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November 9, 2022

Shaun Bowen  
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Brookfield Properties  
3200 Park Center Drive, Suite 1000  
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Transmitted via email to [Shaun.Bowen@brookfieldpropertiesdevelopment.com](mailto:Shaun.Bowen@brookfieldpropertiesdevelopment.com)

**RE: Supplemental Cultural Resource Study of Off-Site Improvement Areas for the Menifee Valley Specific Plan Project, City of Menifee, Riverside County, California**

Dear Mr. Bowen:

At the request of Brookfield Properties, PaleoWest LLC (PaleoWest) conducted a supplemental cultural resources study in support of the Menifee Valley Specific Plan Project (Project) in the city of Menifee, Riverside County, California. The Project involves the development of a mixed-use, master-planned community consisting of a residential development, along with commercial and business parks, public facilities, and open space recreation. Cultural resource assessments of the 590.3-acre Project site have previously been conducted by Applied EarthWorks (Clark and McDougall 2019) and PaleoWest (Clark 2022).

Off-site road improvements, which encompass approximately 60 additional acres, have recently been defined for the proposed Project (Attachment A, Project Offsite Improvement Map). Because the existing cultural resources studies do not assess the offsite improvement areas, Brookfield Properties has requested that PaleoWest conduct a supplementary study that considers the potential impacts of off-site improvements to historical and archaeological resources under the California Environmental Quality Act (CEQA). The supplemental cultural resources study consisted of a review of existing record search data, a cultural resource survey, and resource updates and significance evaluations. This memorandum summarizes the results of the cultural resources assessment and provides management recommendations for the proposed off-site improvement areas.

## **Review of EIC Record Search Data**

PaleoWest reviewed the record search data previously obtained from the Eastern Information Center (EIC) on June 1, 2021 (Clark 2022). The records search area encompassed the Project site and all off-site improvement areas, along with an approximately 1-mile buffer area. The EIC record search results indicate that five previously recorded cultural resources are located within or immediately adjacent to the proposed off-site improvement areas. These include a multi-component archaeological site (P-33-001175/CA-RIV-1175/H), a historic-era railway (P-33-015743/CA-RIV-8196H), and three historic-era roads (P-33-020447/CA-RIV-10348, P-33-020505/CA-RIV-10406H, and P-33-020644/CA-RIV-10551H). Brief descriptions of each of these



resources are provided below; locations are shown on the Cultural Resource Location Map in Attachment A.

[P-33-001175/CA-RIV-1175/H](#). This multi-component archaeological site is mapped [REDACTED]. The resource was originally recorded by G.A. Smith in 1977 with later updates by C.E. Drover (1989), Landis (1989), and Wilson and Gibson (2012). The site consists of four prehistoric bedrock milling slicks on granite boulders, as well as a possible cobble mano and a large metasedimentary flake core. A small concentration of historic-era refuse was also recorded at the site. The site has been determined ineligible for listing on the California Register of Historical Resources (CRHR) (California Public Utilities Commission 2016).

[P-33-015743/CA-RIV-8196H](#). This resource consists of a segment of the San Jacinto Valley Railroad [REDACTED]. The resource was originally recorded by Easter and Beedle in 2005 with later updates completed by Craft and Cooley (2008), Smallwood et al. (2008), and Hamilton and George (2009), Justus et al. (2010), Trampier (2011a), Wilson and Gibson (2012), and Tang et al. (2015). The railroad line was constructed by Fred Perris and C.W. Smith of the California Southern Railroad in 1988 and runs from the Perris Station in a semicircular route through the San Jacinto Valley. The railroad provided transportation of products from the San Jacinto Valley to markets in San Diego and Los Angeles, as well as passenger services to Los Angeles. The resource has been previously determined eligible for listing on the CRHR under Criterion 1 due to its importance in the development of Riverside County's agri-business from 1888 until 1950.

