Appendix E

Cultural Resources Inventory and Evaluation Report

Cultural Resources Inventory and Evaluation Report

The Elephant Hill Project

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AMSL	Above mean sea level
APN	Assessor's Parcel Number
ATSF	Atchison, Topeka, and Santa Fe
CEQA	California Environmental Quality Act
City	City of Pomona
CHRIS	California Historical Resource Information System
County	Los Angeles County
CRHR	California Register of Historic Resources
Elephant Hill Project	Proposed Project
GPR	Ground Penetrating Radar
GPS	Global Positioning System
HALS	Historic American Landscape Survey
NAHC	Native American Heritage Commission
NEA	Northwest Economic Associates
NETR	National Environmental Title Research
NRCS	Natural Resources Conservation Service
NPS	National Park Service
NRHP	National Register of Historic Places
Plan	Cultural Resource Monitoring and Inadvertent Discovery Plan
SCCIC	South Central Coastal Information Center
SLF	Sacred Lands File
SR	State Route
TCR	Tribal Cultural Resource
UCSB	University of California, Santa Barbara
USDA	U.S. Department of Agriculture
USGS	United States Geological Survey
WEAP	Worker Environmental Awareness Program

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Executive Summary

Dudek was retained by the City of Pomona (City) to complete a Cultural Resources Inventory and Evaluation Report for the Elephant Hill Project (proposed Project). The proposed Project includes a master-planned residential community on an approximately 120.6-acre site (Project site) divided between a smaller Development Area and designated open space areas. The purpose of this report is to identify all known archaeological and historical resources, as defined by the California Environmental Quality Act (CEQA), within or adjacent to the proposed Project site, and to determine whether or not the proposed Project would result in a significant impact to a historical resource under CEQA. A cultural and paleontological assessment was conducted in 2020 for the proposed Project (Maxon 2020) and included a California Historical Resources Information System (CHRIS) records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) records search, paleontological resources records search, archival and background research, and a pedestrian survey. With respect to archaeological resources, Dudek was retained to conduct a supplemental investigation primarily focused on the potential for cultural resources and unmarked burials to exist within and adjacent to the Spadra cemetery. As a result, this report both summarizes the findings of the previous investigation conducted for this project (Maxon 2020) and presents the supplemental findings of the investigation conducted by Dudek.

This report includes the following components: (1) CHRIS records search covering the proposed Project site, the Built Environment Study Area, and a 0.5-mile radius from the proposed Project site boundary; 2) results of an intensive-level survey of the proposed Project site and additional study areas in consideration of built environment resources; (3) results of a Ground Penetrating Radar (GPR) survey of the proposed Project site; (4) review of geotechnical reports of the proposed Project site; (5) a search of the NAHC SLF; (6) background and ethnographic research regarding archaeological resources; (7) review of historic aerial images and maps; (8) archival and property development research for properties located within the Built Environment Study Area; (9) evaluation results of any un-evaluated historic age properties in accordance with eligibility criteria of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and local landmark and historical resource lists; review of historic maps and aerials; and (10) analysis of potential for a substantial adverse change to historical resources.

No known significant archaeological resources, as defined by CEQA Section 15064.5 or archaeological resources of any kind, were identified within the proposed Project Development Area or within areas proposed for habitat restoration as a result of two archaeological investigations conducted to assess the proposed Project. However, based on the identification of archaeological resources of both a prehistoric and historic nature located within and surrounding the general proposed Project site and the presence of potentially intact native soils, the potential for proposed disturbances to impact unknown prehistoric and historic archaeological resources is possible. If yet unknown archaeological resources, possessing the characteristics outlined in CEQA as significant, exist and are inadvertently encountered during implementation of the Project, there is potential for a substantial adverse change in the significance of an historical resource to occur.

Two built environment properties requiring survey and evaluation were identified in the Built Environment Study Area: Spadra Cemetery and the segment of Brea Canyon Road. These properties were recorded and evaluated under NRHP and CRHR designation criteria and integrity requirements, as well as local City of Pomona Designated Historic Landmark criteria in compliance with CEQA. After thorough consideration of NRHP, CRHR, and local designation criteria, the Brea Canyon Road segment within the proposed Project site does not appear eligible for either national, state, or local listing either individually or as part of a multi-property district. Therefore, it does not

appear to be a historical resource for the purposes of CEQA and did not warrant further consideration of impacts. The Spadra Cemetery is a locally designated landmark and is considered a historical resource for the purposes of CEQA. As a result of the data revealed by this study, the cemetery is also recommended as individually eligible for listing under National Register Criteria A and B and California Register Criteria 1 and 2 at the local level, with a period of significance spanning 1868 to 1967. Additionally, Spadra Cemetery meets the required Criteria Considerations C and D, which apply to cemeteries and graves.

Measures are recommended to ensure the proper treatment of unknown archaeological resources and human remains in the event either are encountered inadvertently during ground disturbing activities. With the proper implementation of the recommended measures, the potential impact to archaeological resources or human remains is considered to be less then significant. Therefore, impacts to archaeological resources and human remains would be **less than significant with mitigation**. Analysis of project-related impacts found that vibration-related impacts could be mitigated to a less-than-significant level with mitigation incorporated; however, view and vista impacts, a key component of local City of Pomona Designated Historic Landmark criterion 6, could not be mitigated to a less than significant level. Detailed CEQA impact analysis and mitigation requirements are presented in Section 5. This study finds that the Project will have a **significant, unavoidable impact**, as defined by CEQA.

1 Introduction

This section provides a detailed description of the proposed Project including information about the location and setting; background; project purpose and objectives; and construction components; (see Figure 1, Project Location). To ensure clarity and consistency throughout this report, the following terms and associated meanings will be used: "Project site" represents the entirety of the proposed 120.6-acre project property; "Development Area" represents all areas proposed for ground disturbance; "Built Environment Study Area" represents the maximum physical extent of potential direct and indirect impacts considered in this study with respect to historic built environment resources; and "Archaeological Study Area" represents maximum physical extent of potential direct impacts considers in this study with respect to known and unknown archaeological resources.

The Dudek project team responsible for this report and/or the fieldwork and analysis includes Dudek Archaeologists Brad Comeau MS, RPA, Linda Kry BA, RA, Jennifer De Alba BA, Brenda Rogers BA, and Kira Archipov BA, as well as primary authorship and supervision by Heather McDaniel-McDevitt MA, RPA; and Dudek Architectural Historians Kate G. Kaiser, MSHP, Caitlin Greeley, MA, and Fallin Steffen, MPS. This report was reviewed for quality assurance/quality control by Dudek Senior Architectural Historian Allison Lyons, MSHP, Historic Built Environment Lead and Task Manager Katie Haley, MA and Senior Archaeologist Heather McDaniel McDevitt MA RPA. All authors and reviewers meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) for archaeology, architectural history, or both. The key preparers' qualifications are located in Appendix A.

1.1 Project Location

The proposed Project site is at and near the local geographic landmark referred to as "Elephant Hill", a largely undeveloped foothill, rising 1,145 feet in elevation, within the City of Pomona, Los Angeles County (County) (see Figure 1, Project Location). Specifically, the proposed Project site is located directly to the east of State Route (SR) 57; south of the Union Pacific Railroad tracks right-of-way; north of Mission Boulevard and at the northwestern corner of Mission Boulevard; and approximately 370 feet west of Humane Way. The proposed Project site encompasses approximately 120.6 acres and consists of three parcels (Assessor's Parcel Numbers [APNs] 8707-020-001, 8707-020-008, and 8708-021-058) situated within public land survey system Section 26 of Township 1 South, Range 9 West on the *San Dimas*, California 7.5-minute United States Geological Survey (USGS) Quadrangle and an elevation range between approximately 730 feet and 1,160 feet above mean sea level (AMSL).

1.2 Project Description

Construction development would occur within the southwestern area of the proposed Project site (Development Area) (refer to Figure 2, Built Environment Study Area for delineation of the Development Area). The Development Area would include single- and multi-family residential units, a recreational center; developed and undeveloped open space, including landscaped slopes and fuel modification areas; utility infrastructure; and circulation and parking. In addition, the proposed Project would include a trail with overlooking the western perimeter of the Development Area. The remaining area of the proposed Project site would continue as undeveloped open space (open space area). Biological habitat mitigation is proposed within the northern portion of open space area. While the proposed Project does not require any land use or zoning change, a Conditional Use Permit, Tentative Tract Map/Parcel Map, and a Major Oak Tree Permit would be required.

Construction activities would be phased over approximately 4 years and include grading, site preparation and construction. Grading would occur within 35.98 acres of the 120.6-acre site and involve 1,556,000 cubic yards of cut and 1,537,000 cubic yards of fill. The Project proposes to cut into the hill area employing blasting and utilize that material to create terraces at the base of the hillside. Excess fill materials would be exported for reuse to a nearby landfill or construction site in need of fill. Terraces would be retained by a mechanically stabilized earth retaining wall. The mechanically stabilized earth would be constructed of precast concrete panels and the entire height of the retaining walls would measure between 22 and 25 feet. Equipment and material staging would be limited to the Development Area.

The proposed Project would include construction of 228 residential dwelling units, with 68 single-family units and 160 multi-family units, to be located within the approximately 11.57-acre residential area. The proposed multi-family residential units would be comprised of 94 two-story duplexes and 66 three-story townhomes. The proposed Project would include a series of internal private streets connecting the public street system at Sorrento Drive and Mission Boulevard, located south of the Development Area. On-site parking would total 666 parking spaces including surface, garage, and on-street parking. On-site utility improvements would include stormwater, water, sewer, electrical, and other dry utilities located within the Development Area. In addition, off-site utility connections would be required within the nearby Mission Boulevard and Sorrento Drive, as well as an off-site sewer connection to the Humane Society property located southeast of the proposed Project site.

The proposed ground disturbance is anticipated to extend up to 130 feet below current ground surface within focused areas of the hillside portions of the proposed Project site and no more than 20 feet below current ground surface within focused portions of the valley floor for removal and recompaction of undocumented artificial fill. Since significant fill soil is proposed to be deposited from the hillside portions to the current valley floor resulting in a total fill thickness of approximately 155 feet, no ground disturbance within native soils is expected to occur within a large portion of the Development Area proposed for building construction, utility, and retaining wall installation, landscaping, and paving.

1.3 Environmental Setting

While the proposed Project site is undeveloped, it is surrounded by residential uses to the south and southwest, industrial and commercial uses to the west, City and County facilities to the southeast, and the Union Pacific Railroad right-of-way and Spadra Cemetery (APN 8707-020-900) to the north. Development further north of the proposed Project site consists of largely commercial uses. Much further south of the proposed Project site is the Puente Hills, a range of hills through which Brea Canyon runs, separating Los Angeles and Orange counties.

The proposed Project site is within the northern geomorphic province of the Peninsular Range, which is characterized by northwest trending mountains and valleys, including the Upper Santa Ana Valley, that generally trend northwestward from the tip of Baja California to the Los Angeles Basin. The proposed Project site is located at the western end of the Upper Santa Ana Valley and is bordered by the Chino Hills on the southwest, the San Jose Hills on the west, the San Gabriel Mountains on the north, the Rialto–Colton Fault on the northeast, and La Sierra Hills and Jurupa Hills on the southeast.

Oriented in different directions and separated by the San Jose Creek, the Chino Hills trend northwest, whereas the San Jose Hills trend northeast. Both are composed of the same geologic formations, consisting of the Monterey Formation and Glendora volcanics. The Monterey Formation is the most prevalent and consists of sandstones, conglomerates, and shales. These deposits are highly ductile and display synclines, anticlines, folds, and faults in

the San Jose Hills. The Glendora volcanics is the least prevalent and consists of volcanic conglomerates, basalt flows, and tuff breccias. Over time, erosion from these and other surrounding highlands has filled the Chino Basin with over 1,000 feet of unconsolidated sediments. With increasing depth, these sediments comprise the Holocene-age Younger Alluvium, the Pleistocene-age Older Alluvium, and the Pliocene-age Fernando Group. Both the Younger and Older Alluvium generally consist of gravel, sand, silt, and clay, which comprise interbedded and discontinuous layers of variable thickness. The proposed Project site landscape consists of one large, steep, rocky hillside, which is known to be remnant of a volcanic neck. Geologic units present on-site include undocumented older artificial fill from various sources, alluvium, and three general categories of volcanic rock.

The proposed Project site is underlain by Quaternary alluvium that is generally located within the low-lying western valley area of the proposed Project site, underlying the undocumented artificial fill placed during the construction of SR 57, located adjacent to the proposed Project site to the west. The three general categories of volcanic rock, including tertiary glendora volcanics rhyolite, which consists of light brown to orangish or reddish gray, hard rock; tertiary glendora volcanic breccia, which consists of light brown matrix of crystalline rock with brecciated hard rock inclusions; and tertiary glendora volcanics tuff, which consist of dull off-white to light reddish gray tuff (weathers to sandy clay) with various colored gravel inclusions, dry, friable to "welded tuff," which varies considerably (LGC Geotechnical, Inc. 2020). According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, existing development within the proposed Project site is underlain by four (4) soil types. These soils types include: Urban Land-Biscailuz-Pico Complex with 0 to 2% slopes, present along the base of the western portion of Elephant Hill; Urban Land-Pico-Metz Complex with 0 to 2% slopes, present along the base of the northeastern portion of Elephant Hill; Lithic Haploxerolls-Lithic Argixerolls Complex with 20 to 55% slopes, is the dominant soil type within the proposed Project site and encompasses Elephant Hill; and Counterfeit-Urban Land Complex with 10 to 35% slopes, terraced, present along the southwestern portion of the proposed Project site, present along the base of the southwestern portion of Elephant Hill (USDA 2022).

The proposed Project site is located within the San Gabriel River Watershed. The nearest waterway to the proposed Project site is the San Jose Creek, which is an intermittent, tributary stream of the San Gabriel River, and is situated between the Chino and San Jose Hills, and borders the proposed Project site to the north and west. Drainage within the existing development footprint of the proposed Project site is generally divided by the existing hill into two drainage areas, including the western and eastern drainage areas. An existing 24-inch storm drain is located along Sorreno Drive and discharges into the incised channel. Drainage from the western area is generally conveyed south and west via natural sheet flow, rills, gullies and incised channels, to a flat area just east of SR 57. Runoff is then conveyed west under SR 57 via two existing culverts prior to discharging to an existing City storm drain line and eventually the San Jose Creek. Drainage from the eastern area is generally conveyed south toward Mission Boulevard and then flows east prior to discharging to an existing storm drain line within Mission Boulevard. From there, runoff is then conveyed northeast into the San Jose Creek Drain.

Ground surface cover consists of 13 vegetation communities/land cover types, including California buckwheat scrub (*Eriogonum fasciculatum*), deer weed scrub (*Lotus scoparius*), bush monkey flower scrub (*Diplacus aurantiacus*), laurel sumac scrub (*Malosma laurina*), poison oak scrub (*Toxicodendron diversilobum*), California walnut groves (*Juglans californica*), coast live oak woodland (*Quercus agrifolia*), ornamental/non-native vegetation, wild oats (*Avena* spp.) and annual brome grassland (*Bromus* spp.), upland mustards (*Brassica nigra*), Peruvian peppertree woodland (*Schinus mole*), fountain grass swards (*Pennisetum setaceum*), and disturbed/developed (VCS Environmental 2021).

The proposed Project site has been subject to disturbance as a result of illegal dumping and public use of the site for hiking. These activities have led to areas of exposed bare soils (where trails have formed) and several debris piles scattered along the base of Elephant Hill. Additionally, evidence shows that the Development Area has been subjected to periods of alluvial deposition.

The proposed Project site will intersect one historic-age, previously unrecorded property: a segment of Brea Canyon Road. Another Designated Historic Landmark, the Spadra Cemetery, is adjacent to, but does not fall within, the proposed Project site. Both of these properties are discussed below in the Built Environment Study Area discussion.

2 Regulatory Setting

2.1 Federal

The National Register of Historic Places

While there is no federal nexus for this Project, the properties affected by the proposed Project were evaluated in consideration of NRHP designation criteria. The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
B. That are associated with the lives of persons significant in our past; or
C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to these basic evaluation criteria, the NRHP outlines further criteria considerations for significance. Moved properties; birthplaces; cemeteries; reconstructed buildings, structures, or objects; commemorative properties; and properties that have achieved significance within the past 50 years are generally not eligible for the NRHP. The criteria considerations are exceptions to these rules, and they allow for the following types of resources to be NRHP eligible (NPS 1995, p. 25):

A a religious property deriving primary significance from architectural or artistic distinction or historical importance;
B a building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;
C a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life;
D a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events;

E a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;

F a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

G a property achieving significance within the past 50 years if it is of exceptional importance.

Once the significance of a resource has been determined, the resource then must be assessed for integrity. Integrity is (1) the ability of a property to illustrate history and (2) possession of the physical features necessary to convey the aspect of history with which it is associated (NPS 1995, p. 44). The evaluation of integrity is grounded in an understanding of a property's physical features and how they relate to the property's significance. Historic properties either retain integrity (that is, convey their significance) or they do not. To retain integrity, a property will always possess several, and usually most, of the seven aspects of integrity (NPS 1995, pp. 44-45):

1. **Location** is the place where the historic property was constructed or the place where the historic event occurred.
2. **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting** is the physical environment of a historic property.
4. **Materials** are the physical elements that were combined or deposited during a particular period and in a particular pattern or configuration to form a historic property.
5. **Workmanship** is the physical evidence of crafts of a particular culture or people during any given period in history or prehistory.
6. **Feeling** is the property's expression of the aesthetic or historic sense of a particular period.
7. **Association** is the direct link between an important historic event or person and a historic property.

2.2 State

California Register of Historical Resources

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to California Public Resources Code Section 5024.1(c) (1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historical, and tribal cultural resources:

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

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5[b]). An "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (a) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (b) is associated with the lives of persons important in our past; (c) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (d) has yielded, or may be likely to yield, information important in pre-history or history.

The term "historical resource" also includes any site described in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1[q]).

CEQA also applies to "unique archaeological resources." California Public Resources Code Section 21083.2(g) defines a "unique archaeological resource" as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

All historical resources and unique archaeological resources – as defined by statute – are presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5[a]). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (California Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5[c][4]).

