

CULTURAL RESOURCES ASSESSMENT

Home Lumber Property Project

City of San Bernardino, San Bernardino County, California

Prepared for:

John Schaefer
Hillwood Investment Properties
901 Via Piemonte, Suite 175
Ontario, California 91764

Prepared by:

David Brunzell, M.A., RPA
BCR Consulting LLC
1420 Guadalajara Place
Claremont, California 91711

Project No. HIL1302

National Archaeological Data Base Information:

Type of Study: Reconnaissance Cultural Resources Assessment

Resources Recorded: None

Keywords: San Bernardino

USGS Quadrangle: 7.5-minute San Bernardino South, California (1980)



BCRCONSULTING LLC

August 23, 2013

MANAGEMENT SUMMARY

BCR Consulting LLC (BCR Consulting) is under contract to Hillwood Investment Properties to conduct a Cultural Resources Assessment of the Home Lumber Property Project (62 acres; the project) located in the City of San Bernardino (City), San Bernardino County, California. Tasks completed for the scope of work include a cultural resources records search, a reconnaissance-level pedestrian cultural resources survey, compilation of this technical report, Native American Consultation (Appendix A), and a Paleontological Resources Assessment (Appendix B). Project photographs are provided in Appendix C. These tasks were performed in partial fulfillment of California Environmental Quality Act (CEQA) requirements. The records search revealed that 32 cultural resources studies have taken place resulting in the recording of 15 cultural resources (14 historic-period and one prehistoric) within one-mile of the project site. None of the previous cultural resource studies have assessed the project site, and no cultural resources have been recorded within its boundaries.

During the field survey, BCR Consulting archaeologists did not discover any cultural resources, including prehistoric or historic archaeological sites or historic buildings, within the project site boundaries. As a result BCR Consulting recommends that no additional cultural resources work or monitoring is necessary for proposed project activities within the project site boundaries. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist shall be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

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INTRODUCTION

BCR Consulting LLC (BCR Consulting) is under contract to Hillwood Investment Properties to conduct a Cultural Resources Assessment of the Home Lumber Property Project (62 acres; the project) located in the City of San Bernardino (City), San Bernardino County, California. An intensive-level pedestrian cultural resources survey of the project site was completed in partial fulfillment of California Environmental Quality Act (CEQA) requirements. The project site is located in a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, as depicted on the United States Geological Survey (USGS) *San Bernardino South, California* (1980) 7.5-minute topographic quadrangle (Figure 1).

NATURAL SETTING

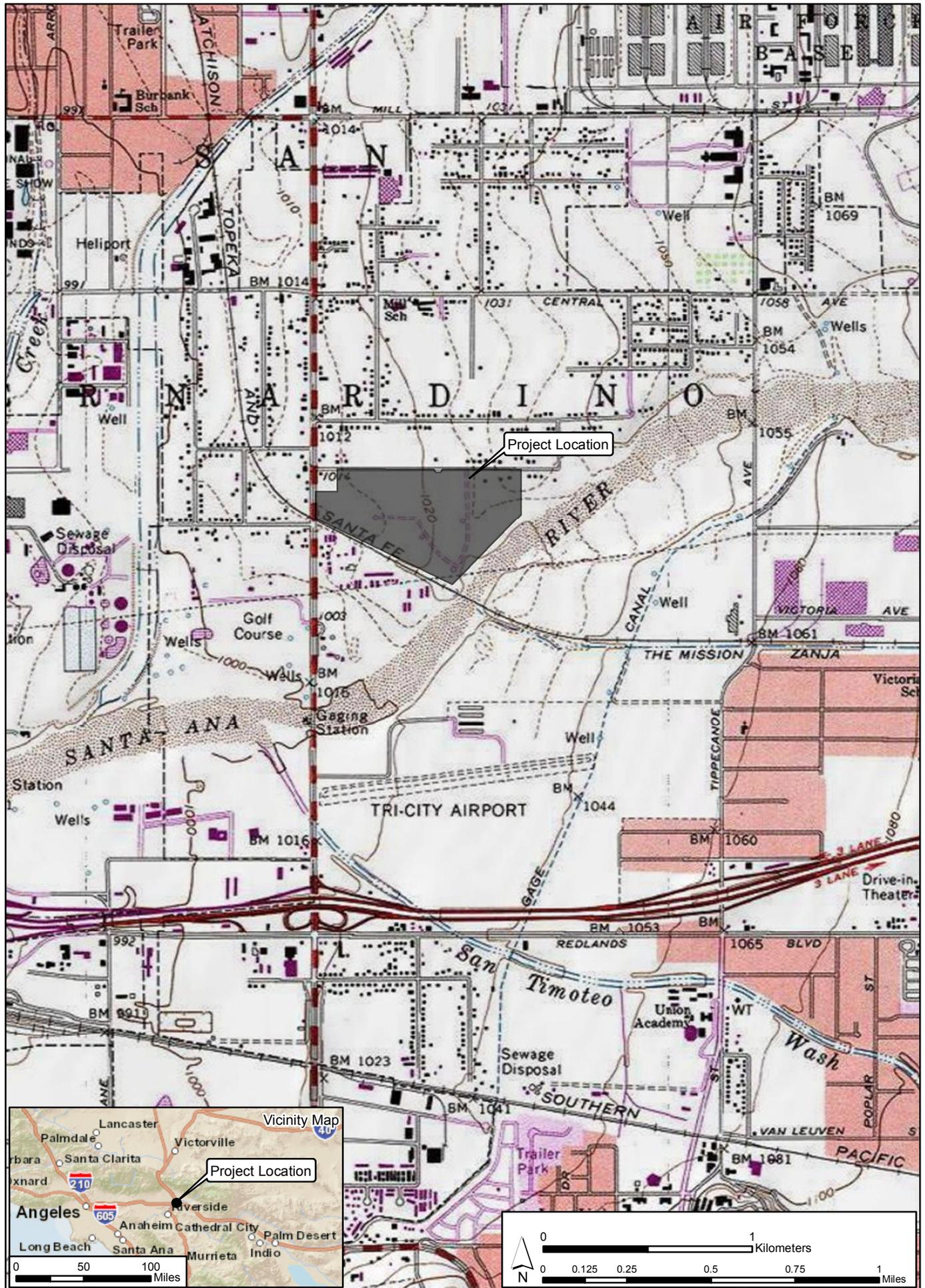
The elevation of the project site ranges from approximately 1010 to 1033 feet above mean sea level (AMSL). The property has been subject to severe disturbances related to grading for existing and former modern business developments. The project site is covered with young alluvial valley deposits (Qya5), and is adjacent to very young wash deposits (Qw and Qw1). These are locally exhibited as fine sands and silty sands deposited by the Santa Ana River, which currently flows intermittently from northeast to southwest adjacent to the project site's southwestern boundary (USGS 2003; USGS 1980). The current study has not yielded any evidence that local sediments have produced raw materials used in prehistoric tool manufacture within one mile of the project site. Local rainfall ranges from 5 to 15 inches annually (Jaeger and Smith 1971:36-37).

