process for the proposed construction of a multi-family residential complex with 31 buildings, paved parking lots, concrete sidewalks, a community center, and other associated amenities. The City of Perris, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or near the project area.

In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search, contacted Native American representatives, pursued historical background research, and carried out an intensive-level field survey. The results of these research procedures identified no "historical resources" within or adjacent to the project area. The State of California Native American Heritage Commission stated that the Sacred Lands File maintained by the commission indicated the presence of unspecified Native American cultural resource(s) in the project vicinity and referred further inquiry to the Pechanga Band of Luiseño Indians. In response to the inquiry, the Pechanga Band identified the locations of two Traditional Cultural Properties in the surrounding area but not within the project boundaries.

Based on these findings, CRM TECH recommends to the City of Perris a conclusion of *No Impact* on "historical resources." No further cultural resources investigation is recommended for this project unless development plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

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#### INTRODUCTION

Between May and July 2022, at the request of Tom Dodson & Associates, CRM TECH performed a cultural resources study on approximately 13.4 acres of vacant land in the City of Perris, Riverside County, California (Fig. 1). The subject property of the study, Assessor's Parcel Number 311-502-001, is located on the north side of Dale Street between Wilson Avenue and Murrieta Road, in the southeast quarter of Section 29, Township 4 South, Range 3 West, San Bernardino Baseline and Meridian as depicted in the United States Geological Survey (USGS) Perris, California, 7.5' quadrangle (Figs. 2, 3).

The study is part of the environmental review process for the proposed construction of a multifamily residential complex with 31 buildings, paved parking lots, concrete sidewalks, a community center, and other associated amenities. The City of Perris, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of the study is to provide the City with the necessary information and analysis to determine whether the proposed project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or near the project area.

In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search, contacted Native American representatives, pursued historical background research, and carried out an intensive-level field survey. The following report is a complete account of the methods, results, and final conclusion of the study. Personnel who participated in the study are named in the appropriate sections below, and their qualifications are provided in Appendix 1.

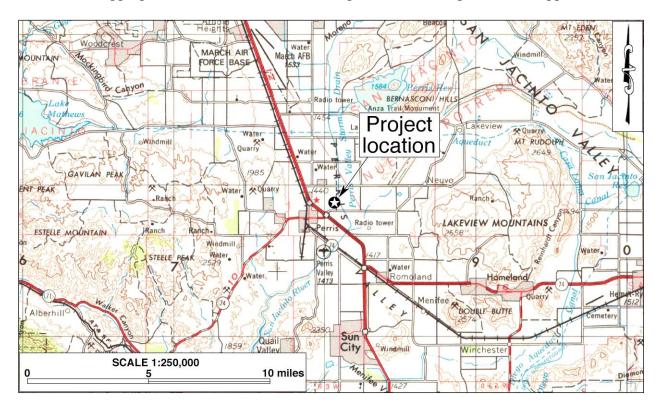


Figure 1. Project vicinity. (Based on USGS Santa Ana, Calif., 120'x60' quadrangle [USGS 1979a])

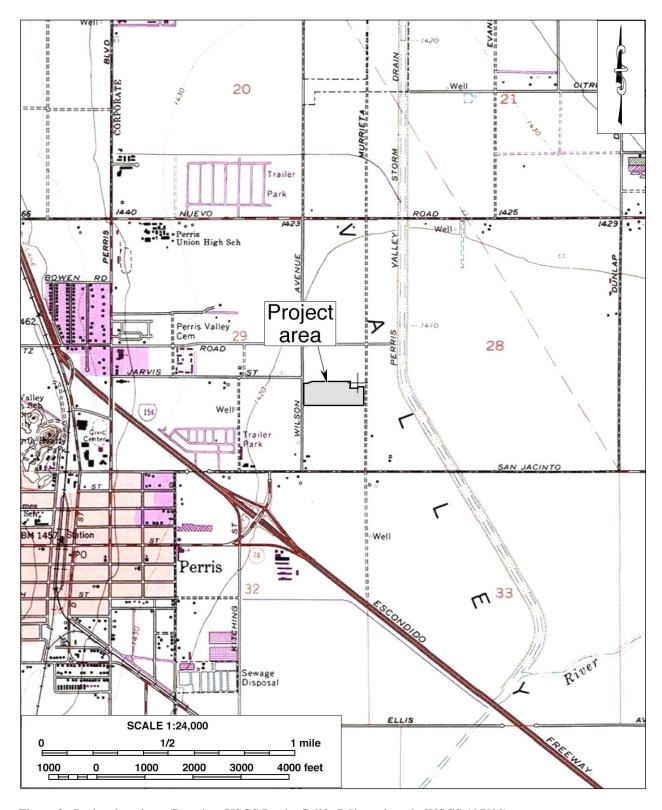


Figure 2. Project location. (Based on USGS Perris, Calif., 7.5' quadrangle [USGS 1979b])



Figure 3. Aerial image of the project area.

#### **SETTING**

#### **CURRENT NATURAL SETTING**

The project area is located in the Perris Valley, a semi-arid inland alluvial valley in western Riverside County that extends generally in a northwest-southeast direction. A number of isolated granitic mountains, such as the Lakeview Mountains and the Bernasconi Hills, separate the Perris Valley from the nearby Moreno, San Jacinto, and Menifee Valleys. These valleys are sub-basins of the San Jacinto watershed, one of the three major geographical subdivisions of the Santa Ana Basin. This valley complex is bounded on the northeast by the San Jacinto Mountains and on the southwest by the Santa Ana Mountains. The climate and environment of the region are typical of southern California's inland valleys, with temperatures in the region reaching over 100 degrees Fahrenheit in summer and dipping to near freezing in winter. The average annual precipitation is approximately 12 inches, most of which occurs between December and March.

Situated in a formerly agrarian area that has been undergoing rapid residential and industrial transformation, the project area is bounded by Dale Street on the south, Wilson Avenue on the west, Murrieta Road on the east, and former agricultural land on the north. Historically also agricultural in use, portions of the project area were previously graded for streets and building pads but the entire parcel remains undeveloped and overgrown with vegetation. The terrain in the project area is relatively level, and the elevations range roughly from 1,420 feet to 1,425 feet above mean sea level. The surface soil is composed of yellowish-brown, fine- to medium-grain sands mixed with small to medium rocks, and the existing vegetation consists primarily of foxtail, tumbleweed, and ruderal grasses (Fig. 4).