Under CEQA a significant cultural impact results from a "substantial adverse change in the significance of an historical resource [including a unique archaeological resource]" due to the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); California Public Resources Code Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project:

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

California State Assembly Bill 52

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

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

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

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

The following tribes are traditionally and culturally affiliated with the project region:

- Gabrieleno Band of Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- San Gabriel Band of Mission Indians
- Torres Martinez Desert Cahuilla Indians
- Gabrieleno Tongva Indians of CA Tribal Council
- L.A. City/County Native American Indians Commission
- Gabrielino/Tongva Tribe

In compliance with the Native American Historic Resource Protection Act, which was adopted under Assembly Bill (AB) 52 in 2015, a notification letter for this EIR was sent to all tribal representatives included in the NAHC-provided list of recommended tribal contacts for the project area. The notification letter provided a brief project description and invitation to provide information and/or request consultation with the City regarding the potential for the project to affect tribal cultural resources. The City has received responses from Gabrieleno Band of Mission Indians – Kizh Nation requesting consultation. Tribal consultation was closed on October 16th, 2023.

2.3 Local

Local landmarks in the City of Pomona are known as "designated historic landmarks" and are under the aegis of the Development Services' Planning Division, Historic Preservation Program. These landmarks are defined in the Zoning Ordinance as follows (City of Pomona Zoning Ordinance Section.5809-13 - Historic preservation.C.11, added by Ordinance No. 4009, Section 2, effective April 2, 2007):

> "Designated Historic Landmark" means any improvement or natural feature that has special historical, cultural, aesthetic, or architectural character, archaeological importance, interest, or

value as part of the development, heritage or history of the city of Pomona, the state of California, or the nation, that has been designated a historic landmark of the city of Pomona and placed on the Pomona historic register.

Any improvement, natural feature, or site may be designated an historic landmark by the historic preservation commission and city council and any area within the City of Pomona may be designated an historic district pursuant to subsection E of the City of Pomona Municipal Code (Section.5809-13.E Designation Procedures) if the building or majority of buildings (in a district) are 50 or more years old or of exceptional quality if less than 50 years old, and it meets one or more of the following criteria Section.5809-13.D Historic Landmark Designation Criteria):

1. It exemplifies or reflects special elements of the City of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. It is identified with persons or events significant in local, state, or national history;
3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;
5. It is the work of a notable builder, designer, landscape designer or architect;
6. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;
7. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;
8. It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;
9. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or
10. It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

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Chapter 8: Archaeological and Indigenous Resources

In order to protect these potential resources, the City of Pomona will require studies be completed as part of the environmental review process for new development projects. The City of Pomona has implemented the following policies / requirements:

1 The City of Pomona shall maintain sources of information regarding paleontological and archeological sites and the names and addresses of responsible organizations and qualified individuals, who can analyze, classify, record, and preserve paleontological or archeological findings.

2 A qualified paleontologist/archeologist is required to monitor all grading and/ or excavation where there is a potential to affect cultural, archeological or paleontological resources. If these resources are found,

the applicant shall implement the recommendations of the paleontologist/ archeologist, subject to the approval of the Planning Division.

3 Public Records. The City of Pomona will treat all archeological site information, including reports with specific site locations, as confidential information. However, since many non-sensitive properties (such as rock walls, ditches, Victorian buildings, etc.) have been recorded in archeological site records, a review of the individual site record should be accomplished to determine whether a specific property's location and information should be withheld under any given circumstance. This information will be kept on file with the City of Pomona's Development Services Department. The Director, in consultation with the Historic Preservation Commission, will develop a policy regarding access to such records. Any policy should be consistent with state or federal regulations.

The following studies are required for any project that has the potential to affect archaeological resources:

- Phase I archaeological assessment.
- Phase II study (When a Phase I assessment determines a Phase II study is warranted).
- Phase III data recovery and mitigation program (When a Phase II study determines a Phase III program is warranted).

All reports will be prepared in accordance with federal and state guidelines, and by persons who meet the Secretary of the Interior's professional qualification standards.

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3 Study Areas

3.1 Archaeological Study Area

The Archaeological Study Area includes the entire proposed Project site with specific consideration of the potential for ground disturbance activities to impact known and unknown archaeological resources. The entire 120.6-acre proposed Project site was included in the CHRIS records search; additionally, archival, historical map, and aerial photograph reviews were conducted. The ground penetrating radar study was limited to areas within the proposed Project site adjacent to the Spadra Cemetery and portions of the Spadra Cemetery adjacent to the proposed Project site. A pedestrian survey was conducted in 2020 by VCS Environmental that included the 52.58-acre Development Area as well as portions of the proposed Open Space area in order to relocate a previously identified archaeological resource (Maxon 2020). Dudek also performed a pedestrian survey in 2022.

3.2 Built Environment Study Area

The Built Environment Study Area for the proposed Project is illustrated on Figure 2. To establish an appropriate project study area under CEQA all potential project-related impacts that could result in a substantial adverse change in the significance of a known or unknown historical resource should be considered. Project construction and implementation activities are considered a substantial adverse change if they would cause physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (State CEQA Guidelines Section 15064.5). Current professional practice commonly groups activities that could cause a substantial adverse change to historical resources into direct and indirect impact considerations. Direct impact considerations are commonly linked to physical project construction activities including but not limited to demolition, construction-related ground borne vibration, and property takes. Impact considerations commonly considered indirect are largely related to potential post-construction effects of a project that is near a historical resource, such as noise, shadow, or visual effects, depending on the circumstances.

The proposed Project site is largely undeveloped and there are no built environment properties located within the proposed Project boundary. There are two (2) built environment properties located directly adjacent to the Project boundary that are over the age of 45 and require consideration of potential historic significance and impacts under CEQA. A segment of Brea Canyon Road runs along the southern border of the proposed Project site and is proposed for partial demolition as part of project construction. The Spadra Cemetery (APN 8707-020-900), a 2.35-acre City of Pomona Designated Historic Landmark, is located immediately adjacent to the proposed Project site and could sustain impacts as a result of project construction and change of historic setting following project implementation. As such, both properties the Spadra Cemetery and a segment of the Brea Canyon Road, are included in the Built Environment Study Area and addressed in detail in this report.

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4 Background Research

As previously mentioned, a cultural and paleontological assessment was conducted in 2020 for the proposed Project (Maxon 2020) and included a CHRIS, NAHC SLF, and paleontological resources records search, archival and background research, and a pedestrian survey. With respect to archaeological resources, Dudek was retained to conduct a supplemental investigation primarily focused on the potential for cultural resources and unmarked burials to exist within and adjacent to the Spadra cemetery. Below is a summary of the cultural resources portion of the investigation conducted by Patrick Maxon, RPA of VCS Environmental in 2020 titled *Elephant Hill Cultural Resources Due Diligence Study.*

Maxon's report documents the results of a CHRIS records search, NAHC's SLF search, paleontological records searches, review of historic aerials, and a field survey addressing the current proposed Project site. The records search identified the previously recorded site CA-LAN-883 within the current proposed Project site; however, during the field survey no evidence of site CA-LAN-883 was observed. The author concurred with McLean's 2004 assertion that the materials observed in 1978 were likely not a resource but rather a natural occurrence. Three built environment resources were identified outside the current proposed Project site and determined to not be impacted by the current proposed Project. However, a 500-foot-long segment of the Old Diamond Bar Boulevard was identified within the southeastern portion of the current proposed Project site. Maxon provided the following recommendations:

- *One cultural resources site (19-000883) was recorded on the Project site in 1978. It was subsequently visited by LSA (2004) and determined to be a natural occurrence. The current survey verified that result. This can be considered a non-resource.*

- *The LSA (2004) report describes the discovery of a historic ceramic and glass scatter immediately south of Spadra Cemetery, possibly related to a structure that once stood in the area. Because of the presence of a homeless encampment and possible fill placed in the area, the scatter was not relocated; however, it may still exist on the surface mixed in with other refuse or it could now be buried and might be encountered during grading.*

- *An approximately 500 foot long remnant segment of Old Diamond Bar Boulevard remains in existence on the southeastern portion of the Project site, beginning immediately north of Sorrento Drive and extending north along the back of the townhome complex north of Sorrento Drive and west of West Mission Boulevard. It will need to be recorded on DPR 523 forms.*

- *The Louis Phillips Ranch Mansion site and the UPRR/SPRR line are both outside the Project site and will not be impacted by the proposed project.*

- *The bulk of the Project site is not paleontologically sensitive since the entire Elephant Hill is composed of Glendora Volcanics that by definition are not paleontologically sensitive. Only grading in the Miocene sedimentary deposits (Puente and Monterey Formations) in the extreme southern corner of the Project site would require monitoring.*

4.1 CHRIS Records Search Results

On September 3, 2020, South Central Coastal Information Center (SCCIC), located at California State University, Fullerton, conducted a records search of the CHRIS database in support of the Maxon (2020) investigation. The search included the proposed Project site and a 0.5-mile radius and was conducted to identify and collect the records for any previously recorded cultural resources and cultural resource studies and to review the following lists in an effort to identify resources meeting the respective criteria for the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, and the California State Historic Resources Inventory list. With respect to built environment resources, Dudek also reviewed the Built Environment Resources Database, California Inventory of Historical Resources (1976); Historical Maps; Local Inventories; and General Land Office and/or rancho plat maps. The complete records search results of maps, records, reports and a complete bibliography of all resources and prior cultural resource studies identified within 0.5-mile of the proposed Project site are included in Confidential Appendix B.

4.1.1 Previously Conducted Cultural Resource Investigations

The SCCIC records indicate that 17 previously conducted studies have been undertaken within the 0.5-mile radius of the proposed Project site between 1974 and 2010. Two of these studies, LA-00342, and LA-08120, address the proposed Project site. Table 1, below, details all 17 cultural resources studies followed by a brief summary of the reports that overlap the proposed Project site. For clarity, in the summaries below "subject area" refers to the area studied as a result of the previously conducted investigation and "current proposed Project site" refers to the area this current study is investigating.

Table 1. Previous Cultural Resources Investigations Within 0.5-Mile of the Proposed Project Site

SCCIC ID	Author	Year	Report Title	Addresses Proposed Project Site
LA-00111	Clewlow, William C. Jr	1974	Report on Archaeological Resources at Fire Station # 7and Training Facility	No
LA-00342	Taylor, Thomas T	1978	Report of the Archaeological Survey of Five Possible Steel Tank Reservoir Sites and Pipe Routes for the Walnut Valley Water District	Yes
LA-02882	McKenna, Jeanette A.	1993	Cultural Resources Investigations, Site Inventory, and Evaluations, the Cajon Pipeline Project Corridor, Los Angeles and San Bernadino Counties, California	No
LA-02970	Chamberlaine, Pat and Jean Rivers-Council	1992	Cajon Pipeline Project Draft Environmental Impact Statement Environmental Impact Report	No
LA-03925	Meighan, Clement W.	1984	Historic Architectural Survey Report: a Phase I Report (identification of Cultural Resources)	No
LA-04054	Meighan, Clement W	1984	Archaeological and Historical Resources: Highway 71	No

Table 1. Previous Cultural Resources Investigations Within 0.5-Mile of the Proposed Project Site

SCCIC ID	Author	Year	Report Title	Addresses Proposed Project Site
LA-04150	Mason, Roger D. and Brechbiel, Brant A.	1998	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: LA 210-04 City of Pomona, California	No
LA-04835	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	No
LA-05170	Duke, Curt	2000	Cultural Resource Assessment for Pacific Bell Wireless Facility SB 002-01, County of Los Angeles, California	No
LA-05643	Duke, Curt	2002	Cultural Resource Assessment: Cingular Wireless Facility No. SB 148-01 Los Angeles County	No
LA-06259	Duke, Curt	2002	Cultural Resource Assessment AT&T Wireless Services Facility No. D293b Los Angeles County, California	No
LA-06260	Duke, Curt	2002	Cultural Resource Assessment AT&T Wireless Services Facility No. D293c Los Angeles County, California	No
LA-06996	Dice, Michael H	2002	Records Search Results for Bechtel Telecommunications Facility D293d (intercontinental), 105 Exchange Place, Pomona, Los Angeles County, California	No
LA-07182	Smith, Philomene C.	2001	Highway Project for Pavement Rehabilitation on Route 71 From Mission Boulevard to 360m South of Old Pomona Road in the City of Pomona	No
LA-08120	McLean, Deborah K	2004	Results of Due Diligence Records Search and Archaeological Survey for the Centex Homes Proposed Elephant Hill Project, City of Pomona, Los Angeles County, California	Yes
LA-10561	Sylvia, Barbara	2001	Negative Archaeological Survey Report - Highway Project Description, State Route 71	No
LA-11821	Panich, Lee and Holson, John	2010	Archaeological Survey Report, Tehachapi Renewable transmission Project Segment 8 Telecommunications Route, Los Angeles and San Bernardino Counties, California	No

Report No. LA-00342. *Report of the Archaeological Survey of Five Possible Steel Tank Reservoir Sites and Pipe Routes for the Walnut Valley Water District* (Taylor 1978), documents the results of a CHRIS records search, background research, and a field survey to assess potential impacts to cultural resources as a result of installation of five steel tanks and a pipeline. A portion of the study area overlaps approximately 60% of the central and western portions of the current proposed Project site. The records search identified the previously recorded CA-LAN-853 within the current proposed Project site, as well as three historical built environment and historic archaeological sites north of Elephant Hill and outside the current proposed Project site. The report includes the recommendation that Elephant Hill not be further developed and instead be designated as a historic site. If preservation of Elephant Hill is not feasible, salvage/data recovery efforts were recommended.

Report No. LA-08120. *Results of Due Diligence Records Search and Archaeological Survey for the Centex Homes Proposed Elephant Hill Project, City of Pomona, Los Angeles County, California* (McLean 2004), documents the results of a CHRIS records search and field survey with a study area that overlaps the entire current proposed Project site. The records search identified the previously recorded CA-LAN-883 within the current proposed Project site; however, during the field survey no evidence of site CA-LAN-883 was observed. The report states the site was possibly destroyed during the construction of a fire break, Additionally, the authors of the report assert that flakes documented in the CA-LAN-883 site record may not be human induced by citing that changes in temperature and/or moisture content may have caused the siltstone material to fracture resulting in what appeared to "be primary flakes" but were in fact naturally occurring. Due to the lack of evidence for lithic reduction such as hammerstones, cores, secondary and tertiary flakes, and early-stage bifaces, the authors determined the primary flakes were naturally occurring and not cultural in origin. However, it was also believed opportunistic prehistoric quarrying may have occurred and the colluvial and alluvial sediments located at the northern base of the hill could potentially contain buried cultural resources. The report includes recommendations that a thorough survey report be prepared, subsurface testing, and that archaeological monitoring take place during ground disturbing activities within potential cultural resource bearing sediments.

4.1.2 Previously Recorded Cultural Resources

The SCCIC records indicate that one prehistoric cultural resource has been identified within an area of the proposed Project site designated as open space and three cultural resources have been previously recorded within the 0.5-mile radius of the proposed Project site, including one prehistoric site, one built environment resource, and one resource that is both built environment and historic-period. All previously recorded cultural resources located within a 0.5-mile radius of the proposed Project site are summarized in Table 2 and are briefly described below

Table 2. Previously Recorded Cultural Resources Within 0.5-Mile of the Proposed Project Site

Designation	Resource Description	Recorded By	NRHP Eligibility	Approximate Distance from Proposed Project Site
CA-LAN-000883 (P-19-000883)	Prehistoric site consisting of scrapers, chopper-core tools, cores, and both utilized and non-utilized flakes.	1978 (R. Douglas)	Likely not eligible	Overlapping proposed Project site designated open space
CA-LAN-001867H (P-19-001867H)	The Phillips Mansion Site and associated artifacts	1990 (Mack, Andry, and Moranez)	Mansion is Listed; Eligibility for historic-period portion is unknown	<40 meters (131 feet) north
(P-19-180724)	The Phillips Mansion	1974 (Neibel);	Listed	110 meters (360 feet) north
(P-19-186112)	Historic Union Pacific Railroad, Southern Pacific Railroad	1999 (S. Ashkar); 2002 (Herbert and Herrick); 2009 (R. Ramirez and F. Smith); 2009 (F. Smith and J. Steely); 2012 (Alyssa Newcomb); 2018 (Ahrens); 2019 (Jenna Kachour)	6Z: Found ineligible for NRHP, CRHR, or Local designation through survey evaluation	<20 meters (65 feet) north

CA-LAN-883. CA-LAN-883 (P-19-000883) is a prehistoric archaeological site measuring approximately 200 square-meters (2,153 square feet) at an elevation of approximately 900–1,100 feet. Although, the resource is located within the general proposed Project site, it is located within an area designated as open space and will not be subjected to ground disturbing activities proposed for the Project. CA-LAN-883 is documented in the site record as consisting of scrapers, chopper-core tools, cores, and both utilized and non-utilized flakes. The site was originally formally recorded in 1978 by Douglas, who described the site as a series of "three single component activity loci" and a "probable lithic-tool quarry site". Douglas noted the artifacts were spaced among natural spalls. Although the site record has not been updated, studies have been conducted in the area since Douglas's 1978 survey that have found no evidence of the site. One report (McLean 2004) states the site was possibly destroyed during the construction of a fire break. Additionally, McLean asserts that flakes documented in the CA-LAN-883 site record may not be human induced. This is supported with the reasoning that changes in temperature and/or moisture content may have caused the siltstone material to fracture resulting in what appeared to "be primary flakes" but were in fact naturally occurring. Due to the lack of evidence for lithic reduction such as hammerstones, cores, secondary and tertiary flakes, and early-stage bifaces, McLean contends the primary flakes were naturally occurring and not cultural in origin. However, McLean states that prehistoric quarrying may have occurred and the colluvial

and alluvial sediments located at the northern base of the hill could potentially contain buried cultural resources. No subsurface excavations were conducted and as a result the horizontal and vertical extent of the resource is unknown. CA-LAN-883 has not been evaluated for listing on the NRHP or the CRHR.

CA-LAN-1867H. CA-LAN-1867H (P-19-001867H) is a built environment and historic archaeological resource measuring 105 meters by 70 meters (344 feet by 230 feet) at an elevation of 770 feet and is located less than 40 meters (131 feet) north of the proposed Project site. CA-LAN-1867H is documented as consisting of the Phillips Ranch Mansion, a stone/masonry outbuilding, a rock and brick lined hole that was the well head for a former windmill, a rock landscaping wall, square nails, pieces of sheet mica, small leather fragments, brick fragments, and small bone fragments. The site was originally formally recorded in 1990 by Mack, Andry, and Moranez. No subsurface excavations were conducted and as a result the horizontal and vertical extent of the resource is unknown. CA-LAN-1867H has not been evaluated for listing on the NRHP or the CRHR.