Although recent and historical impacts have decimated local vegetation, remnants of a formerly dominant coastal sage scrub vegetation community have been sporadically observed in the area. Signature plant species include black sage (*Salvia mellifera*), California brittlebush (*Encelia californica*), California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), deerweed (*Lotus scoparius*), golden yarrow (*Eriophyllum confertiflorum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), poison oak (*Toxicodendron diversilobum*), purple sage (*Salvia leucophylla*), sticky monkeyflower (*Mimulus aurantiacus*), sugar bush (*Rhus ovate*), toyon (*Heteromeles arbutifolia*), white sage (*Salvia apiana*), coastal century plant (*Agave shawii*), coastal cholla (*Opuntia prolifera*), Laguna Beach liveforever (*Dudleya stolonifera*), many-stemmed liveforever (*Dudleya multicaulis*), our Lord's candle (*Yucca whipplei*), prickly pear cactus (*Opuntia sp.*) (Williams et al. 2008:118-119). Signature animal species within Coastal Sage Scrub habitat include the kangaroo rat (*Dipodomys sp.*), California horned lizard (*Phrynosoma coronatum frontale*), orange throated whiptail (*Cnemidophorus hyperthrus*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), brown-headed cowbird (*Molothrus ater*), California gnatcatcher (*Polioptila californica californica*), California quail (*Callipepla californica*), and San Diego cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) (Williams et al. 2008:118-120). Local native groups made use of many of these species (see Lightfoot and Parrish 2008).

CULTURAL SETTING

Prehistoric Context

The local prehistoric cultural setting has been organized into many chronological frameworks (see Warren and Crabtree 1986; Bettinger and Taylor 1974; Lanning 1963;



Project Location Site
Home Lumber Property Project

Figure 1

Hillwood Investment Properties
901 Via Piemonte, Suite 175
Ontario, California 91764

Reference: ESRI; USGS Quad: San Bernardino South (1980), CA

Hunt 1960; Wallace 1958, 1962, 1978; Campbell and Campbell 1935), although there is no definitive sequence for the region. The difficulties in establishing cultural chronologies for western San Bernardino County are a function of its enormous size and the small amount of archaeological excavations conducted there. Moreover, throughout prehistory many groups have occupied the area and their territories often overlap spatially and chronologically resulting in mixed artifact deposits. Due to dry climate and capricious geological processes, these artifacts rarely become integrated in-situ. Lacking a milieu hospitable to the preservation of cultural midden, local chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as groundstone. Such methods are instructive, but can be limited by prehistoric occupants' concurrent use of different artifact styles, or by artifact re-use or re-sharpening, as well as researchers' mistaken diagnosis, and other factors (see Flenniken 1985; Flenniken and Raymond 1986; Flenniken and Wilke 1989). Recognizing the shortcomings of comparative temporal indicators, this study recommends review of Warren and Crabree (1986), who have drawn upon this method to produce a commonly cited and relatively comprehensive chronology.

Ethnography

Although no previously recorded prehistoric sites have established a local prehistoric ethnographic affiliation, the project site vicinity is situated at an ethnographic nexus peripherally occupied by the Gabrielino and Serrano. Each group consisted of semi-nomadic hunter-gatherers who spoke a variation of the Takic language subfamily. Individual ethnographic summaries are provided below.