Figure 4. Overview of the current natural setting of the project area. (Photograph taken on May 24, 2022; view to the northwest)

#### **CULTURAL SETTING**

#### **Prehistoric Context**

The earliest evidence of human occupation in western Riverside County was discovered below the surface of an alluvial fan in the northern portion of the Lakeview Mountains, southeast of the project area, with radiocarbon dates clustering around 9,500 B.P. (Horne and McDougall 2008). Another site found near the shoreline of Lake Elsinore, close to the confluence of Temescal Wash and the San Jacinto River, yielded radiocarbon dates between 8,000 and 9,000 B.P. (Grenda 1997). Additional sites with isolated Archaic dart points, bifaces, and other associated lithic artifacts from the same age range have been found in the nearby Cajon Pass area of San Bernardino County, to the northwest, typically atop knolls with good viewsheds (Basgall and True 1985; Goodman and McDonald 2001; Goodman 2002; Milburn et al. 2008).

The cultural prehistory of southern California has been summarized into numerous chronologies, including those developed by Chartkoff and Chartkoff (1984), Warren (1984), and others. Specifically, the prehistory of Riverside County has been addressed by O'Connell et al. (1974), McDonald et al. (1987), Keller and McCarthy (1989), Grenda (1993), Goldberg (2001), and Horne and McDougall (2008). Although the beginning and ending dates of different cultural horizons vary regionally, the general framework of the prehistory of western Riverside County can be divided into three primary periods:

- Paleoindian Period (ca. 12,500-9,000 B.P.): Native peoples of this period created fluted spearhead bases designed to be hafted to wooden shafts. The distinctive method of thinning bifaces and spearhead preforms by removing long, linear flakes leaves diagnostic Paleoindian markers at tool-making sites. Other artifacts associated with the Paleoindian toolkit include choppers, cutting tools, retouched flakes, and perforators. Sites from this period are very sparse across the landscape and most are deeply buried.
- Archaic Period (ca. 9,000-1,500 B.P.): Archaic sites are characterized by abundant lithic scatters
  of considerable size with many biface thinning flakes, bifacial preforms broken during
  manufacture, and well-made groundstone bowls and basin metates. As a consequence of making
  dart points, many biface thinning waste flakes were generated at individual production stations,
  which is a diagnostic feature of Archaic sites.
- Late Prehistoric Period (ca. 1,500 B.P.-contact): Sites from this period typically contain small lithic scatters from the manufacture of small arrow points, expedient groundstone tools such as tabular metates and unshaped manos, wooden mortars with stone pestles, acorn or mesquite bean granaries, ceramic vessels, shell beads suggestive of extensive trading networks, and steatite implements such as pipes and arrow shaft straighteners.

#### **Ethnohistoric Context**

According to current ethnohistorical scholarship, the traditional territories of several Native American groups, including the Luiseño, the Serrano, the Gabrielino, and the Cahuilla, overlapped one another in the present-day Riverside-San Bernardino region during the Late Prehistoric Period, but the Perris Valley area is generally recognized as a part of the traditional homeland of the Luiseño, a Takic-speaking people whose territory extended from present-day Riverside to Escondido

and Oceanside. The name of the group derived from Mission San Luis Rey, which held jurisdiction over most of the traditional Luiseño territory during the late 18th and early 19th centuries. In modern anthropological literature, the leading sources on Luiseño culture and history are Kroeber (1925), Strong (1929), and Bean and Shipek (1978). The following ethnohistoric discussion is based primarily on these sources.

The name Luiseño derived from Mission San Luis Rey, which held jurisdiction over most of the Luiseño territory during the Mission Period. Prior to European contact, the Luiseño may have been known as *Puyumkowitchum*, or "Western people." Luiseño history, as recorded in traditional songs, tells the creation story from the birth of the first people, the *kaamalam*, to the sickness, death, and cremation of *Wiyoot*, the most powerful and wise one, at Lake Elsinore. The Luiseño society was based on autonomous lineages or kin groups, which represented the basic political unit among most southern California Indians. Each Luiseño lineage possessed a permanent base camp, or village, on the valley floor and another in the mountain regions for acorn collection. Luiseño villages were made up of family members and relatives, usually located in sheltered canyons or near year-round sources of water, always in proximity to subsistence resources.

Luiseño subsistence was defined by the surrounding landscape, exploiting nearly all of the resources available in a highly developed seasonal mobility system, including cultivating and gathering wild plants, fishing, and hunting. They collected seeds, roots, wild berries, acorns, wild grapes, strawberries, wild onions, and prickly pear cacti, and hunted deer, elks, antelopes, rabbits, wood rats, and a variety of insects. Bows and arrows, rabbit sticks, traps, nets, clubs, and slings were the main hunting tools. Each lineage had exclusive hunting and gathering rights in their procurement ranges. These boundaries were respected and only crossed with permission.

As the landscape defined their subsistence practices, the tending and cultivation practices of the Luiseño helped shape the landscape. The practice of controlled burning of chaparral and oak woodland areas created an open countryside with more accessible foraging material for animals, which in turn led to more successful hunting. It also increased the ease with which plant foods could be gathered and prevented out-of-control wildfires by eliminating dead undergrowth before it accumulated to dangerous levels. Coppicing, or trimming plants to the ground, resulted in straighter growth for basketry and arrow-making materials. Granitic outcroppings were used for pounding and grinding nuts and seeds, which left their mark in the resulting bedrock milling features, the most common archaeological remains found in the region.

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 each, although other estimates place the total Luiseño population at 4,000-5,000 (Bean and Shipek 1978:557). Some of the villages were forcefully moved to the Spanish missions, while others were largely left intact. Ultimately, Luiseño population declined rapidly after European contact because of harsh living conditions at the missions and, later, on the Mexican ranchos, where the Native people often worked as seasonal ranch hands, as well as diseases such as smallpox.