[CA-RIV-10348H \(P-33-020477\)](#). This historic-era resource was initially recorded by Statistical Research Inc. (SRI) as a 90-foot-long segment of improved dirt road located north of State Route (SR) 74 (Trampier 2011b). The resource, which is known as Malaga Road, was described as a graveled road that is used to access agricultural lands. The road appears to date to the early 20<sup>th</sup> century and was not evaluated for listing on the CRHR.

[CA-RIV-10406H \(P-33-020505\)](#). This resource was initially recorded by SRI as a 275-foot-long section of Menifee Road that runs north to south on either side of SR 74 (Trampier 2011c). The resource was described as an asphalt roadway that ranges in width from 54 to 75 feet. SRI only recorded the portion of the roadway within the right-of-way (ROW) of SR 74. The resource appears on historic topographic maps dating to the 1940s and 1950s. It has not been evaluated listing on the CRHR.

[CA-RIV-10551H \(P-33-020644\)](#). This resource was initially recorded by SRI as a 275-foot-long section of Briggs Road that runs north to south on either side of SR 74 (Trampier 2011d). The resource was described as an asphalt roadway with a width of 54 feet. SRI only recorded the portion of the roadway within the SR 74 ROW. The resource appears on historic topographic maps dating to the 1940s and 1950s. It has not been evaluated listing on the CRHR.

## Native American Heritage Commission Sacred Land File Search

The Native American Heritage Commission (NAHC) completed a search of their Sacred Lands File (SLF) for the Project on April 9, 2021 (Clark 2022). The SLF search area included the Project



site and all off-site improvement areas, along with an approximately 1-mile buffer area. The SLF search was completed with negative results. As part of their response, the NAHC provided a list of 24 contacts from 20 Native American groups. PaleoWest subsequently sent outreach letters to each of the Native American contacts on September 21, 2021 with follow up emails sent on November 1, 2021 (see Clark 2022). No specific information on known Native American resources located within the off-site improvement areas was received as a result of the outreach efforts.

## Survey

On May 3, 2022, PaleoWest Associate Archaeologist Marcos Ramos, M.A., Register of Professional Archaeologists (RPA) conducted a survey of the proposed off-site improvement areas. A combination of survey methods was used to inventory the area for cultural resources. A reconnaissance survey was initially completed for the portions of the off-site improvement areas located along the paved roadways of SR 74, Menifee Road, Biscayne Street, and Briggs Road. This was followed by an intensive pedestrian survey of the unpaved portions of the off-site improvement areas. The pedestrian survey consisted of walking a series transects spaced at 10- to 15-meter (33- to 50-feet) intervals across the area. The archaeologist carefully inspected all areas likely to contain or exhibit sensitive cultural resources to ensure discovery and documentation of any visible, potentially significant cultural resources. As part of the survey effort, all previously recorded cultural resources located within or adjacent to the off-site improvement areas were revisited.

Historical site indicators may include fence lines, ditches, standing buildings, objects or structures such as sheds, or concentrations of materials at least 45 years in age, such as domestic refuse (e.g., glass bottles, ceramics, toys, buttons or leather shoes), refuse from other pursuits such as agriculture (e.g., metal tanks, farm machinery parts, horse shoes) or structural materials (e.g., nails, glass window panes, corrugated metal, wood posts or planks, metal pipes and fittings, railroad spurs, etc.). Prehistoric site indicators may include areas of darker soil with concentrations of ash, charcoal, fragments of animal bone (burned or unburned), shell, flaked stone, ground stone, or even human bone.

Ground visibility within the Project's off-site improvements areas ranged from poor to very good (0 to 80 percent visibility). Visibility was extremely poor in the proposed off-site improvement areas within the SR 74, Menifee Road, Biscayne Street, and Briggs Road ROW as much of the ground surface in these areas was obscured by road pavement and sidewalks (Attachment B, Photograph 1). Visibility was much greater in the unpaved road alignment along Case Road and the old alignment of Briggs Road just north of Case Road (Attachment B, Photograph 2). A moderate level of ground visibility (average of 40 percent visibility) characterized these areas with swaths of the ground surface obscured by grasses and small scrubs (Attachment B, Photograph 3). Exposed native sediments consisted of relatively loose, brown sandy silt that were highly disturbed by agricultural use, grading, and vehicular traffic (Attachment B, Photograph 2). A low density of modern trash was found across the survey area.