P-19-180724. P-19-180724 is a built environment historical resource referred to as the Louis Phillips Mansion located approximately 110 meters (360 feet) north of the proposed Project site. P-19-180724 was originally formally recorded in 1974 by Neibel who described the Mansion as a two story brick house construction in 1875 by Louis Phillips. The structure is the first brick house built in Pomona Valley and is the oldest extant residential structure in the Valley with the exception of the four extant Spanish adobes. The Louis Phillips Mansion was nominated and approved for listing as a California Point of Historical Interest in 1970 and nominated and approved for listing on the NRHP in 1974.

P-19-186112. P-19-186112 is a built environment historical resource known as the Union Pacific Railroad/Southern Pacific Railroad with the nearest segment located less than 20 meters (65 feet) north of the proposed Project site. The railroad was initially constructed in 1869 and was originally formally recorded in 1999 by Ashkar. The site record has been updated six times between 2002 and 2019. In 1999 Ashkar determined the historic railroad was eligible for the National Register of Historic Places under Criteria A and B. However, the segment of P-19-186112 located adjacent to the proposed Project site was evaluated in 2002 by Herbert and Herrick and appeared to not meet the criteria for listing in the NRHP.

4.2 Native American Heritage Commission Sacred Land Files Request

A search of the NAHC's SLF was requested on August 10, 2020 by VCS Environmental, and was conducted on August 24, 2020 by Steven Quinn, Cultural Services Analyst, to determine the presence of any Native American cultural resources within the proposed Project site as listed in the SLFs maintained by the NAHC. The NAHC records search results were positive for known Native American heritage resources within the proposed Project site. The NAHC identified eight Native American individuals who would potentially have specific knowledge as to whether or not other cultural resources are identified within the proposed Project site that could be at-risk. To date, neither VCS Environmental nor Dudek have initiated informal outreach with the individuals on the NAHC's contact list, in regard to the proposed Project site. Note: SLFs maintained by the NAHC represent a curation of "sacred lands" or TCRs provided by Tribal entities and Native American representatives. For various reasons Tribal entities and Native American representatives do no not always report sacred lands or TCRs to the NAHC; as such, the NAHC's SLF is not a comprehensive list and searches of the SLF must be considered in concert with other research and not used as a sole source of information regarding the presence of TCRs or cultural resources (Maxon 2020).

4.3 Historical Aerial and Topographic Map Review

Historical topographic maps and aerial photographs were reviewed to better understand natural or human-made changes to the proposed Project site and surrounding area over time. A review of all available historical aerial photographs was conducted and includes the following years: 1928, 1938, 1946, 1948, 1949, 1953, 1960, 1964, 1965, 1966, 1968, 1972, 1973, 1976, 1977, 1980, 1981, 1982, 1983, 1985, 1988, 1989, 1990, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2005, 2007, 2009, 2010, 2012, 2014, 2016, and 2018 (NETR 2022b UCSB 2022). Through careful comparative review of historical aerials, changes to the landscape of a study area may be revealed. Disturbance to the study area is specifically important as it assists in determining if soils within the study area are capable of sustaining intact archaeological deposits. Additionally, historical aerials have the potential to reveal whether a study area was subjected to alluvial deposits by way of flooding, debris flows or mudslides, as well as placement of artificial or foreign fill soils that may have buried intact archaeological deposits. Historic aerials were also used to obtain approximate dates of construction and dates of alterations for buildings and structures within the Built Environment Study Area.

A review of available topographic maps was conducted and includes the following years: 1897, 1898, 1902, 1904, 1908, 1912, 1923, 1928, 1932, 1941, 1946, 1956, 1960, 1963, 1967, 1975, 1984, 2012, 2015, 2018 (NETR 2022a). Topographic maps depict elevation of the study area as well as the areas surrounding it and illustrate the location of roads and some buildings. Although topographic maps are not comprehensive, they are another tool in determining whether a study area has been disturbed and at times to what approximate depth. Table 3 summarizes the findings of the historical aerial and topographic map review.

Table 3. Historical Aerial and Topographic Map Review

Historical Aerials	
Year	**Description**
1928	The proposed Project site is undeveloped and covered in vegetation. Spadra Cemetery is visible with several mature tree plantings and a well-worn walking path extending to the circle in the center of the cemetery. A faint grid pattern showing the blocks is visible but lacks detail. An access road to the property is visible approaching from the west, connecting the cemetery to Pomona Boulevard. A segment of Brea Canyon Road is visible as a faint footpath on the southside of Elephant Hill, but does not appear, at this time, to be a formal road. The surrounding region appears to host the town of Spadra's main street, along Pomona Boulevard to the northwest. Aside from this small, developed strip, the area surrounding the town appears to be made up entirely of farms, agricultural fields, haystacks, vineyards, and orchards. The Union Pacific Railroad tracks are visible immediately north of the Spadra Cemetery.
1938	Spadra Cemetery is visible in this photograph and appears to have gained more plantings. A row of trees appears to have been planted along the northwest property line along the Union Pacific Railroad tracks. A segment of Brea Canyon Road is visible in this photograph as a paved, two-lane road, arching southwest towards Walnut and Orange County. Fresh and unvegetated through-cuts[1] are visible in Elephant Hill and the hill to the south to accommodate the roadbed. Far to the southwest, the Pacific Colony state hospital campus is visible. The surrounding region still appears to be primarily agricultural development.
1946 & 1948	There is an increase in development surrounding the proposed Project site. There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road.
1953	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road. The City of Pomona's western boundary appears to have expanded considerably towards the town of Spadra at this time. Several residential subdivision developments, including Westmont Park, encroach to the eastern side of Elephant Hill. The Naval Industrial Reserve Ordinance Plant appears to have been constructed as well, also abutting Elephant Hill to the east. Far to the north, Interstate 10 appears under construction.

[1] A "through-cut" refers to when a linear feature, such as a road or railroad, cuts into a hill slope where there is a cut slope on both sides of the linear feature. Through-cuts may be employed when engineering grading around the outer edge of a ridge or slope is not possible.

Table 3. Historical Aerial and Topographic Map Review

Historical Aerials	
Year	**Description**
1960	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road. The buildings and agricultural fields immediately northeast and northwest of the cemetery and Union Pacific Railroad, and south of Pomona Boulevard have been cleared and all orchards demolished. More residential subdivisions appear east of Elephant Hill and north of the Southern Pacific Railroad and Valley Boulevard, northwest of Elephant Hill.
1964-1966	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road.
1968	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road. North of Elephant Hill, between the Southern Pacific Railroad and Valley Boulevard, and large industrial/manufacturing building and yard appear, replacing one of the Spadra farms/agricultural properties.
1972	SR 57 appears, immediately west of Spadra Cemetery. The access road along the west side of the property (visible since 1928 aerial) has been destroyed. There is now a trail along the eastern half of Elephant Hill ridgeline. The southwest corner and western edge of the proposed Project site are partially graded. There is a trail intersecting the southwest corner of the proposed Project site, connecting the western boundary to the road to the south. Brea Canyon Road appears to have been partially demolished, leaving only the short segment in the proposed Project site intact. Mission Boulevard tracks away from Brea Canyon Road at the east side of Elephant Hill, while SR 57 appears to have been constructed over the western and southern portions of the road. The onramp interchange for SR 57 at Mission Boulevard was constructed over the sites of homes and farms. More industrial/manufacturing properties are being constructed along Pomona Boulevard, replacing some of the older homes. Very few agricultural tracts remain. Only a few of the original Spadra homes (Phillips Mansion and one other) appear along Pomona Boulevard.
1973	The trail along the ridgeline is no longer present.
1976	There is some vegetation cleared within the center of the proposed Project site. More industrial/manufacturing properties and warehouses appear along Pomona Boulevard, replacing former farms.
1977	The center of the proposed Project site appears to once again to be covered in small vegetation. More industrial/manufacturing properties and warehouses appear along Pomona Boulevard, replacing former farms.

Table 3. Historical Aerial and Topographic Map Review

Historical Aerials	
Year	**Description**
1980	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road. The last remaining house from Spadra is now the Phillips Mansion. All other homes along Pomona Boulevard have been demolished or replaced with warehouses. More industrial/manufacturing properties and warehouses infill remaining lots along Pomona Boulevard.
1981 & 1982	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the segment of Brea Canyon Road. More industrial/manufacturing properties and warehouses appear along Pomona Boulevard, infilling former farms.
1983	There is a winding trail south of Spadra Cemetery coming off of the trail along the western boundary of the proposed Project site. More industrial/manufacturing properties and warehouses appear along Pomona Boulevard, infilling former farms.
1985	There are additional winding trails within the southwest corner of the proposed Project site. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. The last orchard in the former town of Spadra has now been replaced with a warehouse. No more undeveloped property remains and industrial/manufacturing infill of the surrounding region is complete.
1988	The winding trail south of Spadra Cemetery is no longer visible. No discernible changes to Spadra Cemetery. A new residential subdivision with large round housing arrangements appears immediately adjacent to the remaining Brea Canyon Road segment. A portion of the old road's through-cut through the hillside of Elephant Hill has been demolished.
1989	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
1990	There is a winding trail within the center of the northern border of the proposed Project site. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.

Table 3. Historical Aerial and Topographic Map Review

Historical Aerials	
Year	**Description**
1992	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
1993	The trail along the eastern half of Elephant Hill ridgeline is again visible and the surface area within the center of the southern border appears disturbed and cleared of vegetation. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
1994	With the exception of small vegetation growth, there are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
1995	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery. Another new residential subdivision appears immediately south of the remaining segment of Brea Canyon Road on the northeast side of Sorrento Drive.
1996-2003	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
2005	The trail across the ridgeline of Elephant Hill extends further west. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
2007	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.

Table 3. Historical Aerial and Topographic Map Review

Historical Aerials	
Year	**Description**
2009	There trails are no longer visible. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
2010-2018	There are no significant changes to the proposed Project site with the exception of small vegetation clearing along the western border of the proposed Project site. No discernible changes to Spadra Cemetery or the remaining segment of Brea Canyon Road. No discernible changes to surrounding area.
Topographic Maps	
1897	The proposed Project site is depicted as undeveloped. There is the Southern Pacific Railroad north and west of the proposed Project site. San Jose Creek runs from west of the proposed Project site and loops around the north, east and southeast boundary of the proposed Project site. Spadra is labeled to the west of the proposed Project site.
1898-1946	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. In the 1928 topographic map has the Southern Pacific Railroad now labeled Union Pacific Railroad
1956	The proposed Project site is now labeled as Elephant Hill. Spadra Cemetery is depicted to the west, and Sewage Disposal is depicted to the northeast of the proposed Project site. There is an increase in development surrounding the proposed Project site with Brea Canyon Road depicted along the southern boundary of the proposed Project site.
1960	The 1960 topographic map depicts the same information as the 1946 map.
1963	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred.
1967	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. There are now structures depicted adjacent to the proposed Project site to the southeast.
1975	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred. SR 57 is now depicted to the west of the proposed Project site and the current Mission Boulevard is now depicted south of the proposed Project site, replacing the previous Brea Canyon Road.
1984-2018	There are no apparent changes within the proposed Project site that suggest ground disturbance has occurred.

The proposed Project site has been undeveloped since at least 1928. There has been surface disturbance in the form of grading or trails since at least 1972. Spadra has been depicted on topographic maps since 1897.

4.4 Geotechnical Report Review

A geotechnical report prepared for the proposed Project site was reviewed to determine subsurface geological conditions of the site (LGC Geotechnical, Inc. 2020). According to the boring logs and the mapped locations of the subsurface investigations, the testing was completed through the use of hollow-stem auger boring, bucket auger boring, exploratory test pits, and cone penetration tests. These tests were carried out in 2013 and 2020 and were primarily confined to the base of Elephant Hill, along the west and south. Undocumented artificial fill soils were documented to be present along the western and southern portions of the proposed Project site and were encountered in areas tested from surface to depths up to 10 feet below existing ground surface (LGC Geotechnical, Inc. 2020). Within the tested areas, fill soils are underlain by native soils and/or Glendora volcanics rhyolite (Tgr) to maximum depths explored. The report notes that the undocumented artificial fill soils were derived from the construction of California State Route 57 and Brea Canyon. Since no construction or ground disturbing activities are proposed to occur within the Elephant Hill area or the northern and eastern portions of the proposed Project, no subsurface exploratory investigations were not completed.

4.5 Building Development and Archival Background Research

In addition to the records search results, building development and archival research was conducted for the proposed Project site and the two historic-age properties located adjacent to the proposed Project site (Spadra Cemetery and a segment of Brea Canyon Road) in an effort to establish a thorough and accurate historic context for the significance evaluations and to confirm the building development history of these properties. These additional sources are summarized below.

4.5.1 City of Pomona, City Clerk's Office

On April 29, 2022, Dudek reviewed public records and documents available online through the digital archiving system known as LaserFiche, maintained and administered by the City Clerk's office for the City of Pomona. Records obtained through LaserFiche include City Council and Historic Preservation Commission meeting minutes related to the city resolution to make Spadra Cemetery a historical landmark, as well as records relating to the re-alignment of Brea Canyon Road. Information obtained from the City Clerk's Office was used in the preparation of the historical context (Section 3).

4.5.2 Historical Society of Pomona Valley

Dudek communicated with Deborah Clifford at the Historical Society of Pomona Valley in order to coordinate access to the Spadra Cemetery, which is the property of Historical Society of Pomona Valley. On April 7 and April 21, 2022, Dudek visited the Historical Society of Pomona Valley at the Pomona Ebell Museum of History, at 585 E. Holt Avenue and reviewed the museum's collections related to the cemetery. These items included records of burials, historical accounts of Spadra, deeds, papers of the Spadra Cemetery Association, papers and ephemera related to the transfer of the cemetery into historical society ownership, and the nomination and acceptance of the cemetery as a local landmark. Information obtained from the Historical Society of Pomona Valley was used in the preparation of the historical context (Section 3) and significance evaluations (Section 5).

4.5.3 California Special Collections, Pomona Public Library

On April 18, 2022, Dudek contacted Allen Lagumbay and Pat Lambert at the Pomona Public Library in order to request items related to the history of Spadra and Spadra Cemetery. On April 20 and April 28, 2022, Dudek visited the California Special Collections room at Pomona Public Library and reviewed books, journal articles, maps, photographs, and other ephemera related to the Old Brea Road and the Spadra Cemetery, as well as the general historical context of Spadra. Dudek also utilized photographs and digitized resources from Pomona Public Library's Digital Collections, including the Pomona Landmarks Collection Information obtained from the Pomona Public Library and used this information in the preparation of the historical context (Section 3) and significance evaluations (Section 5).

4.5.4 Special Collections, Honnold Mudd Library, The Claremont Colleges

On April 28, 2022, Dudek visited the Special Collections department at the Honnold Mudd Library in order to access the Kewen Dorsey diaries and city directories that covered Spadra for the years 1898 and 1899. Information obtained from the Honnold Mudd Library was used in the preparation of the historical context (Section 3) and significance evaluations (Section 5).

4.5.5 Historical Newspapers

Dudek researched relevant historic newspapers available through ProQuest, Newspapers.com, and GenealogyBank.com related to the Old Brea Road and the Spadra Cemetery, as well as general historical context of Spadra. Such Newspapers include the *Los Angeles Star, Los Angeles Times, San Bernardino County Sun, Los Angeles Daily News,* and the *Pomona Progress Bulletin.* These newspapers were used in the preparation of the historical context (Section 3).

5 Field Methods

On April 7, 2022, Dudek Architectural Historian Kate Kaiser, MSHP and Heather McDaniel-McDevitt, MA, RPA, conducted an initial site visit to the Spadra Cemetery and Old Brea Road in order to assess proper approaches to fieldwork and recordation of the site as well as determine GPR survey locations. This initial survey consisted of walking the proposed Project site and documenting necessary details for the purpose of developing general and specific field work plans.

5.1 Archaeological Field Methods

The proposed Project site was surveyed by VCS Environmental on September 20, 2020 within the lower elevated areas of the Project site, south and west of Elephant Hill, and within the more elevated terrain of Elephant Hill for the purpose of locating 19-000883. again by Dudek between April 18 and April 21, 2022. The Dudek pedestrian survey was conducted within the Development Area of the proposed Project site between April 18 and 21, 2022. The intensive-level survey methods consisted of a pedestrian survey conducted in parallel transects, spaced no more than 10 meters (30 feet) apart. The ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent burrows, cut banks, trails and drainages were also visually inspected for exposed subsurface materials. No artifacts were collected during the survey.

All fieldwork was documented using field notes and an Apple Generation 7 iPad (iPad) equipped with Esri Collector and Avenza PDF Maps software with close-scale georeferenced field maps of the proposed Project site, and aerial photographs. Location-specific photographs were taken using the iPad's 12-mega-pixel resolution camera. Cultural resources identified during this inventory within the proposed Project site were to be recorded on DPR forms, using the Instructions for Recording Historical Resources (Office of Historic Preservation 1995). All field notes, photographs, and records related to the current study are on file at Dudek's Santa Barbara, California office. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory.

Following is the statement of survey methods extracted from the VCS Environmental (Maxon 2020) report, "On September 10, 2020, the author completed a pedestrian survey of the project site. Initially, the lower elevated areas of the project site, south and west of Elephant Hill, were examined. Next, the more elevated terrain of Elephant Hill was reached from its more easily accessible western slopes for the purpose of locating 19-000883."

5.2 Ground-Penetrating Radar Survey Field Methods

Based on background research, the potential for unmarked burials associated with the Spadra Cemetery merited further study. Therefore, GPR was used to non-invasively identify potential subsurface features that may coincide with the location of unmarked burials and abandoned refuse deposits.