Gabrielino. The Gabrielino probably first encountered Europeans when Spanish explorers reached California's southern coast during the 15th and 16th centuries (Bean and Smith 1978; Kroeber 1925). The first documented encounter, however, occurred in 1769 when Gaspar de Portola's expedition crossed Gabrielino territory (Bean and Smith 1978). Other brief encounters took place over the years, and are documented in McCawley 1996 (citing numerous sources). The Gabrielino name has been attributed by association with the Spanish mission of San Gabriel, and refers to a subset of people sharing speech and customs with other Cupan speakers (such as the Juaneño/Luiseño/Ajachemem) from the greater Takic branch of the Uto-Aztecan language family (Bean and Smith 1978). Gabrielino villages occupied the watersheds of various rivers (locally including the Santa Ana) and intermittent streams. Chiefs were usually descended through the male line and often administered several villages. Gabrielino society was somewhat stratified and is thought to have contained three hierarchically ordered social classes which dictated ownership rights and social status and obligations (Bean and Smith 1978:540-546). Plants utilized for food were heavily relied upon and included acorn-producing oaks, as well as seed-producing grasses and sage. Animal protein was commonly derived from rabbits and deer in inland regions, while coastal populations supplemented their diets with fish, shellfish, and marine mammals (Boscana 1933, Heizer 1968, Johnston 1962, McCawley 1996). Dog, coyote, bear, tree squirrel, pigeon, dove, mud hen, eagle, buzzard, raven, lizards, frogs, and turtles were specifically not utilized as a food source (Kroeber 1925:652).

Serrano. Kroeber (1925) applied the generic term "Serrano" to four groups, each with distinct territories: the Kitanemuk, Tataviam, Vanyume, and Serrano. Only one group, in the San Bernardino Mountains and West-Central Mojave Desert, ethnically claims the term Serrano. Bean and Smith (1978) indicate that the Vanyume, an obscure Takic population,

was found along the Mojave River at the time of Spanish contact. The Kitanemuk lived to the north and west, while the Tataviam lived to the west. All may have used the western San Bernardino County area seasonally. Serrano villages consisted of small collections of willow-framed domed structures situated near reliable water sources. A lineage leader administered laws and ceremonies from a large ceremonial house centrally located in most villages. Local Serrano relied heavily on acorns and piñon nuts for subsistence, although roots, bulbs, shoots, and seeds supplemented these. When available, game animals commonly included deer, mountain sheep, antelope, rabbits, small rodents, and various birds –particularly quail (Bean and Smith 1978:571).

History

Historic-era California is generally divided into three periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present).

Spanish Period. The first European to pass through the area is thought to be a Spaniard called Father Francisco Garces. Having become familiar with the area, Garces acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near what today is Pasadena (Beck and Haase 1974). Garces was followed by Alta California Governor Pedro Fages, who briefly explored the region in 1772. Searching for San Diego Presidio deserters, Fages had traveled through Riverside to San Bernardino, crossed over the mountains into the Mojave Desert, and then journeyed westward to the San Joaquin Valley (Beck and Haase 1974).

Mexican Period. In 1821, Mexico overthrew Spanish rule and the missions began to decline. By 1833, the Mexican government passed the Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings, and released their neophytes (Beattie and Beattie 1974).

American Period. The American Period, 1848–Present, began with the Treaty of Guadalupe Hidalgo. In 1850, California was accepted into the Union of the United States primarily due to the population increase created by the Gold Rush of 1849. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849–1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi and Missouri Valleys. When the beef market collapsed, many California ranchers lost their ranchos through foreclosure. A series of disastrous floods in 1861–1862, followed by a significant drought further diminished the economic impact of local ranching. This decline combined with ubiquitous agricultural and real estate developments of the late 19th century, set the stage for diversified economic pursuits that have continued to proliferate to this day (Beattie and Beattie 1974; Cleland 1941).

Local Sequence. The project site is located within the boundaries of the historic Rancho San Bernardino, a mission rancho originally associated with the nearby Spanish Asistencia. Rancho San Bernardino became the property of the Lugo family and Diego Sepulveda in 1842 as part of the secularization process, securing Mexico's local hegemony after official

independence from Spain. When the United States annexed California after the Mexican-American War, the Lugo family and Diego Sepulveda received the official U.S. land patent for the property, via a claim filed under the authority of Congress (U.S. Congress 1851, General Land Office 1865). Brigham Young's Mormon scouts subsequently bought Rancho San Bernardino from the Lugos and Sepulveda and erected a sawmill and irrigation system, splitting the land into a system of ranches and farms. The resulting economy soon necessitated a stage stop, and by 1855 the freight-hauling enterprise of Banning & Alexander was running a brisk service between San Bernardino and Los Angeles (Lavender 1972:230-231).

Although large tracts owned by the U.S. Government became available for homesteading during the 1860s, various pressures forced local Mormon pioneers to recede to Salt Lake City during this period. In the wake of the Mormon exodus, other settlers began to take advantage of new homestead opportunities. Agriculture (particularly citrus orchards) was central to the region's success, and by the early 20th century the City of San Bernardino's downtown took shape as the hub of economic activity. Spanish Colonial-style civic and commercial buildings predominated San Bernardino construction projects between the 1920s to the 1940s. While similar popular architectural styles were reflected in some residential neighborhoods, the gradual development of forms more typical of the California working class population became common (Donaldson 1991). These included 1920s Craftsman and Spanish Colonial Revival style bungalows, and the simple Minimal Traditional Style during the 1930s (*ibid.*).