Results of the survey indicate that portions of three previously documented cultural resources intersect the proposed off-site improvement areas. These include segments of the San Jacinto Valley Railroad (CA-RIV-8196H), Menifee Road (CA-RIV-10406H), and Briggs Road (CA-RIV-



10551H). Descriptions of each of these resources, along with significance evaluations, are provided below; Department of Parks and Recreation 523 forms are included in Attachment C. Revisit to the multi-component archaeological site (CA-RIV-1175/H) and Malaga Road (CA-RIV-10348H) found no evidence that either resource extends into the proposed off-site improvement area. No newly identified cultural resources were documented during the survey effort.

[P-33-015743/CA-RIV-8196H](#). An approximately 590-foot-long segment of the San Jacinto Valley Railroad was documented in the proposed off-site improvement area [REDACTED]. The railroad line in this area consists of a single set of tracks sitting on a series of ballasts [REDACTED]. The rail tracks sit upon a slightly bermed area that averages 20 feet in width with a height of 1-2 feet (Attachment B, Photograph 4). No historic period artifacts were found in association with the railroad.

As previously discussed, the railroad has been determined eligible for listing on the CRHR under Criterion 1 due to its importance in the development of Riverside County's agri-business from 1888 until 1950 (ESA 2018:3.5-18). The section of railway located within the proposed off-site improvement area appears to be in relatively good condition with intact rails and ballasts. As such, it retains integrity of location, design, materials, workmanship, feeling, and association. Although the setting has been negatively impacted by the construction of a residential development to the south, the resource retains sufficient integrity to convey its significance.

[P-33-020505/CA-RIV-10406H](#). PaleoWest recorded an approximately 1.3-mile-long section of the Menifee Road that ran from a point south of Case Road to a point north of Watson Road. The expanded section of road documented by PaleoWest follows the historic-era alignment of Menifee Road. Most of the roadway consists of a paved asphalt two-lane roadway that measures 45-50 feet in width with unpaved shoulders (Attachment B, Photograph 1). The portion of the road south of the SR 74 intersection have been improved and contain turn lanes and concrete sidewalks. No historic-era artifacts were found in association with the road segment.

Although an exact date of construction could not be ascertained, the road was likely built in the context of the Perris Valley area's development as an agricultural settlement. Menifee Street first appears on a 1901 United States Geological Survey (USGS) topographic map as part of a network of roads that conform to the survey grid; it is unclear whether the road was paved at this time (USGS 1901). By 1942, Menifee Road is depicted as an improved roadway (USGS 1942). Historical aerial photographs suggest that no significant improvements to the road occurred between the 1967 and 1985; these images indicate that the area surrounding the road was largely agricultural throughout the 20<sup>th</sup> century (NETRonline 2022). The portion of the road south of SR 74 was widened sometime between 1985 and 1996 to accommodate a dedicated northbound right turn lane (NETRonline 2022).

The segment of the Menifee Road presently under evaluation is likely associated with agricultural development of the Perris Valley. No evidence was found to suggest it played a significant role in any historical events or with any individuals known to have made important historical contributions (CRHR Criteria 1 and 2). Additionally, the subject road segment is of a



ubiquitous type and does not represent a distinctive engineering design or method of construction (CRHR Criterion 3). Finally, the resource has not yielded and is unlikely to yield important prehistoric or historical information (CRHR Criterion 4). Therefore, the segment of Meniffee Road located within the proposed off-site improvement area does not meet any of the criteria for listing on the CRHR.

[P-33-020644/CA-RIV-10551H](#). PaleoWest documented an approximately 1.6-mile-long section of the Briggs Road that ran from a point south of Case Road to a point north of SR 74. The road segment documented by PaleoWest follows the historic-era alignment of Briggs Road. Most of the roadway consists of a paved asphalt two-lane roadway that measures 50 feet in width (Photograph 5). The southern 0.27-mile portion of the resource is unpaved but is actively used and maintained as an access road; this portion of the roadway exhibits a width of 30 feet (Attachment B, Photograph 2). No historic-era artifacts were found in association with the road segment.