The GPR survey was conducted using a Sensors & Software Noggin GPR transmitter/receiver using the SmartCart Configuration with a 250 MHz antenna. The Dudek GPR is a wheeled device approximately the size of a child's wagon which is pushed across the ground in a series of lines and/or grids that is tracked by a Trimble Juno global

positioning system (GPS) device with an external antenna providing sub-meter accuracy positional information for each transect. This allows the investigators an opportunity to observe any potential anomalies in real time as they conduct the survey. Most transects were aligned on a single Cartesian grid system to ensure each line was equally spaced at 50 cm intervals. The GPR device collected data from the ground surface to a depth of 6.1 meter below ground. GPR transects were walked both within and outside the fenced cemetery boundary. A total of 272 transects were walked to cover the survey area (Figure A). Transects were recorded within the cemetery to help observe the type of responses the burials in this area would produce, in order to facilitate identification of potential burials outside the fence. Gaps between GPR transects result from the presence of trees, fences, large debris, and other obstacles that were unable to be moved. Test transects were also recorded over and adjacent to some of the known grave sites where headstones are present.

GPR is non-invasive and uses electromagnetic fields to probe subsurface contexts for objects and changes in soil or material properties. Generally summarized, an antenna sends a finite frequency non-dispersive wave through the ground. This wave is then scattered and/or reflected back as “anomalies” with interpretable characteristics. While the location of anomalies can be identified in the field and GPR survey strategies are adjusted to focus on these areas in real-time, the final data product is post-processed through Sensors and Software’s EKKO_Pulse software and then analyzed and interpreted. By walking continuous linear transects and grids, this software allows for a generation horizontal mapping of subsurface features. This is method is most effective with historical features constructed of materials such as asphalt, brick, concrete, metal, wood, and other materials that would stand out against the surrounding soil matrix. The nature of potential resources identified as a result of background research conducted specifically for the proposed project site would likely be unmarked historic graves, cemetery associated features, historic refuse deposits and structure foundations. These potential features would likely be identifiable as a difference in compaction relative to the surrounding substrate.

The Noggin GPR system produces a radargram which is a vertical profile indicating the locations of underground features such as rodent dens, underground utilities, geological strata, tree roots, etc. This information is used to determine the general background “noise” that can be discarded as non-archaeological or non-burial related and isolate any anomalies that may be archaeological in origin or burial related. The radargrams are analyzed real-time in the field by the operator(s), with additional post-processing analysis. The EKKO_Project software was used to review the radargrams and to convert the data into horizontal slice images. The slices are interpolations of the data in the radargrams, which show 2D images at various depth increments (i.e., from 0-10 cm, 10-20 cm, 30-50 cm, etc.). The 2D slices can also be merged into 3D animations. These slices are presented in red-blue color scale, with red indicating stronger (higher amplitude) responses, and blue indicating low amplitude. Typically, burials would display as distorted (rounded) rectangles in red/orange, with background soils towards the blue end of the scale, although depending on subsurface soil, the opposite can be true (for example, if grave shafts are excavated into a cobble layer, but backfilled without cobbles). All of the recorded lines were processed together to make slice images of the survey area.

5.3 Built Environment Field Methods

On April 20, 2022, Dudek Architectural Historians Kate Kaiser, MSHP and Caitlin Greeley, MA, surveyed and recorded the Spadra Cemetery, closely following the recordation guidelines and methodology laid out in National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places. As such, the relationship between the cemetery and landscape features, traditional routes of travel, the arrangement of graves were noted, the overall layout of blocks, signage or its remnants, curbs and their use for delineation of the blocks

and plots, landscape and planting features, and intra-site circulation systems were noted. Headstone typologies were determined using multiple sources, including Pinyerd and Niederer 2018, Oregon Parks and Recreation Department 2015, Donovan and Associates 1989, and Chicora Foundation 2022. All headstones and example photographs are documented in Appendix C of this report. On April 20, 2022, Kaiser and Greeley also surveyed a segment of the Brea Canyon Road within the proposed Project site. The road was documented with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property.

Methods for documenting both the Spadra Cemetery and the segment of Brea Canyon Road included using field notes, digital photography, GPS software, close-scale field maps, and aerial photographs. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office. A complete California DPR 523 form recording Spadra Cemetery may be found in Appendix D.

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6 Background Context

6.1 Prehistoric Overview

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; while some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

Paleoindian Period (pre-5500 BC)

Evidence for Paleoindian occupation in the region is tenuous. Our knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego, through the Mojave Desert, and beyond. One of the earliest dated archaeological assemblages in the region is located in coastal Southern California (though contemporaneous sites are present in the Channel Islands) derives from SDI-4669/W-12 in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2006). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on Naval Air Weapons Station China Lake near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multi-component fluted point site, and MNO-680—a single component Great Basined Stemmed point site (see Basgall et al. 2002). At MNO-679 and -680, ground stone tools were rare while finely made projectile points were common.

Warren et al. (2004) claimed that a biface (prehistoric stone tool that has been flaked on both faces), manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the region that possibly dates between 10,365 and 8,200 BC (Warren et al. 2004). Termed San Dieguito (see also Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (see also Warren 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos's interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key

early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

San Dieguito sites are rare in the inland valleys, with one possible candidate, RIV-2798/H, located on the shore of Lake Elsinore. Excavations at Locus B at RIV-2798/H produced a toolkit consisting predominantly of flaked stone tools, including crescents, points, and bifaces, and lesser amounts of groundstone tools, among other items (Grenda 1997). A calibrated and reservoir-corrected radiocarbon date from a shell produced a date of 6630 BC. Grenda (1997) suggested this site represents seasonal exploitation of lacustrine resources and small game and resembles coastal San Dieguito assemblages and spatial patterning.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in Southern California deserts, where hunting-related tools were replaced by processing tools during the early Holocene (see Basgall and Hall 1990).

Archaic Period (8000 BC–AD 500)

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in Southern California. If San Dieguito is the only recognized Paleoindian component in coastal Southern California, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (see Hale 2001, 2009).

The Archaic pattern, which has also been termed the Millingstone Horizon (among others), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (see Basgall and Hall 1990; Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow was adopted around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remained low. After the bow was adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decreased in proportion relative to expedient, unshaped ground stone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complemented only by the addition of the bow and ceramics.

Late Prehistoric Period (AD 500–1769)

The period of time following the Archaic and before Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004); however, several other subdivisions continue to be used to describe various shifts in assemblage composition. In general, this period is defined by the addition

of arrow points and ceramics, as well as the widespread use of bedrock mortars. The fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall 1990); even then, weighing the economic significance of millingstone-handstone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages.

6.2 Ethnographic Overview

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first written records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Harrington 1934; Laylander 2000; Sparkman 1908; White 1963). The principal intent of these researchers was to record the precontact and culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of precontact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007).

Golla contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007, p. 80). A large amount of variation within the language of a group represents a greater time depth than a group’s language with less internal diversity. One

method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Golla 2007, p. 74). These groups include the Gabrielino, Cahuilla, and Serrano. Golla interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2000).

Gabrielino/Tongva

Based on evidence presented through past archaeological investigations, the Gabrieliño appear to have arrived in the Los Angeles Basin around 500 BC. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast.

The names by which Native Americans identified themselves have, for the most part, been lost and replaced by those derived by the Spanish people administering the local Missions. These names were not necessarily representative of a specific ethnic or tribal group, and traditional tribal names are unknown in the post-Contact period. The name "Gabrieliño" or "Gabrieleno" was first established by the Spanish from the San Gabriel Mission and included people from the established Gabrieliño area as well as other social groups (Bean and Smith 1978; Kroeber 1925). Many modern Native Americans commonly referred to as Gabrieliño/Gabrieleno identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin. While distinct bands of the indigenous people of Los Angeles Basin have adopted their own unique name, the term Gabrieliño is applied here.

The Gabrieliño established large, permanent villages along rivers and streams, and lived in sheltered areas along the coast. Gabrieliño lands included the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina and stretched from the foothills of the San Gabriel Mountains to the Pacific Ocean. Tribal population has been estimated to be at least 5,000 (Bean and Smith 1978), but recent ethnohistoric work suggests a much larger population, approaching 10,000 (O'Neil 2002). Archaeological sites composed of villages with variously sized structures have been identified through the Los Angeles Basin. Within the permanent village sites, the Gabrieliño constructed large, circular, domed houses made of willow poles thatched with tule, each of which could hold upwards of 50 people (Bean and Smith 1978). Other structures constructed throughout the villages probably served as sweathouses, menstrual huts, ceremonial enclosures, and communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Gabrieliño villages (McCawley 1996).

The largest, and best documented, ethnographic Gabrieliño village in the vicinity was that of Yanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of the downtown Los Angeles (McCawley 1996:56-57; NEA and King 2004). This village was reportedly first encountered by the Portola expedition in 1769. In 1771, Mission San Gabriel was established. Yanga provided a large number of the recruitments to this mission; however, following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid work became increasingly common,

which had the result of reducing the number of Native American neophytes from the immediately surrounding area (NEA and King 2004). Mission records indicate that 179 Gabrieliño inhabitants of Yanga were recruited to San Gabriel Mission (King 2000: 65; NEA and King 2004: 104). Based on this information, Yanga may have been the most populated village in the Western Gabrieliño territory. Second in size, and less thoroughly documented, the village of Cahuenga was located slightly closer, just north of the Cahuenga Pass.

The environment surrounding the Gabrieliño included mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like most native Californians, acorns (the processing of which was established by the early Intermediate Period) were the staple food source. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978:546; Kroeber 1925; McCawley 1996).

Tools and implements used by the Gabrieliño to gather and collect food resources included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Trade between the mainland and the Channel Islands Groups was conducted using plank canoes as well as tule balsa canoes. These canoes were also used for general fishing and travel (McCawley 1996).

The collected food resources were processed with hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

The Chinigchinich cult, centered on the last of a series of heroic mythological figures, was the basis of religious life at the time of Spanish contact. The Chinigchinich cult not only provided laws and institutions, but it also taught people how to dance, which was the primary religious act for this society. The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups even as Christian missions were being built. This cult may be the result of a mixture of native and Christian belief systems and practices (McCawley 1996).

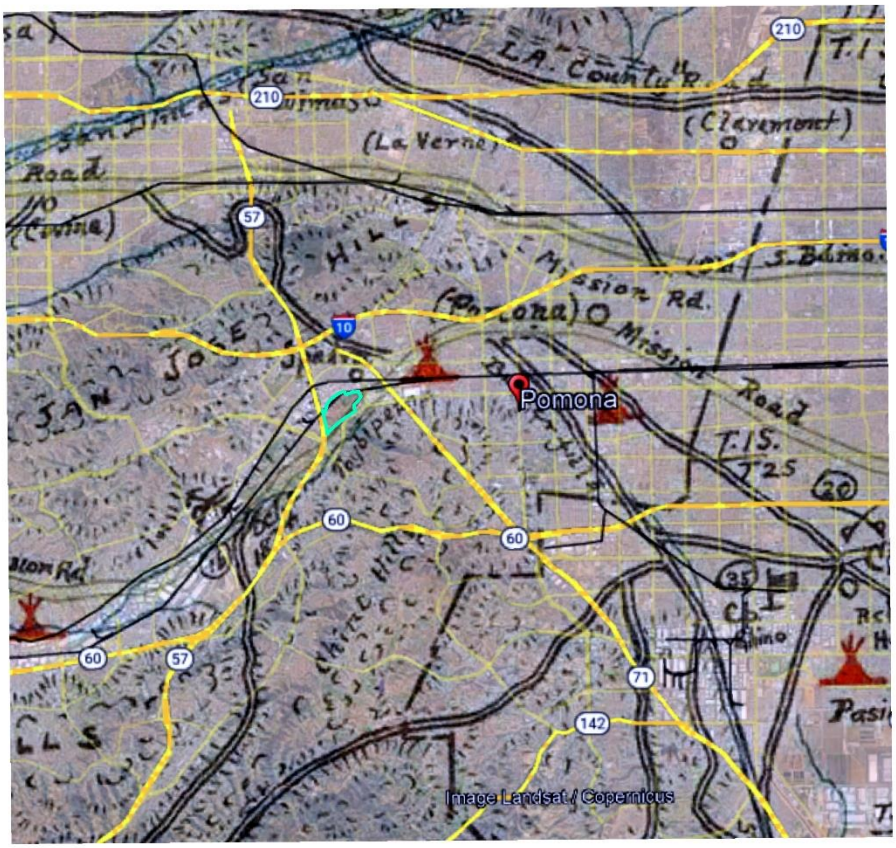
Deceased Tongva were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996). Cremation ashes have been found buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966), as well as scattered among broken ground stone implements (Cleland et al. 2007). Supporting this finding in the archaeological record, ethnographic descriptions have provided an elaborate mourning ceremony. Offerings varied with the sex and status of the deceased (Johnston 1962; McCawley 1996; Reid 1926). At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period (McCawley 1996).

6.3 1938 Kirkman-Harriman Historical Map Review

Dudek cultural resource specialists reviewed pertinent academic and ethnographic literature for information pertaining to past Native American use of the proposed Project site and vicinity. This review included consideration of sources commonly identified during tribal consultation, notably the 1938 Kirkman-Harriman Historical Map (Exhibit 1. 1938 Kirkman-Harriman Historical Map). Based on this map, the southeastern portion of the proposed Project site overlaps a portion of the northeast-southwest trending Mission Road. The proposed Project site is mapped at the base of two hills: San Jose Hills to the northwest and Chino Hills to the southeast. The nearest

waterway to the proposed Project site is the northeast-southwest trending San Jose Creek, mapped approximately 0.25 miles to the southeast. According to the map, approximately 2 miles to the southwest of the proposed Project site is an "Indian Fight" site symbolized with a sword crossing an arrow. This battle site is marked on the map as site number "16" and represents the battle between Mexican soldiers and Native Americans on October 20, 1834, and is specifically noted to be west of Spadra. The nearest mapped Native American village is Toybipet and is approximately 1 mile to northeast of the proposed Project site.

Exhibit 1. Twelve-mile square excerpt of the 1938 Kirkman Herriman Map depicting the proposed Project site



Source: Compiled by Geo. W. Kirkman, C.E.B.S. August 1937, Los Angeles, California. Copyright 1938 by George W. Kirkman

It should be noted that this map is highly generalized due to scale and age and may be somewhat inaccurate with regard to distance and location of mapped features. Additionally, this map was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833). Although the map contains no specific primary references, it matches with the details documented by the Portola expedition (circa 1769-1770). While the map is a valuable representation of post-mission history, substantiation of the specific

location and uses of the represented individual features would require review of archaeological or other primary documentation on a case-by-case basis. SCCIC records identified one prehistoric site within the proposed Project site (CA-LAN-883/P-19-000883). The site was originally documented as a probable lithic-tool quarry site comprised of three single activity loci, including tools in 1978. However, there are differing opinions on whether the resources identified within the site are cultural or naturally occurring. While it is unclear as to whether the resources that were documented in 1978 are prehistoric resources, one report (LA-08120) did state that opportunistic quarrying may have occurred and the sediments from the hill may have buried cultural resources at the base of the hill. SCCIC records further note that there is no evidence of the site and it may have been destroyed during the construction of a fire break. Moreover, the related SCCIC records do not mention any reference to a village site mapped nearest to the proposed project site.

No archaeological evidence of the nearest village depicted on the 1938 Kirkman-Harriman map, such as an archaeological site, was identified in the SCCIC records search results or review of other archaeological information. Based on review of pertinent academic and ethnographic information, the proposed Project site falls within the boundaries of the Gabrieliño traditional territory; however, no clear evidence of Native American cultural resources have been previously documented in areas that may be impacted by the proposed Project.

6.4 Historic Period Overview

Post-contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan Rodríquez Cabrílo stopped in 1542 at present-day San Diego Bay. With his crew, Cabrílo explored the shorelines of present Catalina Island as well as San Pedro and Santa Monica Bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno's crew also landed on Santa Catalina Island and at San Pedro and Santa Monica Bays, giving each location its long-standing name. The Spanish crown laid claim to California based on the surveys conducted by Cabrílo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

More than 200 years passed before Spain began the colonization and inland exploration of Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July of 1769, while Portolá was exploring southern California, Franciscan Fr. Junípero Serra founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father Crespi named "the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula" or "Our Lady the Queen of the Angeles of the Porciúncula." Two years later, Friar Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Kyle 2002). Mission San Fernando Rey de España was established nearly 30 years later on September 8, 1797.

Mexican Period (1822–1848)

A major emphasis during the Spanish Period in California was the construction of missions and associated presidios to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns, but just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles). Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. Nine ranchos were granted between 1837 and 1846 in the future Orange County (Middlebrook 2005). Among the first ranchos deeded within the future Orange County were Manuel Nieto's Rancho Las Bolsas (partially in future Los Angeles County), granted by Spanish Governor Pedro Fages in 1784, and the Rancho Santiago de Santa Ana, granted by Governor José Joaquín Arrillaga to José Antonio Yorba and Juan Pablo Peralta in 1810 (Hallan-Gibson 1986). The secularization of the missions (enacted 1833) following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848–Present)

War in 1846 between Mexico and the United States precipitated the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. The Mexican-American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. Territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros

drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 2005).

6.5 History of Spadra

The town of Spadra began as part of Rancho San Jose, a land grant awarded to Ricardo Vejar. In 1861, Louis Shlesinger and Heiman Tischler in Los Angeles helped Ricardo Vejar mortgage the property. At this time, lending to Vejar was considered a good investment because in the previous year, 1860, his cattle and lands had produced $40,000 in income, making him the fourth richest man in Los Angeles County. Though Vejar might have been able to pay off the mortgage under typical conditions, in the winter of 1861–1862 rain fell for a month, causing catastrophic floods along all major and minor watersheds in Los Angeles County, San Bernardino County, San Diego County, and including areas later sectioned off to become Orange and Riverside County. The terrible floods were followed by severe droughts beginning in 1862 that extended for three years. Finally, national market uncertainty caused by the Civil War brought incredible financial stress to California. In 1862, Vejar was foreclosed upon by Schlesinger and Tischler, starting first with his chattel loan, which recalled his animals, and followed with his house and acreage in early 1863 (Bracket 1920, pp. 75-76; Los Angeles Star 1863, p. 3; Wheeler 1983).