Subsequent to World War II, southern California experienced an unprecedented land boom resulting from the local discharge of former military personnel. The railroad, U.S. Air Force (both civilian and military), and Kaiser Steel initially remained strong, and a revitalized construction industry formed due to new commercial, residential, and infrastructure developments. Although San Bernardino initially prospered during the post-war years, the eventual closures of Norton Air Force Base and Kaiser Steel in addition to the relocation of many railroad jobs punctuated a general economic downturn for San Bernardino's working class that has persisted since the 1980s (Osbourne 1996; Center for Land Use Interpretation 2013).

PERSONNEL

David Brunzell, M.A., RPA acted as the Project Manager and Principal Investigator for the current study. He also performed the cultural resources records search at the San Bernardino Archaeological Information Center (SBAIC), and compiled the technical report. David Brunzell and BCR Consulting Field Archaeologist/Paleontologist and Geographic Information System (GIS) Specialist Joseph Brunzell completed the pedestrian field survey. Joseph Brunzell prepared the Figure 1 and initiated Native American Consultation (Appendix A). Eric Scott of the San Bernardino County Museum performed the Paleontological Resources Assessment (Appendix B).

METHODS

Records Search

Prior to fieldwork, BCR Consulting conducted an archaeological records search at the SBAIC. This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated

from projects completed within one mile of the project site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

Field Survey

An archaeological pedestrian field survey of the project site was conducted on August 12, 2013. The survey was conducted by walking parallel transects spaced approximately 15 meters apart across 100 percent of the project site, where accessible. Soil exposures, including natural and artificial clearings were carefully inspected for evidence of cultural resources.

RESULTS

Records Search

Data from the SBAIC revealed that 32 cultural resource studies have taken place resulting in the recording of 15 cultural resources within one mile of the project site. Of the 15 previously recorded cultural resources, 14 were historic-period and one was prehistoric. None of the previous cultural resource studies have assessed the project site, and no cultural resources have been recorded within its boundaries. The records search is summarized as follows:

Table A. Cultural Resources and Reports Within One Mile of the Project Site

USGS 7.5 Minute Quadrangle	Cultural Resources Within One Mile of Project Site	Cultural Resource Studies Within One Mile of Project Site
<i>San Bernardino South, California (1980)</i>	CA-SBR-1419, 6103, 6847H, 13546, 13547, 13548, 17818/CPHI-SBR-7, 17668, 17813, 23628, PSBR-26H, P1074-198H, P1074-85H, P1074-90H, CPHI-SBR-63	SB-1060531, 1061133, 1061134, 1061287, 1061808, 1061852, 1062156, 1062260, 1062784, 1063009, 1063228, 1063286, 1063656, 1064364, 1064633, 1064639, 1065248, 1065254, 1065600, 1065601, 1065607, 1065616, 1065619, 1065619, 1066291, 1066331, 1066446, 1066447, 1067008, 1067256, 1067368, 1067371

Field Survey

During the field survey, BCR Consulting staff carefully inspected the project site, and identified no cultural resources within its boundaries. Surface visibility was approximately 60 percent within the project site. Ground disturbances were severe and included grading for and construction of existing and former modern business developments.

RECOMMENDATIONS

BCR Consulting conducted a Cultural Resources Assessment of the Home Lumber Property Project in the City of San Bernardino, San Bernardino County, California. This work was completed pursuant to CEQA. The records search and field survey did not identify any cultural resources (including prehistoric or historic archaeological sites or historic buildings) within the project site. Furthermore, records search results combined with surface conditions have failed to indicate sensitivity for buried cultural resources. Based on these results, BCR

Consulting recommends that no additional cultural resource work or monitoring is necessary for any earthmoving proposed within the project site. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

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APPENDIX A NATIVE AMERICAN CONSULTATION

Subject: SLF/Tribe List for the Hillwood Home Lumber Project, City of San Bernardino, San Bernardino County

From: David Brunzell (david.brunzell@yahoo.com)

To: ds_nahc@pacbell.net;

Date: Saturday, August 3, 2013 10:34 AM

Hi Dave,

I'd like to request a Sacred Lands File search and list of potentially interested tribes for the proposed Hillwood Home Lumber Industrial Development Project located in the City of San Bernardino, San Bernardino County, California. The proposed project is located in a non-sectioned portion of Township 1 South, Range 4 West, SBBM and is depicted on the *San Bernardino South* (1980), *California* 7.5 Minute Topographic Quadrangle (see attached map)*.

Please send the list to my email or the below fax number and please get in touch with any questions.

Thanks,

David Brunzell
Principal Investigator/Archaeologist

BCR Consulting LLC
Certified Small Business (SB)
1420 Guadalajara Place
Claremont, California 91711
Phone: 909-525-7078
Fax: 909-992-3065

www.bcrconsulting.net

*See Figure 1 of report.

STATE OF CALIFORNIA

Edmund G. Brown, Jr. Governor

**NATIVE AMERICAN HERITAGE
COMMISSION**

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95891
(916) 373-3715
Fax (916) 373-5471
www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

August 6, 2013

Mr. David Brunzell, RPA, Principal

BCR Consulting, LLC

1420 Guadalupe Place
Claremont, CA 91711

Sent By FAX to: 909-992-3065
No. of Pages: 3

Re: Request for Sacred Lands File Search and Native American Contacts list for the
"Hillwood Home Lumber Industrial Development Project," Located in
the City of San Bernardino; San Bernardino County, California.