After the American annexation of Alta California, the large number of non-Native settlers further eroded the foundation of traditional Luiseño society. During the latter half of the 19th century, almost all of the remaining Luiseño villages were displaced, their occupants eventually removed to

the various reservations including Soboba, Pechanga, and Pala. Currently, language and ceremonies are being revitalized, and some groups have taken to using ethnographic terms such as *Puyumkowitchum* to refer to themselves

#### **Historic Context**

In California, the so-called "historic period" began in 1769, when an expedition sent by the Spanish authorities in Mexico founded Mission San Diego, the first European outpost in Alta California. For several decades after that, however, Spanish colonization activities were largely confined to the coastal regions and left mostly indirect impact on the arid hinterland of the territory. Although the first explorers, including Pedro Fages and Juan Bautista de Anza, traveled through the Perris and San Jacinto Valleys as early as 1772-1774 (Beck and Haase 1974:15), no Europeans were known to have settled in the vicinity until the beginning of the 19th century.

During much of the Spanish and Mexican Periods in California history, the Perris Valley was nominally under the control of Mission San Luis Rey, which was established near present-day Oceanside in 1798. By 1821, it had become a part of the loosely defined Rancho San Jacinto, a vast cattle ranch for that mission, the name of which was first mentioned in mission records in 1821 (Gunther 1984:467). The rancho was headquartered on a small hill near the Lakeview Mountains, where an adobe house for the *mayordomo*, known in later years as Casa Loma, was built sometime before 1827 (*ibid*.:102; Hudson 1989:19).

In the 1840s, after secularization of the mission system, the Mexican government issued three large land grants on the former mission rancho of San Jacinto (Beck and Haase 1974:38). As elsewhere in southern California during the rancho period, cattle raising was the most prevalent economic activity on these and other nearby land grants, until the influx of American settlers eventually brought an end to this now-romanticized lifestyle in the second half of the 19th century. The nearest among them to present-day Perris was Rancho San Jacinto Nuevo y Potrero, granted to Miguel de Pendrorena, a merchant in San Diego, in 1846, just a few months before the American occupation of California (Gunther 1984:466). The project area was not included in any of these land grants, and thus remained unclaimed public land at the time of the American annexation.

In 1882-1883, the Perris Valley received a major boost in its early development when the California Southern Railway was constructed through the area, to be connected to the Atchison, Topeka and Santa Fe Railway's nationwide system a few years later. In a scenario repeated frequently in the American West, a string of towns soon emerged along the railroad line. The town of Perris was founded in 1886, and named in honor of Frederick Thomas Perris, the California Southern Railway's chief engineer and superintendent of construction (Gunther 1984:385). In 1893, with the creation of Riverside County, Perris was designated as one of the 12 original judicial townships (*ibid.*:120).

On May 16, 1911, Perris was incorporated as the sixth city in the county. By 1914, the city had a population of 1,000, a bank, a newspaper, three hotels, three churches, and three large grain warehouses (LSA Associates 2013). Through much of the 20th century, the city remained a largely agrarian community and a supply base for farmers in the Perris Valley, one of most important agricultural regions in Riverside County. In 1918, Perris received another boost with the establishment of the U.S. Army Air Corps' March Field (now March Air Reserve Base) near its

northern boundary, which began ushering in a gradual diversification in local economy. Nevertheless, agriculture remained a dominant factor throughout the historic period (*ibid.*).

During the second half of the 20th century, particularly towards the end of the century, urban/suburban development became the driving force behind the growth in the Perris area, with vast spans of former farmlands turned into residential tracts, commercial development, and other associated facilities. Today, the Perris area is also known for hot air balloon and skydiving excursions, the Orange Empire Railway Museum, and recreational uses of Lake Perris, the terminal reservoir of the eastern branch of the California Aqueduct.

#### **RESEARCH METHODS**

#### RECORDS SEARCH

The historical/archaeological resources records search service for this study was provided by the Eastern Information Center (EIC), University of California, Riverside, on May 26, 2022. During the records search, EIC staff examined maps and records on file for previously identified cultural resources and existing cultural resources reports within a one-mile radius of the project area. Previously identified cultural resources include properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Historic Landmarks, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Resources Inventory. In addition to EIC records, the City of Perris General Plan was also consulted for pertinent information.

#### NATIVE AMERICAN PARTICIPATION

On May 19, 2022, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. In the meantime, CRM TECH notified the Soboba Band of Luiseño Indians in San Jacinto of the upcoming archaeological fieldwork and invited tribal participation. Following the NAHC's recommendations, on June 22, 2022, CRM TECH further contacted the Soboba Band and the Pechanga Band of Luiseño Indians in Temecula in writing for additional information on potential Native American cultural resources in the project vicinity. Correspondence between CRM TECH and the Native American representatives is presented in Appendix 2 and summarized in the sections below.

#### HISTORICAL RESEARCH

Historical background research for this study was conducted by CRM TECH principal investigator/ historian Bai "Tom" Tang. Sources consulted during the research included published literature in local and regional history, U.S. General Land Office (GLO) land survey plat maps dated 1855-1865, USGS topographic maps dated 1901-1979, and aerial photographs taken in 1966-2021. The historic maps are available at the websites of the USGS and the U.S. Bureau of Land Management, and the aerial photographs are available at the Nationwide Environmental Title Research (NETR) Online website and through the Google Earth software.

#### FIELD SURVEY

On May 24, 2022, CRM TECH field director Daniel Ballester carried out the field survey of the project area. The survey was completed on foot at an intensive level by walking a series of parallel east-west transects at 15-meter (approximately 50-foot) intervals. In this way, the entire project area was surveyed systematically for any evidence of human activities dating to the prehistoric or historic period (i.e., 50 years or older). Ground visibility was generally fair (75%) despite the low-lying vegetative cover. In light of the extensive disturbance to the ground surface by past agricultural operations and grading throughout the project area, the visibility is considered adequate for the survey effort.

#### **RESULTS AND FINDINGS**

#### RECORDS SEARCH

According to EIC records, small portions of the project area may have been covered by three previous studies completed between 2004and 2015, but the property as a whole had not been surveyed systematically for cultural resources prior to this study. No cultural resources were previously recorded within or adjacent to the project boundaries. Inside the one-mile scope of the records search, EIC records identify a total of 29 other studies carried out between 1974 and 2019 on various tracts of land and linear features.

EIC records further indicate that 23 historical/archaeological sites and one isolated artifact have been recorded within the one-mile radius, as listed in Table 1. All of these known cultural resources dated to the historic period, and no prehistoric—i.e., Native American—cultural remains have been recorded in the project vicinity. As Table 1 shows, all but three of these sites were buildings or structural remains, with one refuse scatter and two railroad lines representing the only other sites. The isolate consisted of a manhole cover. None of them were found in the immediate vicinity of the project area, and thus none of them require further consideration in conjunction with this project.