Although an exact date of construction could not be determined, the road was likely built in the context of the Perris Valley area's development as an agricultural settlement. Briggs Road first appears on a 1901 topographic map as part of a network of roads that conform to the survey grid; it is unclear whether the road was paved at this time (USGS 1901). By 1942, Briggs Road is depicted as an improved roadway (USGS 1942). Historical aerial photographs suggest that no significant improvements to the road occurred between the 1967 and 2002; these images indicate that the area surrounding the road was largely agricultural throughout the 20<sup>th</sup> century (NETRonline 2022). The southern extent of the historic alignment of the road (unpaved portion) was realigned between 2002 and 2005 (NETRonline 2022). The newly aligned portion of the road is paved and runs approximately 50 to 280 feet east of the original road alignment skirting a small granite outcrop. The original road alignment in this area is still in use as a local access road and appears to be regularly graded and maintained.

An assessment of significance indicates Briggs Road is not eligible for listing on the CRHR. The segment of the road presently under evaluation is likely associated with agricultural development of the Perris Valley. No evidence was found to suggest it played a significant role in any historical events or with any individuals known to have made important historical contributions (CRHR Criteria 1 and 2). Additionally, the subject road segment is of a ubiquitous type and does not represent a distinctive engineering design or method of construction (CRHR Criterion 3). Finally, it has not yielded and is unlikely to yield important prehistoric or historical information (CRHR Criterion 4). Therefore, the segment of Briggs Road located within the proposed off-site improvement area does not meet any of the criteria for listing on the CRHR.

## Discussion and Recommendations

PaleoWest identified three historic period cultural resources in the proposed off-site improvement areas for the Project. Two of these resources, Meniffee Road (CA-RIV-10406H) and Briggs Road (CA-RIV-10551H), were evaluated for listing on the CRHR as part of the supplemental cultural resources study. PaleoWest found that neither resource meets the criteria for listing on the CRHR. The third cultural resource identified within the proposed off-site improvement area is a segment of the historic San Jacinto Valley Railroad (CA-RIV-8196H), which had been previously determined eligible for listing on the CRHR under Criterion 1. The





portion of the railroad within the proposed off-site improvement area retains sufficient integrity to convey its significance. As such, PaleoWest recommends that the historical resource be avoided by Project construction activities. If avoidance is not feasible, then appropriate mitigation would be needed to reduce the impact of the Project on the historical resource.

Two additional resources, the multi-component archaeological site (CA-RIV-1175/H) and Malaga Road (CA-RIV-10348H), are adjacent to the proposed off-site improvement areas. Revisit to these sites found no evidence that cultural materials associated with these resources extend into the proposed off-site improvement area. As such, the Project is not expected to impact CA-RIV-1175/H or Malaga Road.

In the unlikely event that potentially significant archaeological materials are encountered during Project-related ground-disturbing activities, all work should be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. In addition, Health and Safety Code 7050.5, CEQA 15064.5(e), and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Finally, should additional actions be proposed outside the currently defined off-site improvement areas that have the potential for additional subsurface disturbance, further cultural resource management is required.

It has been a pleasure working with you on this Project. If you have any questions, please do not hesitate to contact me at [tclark@paleowest.com](mailto:tclark@paleowest.com).