Dear Mr. Brunzell:

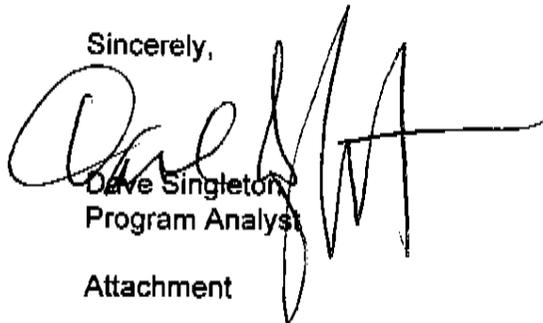
A record search of the NAHC Sacred Lands File failed to indicate the presence of Native American traditional cultural place(s) in the project sites submitted, based on the USGS coordinates submitted as part of the 'Area of Potential Effect. (APE). Also, note that the NAHC SLF Inventory is not exhaustive; therefore, the absence of archaeological or Native American sacred places does not preclude their existence. Other data sources for Native American sacred places/sites should also be contacted. A Native American tribe or individual may be the only sources of presence of traditional cultural places or sites.

In the 1985 Appellate Court decision (170 Cal App 3rd 604; *EPIC v. Johnson*), the Court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

Attached is a list of Native American tribes, individuals/organization who may have knowledge of cultural resources in or near the project area. As part of the consultation process, the NAHC recommends that local governments and project developers contact the tribal governments and individuals to determine if any cultural places might be impacted by the proposed action. If a response is not received in two weeks of notification the NAHC requests that a follow telephone call be made to ensure that the project information has been received.

If you have any questions or need additional information, please contact me at (916) 373-3715.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", with a long horizontal flourish extending to the right.

Dave Singleton
Program Analyst

Attachment

**Native American Contacts
San Bernardino County
August 6, 2013**

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula , CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.
gov
(951) 506-9491 Fax

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

San Manuel Band of Mission Indians
Carla Rodriguez, Chairwoman
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Gabrielino/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Morongo Band of Mission Indians
William Madrigal, Jr., Cultural Resources Manager
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 201-1866 - cell
wmadrigal@morongo-nsn.
gov
(951) 572-6004 Fax

San Manuel Band of Mission Indians
Daniel McCarthy, M.S., Director-CRM Dept.
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933, Ext 3248
dmccarthy@sanmanuel-nsn.
gov
(909) 862-5152 Fax

Serrano Nation of Mission Indians
Goldie Walker, Chairwoman
P.O. Box 343 Serrano
Patton , CA 92369
(909) 528-9027 or
(909) 528-9032

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7060.6 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Hillwood Home Lumber Industrial Development Project; located in the City of San Bernardino; San Bernardino County, California for which a Sacred Lands file search and Native American Contacts list were requested.

**Native American Contacts
San Bernardino County
August 6, 2013**

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning , CA 92220 Cahuilla
siva@dishmall.net
(951) 849-4676

SOBOBA BAND OF LUISENO INDIANS
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Hillwood Home Lumber Industrial Development Project; located in the City of San Bernardino; San Bernardino County, California for which a Sacred Lands file search and Native American Contacts list were requested.

Native American Consultation Summary for the Hillwood Home Lumber Property Project located in the city of San Bernardino, San Bernardino County, California. Native American Heritage Commission replied to BCR Consulting Request on August 6, 2013. Results of Sacred Land File Search did not indicate presence of Native American cultural resources, and recommended that the below groups/individuals be contacted.

Groups Contacted	Letter/Email Date	Response from Tribes
Paul Macarro, Cultural Resources Manager Pechanga Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Sandonne Goad, Chairperson Gabrielino Tongva Nation	Letter: 8/9/12 Email: 8/12/12	None
Joseph Hamilton, Chairman Ramona Band of Cahuilla Indians	Letter: 8/9/12 Email: 8/12/12	None
William Madrigal, Jr., Cultural Resources Mgr. Morongo Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Carla Rodriguez, Chairwoman San Manuel Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Daniel McCarthy, M.S., Director-CRM Dept. San Manuel Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Anthony Morales, Chairperson Gabrieleno/Tongva San Gabriel Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Goldie Walker, Chairwoman Serrano Nation of Mission Indians	Letter: 8/9/12 Email: 8/12/12	None
Ernest Siva, Tribal Elder Morongo Band of Mission Indians	Letter: 8/9/12 Email: 8/12/12	Undeliverable: siva@dishmail.net
Joseph Ontiveros, Cultural Resources Department Soboba Band of Luiseno Indians	Letter: 8/9/12 Email: 8/12/12	8/28/13: Received comment letter via email (see attached) offering treatment recommendations, and requesting: <ul style="list-style-type: none"> • consultation with the developer and land owner, • transfer of project information as developments occur • recognition of Soboba as consulting tribal entity • Native monitors present during any ground-disturbance • Requests of Soboba be honored



August 8, 2013

Paul Macarro
Cultural Resources Manager
Pechanga Band of Mission Indians
P.O Box 1477
Temecula, California 92593

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Paul:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

If you know of any cultural resources in the vicinity that may be of religious and/or cultural significance to your community or if you would like more information, please contact me at 909-525-7078 or david.brunzell@yahoo.com. Correspondence can also be sent to BCR Consulting, Attn: David Brunzell, 1420 Guadalajara Place, Claremont, California 91711. I request a response by September 4, 2013. If you require more time, please let me know. Thank you for your involvement in this process.

Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Sandonne Goad
Gabrielino Tongva Nation
Chairperson
P.O. Box 86908
Los Angeles, California 90086

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Sandonne:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Joseph Hamilton
Chairman
Ramona Band of Cahuilla Indians
P.O. Box 391670
Anza, California 92539

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Joseph:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

William Madrigal, Jr.
Cultural Resources Manager
Morongo Band of Mission Indians
12700 Pumarra Road
Banning, California 92220

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear William:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Carla Rodriguez
Chairwoman
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, California 92346

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Carla:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Daniel McCarthy, M.S.
Director-CRM Department
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, California 92346

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Daniel:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

If you know of any cultural resources in the vicinity that may be of religious and/or cultural significance to your community or if you would like more information, please contact me at 909-525-7078 or david.brunzell@yahoo.com. Correspondence can also be sent to BCR Consulting, Attn: David Brunzell, 1420 Guadalajara Place, Claremont, California 91711. I request a response by September 4, 2013. If you require more time, please let me know. Thank you for your involvement in this process.

Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Anthony Morales
Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, California 91778

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Anthony:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Goldie Walker
Chairwoman
Serrano Nation of Mission Indians
P.O. Box 343
Patton, California 92369

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Goldie:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Ernest Siva
Tribal Elder
Morongo Band of Mission Indians
9570 Mias Canyon Road
Banning, California 92220

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Ernest:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

If you know of any cultural resources in the vicinity that may be of religious and/or cultural significance to your community or if you would like more information, please contact me at 909-525-7078 or david.brunzell@yahoo.com. Correspondence can also be sent to BCR Consulting, Attn: David Brunzell, 1420 Guadalajara Place, Claremont, California 91711. I request a response by September 4, 2013. If you require more time, please let me know. Thank you for your involvement in this process.

Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map



August 8, 2013

Joseph Ontiveros
Cultural Resources Department
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, California 92581

Subject: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project, Located in the City of San Bernardino, San Bernardino County, California

Dear Joseph:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landmarks. The proposed housing development project is located within a non-sectioned portion of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian, and is depicted on the *San Bernardino South, California* (1980) USGS 7.5 Minute Topographic Quadrangle (see attached).

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Sincerely,

BCR Consulting

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
Attachment: USGS Map

August 14, 2013

Attn: David Brunzell, M.A./RPA
Principal Investigator/Archaeologist
BCR Consulting
440 West 7th Street
Claremont, CA 91711



**Re: Tribal Consultation for the Hillwood Home Lumber Industrial Development Project,
Located in the City of San Bernardino, San Bernardino County, California**

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. This project location is in close proximity to known village sites and is a shared use area that was used in ongoing trade between various tribes. Therefore it is regarded as highly sensitive to the people of Soboba.

Soboba Band of Luiseño Indians is requesting the following:

1. To initiate a consultation with the Project Developer and Land owner.
2. The transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur.
3. Soboba Band of Luiseño Indians continues to act as a consulting tribal entity for this project.
4. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseño Indians requests that Native American Monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department to be present during any ground disturbing proceedings. Including surveys and archaeological testing.
5. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

Sincerely,

Joseph Ontiveros
Soboba Cultural Resource Department
P.O. Box 487
San Jacinto, CA 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov

Cultural Items (Artifacts). Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. When appropriate and agreed upon in advance, the Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

