



December 310 2007

Terri Rahhal-City Planner
City of San Bernardino
San Bernardino 92408

Subject: **Cultural Records Search Results for the University Hills Specific Plan in the City of San Bernardino, California (USGS San Bernardino North, CA. quadrangle)**

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Dear Ms. Rahhal:

Michael Brandman Associates (MBA) Senior Archaeologist Michael Dice, M.A. has recently performed a cultural resource records search for the University Hills Specific Plan, a proposed developmental project in the City of San Bernardino that will be supported by an EIR. The records search was undertaken at the Archaeological Information Center (AIC) located at the San Bernardino County Museum. The AIC is the State-approved records repository that keeps numerous types of records associated with archaeological and historic sites that professional archaeologists and historians have reported to the State. The search took place on November 30, 2007. We understand that properties located south of the San Bernardino National Forest boundary will be developed, while those located north of the boundary shall be deemed Open Space.

As seen in the attached topographic map, the project area is located in Section 4, 5, 8 and 9, T1S R4W as found on the USGS San Bernardino North, CA. 7.5' topographic quadrangle. The cultural resource search radius was one mile around the perimeters of the project area and included the project area itself. All available records associated with this radius were photocopied, as were any reports written that may have included the project area. Archival maps were also copied and examined. In addition to the AIC research, MBA obtained copies of historic aerial photographs and reviewed those for the existence of structural footprints and visible features.

The results of the record search showed that the entirety of the project area was surveyed by Chris Drover (Drover 1990) for the old Paradise Hills project, which subsequently was never constructed. Drover identified one historic resource built in the 1940-1950's but declined to record it. The buildings are probably associated with a demolished farmstead located in the southwest ¼ of the southwest ¼ of Section 4 near the floor of Badger Canyon. Although this is located in Open Space, this resource would now be more than 45 years old and following CEQA guidelines it should be fully recorded and evaluated for significance. This location is supposedly at the unrecorded "Circle K" Nudist Camp, of which little written information is known. A portion of the project area north of the San Bernardino National Forest boundary was examined by Lerch (SR 2001) for FEMA and the City following Section 106 guidelines. Although the Lerch report was not a protocol archaeological survey, he reported that no cultural resources were located in that portion of the project area. This is curious because the old Circle K buildings noted by Drover can be clearly seen in the modern GoogleEarth aerial photograph.



Review of archival topographic maps was also undertaken at the AIC. The 1898 survey map shows that an unrecorded homestead known as the J.W. Marshall Place is located in the southwest $\frac{1}{4}$ of the southwest $\frac{1}{4}$ of Section 4 on a bench above the bottom of Badger Canyon Creek. Marshall also had a crop field a little east of his homestead. The historic homestead was likely built at the very spot where the existing Circle K building remnants now stand.

Six recorded historic structures or structure complexes (CA-SBR-6345H, -6581H, -8083H, -8302H, -9859H, -9860H), two individual structures (P36-012952, P36-012953) and three "pending" historic sites (P1071-3H, P1071-22H and PSBR-19H) are known for the search radius. None of these are located on-site. With the inclusion of the J.W. Marshall/Circle K Camp, a total of 12 cultural resources are located within the search radius.

Drover (1990) noted that the region's prehistoric inhabitants would have processed foodstuffs on bedrock outcrops, yet none were observed in the project area. Drover recommended that since no archaeological or historic sites were found in the project area, no additional mitigation could be recommended. Monitoring was not recommended but he stated that an archaeologist be retained in case any resources were uncovered during project-related earthmoving.

A series of archival aerial photographs were inspected for signs of structural footprints and the demolition of such structures over time. MBA obtained aerial photos from 1930, 1953, 1966, 1980 and other dates, but the first four were reviewed for historical relevance. In 1930, the property exhibited one structure complex in Badger Canyon: this is the J.W. Marshall homestead. The complex exhibited citrus orchards, a house and barn, roads and fields. No other building can be observed in the project area. A fresh pipeline scar can be observed at the base of the foothills: this may represent a water pipeline that had been recently constructed. Fields are located at the mouth of Badger Canyon and no flood control infrastructure can be observed. By 1953, the Marshall homestead had matured and the adjacent fields did not seem to be in use. A few additional structures had been built on the property. A new farm appears at the mouth of Badger canyon. This is not located in the project area but the foundation remnants can be seen to this day. There are still no flood control basins in or near the project area. In 1966, it was clear that flood control basins had been constructed. The Marshall homestead had undergone another change as some of the buildings had been removed and/or replaced but the large barn remained. By 1980, the Marshall place lacked any evidence of agricultural effort, just one large building complex and the barn remained. The orchard was gone and the old fields were unused. The structure at the mouth of Badger Canyon was in similar condition and agriculture was not being conducted nearby.

In summary, the purpose of the cultural records search was to obtain a copy of the 1990 Paradise Hills report and to review records such that any cultural resource information recorded after the Drover report was written could be obtained. This showed that at least one unrecorded resource is located in the project area. We believe that a new resurvey of the project area by a qualified archaeologist may support a finding of no effect, but it is possible that a new analysis may arrive at a different conclusion.

Since the project area consists of areas that shall be directly impacted by construction and areas that shall be designated Open Space, CEQA requires that any cultural resources located in a developmental area be evaluated for significance such that the effect of the future entitlement on those resources can be judged. We note that the Drover survey took place 17 to 18 years ago. The State Office of Historic Preservation (OHP) recommends that developmental areas be surveyed every five years because cultural resources can become exposed through erosional processes. Although the OHP recommendation does not bear the same weight as a State Law or Public Code, the Native American Heritage Commission (NAHC) may make this same recommendation once the NAHC responds to the Notice of Preparation.

In addition, we understand that the project may be under the jurisdiction of the Army Corps of Engineers. Since the property was surveyed and reported upon more than 17 years ago, the Army Corps may require a new survey and evaluation of all properties located in the ACOE (Area of Potential Effect) to satisfy Section 106 of the National Historic Preservation Act. Finally, the City must undertake SB18 consultations with local Native American Tribal governments because a Specific Plan is required and part of the project area

shall be designation Open Space. A new archaeological survey will allow the City to provide the Tribes with the most up-to-date information available.

Finally, the Initial Study must determine whether or not there will be significant impacts to paleontological resources. We recommend that a paleontological survey of the project area take place and survey report information added to the EIR before the EIR is circulated to the public.

Sincerely,

A handwritten signature in black ink, appearing to read 'MD', with a long horizontal line extending to the right.

Michael Dice M.A., Senior Archaeologist
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