Sincerely,



**Tiffany Clark, Ph.D., RPA** | Principal Archaeologist

**Attachments**

Attachment A – Maps

Attachment B – Photographs

Attachment C – Department of Parks and Recreation 523 Forms



## References

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- 2011c Department of Parks and Recreation 523 Site Form for P-33-020505/CA-RIV-10406H. Site form on file at Eastern Information Center, University of California, Riverside.
- 2011d Department of Parks and Recreation 523 Site Form for P-33-020644/CA-RIV-10551H. Site form on file at Eastern Information Center, University of California, Riverside





United States Geological Survey (USGS)

1901 Elsinore, California, 1:125,000 scale topographic quadrangle map. Department of Interior, Washington, D.C.

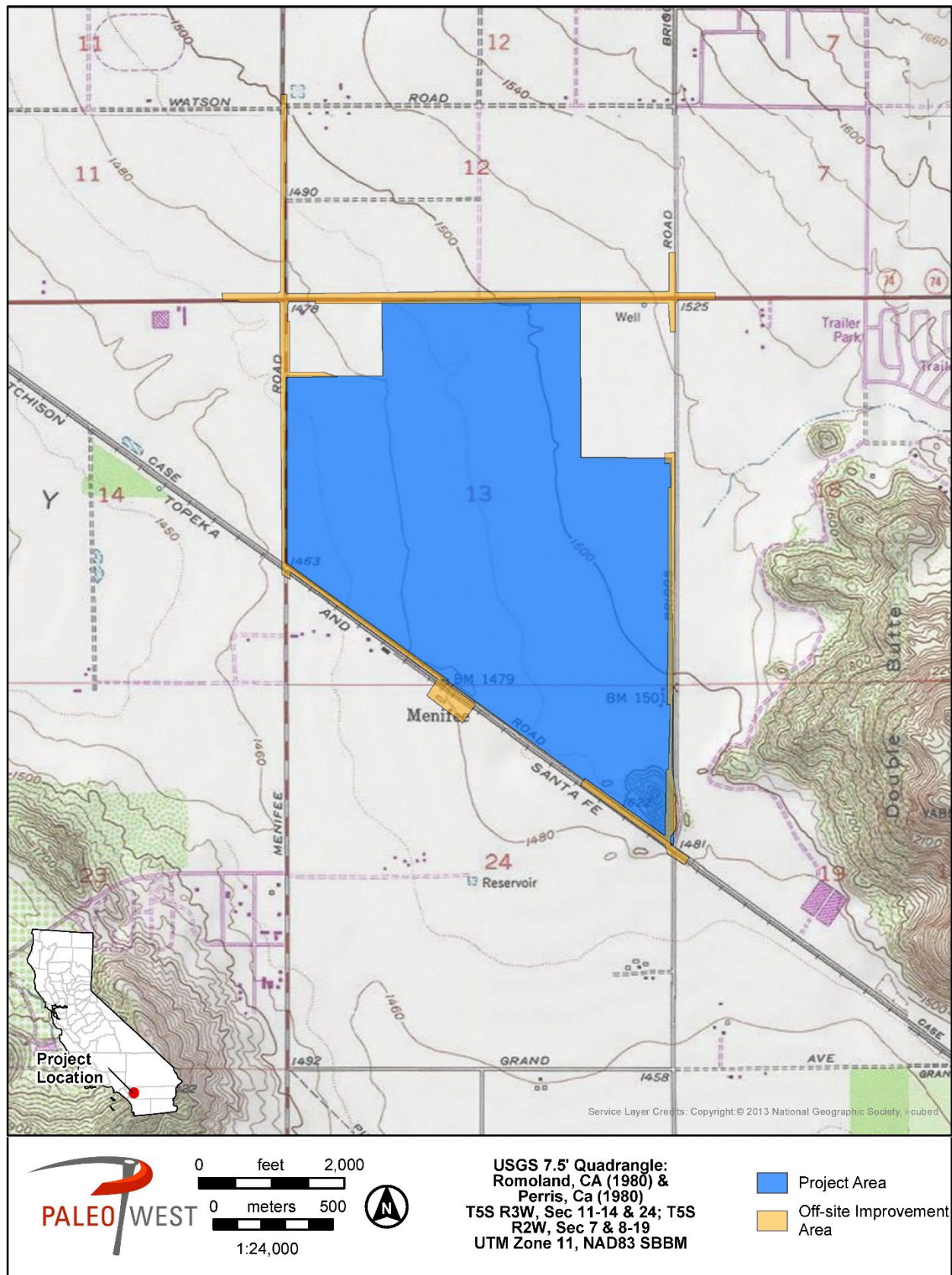
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## **Attachment A. Maps**