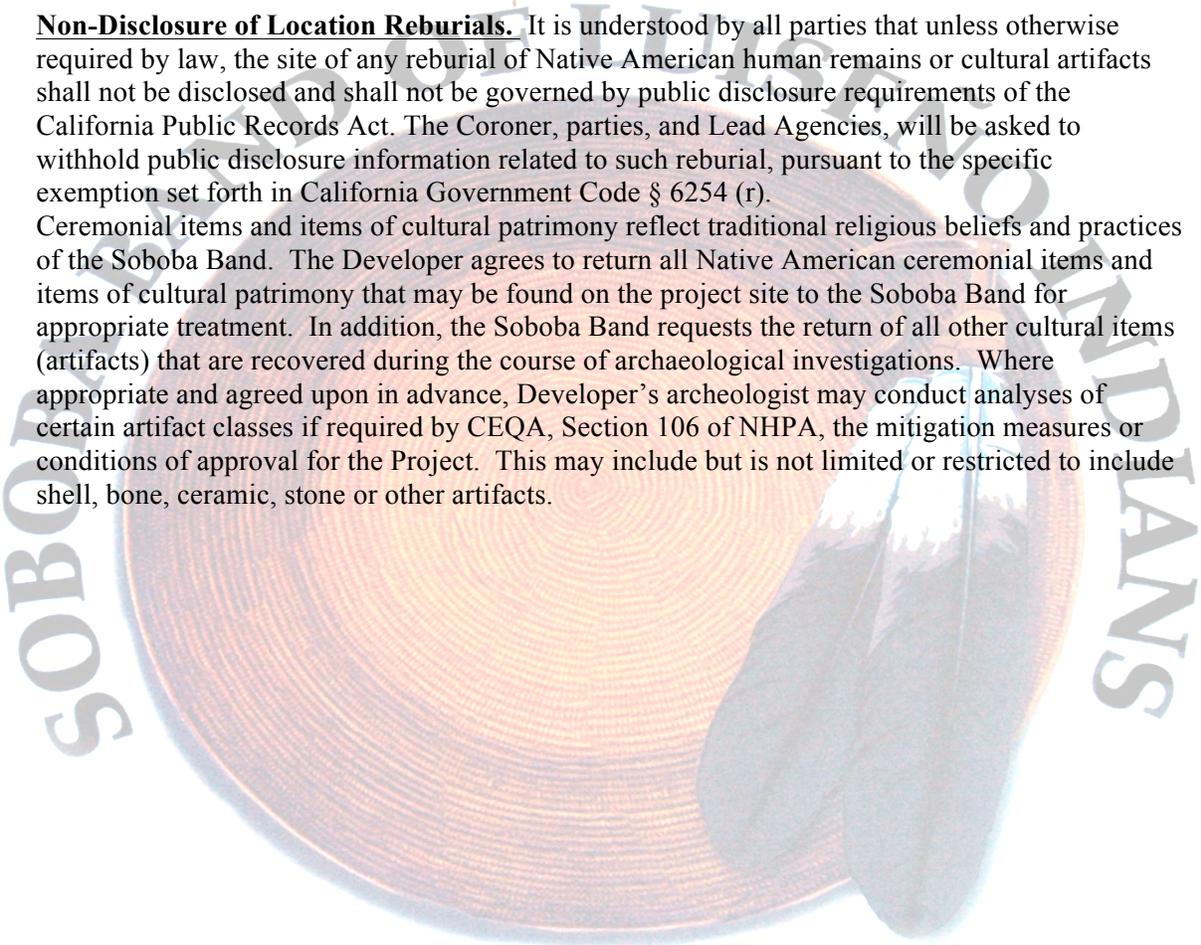
The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

Treatment and Disposition of Remains.

- A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.
- B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.
- C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.
- D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.
- E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes are to be treated in the same manner as human bone fragments or bones that remain intact.

Coordination with County Coroner's Office. The Lead Agencies and the Developer should immediately contact both the Coroner and the Soboba Band in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

Non-Disclosure of Location Reburials. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r). Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.



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Postage	\$ 0.46	0005
Certified Fee	\$3.10	55
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.56	08/09/2013

Sent To Paul Macano
Street, Apt. No., or PO Box No. P.O. Box 1477
City, State, ZIP+4 Temecula, CA 92593

PS Form 3800, August 2006 See Reverse for Instructions

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LOS ANGELES CA 90086

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Certified Fee	\$3.10	55
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.56	08/09/2013

Sent To Sondra Goad
Street, Apt. No., or PO Box No. P.O. Box 86908
City, State, ZIP+4 Los Angeles, CA 90086

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
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For delivery information visit our website at www.usps.com

ANZA CA 92532

Postage	\$ 0.46	0005
Certified Fee	\$3.10	55
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.56	08/09/2013

Sent To Joseph Hamilton
Street, Apt. No., or PO Box No. P.O. Box 341670
City, State, ZIP+4 Anza, CA 92539

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
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For delivery information visit our website at www.usps.com

BANNING CA 92220

Postage	\$ 0.46	0005
Certified Fee	\$3.10	55
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.56	08/09/2013

Sent To William Madrigal, Sr.
Street, Apt. No., or PO Box No. 12700 Punama Rd.
City, State, ZIP+4 Banning, CA 92220

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
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For delivery information visit our website at www.usps.com

HIGHLAND CA 92346

Postage	\$ 0.46	0005
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Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 3.56	08/09/2013

Sent To Carla Rodriguez
Street, Apt. No., or PO Box No. 26569 Community Center Dr.
City, State, ZIP+4 Highland, CA 92346

PS Form 3800, August 2006 See Reverse for Instructions

U.S. Postal Service™
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Sent To Daniel McCarthy
Street, Apt. No., or PO Box No. 26569 Community Center Dr.
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APPENDIX B

PALEONTOLOGICAL RESOURCES ASSESSMENT

5 September 2013

BCR Consulting LLC
attn: David Brunzell, Principal Investigator
1420 Guadalajara Place
Claremont, CA 91711

re: **PALEONTOLOGY LITERATURE AND RECORDS REVIEW, HILLWOOD HOME
LUMBER PROJECT, CITY AND COUNTY OF SAN BERNARDINO, CALIFORNIA**

Dear Mr. Brunzell,

The Division of Geological Sciences of the San Bernardino County Museum (SBCM) has completed a records search for the above-referenced property in the City of San Bernardino, San Bernardino County. The proposed study area is located in the northwestern quadrant of section 23 (projected), Township 1 South, Range 4 West, San Bernardino Base and Meridian, as seen on the San Bernardino South, California 7.5' United States Geological Survey topographic quadrangle map (1967 edition, photorevised 1980).