The Conservation Element of the City of Perris General Plan classifies the project vicinity as an area of "Low Density Site Probability" for cultural resources, projected at one site or less per quarter mile (City of Perris 2008:21). The General Plan notes that most of the prehistoric sites in and around the City of Perris consist of bedrock milling slicks (*ibid*.:20). Current ethnohistorical scholarship suggests that Native peoples in this area lived in base camps close to water sources, usually in protected areas such as near the base of hills (Bean and Shipek 1978). The project area, located on the open valley floor, would not have been a favored location for long-term habitation, and there are no bedrock outcrops on the property that could have been used for resource processing, as noted below.

#### NATIVE AMERICAN PARTICIPATION

In response to CRM TECH's inquiry, the NAHC reported in a letter dated June 22, 2022, that the Sacred Lands File indicated the presence of unspecified Native American cultural resource(s) in the project vicinity and referred further inquiries to the Pechanga Band of Luiseño Indians (see App. 2). In addition, the commission also recommended that other local Native American groups be

Table 1. Previously Recorded Cultural Resources within the Scope of the Records Search		
Site No.	Recorded by/Date	Description
33-000706	McLean et al. 1993	Historic-period refuse scatter
33-007624	Harmon 1982	Seneca Falls pump, 1888
33-007632	Harmon 1982	Former Perris High School, 1930
33-007633	Harmon 1982	Perris City Hall, 1925
33-007634	Harmon 1982	Perris police station, 1910
33-007635	Harmon 1982	Perris fire station, 1910
33-007645	Chasteen 2003	"Rock House," vernacular residence, 1928-1929
33-007651	Hedges 1982	Vernacular wood-frame residence
33-007663	Hedges 1982	"Boy Scout house," 1938
33-007665	Harmon 1982	Moderne/Art Deco theater building, circa 1930
33-007670	Harmon 1982	Wood-frame bungalow, ca. 1901
33-009776	Various	Atchison, Topeka, and Santa Fe (ATSF) Railway
33-013494	Hatheway 1987	Craftsman-influenced wood-frame building, 1908
33-013495	Various	Early 20th century residence with archaeological component
33-013496	Hatheway 1987	Brick commercial building, 1910
33-015115	Austerman 2006	Isolate: manhole cover
33-015743	Various	Railroad spur from the ATSF San Jacinto Line
33-017253	Smallwood 2008	Concrete slab foundation
33-026644	Castells 2014	Brutalist-style commercial building, ca. 1967
33-026835	Wilson 2017	Southern California Railroad Lakeview Line
33-028773	Chasteen 2003	Minimal Traditional multi-family residence, 1947
33-028774	Chasteen 2003	Modern-style commercial building, 1948
33-028775	Chasteen 2003	Modern-style commercial building, 1949
33-028776	Chasteen 2003	Ranch-style commercial building, 1947

contacted for pertinent information and provided a referral list of 21 individuals associated with 14 local Native American groups (see App. 2). The NAHC's reply is attached in Appendix 2 for reference by the City of Perris in future government-to-government consultations with the pertinent tribal groups, if necessary.

On June 22, 2022, CRM TECH sent written requests for information to the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians, the two nearest Native American groups (see App. 2). On July 7, 2022, Paul E. Macarro, Cultural Coordinator for the Pechanga Band, replied in writing, stating that the tribe finds the project location to be sensitive for Native American cultural resources due to its location near two known Traditional Cultural Properties and a major tributary of the San Jacinto River. Therefore, Mr. Macarro requested further consultation with the City of Perris, tribal review of all cultural resources documentation generated for this project, as well as Native American and archaeological monitoring of ground-disturbing activities in the project area. As of this time, the Soboba Band has not responded to the request for comments or the invitation to participate in the archaeological fieldwork.

#### HISTORICAL RESEARCH

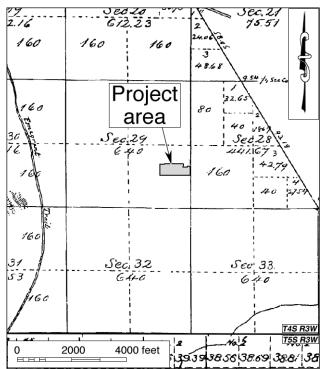
Historical sources consulted during this study suggest that the project area is relatively low in sensitivity for cultural resources from the historic period. In the 1850s-1860s, when the U.S.

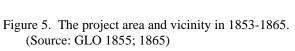
government conducted the first systematic land survey in the present-day Perris area, a wagon road traversing in a generally north-south direction about a mile to the west of the project location was the only human-made feature observed in the vicinity (Fig. 5). By the 1890s, a grid of roads, lined by scattered buildings, had emerged around the town of Perris, including the forerunner of today's Wilson Avenue and Murrieta Road (Fig. 6).

In the late 1930s, a building was noted in the southwestern corner of the property, along Wilson Avenue, but it was no longer extant by the early 1950s (Figs. 7, 8). Some 15 years later, no trace of the building could be found, and the entire project area was evidently under cultivation as agricultural fields (NETR Online 1966; 1967). Farming operations gradually ceased on the property during the 1980s-1990s era, when residential development began to accelerate in the surrounding area (NETR Online 1985; 1997). The project area itself was graded in preparation for similar development between 2005 and 2009, but the project was later abandoned, and the property was left undeveloped and unused to the present time (NETR Online 2005-2018; Google Earth 2005-2021).

#### FIELD SURVEY

The intensive-level field survey produced completely negative results for potential cultural resources, and no buildings, structures, objects, sites, features, or artifact deposits of prehistoric or historical origin were encountered. As a result of the prolonged farming operations on the property, and grading in more recent times, the ground surface in the entire project area has been extensively disturbed, with little vestige of the natural landscape surviving today.