Shortly after assuming ownership of the property, Schlesinger reportedly died in the shipwreck of the *Ada Hancock*, which sank after an explosion in April 1863. Tischler was not well received as the new owner of Rancho San Jose, and he reportedly did not pay his employees to manage the herd of cattle he received in the chattel loan foreclosure. Tischler and his friend Edward Newman were ambushed while traveling to the rancho. Newman was killed. As a result, Tischler hired a young Louis Phillips, a Prussian immigrant who had been operating a small ranch in Boyle Heights, close to the City of Los Angeles, to handle affairs at Rancho San Jose. Within months, Tischler decided to divest himself of Rancho San Jose and sold the property to Phillips for $30,000. Phillips prospered at Rancho San Jose and, by most accounts, was well-liked as he paid his employees, did not take on debt, and was honest with his neighbors and workers. Phillips eventually began reaching out to other settlers in the nearby community of El Monte to form a town that eventually became Spadra. Phillips was married to El Monte settler Esther Blake in 1866 by Reverend Richard C. Fryer, another El Monte settler and the first Baptist minister in the region (Bracket 1920, p. 77-79; Driscoll 1950, p. 34; Shires 1967, pp. 3-4; Wheeler 1983).

In 1866, Phillips approached William Rubottom, another resident of El Monte, who was then operating an inn in Cucamonga (present day Rancho Cucamonga) about building an inn close to Rancho San Jose. Rubottom established a hotel and a stagecoach station along the Overland Stage's Los Angeles-San Bernardino Road, later the Butterfield Stage route. Rubottom had maintained a stage station in Cucamonga as well, but after moving to Spadra, Rubottom's stage station became the premier horse team-switching station in the area. In 1867, a post office was established and the new community was named "Spadra" for Spadra Bluffs in Arkansas, Rubottom's hometown (Exhibit 2). After the post office was established, other settlers came from El Monte including Reverend Richard C. Fryer and Caroline Fryer, Senator Alvan T. Currier, Charles Blake and his family, A.B. Caldwell, Susan Caldwell and their family, and George, John, and Jim Egan. Reverend Fryer went on to establish a Baptist ministry in Spadra in 1870 and became the first Baptist Church in the Pomona Valley (Brackett 1920, p. 79-80, 136; Driscoll 1950, p. 34-35; Plender 1970, p. 20-21; Shares 1967, p. 3; Wheeler 1983).

Exhibit 2. Exterior view of Rubottom Hotel and stagecoach station, ca. 1860.



Source: California Historical Society Collection, Digital Library, University of Southern California

In 1873, after Phillips was contracted for a right-of-way across his land, the Southern Pacific railroad began construction east from Los Angeles. Until mid-1875, Spadra was the eastern terminus of the Los Angeles line. Freight, machinery, and crops all had to transfer between rail and stagecoach in Spadra, and for the years between 1866 and 1876, Spadra saw increased economic activity. At the height of this activity, more families permanently moved to Spadra. In 1875, Louis Phillips began building two-story, brick, Second Empire-style Mansion on present day Pomona Boulevard. By 1876, the railroad had extended to the new town of Pomona (established in 1875), and then onward towards Colton. With the increase in railroad commerce, the stagecoach commerce, travel, and freighting dwindled. Spadra returned to agricultural production, primarily dealing with hay and alfalfa and selling horses through the late 1870s and 1880s. After the brief increase in economic activity in the mid-1870s, life at Spadra became more rural. The nearby town of Pomona, established in 1875, was quickly growing into a small metropolis, as the platted town allowed more growth than at Spadra, where town growth was limited by the large tracts of agricultural land owned by the prominent town families. Louis Phillips, who sold the land Pomona was developed on, is also credited as the Pomona town founder. Spadra's main street did not grow beyond its post office, a saloon, a hotel, three stores, two blacksmith shops, and the school (Exhibit 3). In the hills southeast of town, a limestone quarry crushed rocks for cement and mortar, though like the other industries in town, the quarry remained largely local (Brackett 1920, p. 114-115, 147; Plender 1970, 21-22, 24; Dorsey 1924, 20-23).

Exhibit 3. Map, Early Spadra 1837-1916



Source: California Special Collections, Pomona Public Library

During the 1880s the scale of economic activity began shifting entirely to Pomona, reversing the earlier trend where Spadra was considered primary and Pomona secondary. Established in Louis Phillips' sheep pasture, Pomona grew especially during the land boom years between 1882 and 1887 when thousands of lots were sold in Pomona. By 1886, the City of Pomona's population exceeded 5,000. In 1887, Pomona incorporated and displaced Spadra as the primary city in eastern Los Angeles County. Pomona's prominence in the local Pomona Valley was solidified when, in 1891, the Atchison, Topeka, and Santa Fe (ATSF) Railroad bypassed Spadra entirely in favor of having a depot in Pomona. All passenger trains on the Southern Pacific also routed through Pomona, instead of Spadra. (Plender 1970, p. 30; Shires 1967, p. 11-12).

In the 1890s, there was a brief resurgence of Spadra after the neighboring City of Pomona voted to become a dry town and adhere to the temperance movement's demands. However, that revival brought no permanent settlers or business (Piersol 1964, p. 25). According to most sources, Spadra ceased to grow after 1890. Children of the original settlers all, without exception, left Spadra when they came of age, though original settlers remained in Spadra until they died. Lifelong resident and schoolteacher J.M. Fryer wrote in the *Pomona Progress Bulletin* (Bracket 1920, p. 221; The Bulletin 1919a, p. 16):

> You see, years ago, as the people began to settle in this vicinity all of them had large families and the children attended the Spadra School. But when the children grew up, they scattered out into

> other places, leaving the old folks at home. None of them wanted to sell their land, for they think it is good enough for them, so there has been but little opportunity for families with children of school age to locate in this district during the more recent years.

Serious decline in Spadra continued until the town was left with less than 200 residents. The Baptist ministry established by Reverend Fryer in 1870 moved to the City of Pomona in the early twentieth century (Pomona Progress-Bulletin 1945, p. 1). In 1902, the Rubottom Hotel was demolished. In 1919, the City of Pomona successfully fought for the new state hospital, called the Pacific Colony, not to be located in the city due to a municipal water concern. The Pacific Colony for the mentally ill and incapacitated was instead pushed into Spadra, where it was established on 1,500 acres (The Bulletin 1919b, p. 6). Instead of stimulating the local economy or inviting growth, the Pacific Colony was designed to be self-sufficient and there was no substantial increase in Spadra's population. The same year, the Spadra School closed and the building was sold (Pomona Progress Bulletin 1920, p. 9). In 1926, the City of Pomona located their sanitation plant just outside of Spadra at Pomona's western edge. During the 1930s, there was little growth in Spadra, but conversely, the Pacific Colony expanded significantly during the Great Depression years, growing from 27 inmates in 1927 to 720 inmates by 1934. The institution was chronically over capacity until more expansions in the post-World War II years. The expansions, and multiple mass escapes of inmates, led to an increased feeling of crime and undesirability for Spadra (Fryer 1980, pp. 139-141; Lira 2015, pp. 49-51).

The 1950s were a period of intensive development for the City of Pomona, and Pomona began to view the sparsely-populated Spadra as a location for the City's less-desirable businesses, including industrial and manufacturing sites. Pomona attempted to relocate a local airport to Spadra. While this was unsuccessful, Pomona continued to try to expand west. By 1953, Pomona's western city border expanded further towards Pomona and several new housing subdivisions appeared in the former citrus groves between Mission Boulevard/Brea Canyon Road and Pomona Boulevard (NETR 2022b). Shortly after, the City of Pomona voted to dissolve the Spadra School district and absorb the schools and students into the Pomona School District. (Pomona Progress-Bulletin 1954, p. 6). In 1955, the Spadra post office was closed (Pomona Progress-Bulletin 1955, p. 13). In 1956, the Kellogg campus of California Polytechnic University, Pomona (Cal Poly Pomona) opened in northwest Spadra, relocated from its previous location in San Dimas, on lands leased from the Pacific Colony state hospital (later the Pacific State Hospital and Lanterman State Hospital) and inherited from the Kellogg estate. As the school expanded its campus, it also grew more and more towards the town center of Spadra (Chavez et al. 2016). In 1957, a large landfill for the City of Pomona was established over a 128-acre site in Spadra (Pomona Progress Bulletin 1958a, p. 17).

After several unsuccessful attempts in 1958 and again in 1960, Spadra was annexed to the City of Pomona in two portions. The first annexation included the area northwest of Pomona Boulevard strip and the second annexation took the railroad right of way and Spadra Cemetery area. At this time, there were only 140 registered voters in Spadra able to participate in the annexation vote (Exhibit 4) (Piersol 1964, p. 25; Pomona Progress-Bulletin 1960, p. 17; Pomona Progress-Bulletin 1961, p. 13).

Exhibit 4. Western Pomona Looking South-West Over Spadra, March 8, 1955, Photographer Robert C. Frampton; Spadra Cemetery and Elephant Hill in top left of photograph



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

After annexation, Spadra transitioned to the manufacturing and industrial district for the City of Pomona. In 1972, the Orange Freeway (present day SR 57) was dedicated, cutting from Interstate 10 south towards Orange County by way of Brea Canyon (Pomona Progress-Bulletin 1969, p. 1; 1972, p. 11). As a result of the highway construction and expansion of the City of Pomona, all but two of the original elements of Spadra have been destroyed. The remaining portions of Spadra include the Louis Phillips Mansion on Pomona Boulevard (the Alvan T. Currier House was moved to the same property in an attempt to preserve it) and the Spadra Cemetery, hidden south of the railroad and north of Elephant Hill. The Historical Society of Pomona Valley acquired the Phillips Mansion in 1966, and Spadra Cemetery in 1971. Since 1971, multiple community efforts have been made to protect these remaining properties from demolition (Daily News-Post 1972, p. 2; Historical Society of Pomona Valley 2022; Los Angeles Times 2002a, p. 3. Meare 2017).

6.6 Spadra Cemetery (1868-present)

Spadra Cemetery was formed just 2 years after the community was officially founded. In 1867, Louis Phillips deeded 250 acres to Reverend Richard C. Fryer, the Baptist minister who had administered his marriage. This transfer was a donation to Fryer's ministry and constituted the first Protestant cemetery in Pomona Valley. The very first burial at Spadra was that of Melinda Arnett, wife of Richard S. Arnett and matriarch of one of the many families that moved from El Monte to Spadra. She died in 1868, a year after the land for the cemetery was deeded. The Cemetery was laid out across 2.5 acres with 63 blocks or 922 total lots and a central circle. Though not officially designed by a known architect or landscape architect, the Spadra Cemetery adhered to the principles of a "Rural Cemetery," with an isolated location against Elephant Hill, picturesque setting, long-term shade plantings, and regular rectangular plots fitted to the oblong cemetery property. Major families in town all purchased family blocks in the Spadra Cemetery, including the Arnett, Blake, Bowers, Clark, Caldwell, Currier, Egan, Fryer, Greenwood, Hewets, Kepner,

Lilly, Middagh, Phillips, Rubottom, and Shrewsbury families. Others without family plots were also buried in the cemetery (Brackett 1920, p. 80; Spadra Cemetery Association 1948, pp. 1-24; Swank 1973, pp. 5-8).

Burials progressed normally for the decades following the cemetery's established. The diary of Kewen Dorsey, long-time Spadra resident and grandson of Uncle Billy Rubottom, dating from 1875 to 1892 records many of the burials in Spadra Cemetery. From the cemetery's initial dedication to the time the Spadra Cemetery Association assumed ownership in 1898, there were approximately 73 recorded burials and most of the prominent Spadra families buried some family members in their blocks.[2] Others were also interred at the cemetery, including townspeople buried without families or relations in state, an unnamed member of the Apache tribe, and dozens of infants or children. In 1898, the Spadra Cemetery Association was formed to control the cemetery affairs and install a caretaker position to care for and guard the cemetery. Only 25 blocks were actually in use by families at the time of this organization's incorporation, the remaining blocks were left unfilled (Exhibit 5) (Dorsey 1924, pp. 20-27; Historical Society of Pomona Valley 1973; Los Angeles Times 1898, p. 5; Spadra Cemetery Association 1948, 1971; Swank 1973, pp. 5-8).

Exhibit 5. Supplemental Map of Spadra Cemetery, 1898, drawn by W.H. and C.H. Sanders, civil engineers



Source: Spadra folders, Local Collections, Historical Society of Pomona Valley

[2] Several burials in the sources shared by Pomona Public Library and the Historical Society of Pomona Valley record internment at a given block and lot but lack the internment date and in some cases the name of the person who was buried. Though their block and lot are recorded, many of these entries are marked simply "child," "unknown," or "unknown baby."

In the twentieth century, there were fewer burials overall, and the Spadra Cemetery Association made no attempt to sell the unclaimed blocks to new families. According to cemetery records, until 1936, the cemetery was able to sustain itself with donations only, but after this date, charged $20 for “stockholders” and $25 for non-stockholders for the cost of a lot. As the town of Spadra declined, so too did the cemetery, with just seven burials in the 1940s, eleven in the 1950s and seven in the 1960s (Historical Society of Pomona Valley 1973; Spadra Cemetery Association 1948). Additionally, as burials declined, there was less income for the Spadra Cemetery Association to pay for the caretaker and the cemetery was subject to an increase in vandalism. Several particularly damaging vandalism events in 1937, 1948, and 1958 toppled or broke over 50 headstones (Pomona Progress Bulletin 1937, p. 3; Pomona Progress Bulletin 1948, p. 22; Pomona Progress Bulletin 1958b, p. 29). The final burial at Spadra Cemetery was John Bowers in February 1967, a full 100 years after the first burial at Spadra. As of the final burial, there were approximately 210 people interred at Spadra Cemetery (Exhibit 6) (Historical Society of Pomona Valley 1973; Swank 1973, pp. 5-8).

Exhibit 6. Spadra Cemetery near Pomona Boulevard, about 1964



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

In 1971, the Spadra Cemetery Association declared their intent to dissolve the organization due to lack of activity and inability to defend the cemetery from vandals. The cemetery was deeded to the Historical Society of Pomona Valley later the same year. Though vandalism continued under the new ownership, a preservation and maintenance program was also started by volunteers and the Historic Society in 1975 (McPhillips 1971, letter; McPhillips 1972, letter; Los Angeles County Recorder 1972; Pomona Progress-Bulletin 1971, p. 15; Pomona Progress-Bulletin 1975, p. 48; Pomona Progress Bulletin 1984, p. 298)

After the Historical Society of Pomona Valley assumed ownership, there were two more major events at Spadra Cemetery. In 1990, after decades of vandalism, the Historical Society of Pomona Valley began a preservation program to protect the remaining headstones at Spadra Cemetery. Vehicle damage, gun damage, theft, and general

vandalism had broken many of the tablet-style headstones and leaving them upright was no longer considered optimal for their preservation. The Historical Society hired Bill Beck to design a solution that would take remaining tablet-style headstone and some of the smaller block-style headstones, lay them flat, and encase them in concrete (Beck 1990, letter). In another attempt at protection, in 2000, Alice Page of the Historical Society of Pomona Valley nominated the Spadra Cemetery as a Designated Historic Landmark. The Landmark was accepted by City Council in October 2000 (City of Pomona 2000a, City of Pomona 2000b).

6.6.1 People of Significance Buried at Spadra Cemetery

Louis Phillips (April 22, 1829 – March 16, 1900)

Louis Phillips was born in Posen, Prussia on April 22, 1829. He emigrated to the United States with his older brother at the age of thirteen and lived in Louisiana. He worked in mercantile trade while living in Louisiana. In 1850, he relocated to California where he was a miner, then worked as a store owner in San Francisco. In 1853, he purchased land on the San Gabriel River and became a farmer. He arrived in Spadra in 1863 and eventually owned the 12,000-acre Rancho San Jose estate. He became the founder of the City of Pomona as well as one of the largest property owners in Los Angeles County at the time. He married Esther Blake, and together they had five children: Charles, Louis, George, Mrs. Frank George, and Kate Cecil. Esther Phillip's brothers, Charles and George, worked as merchants in the Phillip's business. Phillips died in Spadra on March 16, 1900 (San Francisco Call 1900, p. 25; Pomona Progress Bulletin 1900, p. 1; Shires 1967, p. 3-4; Wheeler 1983).

William "Uncle Billy" Rubottom (December 27, 1809 – October 13, 1885)

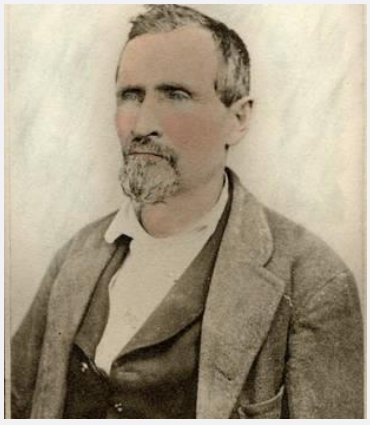


Exhibit 7. William "Uncle Billy" Rubottom (Portrait Photographs Collection, Pomona Public Library)

William Rubottom, known as "Uncle Billy," was born on December 27, 1809, in Wayne County, Missouri (Exhibit 7). In 1852, William and his father Ezekiel Rubottom migrated to California from Arkansas, settling in Willow Grove, part of present-day El Monte. In the 1860s, William moved to present-day Rancho Cucamonga, where he constructed and operated an inn along the San Bernardino Road, before he relocated to the Spadra area in 1866 where he established another hotel there and a stagecoach station. The area was known as "Rubottom's" because the main attraction was the Rubottom Hotel. His daughter-in-law, Susan Glenn, moved to Spadra in the 1860s, and her hospitality and cooking contributed to the success of the Rubottom Hotel. Other settlers arrived in Rubottom's due to its proximity to the stagecoach route through Spadra. After a post office was built in 1870, "Rubottom's" was renamed Spadra after Rubottom's home in Arkansas, Spadra Bluffs. Rubottom became the first postmaster and is credited as the founder of Spadra. His daughter, Civility Rubottom Dorsey, married Captain Hilliard Pierce Dorsey. Mr. Dorsey founded the first Worship Master of Los Angeles Lodge No. 42, Free and Accepted Mason in 1854. They had a son, Kewen Dorsey, who became a beloved citizen of Spadra, and wrote a series of diaries about his life in Spadra. Rubottom murdered his son-in-law Dorsey after Dorsey attacked him and raised his grandson Kewen. William spent his last years with Kewen before his death on October 13, 1885, in Spadra. Rubottom's personality was a component in remembering

his role in the town, not only for embodying the self-starting spirit of the early American era, but also its violence. Rubottom was accused of having murdered someone at knifepoint in Spadra Bluffs, Arkansas, and was known for having stopped the hanging of Dona Maria Merced Rain in Cucamonga (Blackstock 2005; Brackett 1920, p. 79, 80, 87; Dorsey 1970, p. 19; Driscoll 1950, p. 35-36; Historical Society of Pomona Valley ND, p. 1; Pomona Progress Bulletin 1935, p. 12).