Project Offsite Improvement Map

**CONFIDENTIAL FIGURE REMOVED**

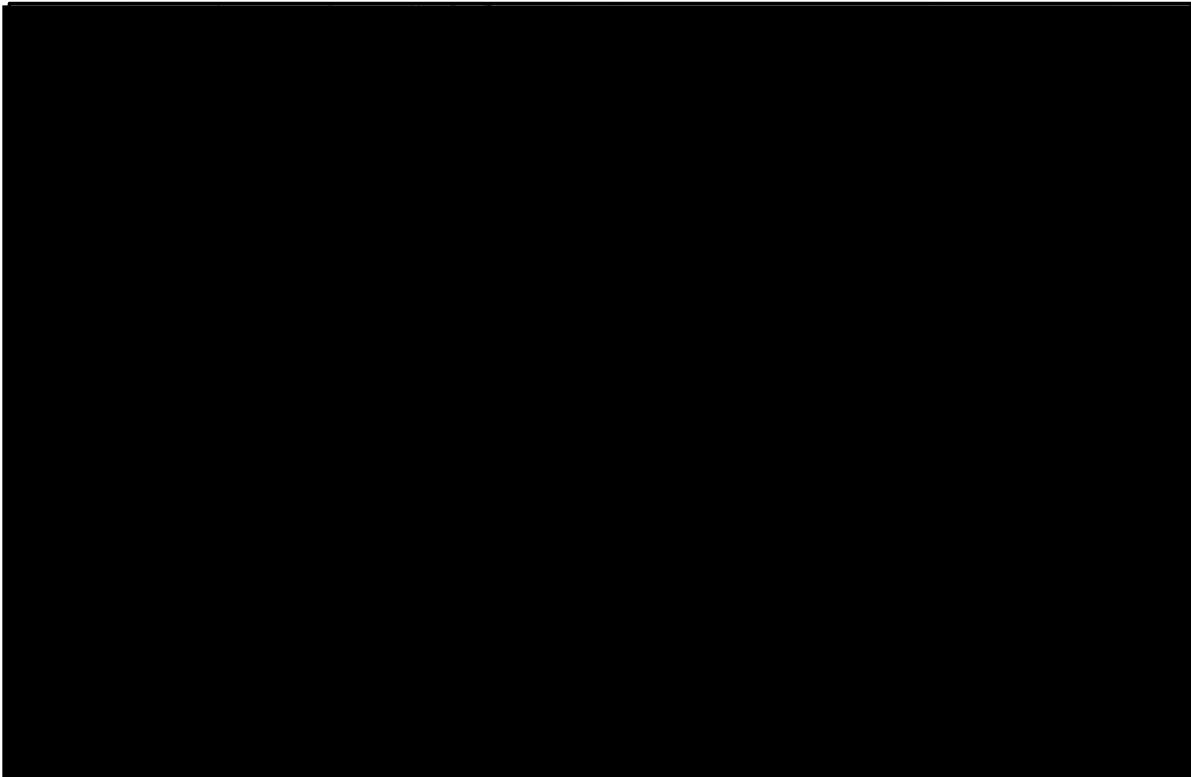
# **Attachment B. Photographs**







Photograph 1. Overview of Menifee Road (CA-RIV-10406H) south of SR 74, facing south



Photograph 2. View of southern end of old alignment of Briggs Road (CA-RIV-10551H) within off-site road improvement area, facing south.





Photograph 3. Off-site improvement area lying south of Case Road with grasses and vegetation cover, facing south.



Photograph 4. Portion of San Jacinto Valley Railroad (CA-RIV-8196H) located south of Case Road, facing southeast.







Photograph 5 . Portion Briggs Road (CA-RIV-10551H) north of Case Road, facing north



**Attachment C.**  
**Department of Parks and**  
**Recreation 523 Forms**



**CONFIDENTIAL ATTACHMENT REMOVED**