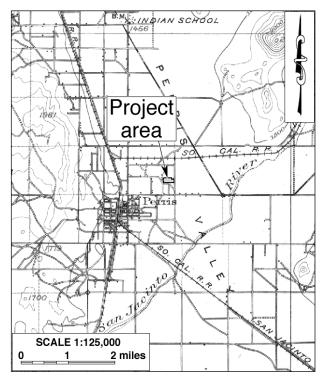


Figure 6. The project area and vicinity in 1897-1898. (Source: USGS 1901)

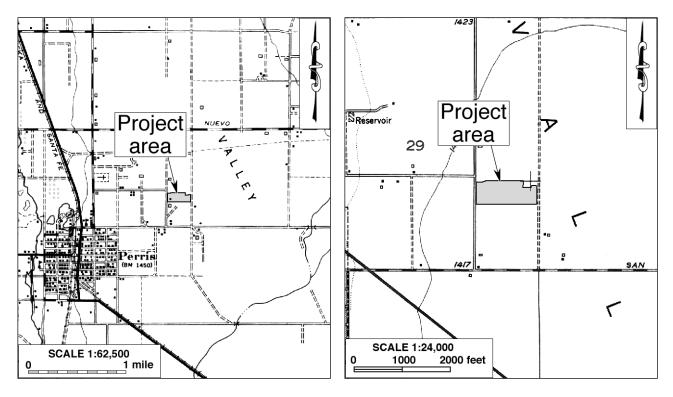


Figure 7. The project area and vicinity in 1939. (Source: USGS 1943)

Figure 8. The project area and vicinity in 1951. (Source: USGS 1953)

No bedrock outcrops or other potential markers of prehistoric human activities were found in the project area. As mentioned above, Wilson Avenue and Murrieta Road outside but adjacent to the western and eastern project boundary trace their beginning to the historic period (Figs. 6-8). However, as working components of the modern transportation infrastructure, these nondescript paved public roadways, with concrete curbs and sidewalks in the case of Wilson Avenue, exhibits no distinctively historical characteristics today. Therefore, they require no further consideration during this study.

#### **DISCUSSION**

The purpose of this study is to identify any cultural resources within or adjacent to the project area and assist the City of Perris in determining whether such resources meet the official definition of "historical resources," as provided in the California Public Resources Code, in particular CEQA. According to PRC §5020.1(j), "historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for

the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

- (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.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

In summary of the research results presented above, no potential "historical resources" were previously recorded within or adjacent to the project area, and none were encountered during the present survey. Furthermore, the ground surface in the project area been extensively disturbed in the past by agricultural operations and, more recently, grading activities in preparation for an abandoned development project.

The NAHC has reported the presence of unspecified Native American cultural resource(s) in the project vicinity and referred further inquiry to the Pechanga Band of Luiseño Indians. In response to the inquiry, the Pechanga Band identified the locations of two Traditional Cultural Properties in the surrounding area but not within the project boundaries. Based on these findings, CRM TECH concludes that no known "historical resources" will be impacted by the proposed project.

#### CONCLUSION AND RECOMMENDATIONS

CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." In conclusion, the present study encountered no "historical resources," as defined by CEQA and associated regulations, within or adjacent to the project area. Therefore, CRM TECH presents the following recommendations to the City of Perris:

- The project as currently proposed will not cause a substantial adverse change to any known "historical resources."
- No further cultural resources investigation is necessary for the proposed project unless development plans undergo such changes as to include areas not covered by this study.
- If buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

#### REFERENCES

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Goodman, John D., II, and M. McDonald

2001 Archaeological Survey of the Southern California Trials Association Event Area, Little Pine Flats, Mountaintop Ranger District, San Bernardino National Forest, California. San Bernardino National Forest Technical Report 05-12-BB-106. San Bernardino.

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  - Map: Perris, Calif. (15', 1:62,500); aerial photographs taken in 1939.
  - 1953 Map: Perris, Calif. (7.5', 1:24,000); aerial photographs taken in 1951.
  - 1979a Map: Santa Ana, Calif. (120'x60', 1:250,000); 1959 edition revised.
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## APPENDIX 1 PERSONNEL QUALIFICATIONS

## PRINCIPAL INVESTIGATOR, HISTORY/ARCHITECTURAL HISTORY Bai "Tom" Tang, M.A.

#### **Education**

1988-1993	Graduate Program in Public History/Historic Preservation, University of California,
	Riverside.
1987	M.A., American History, Yale University, New Haven, Connecticut.
1982	B.A., History, Northwestern University, Xi'an, China.
2000	"Introduction to Section 106 Review," presented by the Advisory Council on Historic
	Preservation and the University of Nevada, Reno.
1994	"Assessing the Significance of Historic Archaeological Sites," presented by the
	Historic Preservation Program, University of Nevada, Reno.

#### **Professional Experience**

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1993-2002	Project Historian/Architectural Historian, CRM TECH, Riverside, California.
1993-1997	Project Historian, Greenwood and Associates, Pacific Palisades, California.
1991-1993	Project Historian, Archaeological Research Unit, University of California, Riverside.
1990	Intern Researcher, California State Office of Historic Preservation, Sacramento.
1990-1992	Teaching Assistant, History of Modern World, University of California, Riverside.
1988-1993	Research Assistant, American Social History, University of California, Riverside.
1985-1988	Research Assistant, Modern Chinese History, Yale University.
1985-1986	Teaching Assistant, Modern Chinese History, Yale University.
1982-1985	Lecturer, History, Xi'an Foreign Languages Institute, Xi'an, China.

#### **Cultural Resources Management Reports**

Preliminary Analyses and Recommendations Regarding California's Cultural Resources Inventory System (with Special Reference to Condition 14 of NPS 1990 Program Review Report). California State Office of Historic Preservation working paper, Sacramento, September 1990.

Numerous cultural resources management reports with the Archaeological Research Unit, Greenwood and Associates, and CRM TECH, since October 1991.

### PRINCIPAL INVESTIGATOR, ARCHAEOLOGY Michael Hogan, Ph.D., RPA (Registered Professional Archaeologist)

#### Education

1991	Ph.D., Anthropology, University of California, Riverside.
1981	B.S., Anthropology, University of California, Riverside; with honors.
1980-1981	Education Abroad Program, Lima, Peru.
2002	"Section 106—National Historic Preservation Act: Federal Law at the Local Level,"
	UCLA Extension Course #888.
2002	"Recognizing Historic Artifacts," workshop presented by Richard Norwood,
	Historical Archaeologist.
2002	"Wending Your Way through the Regulatory Maze," symposium presented by the
	Association of Environmental Professionals.
1992	"Southern California Ceramics Workshop," presented by Jerry Schaefer.
1992	"Historic Artifact Workshop," presented by Anne Duffield-Stoll.