Richard C. Fryer (January 31, 1821 – December 8, 1888)



Exhibit 8. Richard C. Fryer (Historical Society of Pomona Valley)

Reverend Richard C. Fryer was born in Alabama on January 31, 1821 (Exhibit 8). He relocated to Arkansas before migrating to El Monte, California in 1852 to farm. Fryer became the first Baptist minister in Southern California after starting a church out of his house. He was one of the early settlers of Spadra as of 1867, after Louis Phillips gifted him 250 acres for his Baptist ministry due in part to Fryer having officiated Phillips' marriage to Esther Blake in 1866. Fryer held church services first in his home, then at the Spadra School House until 1883, when services were moved to Pomona to the First Baptist Church. Reverend Fryer also served as a member of the State Assembly. He lived in Spadra until 1887 when he relocated to Los Angeles, where he died on December 8, 1888 (Brackett 1920, p. 80; Pomona Progress Bulletin 1945, p. 1; California Genealogy 2022; Find a Grave 2022; Fryer 1980, pp. 139-155).

Alvan T. Currier (April 30, 1840 – August 13, 1921)

Alvan T. Currier was born in Franklin County, Maine on April 30, 1840. He migrated to California and settled in Spadra. He was a rancher, owning a 2,400-acre ranch, the second largest ranch in the area next to Louis Phillips. Currier was a philanthropist and the director of First National Bank of Pomona. He helped construct the YMCA and First Baptist Church in Pomona. In 1898 he was elected State Senator for the Republican Party. He married Susan R. Glenn Rubottom Currier, daughter of Uncle Billy Rubottom. On August 13, 1921, Alvan died in Los Angeles. His residence was relocated to Louis Phillip's property in 2002 for restoration (Los Angeles Times 2002b, p. 2; Brackett 1920, p. 148, 212-213).

6.6.2 Property Type: Rural Cemetery

The "Rural Cemetery" typology is defined in *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Places* (NPS Bulletin 41), as drawing from romantic and picturesque notions of garden and landscape design in the mid-nineteenth century to create cemeteries that were separate from the churchyard models of the colonial and early settlement periods. These "Rural Cemetery" types typically featured manicured lawns, border plantings, shade trees, and irregular plot arrangements, incorporating plantings and natural topography, and focusing on circulation and pathways to guide visitor experience. The style has roots in European gardening and landscape design from the 1840s though 1880s that were guided by the work of landscape architects such as Lancelot "Capability" Brown,

William Kent, or John Claudius Loudon. The "rural" movement applied not only to cemeteries, but also to formal gardens, public and private parks, and parkways and scenic routes (NPS 1992, p. 5-6).

In *NPS Bulletin 41*, the National Park Service (NPS) provides registration requirements and definitions for cemetery properties ordinarily that are not considered eligible for inclusion in the National Register of Historic Places unless they meet special requirements. *NPS Bulletin 41* establishes thresholds of significance for the four National Register criteria, which must be met in addition to the Criteria Considerations in order for a cemetery or burial place to be eligible for listed in the NRHP.

Criterion A. *NPS Bulletin 41* clearly states that to be eligible under Criterion A, the burial place must me associated with a "clearly important" event or trend and that the connection must be "unmistakable." The bulletin gives several examples of cemeteries representing important events or trends in their given community or cultural history (NPS 1992, p. 9).

There are many ways in which a cemetery might represent an important aspect of a community's or a culture's history through association with a specific event or by representing broader patterns of attitudes or behavior. Cemeteries may be significant for their association with a community's initial settlement or early history, or a broader region's exploration or settlement. Cemeteries may also be significant for associations with specific events as well as long-term trends, such as political shifts, battles, or deaths of state leaders. By virtue of being a cemetery and relatively unchanged, or instance, a cemetery might be able to convey the proper context and integrity of a battleground, when no other location with high integrity may remain. Cemeteries are also often the last available location associated with a historic event, so when there is no other property or location that can convey a historical event, such as a fire, slave rebellion, mining accident or earthquake, the burial grounds where survivors of that event are interred may be used in substitute (NPS 1992, p. 9-10).

Cemeteries and burial places may also be related to the history of mortuary practices in general, such as the transition from crowded churchyards to more romantic or idyllic park-like settings, or the popularization of cremation in the nineteenth and early twentieth centuries (NPS 1992, p. 10-11).

Criterion B is focused on the person or group with which the burial place is associated must be of "outstanding importance" to the community, State, or nation. Cemeteries, as well as individual graves, may be eligible under Criterion B. Examples include cemeteries that contain the graves of numerous persons who made outstanding contributions to the history of the State or area in which their graves are located (NPS 1992, p. 11). The key component here is to strive for that "outstanding importance" character, and that there should be either a person of overwhelming importance or an overwhelming number of important individuals buried in a cemetery.

Criterion C has more to do with the craftsmanship of the gravestones or tombs themselves and/or the overall design of cemetery (if designed at all), than the people buried there or the historical circumstances of the cemeteries. As with residences, religious buildings, education buildings, or commercial buildings, there is a variety of monument styles, patterns, iconography, materials and craftsman practices that may be present in a cemetery. Under Criterion C, grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleum), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication. Alternatively, such property types may represent the work of master artists or craftspeople or possess the highest artistic distinction. In addition to "architecture," appropriate areas of significance would include art or landscape design (NPS 1992, pp. 12-13).

Criterion D Burial places can be eligible for their potential to yield information about cultural and ethnic groups. Under Criterion D, the common requirements are that the property have information to contribute and the contributed information is considered important. Whether information yielded is important or not is often determined by research design or a set of research questions. Though Criterion D commonly applies to archaeological research, study of burials and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

In additional to needing to be eligible under one of the four criteria for evaluation, cemeteries and burial places also must meet the requirements of Criteria Considerations. The relevant Criteria Considerations are:

> Criterion Consideration A, a religious property, "if it derives its primary significance from architectural or artistic distinction or historical importance;
>
> Criterion Consideration C, "a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life"; and
>
> Criterion Consideration D, "a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events" (NPS 1992, p. 33).

California guidance for the assessment of historic cemeteries defers to NPS guidance for eligibility and does not offer its own, specific criterion considerations.

Though there are several Criterion Considerations relevant to cemeteries, Criterion Consideration D is the most applicable here. Criterion Consideration D explains (NPS 1992, p. 16),

> A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events. As collective burial places, cemeteries are the focus of many individual expressions commemorating family members and spiritual beliefs. In and of itself, this characteristic does not qualify a burial place for listing in the National Register. However, when a burying ground is of sufficient age and scope to represent more, such as patterns of early settlement or the values of a society generally, National Register Criteria Consideration D provides for its eligibility. Cemeteries nominated for the importance of the information they may impart may be eligible for listing without application of Criteria Consideration D.
>
> To be considered a person of transcendent importance, an individual would have to meet the same test as that for a grave. To qualify for its age, a cemetery must date from an early period within its geographic and cultural context. The age of a burial place might be considered early relative to the period for which we have information about human activity, or relative to the exploration, settlement, and development of an area by a particular group. As with any other type of property, a cemetery may be eligible for the quality of design represented in its funerary art, construction or engineering techniques, landscape architecture, or other values recognized under National Register Criterion C. Likewise, under Criterion A, a cemetery may possess significant associations with historic events, including general events that reflect important broad patterns in our history.

To be considered under Criterion Consideration D, a cemetery must already be eligible under NRHP Criteria A, B, or C, and be:

- A historic cemetery containing the graves of a number of persons of outstanding importance – those whose activities determined the course of events in local, State, or national history; or those whose activities were especially important in reflecting significant cultural currents of the time.
- A cemetery possessing important historic associations from a community's early period of settlement, or which reflects important aspects of community history.
- A cemetery that embodies the principles of an aesthetic movement or tradition of design and monumentation through its overall plan and landscaping, its grave markers and funerary sculpture, or its buildings and structures.
- A cemetery that is associated through its burials with a single important historical event such as a pivotal military battle.
- A cemetery that embodies the folkways, burial customs, or artistic traditions of an ethnic or cultural group whose impact on the community or region was significant but is not well documented in other resources. (NPS 1992, pp. 16-17)

Integrity is the final threshold for finding cemeteries eligible for the NRHP. According to *NPS Bulletin 41*, all aspects of integrity are considered for NRHP eligibility: location, design, setting, materials, workmanship, feeling, and association. A cemetery property must have all aspects of integrity; however, they must have those aspects of integrity necessary to convey significance under the NRHP Criteria they are eligible under. So, location, setting, feeling, and association are essential to those properties nominated under Criterion A and B, while design, materials and workmanship are essential under Criterion C. This section also gives instruction for nominating cemeteries that may have expanded over time, or have non-historic elements included due to burials made outside of the period of significance. In some cases, where there is extreme age or rarity of resource, more allowances can be made for alterations, damage or loss of historic features (NPS 1992, pp. 18-19).

Of note, there are special instructions given for improvements to the cemetery property, particularly to beautification efforts by well-meaning caretakers or lot owners. "Improvements" affect historic integrity. Replacement of historical components with modern features, such as exchanging original headstones, replacing fencing or wall materials, adding elaborate monuments or statuary, and in some cases, making elaborate planting plan changes all reduce integrity and diminish the authentic historic character of the cemetery. In order to a evaluate the impact of such improvements, the features which are crucial components of historic character must be clearly defined and prioritized for preservation (NPS 1992, p. 19).

6.7 Old Brea Road (1933-1973)

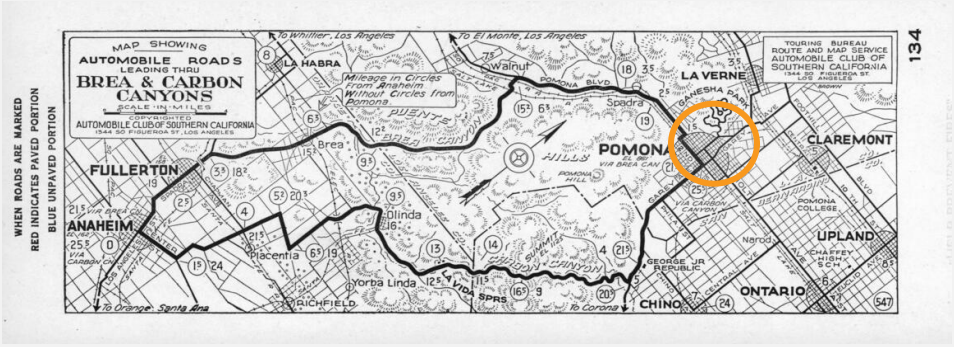
The road known today as Brea Canyon Road was initially comprised of several regional roads that were utilized as a contiguous public thoroughfare between the areas surrounding the cities of Spadra and Anaheim. A route between Spadra and Anaheim was designated beginning in 1873, when plans for a dirt road was announced through Brea Canyon (Los Angeles Herald 1873, p. 2). Brea Canyon Road, since at least 1873 has been a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. Before that time, stagecoach travelers would have to traverse the Puente Hills through the Whittier Narrows or

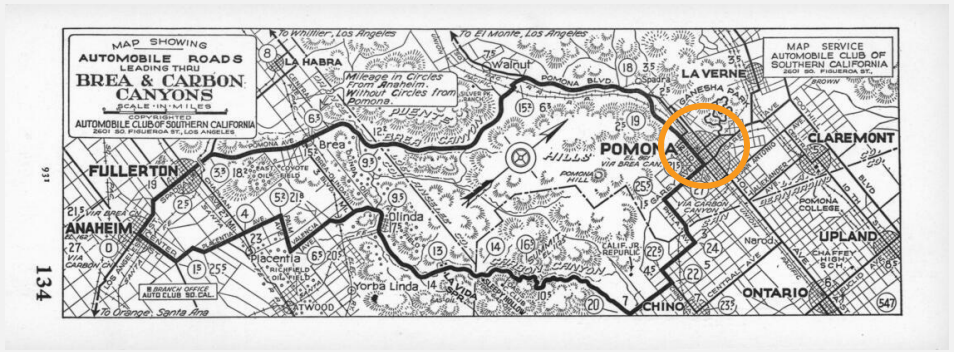
travel through Los Angeles and cross the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

Paving efforts began along sections of the roadway in the early 1910s. The first was between 1911 and 1912 with the improvement of the section of the road located in Los Angeles County. A 3.80-mile section of the road located in Orange County was improved in 1912 (Santa Ana Daily Register 1911, p.4; 1912, p.3). The *Santa Ana Daily Register* reported in 1912 that the nature of the improvements in Orange County would consist of the original, narrow dirt roads being widened to a standardized 20- to 24-foot width, which were then surfaced with an oil macadam pavement material (Santa Ana Daily Register 1912, p. 3).

In the 1920s, the County of Los Angeles implemented additional improvements to the section of the Brea Canyon Road within its own county jurisdiction. The section of the improved Brea Canyon Road lead from the western outskirts of Pomona along Pomona Boulevard, through Spadra, then south along Brea Canyon, skirting past the town of Walnut in Los Angeles County before terminating north of Brea at the Los Angeles County limit (See Exhibit 9, top) (Los Angeles Times 1923, p. 124). The upgraded 6-mile roadway was 20 feet wide on straightaway sections and 24 feet wide on curved sections to allow for consistent driving speed along the length of the roadway. The 6- to 8-inch-thick concrete roadway was installed over either native soil or a bed of decomposed granite. Construction of the road was overseen by the Road Commissioner of Los Angeles County, George W. Jones, and the engineer of construction, A.B. Boyd (Los Angeles Times 1923, p. 124). In 1930, 650 Arizona Ash, Casuarina, and Chinese Elm trees were planted along the shoulders of the Brea Canyon Road (Pomona Progress Bulletin 1930, p. 5).

Exhibit 9. Above – 1923 Map showing Automobile Roads leading through Brea and Carbon Canyon
Below – 1931 Map showing the same route, now following Mission Boulevard, south of Elephant Hill.





Source: Automobile Club of Southern California collection, 1892-1963, Digital Libraries, University of Southern California

The segment of road that intersects the proposed Project site includes a position of 5th Avenue and Mission Boulevard in Pomona then southwest to the road segment within the proposed Project site, before rejoining the existing segment south towards Brea Canyon, that was initially graded and paved following a bid for construction opened by the State of California in 1932 (See Exhibit 9, bottom) (Pomona Progress Bulletin 1932, p. 11). The extension was intended as the first section of a proposed 5th Avenue highway that would connect the City of Pomona to the City of Los Angeles by establishing connections between existing roadways including the Brea Canyon Road (Pomona Progress Bulletin 1933, p. 9). The Griffith Company, contractors (Exhibit 10), won the contract and were responsible for the construction of the extension, running through the hills east of Pomona towards the existing Brea Canyon Road. The *Pomona Progress Bulletin* reported in February 1933 that, "In the top of Elephant Hill there is now a huge gap thru which the highway will pass. More blasting and much grading remains to be done there before the route is ready for the concrete (Pomona Progress Bulletin 1933, p. 9)." This extension eventually became a recognized portion of the Brea Canyon Road. Following the completion of the 5th Avenue extension, the Brea Canyon Road became a recognized section of the state highway system.

Exhibit 10. Photograph of the Griffith Company stamp, still visible along Brea Canyon Road extant segment today (April 2022)



Source: IMG_7803

By 1955, planning for the La Brea Freeway (also known as the Orange Freeway) was in progress, which was intended to streamline travel between Orange and Los Angeles Counties (Los Angeles Times 1955, p.13). This freeway, renamed State Route 57 (SR 57) as part of the state-wide renumbering of California Highways that took place in 1964, follows the route of the original Brea Canyon Road (California Highways 2021). By 1972, SR 57 (the Orange Freeway) was complete. It connected Pomona and San Dimas and provided an interchange with Interstate 10 allowing travel to Orange County through Brea Canyon (Pomona Progress-Bulletin 1972, p. 11). The Orange Freeway supplanted the original Brea Canyon Road and rendered many sections of the connective roadway redundant in the decades following the Orange Freeway's construction. The segment of Brea Canyon Road between Temple Avenue and Mission Boulevard that intersects the proposed Project site was officially

abandoned in 1973 following the passage of California Highway Commission Resolution A 398, which found that the section of "…superseded highway is no longer necessary for State Highway purposes." (Division of Highways 1973, p. 86-7). In the years following the road abandonment, several residential subdivisions were constructed adjacent to the Brea Canyon Road segment near the proposed Project site, and only a few remaining artifacts of the road are still present (NETR 2022b; UCSB 2022).

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7 Results of Identification and Evaluation Efforts

7.1 Archaeological Survey Results

VCS Environmental conducted a survey of all accessible portions of the proposed Project site and Dudek's supplemental pedestrian survey was limited to the Archaeological Study Area. Careful attention was given by Dudek archaeologists to barren ground including at the base of trees, within paths/dirt roads, and any subsurface soils exposed by burrowing animals. Ground surface within the Archaeological Study Area was variable and as such in areas of dense ground coverage, surface scrapes were occasionally implemented, when necessary, to enhance detection of archaeological materials that may have been obscured on the surface.

At the time the Dudek pedestrian survey was conducted, the Archaeological Study Area was entirely undeveloped. Exposed soils in barren areas and under vegetation accounted for approximately 30% of the survey area and provided very good to excellent ground surface visibility (80% to 100%). The remaining 70% of the Archaeological Study Area was covered in tall annual grasses and provided none to fairground surface visibility (0% to 40%). However, grasses were mowed within 50% of this area which ultimately provided very good to excellent ground surface visibility (80% to 100%). No historic or prehistoric resources were observed during the course of either the VCS Environmental or Dudek's surveys. Evidence of disturbance and/or alteration of the landscape includes grading activities, ephemeral roads near the Spadra cemetery, and periodic modern trash deposits and transient encampments.

7.2 Ground Penetrating Radar Survey Results

As mentioned in the methods section, GPR transects were walked both within and outside the fenced cemetery boundary. A total of 272 transects were walked to cover the survey area (Figure A). Transects were recorded within the cemetery to help observe the type of responses the burials in this area would produce, in order to facilitate identification of potential burials outside the fence. Gaps between GPR transects result from the presence of trees, fences, large debris, and other obstacles that were unable to be moved. Test transects were also recorded over and adjacent to some of the known grave sites where headstones are present.