Previous geologic mapping of the region including the proposed study area (Bortugno and Spittler, 1986; Morton and Miller, 2003) indicates that the proposed project property is located upon surface exposures of young alluvial valley deposits dating to the Holocene Epoch (= unit **Qya₅**). These Holocene sediments have low potential to contain fossil resources, and so are assigned low paleontologic sensitivity. These sediments may overlie Pleistocene older alluvium in the subsurface; if present, and depending upon its lithology, this older alluvium may have high potential to contain significant nonrenewable paleontologic resources, and so would be assigned high paleontologic sensitivity. Pleistocene alluvium elsewhere throughout inland Riverside and San Bernardino Counties and the Inland Empire has been repeatedly demonstrated to have high paleontologic sensitivity (Jefferson, 1991; Reynolds and Reynolds, 1991; Anderson and others, 2002; Scott and Cox, 2008; Springer and others, 2009, 2010; Scott, 2010). Fossils recovered from these Pleistocene sediments represent extinct taxa including mammoths, mastodons, ground sloths, dire wolves, sabre-toothed cats, large and small horses, large and small camels, and bison (Jefferson, 1991; Reynolds and Reynolds, 1991; Anderson and others, 2002; Scott and Cox, 2008; Springer and others, 2009, 2010; Scott, 2010).

For this review, I conducted a search of the Regional Paleontologic Locality Inventory (RPLI) at the SBCM. The results of this search indicate that no known paleontologic resource localities are recorded from within the proposed study area, nor from within at least one mile in any direction.

Recommendations

The results of the literature review and the check of the RPLI at the SBCM demonstrate that excavation in conjunction with development has low potential to cause significant adverse impacts to nonrenewable paleontologic resources. Holocene alluvial sediments present at the surface are too young geologically to have potential to contain significant fossil resources. No program to mitigate impacts to resources is therefore recommended for excavation in the Holocene sediments.

However, Pleistocene older alluvium may be present at depth. If present, this alluvium may have high paleontologic sensitivity, depending upon its lithology and depositional context. It cannot be determined *a priori* from the available geologic mapping at what depths such Pleistocene sediments might be encountered; for the purposes of this report, it is inferred that such sediments may be present at depths in excess of 10' below the existing ground surface. If excavation is restricted to depths of approximately 10' below the existing ground surface, or less, then older Pleistocene sediments are not expected to be encountered. At these depths, no program to mitigate adverse impacts to paleontologic resources is recommended at this time.

In the event that excavation is expected to exceed 15' below the existing ground surface in depth, a qualified vertebrate paleontologist must be retained to develop a program to mitigate impacts to such resources, including full curation of recovered significant resources (see Scott and others, 2004). This mitigation program should be consistent with the provisions of the California Environmental Quality Act (Scott and Springer, 2003), as well as with regulations currently implemented by the County of San Bernardino and the proposed guidelines of the Society of Vertebrate Paleontology.

The County of San Bernardino (Development Code §82.20.040) defines a qualified vertebrate paleontologist as meeting the following criteria:

Education: An advanced degree (Masters or higher) in geology, paleontology, biology or related disciplines (exclusive of archaeology).

Professional experience: At least five years professional experience with paleontologic (not including cultural) resources, including the collection, identification and curation of the resources.

The County of San Bernardino (Development Code §82.20.030) requires that paleontologic mitigation programs include, but not be limited to:

(a) Field survey before grading. In areas of potential but unknown sensitivity, field surveys before grading shall be required to establish the need for paleontologic monitoring.

(b) Monitoring during grading. A project that requires grading plans and is located in an area of known fossil occurrence, or that has been demonstrated to have fossils present in a field survey, shall have all grading monitored by trained paleontologic crews working under the direction of a qualified professional, so that fossils exposed during grading can be recovered and preserved. Paleontologic

monitors shall be equipped to salvage fossils as they are unearthed, to avoid construction delays, and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring is not necessary if the potentially-fossiliferous units described for the property in question are not present, or if present are determined upon exposure and examination by qualified paleontologic personnel to have low potential to contain fossil resources.

(c) Recovered specimens. Qualified paleontologic personnel shall prepare recovered specimens to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Preparation and stabilization of all recovered fossils is essential in order to fully mitigate adverse impacts to the resources.

(d) Identification and curation of specimens. Qualified paleontologic personnel shall identify and curate specimens into the collections of the Division of Geological Sciences, San Bernardino County Museum, an established, accredited museum repository with permanent retrievable paleontologic storage. These procedures are also essential steps in effective paleontologic mitigation and CEQA compliance. The paleontologist must have a written repository agreement in hand prior to the initiation of mitigation activities. Mitigation of adverse impacts to significant paleontologic resources is not considered complete until curation into an established museum repository has been fully completed and documented.

(e) Report of findings. Qualified paleontologic personnel shall prepare a report of findings with an appended itemized of specimens. A preliminary report shall be submitted and approved before granting of building permits, and a final report shall be submitted and approved before granting of occupancy permits. The report and inventory, when submitted to the appropriate Lead Agency along with confirmation of the curation of recovered specimens into the collections of the San Bernardino County Museum, will signify completion of the program to mitigate impacts to paleontologic resources.

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Please do not hesitate to contact us with any further questions you may have.

Sincerely,

Eric Scott, Curator of Paleontology
Division of Geological Sciences
San Bernardino County Museum

APPENDIX C

PROJECT PHOTOGRAPHS



Photo 1: Overview from NW Corner (E View)



Photo 1: Overview from NW Corner (S View)



Photo 3: Modern Bldgs in S (E View)



Photo 4: Modern Bldgs in S (SE View)



Photo 5: Modern Plant in SW (View N)



Photo 6: Overview from NE Corner (SW)