#### **Professional Experience**

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1999-2002	Project Archaeologist/Field Director, CRM TECH, Riverside, California.
1996-1998	Project Director and Ethnographer, Statistical Research, Inc., Redlands, California.
1992-1998	Assistant Research Anthropologist, University of California, Riverside.
1992-1995	Project Director, Archaeological Research Unit, U.C. Riverside.
1993-1994	Adjunct Professor, Riverside Community College, Mt. San Jacinto College, U.C.
	Riverside, Chapman University, and San Bernardino Valley College.
1991-1992	Crew Chief, Archaeological Research Unit, U.C. Riverside.
1984-1998	Project Director, Field Director, Crew Chief, and Archaeological Technician for
	various southern California cultural resources management firms.

#### **Research Interests**

Cultural Resource Management, Southern Californian Archaeology, Settlement and Exchange Patterns, Specialization and Stratification, Culture Change, Native American Culture, Cultural Diversity.

#### **Cultural Resources Management Reports**

Principal investigator for, author or co-author of, and contributor to numerous cultural resources management study reports since 1986.

#### **Memberships**

Society for American Archaeology; Society for California Archaeology; Pacific Coast Archaeological Society; Coachella Valley Archaeological Society.

## PROJECT ARCHAEOLOGIST/REPORT WRITER Deirdre Encarnación, M.A.

### Education

2003	M.A., Anthropology, San Diego State University, California.
2000	B.A., Anthropology, minor in Biology, San Diego State University, California; with
	honors.
2021	Certificate of Specialization, Kumeyaay Studies, Cuyamaca College, California.
2001	Archaeological Field School, San Diego State University.
2000	Archaeological Field School, San Diego State University.

## **Professional Experience**

2004-	Project Archaeologist/Report Writer, CRM TECH, Riverside/Colton, California.
2001-2003	Part-time Lecturer, San Diego State University, California.
2001	Research Assistant for Dr. Lynn Gamble, San Diego State University.
2001	Archaeological Collection Catalog, SDSU Foundation.

### Memberships

Society for California Archaeology; Society for Hawaiian Archaeology; California Native Plant Society.

## PROJECT ARCHAEOLOGIST/FIELD DIRECTOR Daniel Ballester, M.S., RPA (Registered Professional Archaeologist)

#### **Education**

2013	M.S., Geographic Information System (GIS), University of Redlands, California.
1998	B.A., Anthropology, California State University, San Bernardino.
1997	Archaeological Field School, University of Las Vegas and University of California,
	Riverside.
1994	University of Puerto Rico, Rio Piedras, Puerto Rico.
2007	Certificate in Geographic Information Systems (GIS), California State University,
	San Bernardino.
2002	"Historic Archaeology Workshop," presented by Richard Norwood, Base
	Archaeologist, Edwards Air Force Base; presented at CRM TECH, Riverside,
	California.

## **Professional Experience**

2002-	Field Director/GIS Specialist, CRM TECH, Riverside/Colton, California.
2011-2012	GIS Specialist for Caltrans District 8 Project, Garcia and Associates, San Anselmo,
	California.
2009-2010	Field Crew Chief, Garcia and Associates, San Anselmo, California.
2009-2010	Field Crew, ECorp, Redlands.
1999-2002	Project Archaeologist, CRM TECH, Riverside, California.
1998-1999	Field Crew, K.E.A. Environmental, San Diego, California.
1998	Field Crew, A.S.M. Affiliates, Encinitas, California.
1998	Field Crew, Archaeological Research Unit, University of California, Riverside.

## **Cultural Resources Management Reports**

Field Director, co-author, and contributor to numerous cultural management reports since 2002.

## APPENDIX 2

# CORRESPONDENCE WITH NATIVE AMERICAN REPRESENTATIVES

## SACRED LANDS FILE & NATIVE AMERICAN CONTACTS LIST REQUEST

### NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100 West Sacramento, CA 95691 (916)373-3710 (916)373-5471 (Fax) nahc@nahc.ca.gov

Project: Prairie View Multi-Family Residential Project; Assessor's Parcel Number 311-502-001
(CRM TECH No. 3893A)
County: Riverside
USGS Quadrangle Name: Perris, Calif.
Township 4 South Range 3 West SB BM; Section(s) 29
Company/Firm/Agency: CRM TECH
Contact Person: Nina Gallardo
Street Address: 1016 E. Cooley Drive, Suite A/B
City:         Colton, CA           Zip:         92324
Phone: (909) 824-6400 Fax: (909) 824-6405
Email: ngallardo@crmtech.us
Project Description: The primary component of the project is a multi-family residential development
on approximately 13.4 acres of land located on the north side of Dale Street, between Wilson
Avenue and Murrieta Road (APN 311-502-001), in the City of Perris, Riverside County,
California.

**From**: ngallardo@crmtech.us

**Sent**: Thursday, May 19, 2022 4:14 PM

To: 'Jessica Valdez'

Cc: 'jontiveros@soboba-nsn.gov'

**Subject**: Cultural Resources Study and Participation in Field Survey for the Proposed Prairie View

Multi-Family Residential Project; Assessor's Parcel Number 311-502-001, in the City of

Perris (CRM TECH No. 3893A)

#### Hello,

I'm writing to inform you that CRM TECH will be conducting a cultural resources study for the proposed Prairie View Multi-Family Residential Project on Assessor's Parcel Number 311-502-001, in the City of Perris, Riverside County (CRM TECH No. 3893A). Specifically, I am contacting you to see if the tribe would like to participate in the archaeological field survey for the project. We are also asking for any information regarding any tribal cultural resources located in or near the project area.

We will contact you again when we have received the RS results from the EIC and begin to set up a specific time and date for the fieldwork. I'm attaching the project area map and other information. Please feel free to email back with any questions regarding the project and possible availability for the field survey.

Thank you for your time and input on this project.