Figures A through K illustrate the results of the GPR survey completed at the Spadra Cemetery. Figures B through E show slice imagery at depths of 0.3 to 0.4 meters, 0.6 to 0.7 meters, 0.9 to 1.0 meter, and 2.0 to 2.1 meters. A variety of locations with GPR anomalies are marked on each image, lettered A through M. Locations A, B, C, E, F, G, H, I, J, and K are located within the Spadra Cemetery boundary delineated by the chain link fence and coinciding with official cemetery maps (Figure B). Locations D, L and M are located outside the formal Spadra Cemetery boundary (Figure B). Following is a summary of findings for each location.

Location A: the anomalies remain strong down to a depth of about 2 meters, after which they fade out. Radargrams for this location (Figure F) show the concrete encasements from 7 to 11 meters and 12.5 to 15 meters. At 13 meters, there is one large, strong hyperbolic response below the depth of the concrete, clearly indicating one burial. The expected paired burial to this did not produce a clear response in the radargram (which was expected to be at about 14 meters), suggesting that if two people are buried here, they are close enough together that only one response was

produced. The other two burial locations (between 7 and 11 meters) produced short, horizontal, linear responses, not the expected hyperbolae. Although different responses, it is clear that two burials, are located here, as expected.

Location B: the anomaly begins to fade closer to the surface (Figure C) and is nearly absent by 2 meters (Figure E). Throughout all depth slices up to 2 meters, this location shows a rectangular feature of consistent size. Radargrams that cross this location show disturbed area below the concrete encasement extending to a depth of 1.9 meters (Figure G; position 7 to 9 meters). Here the radargram also shows short, generally horizontal, linear responses similar to Figure F, which penetrate into the substratum, which naturally occurs at a depth of approximately 1.55 meters.

Location C: this location shows a similar anomaly to Location B in slice imagery (Figures B and C) indicating a possible burial location with concrete marker that has been covered by soil. However, in the radargrams (Figure H; position 26 to 28 meters) only a near surface horizontal anomaly is visible, which disappears after about 0.7 meters below the ground surface, which coincides with the deeper slice images (Figure C). The lack of evidence of a burial shaft or hyperbolic anomaly below the surface feature indicates a burial is not located here. The horizontal anomaly may result from a fallen headstone or buried concrete marker that is obscured.

Location D: a large, strong anomaly is present near the surface (Figure B) but absent after that (Figure D). This location coincides with the drop in elevation along the existing access road, and likely represents a soil type and compaction change, given overall size of the anomaly and its location. Radargrams here also lack hyperbolic or other subsurface anomalies indicative of discrete features.

Location E: this anomaly is a linear feature with each end marked (Figure B). This feature extends from the center of the cemetery to the west towards a concrete drainage basin, indicating the potential presence of a drainage pipe.

Location F: this location shows a single, strong anomaly near the surface (Figure B), which then quickly fades. Multiple small anomalies reappear here at lower depths (Figure C), which become larger and stronger with depth (Figures D and E). These features then disappear by 2.5 meters. Multiple other anomalies are present near Location F which follow a similar pattern. Radargrams which intersect Feature F (Figure I; position 65.4 meters) indicates a cluster of anomalies from the surface down to a depth of about 1.5 meters. It is not clear as to the cause of the anomalies here, but there is undoubtedly something present. The response in the radargrams here do not match the hyperbolae or horizontal linear responses seen at Locations A and B. It is possible that a burial could be present at Feature F or at the other anomalies near Feature F. Ground truthing through subsurface excavation would likely be necessary to confirm what is in this area.

Location G: this location shows a similar pattern to Location F but grows in size, grows in size and strength to about 3 meters, then slowly fades by a depth of 4 meters. One of the radargrams that intersect Location G clearly hit a metal object near the surface causing a “ringing” response here (Figure J; position 68.5 meters). This obscures the data below the metal object and gives the appearance of a deep object, but there is not. The radargram here shows an indication that another object is located about 0.75 meters below the surface immediately adjacent to the metal, but due to the ringing, it is not possible to determine the likely origin of it.

Locations H and I: Other near surface features visible in slice imagery that are generally the size and shape expected of graves and burial shafts, such as Locations H and I, are only present near the surface (Figure C) and are generally absent below that depth. Location I appears similar to Location C in the radargrams, and likely has the same origin. These do not appear to be burials.

Locations J and K: Radargrams for Locations J and K indicate metal objects are located near the surface in both locations, as multiple large "ringing" responses are present. The metal object at Location J is shown in Figure K (position 21.0 meters; note: Feature E is visible in that radargram at position 23.0 meters). Numerous other metal objects are present throughout the survey area, particularly at the south end, including at location L. Location L appears to be another linear object, but in fact is a series of metal objects that all produced ringing responses that blend into one another, giving the appearance of a linear object in slice views.

Location M: this anomaly is consistent with a linear object, similar to Location E, which runs perpendicular to Location L. This is likely a buried utility or similar type of object.

Other anomalies, mostly small, are present throughout the survey area. Many are likely tree roots, as they are strongest and largest next to trees. No other anomalies were observed that were similar to the graves observed at Location A (neither short, horizontal linear anomalies, nor the strong hyperbola at depth). Nor were there anomalies that show other characteristics often observed with graves (such as evidence of grave shafts) or other cultural features such as hearths or house floors. As a result, the GPR survey did not identify any unmarked graves or other cultural features in the survey area, with the exception of possible graves in the area around Location F.

Throughout the radargrams a clear stratigraphic change is present, typically around 1.0 to 1.5 meters below the ground surface. The substratum here is likely be clay or predominantly clay as no responses in the GPR data were received from this stratum.

7.3 Built Environment Results

7.3.1 Spadra Cemetery

One previously identified resource was identified within the Built Environment Study Area and adjacent to the proposed Project site: the Spadra Cemetery. Spadra Cemetery was originally established in 1868 and hosted its final burial in 1967. It is a City of Pomona Designated Historic Landmark and was approved on October 16, 2000 (City of Pomona 2000a, 2000b). The Landmark application was completed by hand (not typed) and is two pages in length. The applicant, Alice Page, checked boxes that the cemetery was eligible for local landmark because it:

- Reflects special elements of the City's cultural, economic, political, architectural, or natural history;
- is identified with important events/person, local, state, federal;
- is the work of a noted architect, builder, designer or person;
- is a unique location, view, vista, or physical characteristics; and
- has significant architectural, structural design, or craftsmanship.

In the "Historical Attributes" section, Page writes that Spadra Cemetery is the "First cemetery in the Pomona Valley. It is the burial site of many members of the early prominent families of Pomona Valley." No more detail or justification was available in the City Council meeting minutes, landmark application prepared by Page, or other sources.

The landmark nomination does not list character-defining features of the cemetery and as such, the viewshed of Elephant Hill was not explicitly discussed. While the construction of the SR 57 to the west and Union Pacific Railroad tracks right-of-way to the north has diminished large portions of the cemetery's surrounding setting,

the view of Elephant Hill to the north is the only undeveloped viewshed from Spadra Cemetery since its establishment in 1868. Elephant Hill visually continues to read as an 1860s undeveloped early rural California hillside. The undeveloped viewshed contributes to the historical setting and feeling of the cemetery and its ability to convey its significance as an 1860s rural cemetery. The viewshed of Elephant Hill from the cemetery, unchanged for over 150 years, can thus be considered a character-defining feature and a "view representing an established and familiarly visual feature" of Pomona under criterion 6.

Spadra Cemetery has not been formally evaluated against National Register or California Register criteria before. Dudek evaluated the Spadra Cemetery under National and California Register criteria in order to fully assess potential impacts under CEQA. This report recommends that Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. It also recommends Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Spadra Cemetery also met the conditions of Criteria Considerations C and D. Below, a description of the property and evaluation under National and California Register criteria is presented.

Description

Spadra Cemetery, originally established in 1868, encompasses a 2.35-acre roughly triangular shaped property tapering towards the northeastern end, situated at the base of Elephant Hill, east of SR 57, and south of the Union Pacific railroad tracks and the industrial/manufacturing district located along Pomona Boulevard. Though the north and southwest boundaries have had extensive construction, improvements, and setting changes over time, the boundary line against Elephant Hill to the east remains completely unchanged as Elephant Hill has remained undeveloped since the founding of the cemetery.

The original layout of the cemetery is intact, with 63 blocks arranged in a north-south-east west grid, slightly offset from the actual property boundary lines, and one circle with a sign in the center near the southwestern edge of the property. There are some blocks with curbing and between the block curbs are pedestrian pathways further reinforcing the grid pattern throughout the cemetery. Though there is a road that leads up to the entrance along the southwestern edge, there are no roads through the cemetery itself. Signage in the cemetery is also limited to a single upright metal sign with no discernible lettering remaining in the center of the circle. Outside of the cemetery property there is an access road from Pomona Boulevard which is gated, but that gate and the signage on it dates to the 2000s.

Though there are no buildings present at Spadra Cemetery, there are several intact gravestone markers as well as damaged markers which have been laid flat and preserved in place in a concrete block. A considerable number of markers have been damaged or lost; however, given the age of the cemetery and multiple conditions, including changes in ownership and lack of on-site security, the loss of these markers does not diminish the significance of the Spadra Cemetery to a degree that it no longer retains integrity (see evaluation below). Markers were made of a variety of materials with the earlier markers tending to be slimmer limestone or marble and later markers tending to be granite. Flat markers and upright markers consist of a mix of types, including:

- A pedestal style monument with an obelisk and vaulted top
- A pedestal style monument with a column

- Block style monuments with flat tops
- Block style monuments with segmental arch
- Block style monuments with beveled tops
- Block style monuments flush with the ground surface
- Block style monuments with a slanted surface, usually close to the ground surface
- Tablet style monuments with flat tops
- Tablet style monuments with rounded tops
- Tablet style monuments with gabled tops
- Tablet style monuments with segmental arch tops
- Tablet style monuments with highboy (segmented arch with ornate ears)tops

Nearly all markers, with few exceptions (flush block style markers, or more ornate pieces), had bases. Bases were wider and thicker that the markers themselves and were both smooth and rusticated types. Most markers appear to be attached to these bases with metal pins, though others are simply fitted into a socket and cemented into place. In places where no marker could be found, the base was present and in good condition. There were at least two more ornate monuments in the cemetery. One was the marker for Ursula Ponedel Meyer, placed in 1935, which was a large, granite, block style monument with a heavy rusticated base with a stylized carving of a Native American with braids on horseback, with the caption "End of the trail." Meyer's monument art was modeled on the famous bronze sculpture created by James Earle Fraser for the Panama-Pacific International Exposition in 1915 of the same subject and title. The other is the Phillips family monument which is an elaborate block-style granite monument on a double base, featuring corners carved to rounded, engaged columns and a hipped roof,

No fencing is present around the headstones or blocks themselves, only curbs. Curbs tended to be of two types: curbs with rounded coping, and curbs with rusticated and edged coping. All curbs appear to have completely closed the block area, not leaving any openings by design. Some curbs were damaged and portions were missing. Finally, while there have been a few modern plantings of succulents and agave, the cemetery retains many of its historical plantings, consisting of pepper trees and canyon live oaks, many of which appear in the earliest aerials from 1928, and relatively younger oaks which appear to have been planted around the property boundary circa 1938.

Exhibits 11 through 18 below show overviews of the cemetery and examples of key cemetery components. A complete documentation of markers, intact, damaged, or otherwise, can be found in Appendix C: Cemetery Inventory. A map of all the intact and broken markers can be viewed in Figure 3, Cemetery Inventory.

Exhibit 11. Overview of Spadra Cemetery from the entrance fence, looking northeast



Source: (IMG_3278)

Exhibit 12. Overview of cemetery from northeast side, looking southwest.



Source: (IMG_7837)

Exhibit 13. Overview of Cemetery from approximate center looking southwest, towards proposed project site



Source: (IMG_3334)

Exhibit 14. Overview of Cemetery from western edge of curbing, looking northeast



Source: (IMG_3618)

Exhibit 15. Example of a "good condition" monument: intact, upright headstone (Ursula P. Meyer)



Source: (IMG_3474)

Exhibit 16. Example of a fair condition monument: headstones laid flat and encased on concrete; in background, examples of poor condition monuments where there was only a base.



Source: (IMG_3521)

Exhibit 17. Example: roundabout feature with rounded curb and metal sign post (sign missing), looking northeast



Source: (IMG_3608)

Exhibit 18. Example: showing typical footpath widths and curbing, looking southwest



Source: (IMG_3622)

National Register of Historic Places/California Register of Historical Resources Statement of Significance

As a City of Pomona Designated Historic Landmark, the Spadra Cemetery is already considered a historical resource under CEQA. However, Spadra Cemetery has not been formally evaluated against National Register or California Register criteria before and what follows is an evaluation of the cemetery against these criteria. This evaluation relies on the property type analysis and thresholds of significance established in the *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Places*. Findings in this section do not undo or delegitimize the local City of Pomona Designated Historic Landmark listing.

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. There are only two remaining, extant historical resources in the former town of Spadra: Spadra Cemetery (est. 1868) and the Phillips Mansion (built 1873). All other original homes, farms, fields, businesses and buildings or structures have been demolished. Under Criterion A/1, Spadra Cemetery has a period of significance which spans from its establishment in 1868 after the death of Melinda Arnett, wife of Richard S. Arnett and member of one of the earliest families to come to Spadra from nearby El Monte; to 1967 which marks the final burial at Spadra Cemetery, which was for John A. Bowers. Spadra Cemetery is sited on approximately 2.35 acres of land, part of the 250 acres Louis Phillips set aside for Reverend Richard C. Fryer, a Baptist minister and one of the earliest settlers of Pomona along with the Rubottom and Arnett families.

As discussed above in the historical context, Spadra was one of the earliest communities established in the American period in this region, located along important stage and rail routes, and had a brief but important impact as the eastern extent of the County of Los Angeles, before Spadra was incorporated into the City of Pomona. Archival research indicates that Spadra Cemetery is the last remaining property in the former town of Spadra that can be understood as representative of the community as a whole. The only other resource remaining in the area related to Spadra is the mansion of Spadra's town founder Louis Phillips, built in 1873, and is not directly associated with the founding of the town so much as it is associated with the brief period of Spadra as a major economic shipping and trade location with arrival of the Southern Pacific Railroad between 1873 and 1874. Therefore, the Spadra Cemetery is directly related to the clearly important event: the establishment and earliest history of Spadra and is eligible because it is the last available location that can be associated with this historical event, all of which are registration requirements for cemeteries as outlined in *NPS Bulletin 41* (NPS 1992, p. 9-10). It was the first Protestant cemetery in Pomona Valley. Spadra Cemetery was a key community component of Reverend Richard C. Fryer's Baptist ministry in Spadra, but the cemetery was used as a final resting place for any non-Catholic and resident of Spadra. Typically, local pioneer cemeteries of this era rejected non-Catholics. Though there has been damage to and theft of headstones at Spadra Cemetery, both Melinda Arnett, the first burial, and John Bowers, the last burial headstones are still present and in relatively undamaged states at the cemetery.

The cemetery also retains adequate integrity to convey significance under Criteria A/1: location, feeling, association and setting. This is discussed in full in the "Integrity" section below.

Therefore, because of (1) its clear association with the founding and early history of Spadra, (2) its position as the last remaining example of a property that can convey that historical significance, and (3) its high degree of those

aspects of integrity that are necessary to convey its historical significance, Spadra Cemetery is recommended eligible for the National Register under Criterion A and California Register under Criterion 1 at the local level, with a period of significance spanning 1868 to 1967.

Criterion B/2: That are associated with the lives of persons significant in our past.

Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Except for Phillips, these important figures have no other extant location which could convey their historical importance. To be found eligible under Criterion B/2 the property has to be directly tied to an important person *and* the place where that individual conducted or produced the work for which he or she is known. *NPS Bulletin 41* allows for special consideration under Criterion B/2 if the burial place is associated with someone of "outstanding importance" to the community, state, or nation and that the burial place contains the graves of numerous persons who made outstanding contributions to the history of the state or area in which their graves are located (NPS 1992 p. 11). Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier are individuals interred at the Spadra Cemetery who are of "outstanding importance."

William "Uncle Billy" Rubottom was the first person to be invited to reside in Spadra by Phillips. Spadra is named for Rubottom's hometown, Spadra Bluffs, Arkansas. Rubottom opened the first stage station and hotel in Spadra, which was a critical stop along the Los Angeles-San Bernardino Road and the Butterfield Stage Route. Intermittent stage stations were important along such routes so that stages could water and rest horses or switch them out after a particularly strenuous journey. Rubottom also served intermittently as the postmaster for Spadra and is of obvious outstanding local importance to Spadra. There are no extant sites associated with Rubottom in California or Arkansas which can convey his significance – only the cemetery remains. Rubottom's hotel was demolished in 1902, and his home was demolished in the 1950s. Prior to his participation in the founding of Spadra, Rubottom owned the Sycamore Inn in present-day Rancho Cucamonga, burned down and was rebuilt as a Craftsman style mansion in 1920 and no longer retains physical historical association with Rubottom's period of ownership.

Reverend Richard C. Fryer is responsible for establishing Spadra Cemetery as the first Protestant Cemetery in Pomona Valley as part of his Baptist ministry. Fryer was instrumental in convincing other El Monte residents to relocate to Spadra, after Phillips brought Fryer over by gifting him a significant acreage for his ministry. Fryer's church services were held first in his home, then at the Spadra School House after 1870, and no actual church was established in Spadra. In 1883, just a few years before his death, the Baptist congregation moved to Pomona when the First Baptist Church at Fourth and Park was opened, though Fryer remained in Spadra until just a few months before his death. The congregation later moved again, and the First Baptist Church building in Pomona was demolished in 1957. Fryer's Spadra home was also demolished, like many of Spadra's buildings, in the 1950s. The Spadra School House was demolished in 1920. Therefore, there is no property, other than Spadra Cemetery, remaining that can convey the historical importance of Reverend Fryer and his role in establishing the community.