Nina Gallardo CRM TECH



#### NATIVE AMERICAN HERITAGE COMMISSION

June 22, 2022

Nina Gallardo CRM TECH

Via Email to: ngallardo@crmtech.us

CHAIRPERSON **Laura Miranda** Luiseño

VICE CHAIRPERSON Reginald Pagaling Chumash

Parliamentarian Russell Attebery Karuk

Secretary **Sara Dutschke** *Miwok* 

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER **Buffy McQuillen**Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER **Stanley Rodriguez** *Kumeyaay* 

EXECUTIVE SECRETARY
Raymond C.
Hitchcock
Miwok/Nisenan

#### NAHC HEADQUARTERS

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

Re: Proposed Prairie View Multi-Family Residential Project, Riverside County

Dear Ms. Gallardo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were <u>positive</u>. Please contact the Pechanga Band of Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological 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. Please contact all of those listed; if they cannot supply information, they may 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 the NAHC. 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: <a href="mailto:Andrew.Green@nahc.ca.gov">Andrew.Green@nahc.ca.gov</a>.

Sincerely,

Andrew Green

Cultural Resources Analyst

ndrew Green

Attachment

#### Native American Heritage Commission Native American Contact List Riverside County 6/22/2022

Agua Caliente Band of Cahuilla Indians

Patricia Garcia-Plotkin, Director 5401 Dinah Shore Drive

Cahuilla

Cahuilla

Cahuilla

Cahuilla

Cahuilla

Palm Springs, CA, 92264 Phone: (760) 699 - 6907 Fax: (760) 699-6924

ACBCI-THPO@aguacaliente.net

Los Coyotes Band of Cahuilla and Cupeño Indians Ray Chapparosa Chairperson

Ray Chapparosa, Chairperson P.O. Box 189

Warner Springs, CA, 92086-0189 Phone: (760) 782 - 0711

Fax: (760) 782-0712

Agua Caliente Band of Cahuilla Indians

Jeff Grubbe, Chairperson 5401 Dinah Shore Drive Palm Springs, CA, 92264

Phone: (760) 699 - 6800 Fax: (760) 699-6919 Morongo Band of Mission Indians

Robert Martin, Chairperson 12700 Pumarra Road Banning, CA, 92220

Phone: (951) 755 - 5110 Fax: (951) 755-5177 abrierty@morongo-nsn.gov

Morongo Band of Mission

Ann Brierty, THPO

Cahuilla Serrano

Cahuilla

Augustine Band of Cahuilla Mission Indians

Amanda Vance, Chairperson P.O. Box 846

Coachella, CA, 92236 Phone: (760) 398 - 4722 Fax: (760) 369-7161 hhaines@augustinetribe.com

12700 Pumarra Road Banning, CA, 92220 Phone: (951) 755 - 5259 Fax: (951) 572-6004 abrierty@morongo-nsn.gov Cahuilla Serrano

Cabazon Band of Mission Indians

Doug Welmas, Chairperson 84-245 Indio Springs Parkway

Indio, CA, 92203

Phone: (760) 342 - 2593 Fax: (760) 347-7880

----

jstapp@cabazonindians-nsn.gov

Pala Band of Mission Indians

Shasta Gaughen, Tribal Historic Preservation Officer

PMB 50, 35008 Pala Temecula

Rd.

Indians

Pala, CA, 92059

Phone: (760) 891 - 3515 Fax: (760) 742-3189 sgaughen@palatribe.com

Cahuilla Band of Indians

Daniel Salgado, Chairperson 52701 U.S. Highway 371

Anza, CA, 92539 Phone: (951) 763 - 5549 Fax: (951) 763-2808 Chairman@cahuilla.net Pechanga Band of Indians

Mark Macarro, Chairperson P.O. Box 1477

Temecula, CA, 92593 Phone: (951) 770 - 6000 Fax: (951) 695-1778

epreston@pechanga-nsn.gov

Luiseno

Cupeno

Luiseno

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 Proposed Prairie View Multi-Family Residential Project, Riverside County.

#### **Native American Heritage Commission Native American Contact List Riverside County** 6/22/2022

#### Pechanga Band of Indians

Paul Macarro, Cultural Resources Coordinator

P.O. Box 1477

Luiseno

Cahuilla

Temecula, CA, 92593 Phone: (951) 770 - 6306 Fax: (951) 506-9491

pmacarro@pechanga-nsn.gov

#### 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

#### Ramona Band of Cahuilla

Joseph Hamilton, Chairperson

P.O. Box 391670

Cahuilla Anza, CA, 92539

Phone: (951) 763 - 4105 Fax: (951) 763-4325 admin@ramona-nsn.gov

#### Ramona Band of Cahuilla

John Gomez, Environmental Coordinator

P. O. Box 391670 Anza, CA, 92539

Phone: (951) 763 - 4105 Fax: (951) 763-4325 jgomez@ramona-nsn.gov

#### Rincon Band of Luiseno Indians

Cheryl Madrigal, Tribal Historic

Preservation Officer

One Government Center Lane

Valley Center, CA, 92082 Phone: (760) 297 - 2635 crd@rincon-nsn.gov

#### Rincon Band of Luiseno Indians

Bo Mazzetti, Chairperson

One Government Center Lane

Valley Center, CA, 92082 Phone: (760) 749 - 1051

Fax: (760) 749-5144 bomazzetti@aol.com

#### Santa Rosa Band of Cahuilla Indians

Lovina Redner, Tribal Chair

P.O. Box 391820

Anza, CA, 92539

Phone: (951) 659 - 2700 Fax: (951) 659-2228 Isaul@santarosa-nsn.gov

#### Soboba Band of Luiseno Indians

Isaiah Vivanco, Chairperson

P. O. Box 487 Cahuilla

San Jacinto, CA, 92581 Phone: (951) 654 - 5544 Fax: (951) 654-4198 ivivanco@soboba-nsn.gov

#### Soboba Band of Luiseno Indians

Joseph Ontiveros, Cultural

Resource Department P.O. BOX 487

San Jacinto, CA, 92581 Phone: (951) 663 - 5279 Fax: (951) 654-4198

jontiveros@soboba-nsn.gov

Cahuilla

Luiseno

Luiseno

Luiseno

Cahuilla

Luiseno

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 Proposed Prairie View Multi-Family Residential Project, Riverside County.

#### Native American Heritage Commission Native American Contact List Riverside County 6/22/2022

Torres-Martinez Desert Cahuilla Indians

Cultural Committee, P.O. Box 1160 Thermal, CA, 92274

Cahuilla

Phone: (760) 397 - 0300 Fax: (760) 397-8146

Cultural-

Committee@torresmartinez-

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 Proposed Prairie View Multi-Family Residential Project, Riverside County.

PROJ-2022- 06/22/2022 01:36 PM 3 of 3

From: ngallardo@crmtech.us

**Sent**: Wednesday, June 22, 2022 3:36 PM

To: 'Ebru Ozdil'

Cc: 'Molly Earp-Escobar'; 'Paul Macarro'

**Subject**: Request for Information Regarding Positive SLF Response for the Proposed Prairie View

Multi-Family Residential Project; CRM TECH #3893A

Hello,

I'm writing to inform you that CRM TECH will be conducting a cultural resources study for the proposed Prairie View Multi-Family Residential Project on Assessor's Parcel Number 311-502-001, in the City of Perris, Riverside County (CRM TECH No. 3893A). We have received the Native American Heritage Commission's (NAHC) SLF response and NA contact list. In the letter, the NAHC reports that the results of the SLF search were positive and recommends contacting the Pechanga Band of Luiseño Indians and other local tribes for further information (see attached).

I'm specifically contacting you to see if the Pechanga Band of Luiseño Indians has any additional information regarding cultural sites located at or near the project location. I'm also attaching the project area map. Please feel free to email back with any questions, comments and/or information regarding the project location. We would appreciate any information that the tribe may provide for CRM TECH to include in our report.

Thanks for your time and input on this project.

Nina Gallardo Project Archaeologist/Native American liaison CRM TECH 1016 E. Cooley Drive Ste. A/B Colton, CA 92324 (909) 824-6400

**From**: ngallardo@crmtech.us

**Sent**: Wednesday, June 22, 2022 3:44 PM

To: 'Jessica Valdez'

Cc: 'jontiveros@soboba-nsn.gov'

**Subject**: Request for Information Regarding Positive SLF Response for the Proposed Prairie View

Multi-Family Residential Project; CRM TECH #3893A

Hello,

I'm writing to inform you that CRM TECH will be conducting a cultural resources study for the proposed Prairie View Multi-Family Residential Project on Assessor's Parcel Number 311-502-001, in the City of Perris, Riverside County (CRM TECH No. 3893A). We have received the Native American Heritage Commission's (NAHC) SLF response and NA contact list. In the letter, the NAHC reports that the results of the SLF search were positive and recommends contacting the Pechanga Band of Luiseño Indians and other local tribes for further information (see attached).

I'm specifically contacting you to see if the Soboba Band of Luiseño Indians has any additional information regarding cultural sites located at or near the project location. I'm also attaching the project area map. Please feel free to email back with any questions, comments and/or information regarding the project location. We would appreciate any information that the tribe may provide for CRM TECH to include in our report.

Thanks for your time and input on this project.

Nina Gallardo Project Archaeologist/Native American liaison CRM TECH 1016 E. Cooley Drive Ste. A/B Colton, CA 92324 (909) 824-6400



#### PECHANGA CULTURAL RESOURCES

Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593 Telephone (951) 770-6300 • Fax (951) 506-9491

July 07, 2022

#### VIA E-Mail and USPS

Nina Gallardo, Project Archaeologist/Native American Liaison CRM TECH 1016 E. Cooley Drive Suite A/B Colton, CA 92324 (909) 824-6400

RE: Request for Information for the Prairie View Multi-Family Residential Project, City of Perris, Riverside County, CA

Dear Ms. Gallardo,

The Pechanga Band of Indians ("the Tribe") appreciates your request for information regarding the above referenced Project. After reviewing the provided maps and our internal documents, we have determined that the Project area is not within our Reservation land's, although it is located in the heart of Our Ancestral Territory. The Tribe acknowledges that a majority of this proposed Project was mass graded between 2008 and 2009. However, at this time Tribe is interested in participating in this Project based upon our 'Ayélkwish/Traditional Knowledge of the area and this Project's-placement, being in-between two Traditional Cultural Properties (the first TCP at 640 vards to the West and the second .90 of-a-mile due East of the APE). Further, this Project has a proximity of 260 yards away from a major tributary of the San Jacinto River. Although a completely modernized channel now, this waterway did formerly coarse-through large and longstanding Ancestral Village complexes. Considering the known, nearby Ancestral human remains and because of previously impacted recorded sites within this Project's-vicinity the Tribe therefore, is interested in participating in this Project. Pechanga believes that the possibility for recovering subsurface resources during ground-disturbing activities for the Project is extremely high.

The Tribe is dedicated to providing comprehensive cultural information to you and your firm for inclusion in the archaeological study as well as to the Lead Agency for CEQA review. At this time, the Tribe requests the following so we may continue the consultation process and to provide adequate and appropriate recommendations for the Project:

- 1) Notification once the Project begins the entitlement process, if it has not already;
- 2) Copies of all applicable archaeological reports, site records, former and proposed grading plans and environmental documents (EA/IS/MND/EIR, etc);
- Government-to-government consultation with the Lead Agency; and

Chairperson: Neal Ibanez

Vice Chairperson: Bridgett Barcello

Committee Members: Darlene Miranda Richard B. Scearce, III Robert Villalobos Shevon Torres Juan Rodriguez

Director: Gary DuBois

Coordinator: Paul Macarro

Cultural Analyst: Tuba Ebru Ozdil

Planning Specialist: Molly Escobar

4) The Tribe believes that monitoring by a Riverside County qualified archaeologist and a professional Pechanga Tribal Monitor may be required during earthmoving activities. Therefore, the Tribe reserves its right to make additional comments and recommendations once the environmental documents have been received and fully reviewed. Further, in the event that subsurface cultural resources are identified, the Tribe requests consultation with the Project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a Sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed Project. We would like you and your client to know that the Tribe does not consider initial inquiry letters from project consultants to constitute appropriate government-to-government consultation, but rather tools to obtain further information about the Project area. Therefore, the Tribe reserves its rights to participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, and requests to be included in all correspondence regarding this Project.

Please note: although Pechanga usually insists on participating in surveys within our Luiseño Ancestral Territory, because of the prior grading-history of this Project-property the Tribe will not be requesting to be present for an additional survey. If you have any additional questions or comments, please contact me at pmacarro@pechanga-nsn.gov or 951-770-6306.

Sincerely,

Paul E. Macarro Cultural Coordinator Pechanga Reservation