Alvan T. Currier was another early settler of Spadra; a locally important landowner second in acreage only to Louis Phillips; trustee to various local banks, churches and schools; Los Angeles county sheriff; and state senator. He is of outstanding importance locally and at the state level. Currier married Susan Rubottom Glenn, daughter of "Uncle Billy" Rubottom. One building in Spadra was associated with Currier. The Currier house was moved to the Phillips Mansion property in an effort to preserve it from demolition in the early 2000s, but in doing so, the location and setting of the Currier House were diminished to the extent that the property no longer conveys its historical

significance. Other buildings associated with Currier, such as the Currier Block in downtown Los Angeles have been demolished and were not associated with the productive life of Alvan T. Currier, but with businesses or people who inhabited them. Currier partially funded the construction of buildings such as the First Bank of Pomona building, but his participation in the funding of this building is not associated with his productive life. Finally, while some of Currier's important achievements may have been conducted at the State Capitol building in Sacramento during his time as a state senator, Currier's more substantial and long term important achievements during the productive years of his life took place in Spadra while he served as the sheriff and as a trustee for local businesses.

One important person interred at the cemetery has other locations which could potentially convey historical significance better than Spadra Cemetery. Louis R. Phillips was the founder and earliest American settler of Spadra and is also attributed as the town founder of City of Pomona since he sold the land Pomona was platted on to land developers. Phillips's donations and land sales to residents of El Monte attracted people to Spadra. Phillips held many important positions in the town as well as the county, including postmaster and county supervisor, in addition to at one time being one of the richest men in Los Angeles County. Phillips, his spouse Esther Blake, and their extended family and children are all interred at Spadra Cemetery. He is of obvious outstanding importance locally. The Phillips Mansion, the only other remaining historic site in Spadra, could potentially convey Phillips' historical significance better than Spadra Cemetery.

As demonstrated above, the Spadra Cemetery maintains a high degree of historical association with at least four early Spadra citizens who were of exceptional local importance and is the only extant historical property which can convey their significance. All four of these exceptionally locally important figures were interred at Spadra Cemetery during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 2 at the local level, with a period of significance spanning 1868 to 1967.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Spadra Cemetery is a Rural Cemetery property type, originally established in 1868 for the first burial and platted immediately afterwards. According to the significance thresholds as defined in *NPS Bulletin 41* under Criterion C for this property type, grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleums), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication (NPS 1992, pp. 12-13). Though the Spadra Cemetery is a unique and well-preserved historical location with obvious historical associations both to the founding and early years of Spadra as well as to historical figures of outstanding importance, the physical monuments at Spadra Cemetery are typical tablet or block style monuments that were common during the late nineteenth and early twentieth centuries. No particularly excellent examples of workmanship or design were present, and most of the monuments were plain or had very simple floral, freemason, or religious imagery, all of which remain common in the twenty-first century. None of the monuments at Spadra Cemetery of themselves appeared to be excellent, undamaged representatives of their stylistic type.

One monument, that of Ella Belle "Ursula" Ponedel Meyer, was of note. Meyer's 1935 monument is large, granite, block style monument with particularly artistic, stylized WPA-style carving of a Native American with braids on horseback, with the caption "End of the trail." This monument design and its title, a Native American on horseback in bas relief, are copies of a plaster relief of a similar subject done by artist James Earle Fraser for the Panama-

Pacific International Exposition in 1915 (Blackstock 2014). Though an artful rendering, the version on Meyer's headstone is derivative of the original pieces and is not representative of a master artist or a good example of a grave-associated artwork.

One craftsperson and headstone maker, a "J. Miller" from Los Angeles, crafted at least two headstones in Spadra Cemetery for the Rubottom family in the 1870s; however, archival research did not uncover any details about Miller or his business, and therefore he cannot be elevated to the level of master craftsperson.

The Spadra Cemetery property does not meet the thresholds for significance under National Register Criterion C or California Register Criterion 3 as established in *NPS Bulletin 41* for cemeteries or burial places. It does not appear to be a good representation of the "Rural Cemetery" type, does not appear to have good representations of any stylistic type, period, methods of construction, or fabrication for its headstones, nor does it have any monuments which could represent the work of master craftspeople, or possess high artistic distinction. Therefore, the Spadra Cemetery property does not appear eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

Though Criterion D/4 commonly applies to archaeological research, study of burials and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

A CHRIS database records search, NAHC SLF search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an archaeological resources assessment for this Project. No archaeological resources were identified within the proposed Project site as a result of these efforts. However, as previously mentioned Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra (reasoning for this finding is further explained in the determination for criterion D/2). Additionally, GPR survey results reveal the potential for unmarked graves to exist within the Spadra Cemetery property. These unmarked graves have potential to reveal information about the historic period and the community of Spadra that is not yet known.

As demonstrated above, the Spadra Cemetery has the potential to yield information important to history in both the study of individuals known to be interred within the cemetery but also those possibly interred. Information yet to be revealed has the potential to illuminate yet unknown information about the town of Spadra during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 4 at the local level, with a period of significance spanning 1868 to 1967.

Criteria Considerations

As a cemetery property type, Spadra Cemetery must qualify as eligible under one of the four standard criteria for significance as well as at least one criteria consideration. As demonstrated above, Spadra Cemetery is eligible under National Register Criteria A and B and California Register Criteria 1 and 2 at the local level, with

a period of significance spanning 1868 to 1967. There are at least four Criteria Considerations which may be applied to cemeteries:

A a religious property deriving primary significance from architectural or artistic distinction or historical importance;

B a building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;

C a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life;

D a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events;

Of these, Criterion Consideration C and Criterion Consideration D to apply to Spadra Cemetery, as it (A) is not a religious property that derives significance from its historical importance or architectural distinction, and (B) Spadra Cemetery remains in its original location and hosts no moved graves that were uncovered during archival research.

As discussed above in National Register Criteria B and California Register Criteria 2, Spadra Cemetery contains (Criteria Consideration C) at least three graves of historical figures of outstanding importance where there is no other extant location which can be directly associated with his or her productive life: Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier. These people meet the threshold for exceptional importance at the local level and there are no buildings still in existence associated with their productive lives. A complete discussion of each person is included above.

As discussed above National Register Criteria A and B and California Register Criteria 1 and 2, Spadra Cemetery also (Criteria Consideration D) derives its primary significance from graves of persons of transcendent local importance (Louis Phillips, Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier), from its age (established 1868, exceptionally early for its geographical context), and from association with historic events (the founding and early years of Spadra). Because Spadra Cemetery is an early Los Angeles County community's cemetery and is associated both with that first year after a post office was officially established as well as the town founders and leaders, Spadra Cemetery meets the thresholds for this Criteria Considerations.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45).

To be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. The Spadra Cemetery also retains adequate integrity to convey significance under Criteria A/1: location, setting, design, feeling, and association, strengthened especially by it being the last remaining such site that can be associated with the town's founding.

The cemetery retains its original **location**, sited on the 2.35-acre property established by Reverend R.C. Fryer on land gifted to him to begin his Baptist ministry in Spadra. The cemetery location and boundary remain unchanged since the cemetery's establishment in 1868. It has not been expanded or reduced in size.

Spadra Cemetery retains a degree of its original **setting** as well because of the natural feature of Elephant Hill, which dominates the view of the cemetery and forms a natural southeastern boundary. The ATSF (now Union Pacific and Metrolink) Railroad along the northern boundary was established in the 1880s and falls within the period of significance. The cemetery's integrity of setting is diminished along the southwestern boundary, as SR 57 (completed in 1972) constitutes a visual and constant audible intrusion into the cemetery and replaced the smaller road present along this boundary during the period of significance.

The cemetery retains its integrity of **design** as the original block and lots system appear to have persisted, despite dozens of vandalism event and damage in the mid and late twentieth century; however, integrity of **workmanship** and **materials** are diminished by the vandalism events as well as diminished by the preservation strategy of preserving damaged headstones in the ground in cement, rather than preserving them upright in their original configurations. A high degree of material and workmanship integrity are not required under National Register Criterion A or B or California Register Criterion 1 or 2 to be considered eligible.

Spadra Cemetery is able to adequately convey the **feeling** of a nineteenth century, small Rural Cemetery established for one specific town, through its boundaries, the original layout of the block and lot system, dozens of original plantings, and secluded setting against the completely undeveloped backdrop of Elephant Hill.

Finally, Spadra Cemetery retains its historical **association** with the specific historical event for which it is significant: the founding and early years of Spadra. Spadra Cemetery had a clear role in the town founding and subsequent years where town amenities such as businesses, a post office, a rail depot, the first church, and the cemetery were established, but before the 1873-1875 economic boom associated with the years that Spadra served as the terminus of the Southern Pacific Railroad line, before it extended to Pomona and on to the City of Colton. This historical association is especially strengthened by the cemetery's role as the last remaining property that can be associated with the town's founding.

Therefore, the Spadra Cemetery retains adequate integrity to convey significance under National Register Criteria A and B and California Register Criteria 1 and 2.

7.3.2 Brea Canyon Road segment

To determine if the proposed Project will impact historical resources under CEQA, properties and built environment features over 45 years of age within the Built Environment Study Area were identified. Only one resource was previously unrecorded: The segment of Brea Canyon Road . The segment of Brea Canyon Road is described below and evaluated for historical significance and integrity in consideration of NRHP and CRHR designation criteria, City of Pomona Designated Historic Landmark criteria, and integrity requirements. The segment of Brea Canyon Road does not meet any of the criteria for listing in the NRHP or CRHR, either individually or as part of an existing historic district, or as a local landmark, as demonstrated below. As such, The segment of Brea Canyon Road cannot be considered a historical resource under CEQA.

Description

A segment of Brea Canyon Road is within the proposed Project site. Brea Canyon Road is a former Los Angeles County Road that extended from City of Pomona to City of Brea (now in Orange County) via Brea Canyon. A route through this area has existed since as early as 1873; however, the route that follows present-day Mission Boulevard in the Built Environment Study Area before rejoining the original 1873 route south of Spadra was constructed in 1933 by Griffith Contracting Company. Much of the 1933 road material through the segment in the Built

Environment Study Area is destroyed or heavily altered. Only two strips of pavement remain and much of that is damaged. Paved sections are also only a single lane in width, when the original 1933 roadbed was at least two lanes in width (Exhibits 19, 20). Two through-cut[3] features also existed to facilitate the route through Elephant Hill, both of which have been altered significantly and the southern faces of these features were demolished to accommodate residential housing developments in the 1980s and the mid-2000s (Exhibit 21). The entire surveyed segment was 1,678 feet or 0.32 miles in length. The primary construction material is a smooth-surfaced concrete, rather than coarser aggregate asphalt. Extant portions of pavement are limited to single lanes, roughly eight (8) feet in width. On one location, just southwest of the Sorrento Drive crossing, there is a contractor stamp which reads "Griffith Company Contractors, June 3, 1933, Station 452+60" (Exhibit 22).

[3] A "through-cut" refers to when a linear feature, such as a road or railroad, cuts into a hill slope where there is a cut slope on both sides of the linear feature. Through-cuts may be employed when engineering a grade around the outer edge of a ridge or slope is not possible.

Exhibit 19. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking west



Source: (IMG_7798)

Exhibit 20. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking northeast



Source: (IMG_7796)

Exhibit 21. View of eastern through-cut, looking east. Left portion is original, while right portion has been partially demolished by residential development



Source: IMG_3295

Exhibit 22. View of contractor stamp, looking west



Source: IMG_7804

National Register of Historic Places/California Register of Historical Resources Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Archival research indicates that a stage route and later an automobile route has been located in Brea Canyon since as early as 1873, but the road segment within the Built Environment Study Area which will be partially demolished by project activities dates to 1933, when the road shifted from its original alignment along Pomona Boulevard south to Mission Boulevard, before rejoining the original road route towards Orange County. The earliest versions of the road from the nineteenth century would have been placed in the canyon out of necessity, as the route would have provided safe, level passage for stage coaches and horses, despite being located along a seasonal creek which often damaged the road. The route along Mission Boulevard, cutting south of Elephant Hill, represents a deviation from the original route and cannot be considered part of that 1873 road segment's historical context. The segment of Brea Canyon Road was an early twentieth century inter-city route, one of many maintained by Los Angeles County. The 1933 route along Mission Boulevard was part of a Los Angeles County Roads Department (i.e. Public Works) initiative to pave and maintain longer routes between major cities, such as Pomona and Brea.

In order to convey significance for an association with early twentieth century inter-city routes, the road must have sufficient integrity, which the segment of Brea Canyon Road does not. From its bisection by the Orange Freeway in the late 1960s, to the county's abandonment of the section within the proposed Project site in 1973, to the construction of nearby residential developments which partially destroyed the remaining alignment in the 1990s and again in the 2000s, the Brea Canyon Road segment in the proposed Project site lacks sufficient integrity of location, setting, design, feeling and association necessary to convey significance under National Register Criterion A or California Register Criterion 1. The road segment in the proposed Project site does not adhere to the original alignment of Brea Canyon Road, and no longer serves as a road since the 1973 abandonment, losing all of its historical association with the County Roads Department and the historical trend of inter-city roadwork in the 1930s.

Further, archival research did not uncover any specific events that happened at this segment of Brea Canyon Road. The road does not appear to have had a demonstrable impact on the surrounding communities of Spadra or Pomona. Research also did not uncover a relationship between The segment of Brea Canyon Road and the expansion of residential subdivisions in Pomona from the 1940s through the 1990s. Therefore, the property does not appear eligible under National Register Criterion A and California Register Criterion 1.

Criterion B/2: That are associated with the lives of persons significant in our past.

To be found eligible under National Register Criterion B and California Register Criterion 2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research indicates The segment of Brea Canyon Road is not directly associated with any specific persons known to be historically important figures at the national, state, or local level. Further, The segment of Brea Canyon Road is a County Roads Department project that represents the collective efforts of many people who worked on the road and it is not known to be a place where any historically significant person or group of people conducted or produce work for which they are known. Due to a lack of identified significant associations with important persons in history, the Brea Canyon Road segment in the Built Environment Study Area is recommended ineligible under National Register Criterion B or California Register Criterion 2.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

In order for linear resources such as roads to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a modern traveler could no longer experience the historical route as intended.

Brea Canyon Road was first designated in 1873, however the segment of Brea Canyon Road in the Built Environment Study Area was a new route designated in 1933 by Los Angeles County Roads Department, and represents a deviation from the original 1873 alignment, which would have followed Pomona Boulevard west from Pomona, then turned southwest at Spadra to follow the San Jose Creek, before finally entering Brea Canyon to traverse the Puente Hills.

The segment of the 1933 road in the Built Environment Study Area is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the Built Environment Study Area cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads.

The segment of Brea Canyon Road was originally constructed in 1933 by Griffith Company Contractors and officially abandoned in 1973 by the County. The road appears to have been a narrow, two-lane route, and constructed of concrete. It is in a depleted state and few materials of the original road remain along this 1,678-foot-long road segment, other than the original alignment. No novel construction methods appear to have been used to create the road, both concrete paving and through-cuts are typical of road construction and engineering for this period. So little of the original materials and workmanship remain that it cannot be called a good example of any specific road type, period or method of construction. A County Roads Department employee would have designed the road, rather than a named engineer or architect and the road segment cannot be considered to be the work of a master architect or engineer. Griffith Company contractors do not appear to have been master builders, and the remains of the segment of Brea Canyon Road cannot be considered representative of their work. The road also does not possess high artistic value. The last component of Criterion C/3, representing a significant and distinguishable entity whose components may lack individual distinction, is typically applicable to districts. The segment of Brea Canyon Road does not appear likely to contribute to a potential historic district, due to the lack of a cohesive grouping of intact properties in the area. Therefore, The segment of Brea Canyon Road does not appear eligible under National Register Criterion C and California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

National Register Criterion D and California Register Criterion 4 generally apply to archaeological resources but may apply to a built environment resource in instances where a resource may contain valuable information about such topics as construction techniques or human activity. The segment of Brea Canyon Road is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic road construction methods, materials, or technologies.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45). As the segment of Brea Canyon Road does not meet any of the required significance Criteria, a discussion of integrity is not required.

City of Pomona Designated Historic Landmark Statement of Significance

In addition to evaluating The segment of Brea Canyon Road against NRHP and CRHR criteria, the City of Pomona has their own criteria to evaluate local landmarks.

1. It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

As discussed above in Criteria A/1 and C/3, The segment of Brea Canyon Road cannot be considered to exemplify or reflect special element of the City of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

2. It is identified with persons or events significant in local, state, or national history;

As discussed above in Criteria B/2, The segment of Brea Canyon Road is not identified with persons or events significant in local, state, or national history. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 2.

3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

As discussed above in Criteria C/3, The segment of Brea Canyon Road does not embody distinctive characteristics of a style, type, period, or method of construction due to its lack of remaining material and impacts to the original road design and cannot be considered a valuable example of the use of indigenous materials or craftsmanship. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

4. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping

of properties which contribute to each other and are unified aesthetically by plan or physical development;

As discussed above in Criteria A/1, The segment of Brea Canyon Road does not contribute to the significance of a geographically definable concentration of historic or scenic properties, or any historic district or area. The road also does not belong to a thematically related group of interrelated or otherwise similar properties that are unified aesthetically, such as a thematic historic district of roads, and in addition, archival research did not identify such a thematic group. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 4.

5. It is the work of a notable builder, designer, landscape designer or architect;

As discussed above in Criteria C/3, The segment of Brea Canyon Road was designed by an unnamed Los Angeles County Roads Department engineer and constructed by Griffith Company Contractors in 1933. No evidence was found to indicate these entities rise to the level of a "notable builder, designer, landscape designer or architect." Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 5.

6. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;

While the segment of Brea Canyon Road is located in an undeveloped area, with a view towards northeast Elephant Hill and northwest to the campus of Cal Poly Pomona, the road segment does not constitute a unique location or a view "representing an established and familiar" overview of the community. A better example of such a view or vista overlooking the city or the Cal Poly Pomona campus might be the summit of Elephant Hill, which has remained an undeveloped, natural space during all the periods of Spadra and Pomona's growth. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 6.

7. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;

As discussed above in Criteria C/3, the segment of Brea Canyon Road lacks many aspects of integrity, including the original design, materials and workmanship, which have deteriorated since the road's abandonment in 1973. Additionally, the materials and elements of design which remain intact are neither a significant structural achievement nor innovative for the period of construction. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 7.

8. It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;

As discussed above in City of Pomona Criteria 4, the segment of Brea Canyon Road does not appear to be part of a thematically or visually unified historic district, or similar to other distinctive properties based on a historical or architectural motif. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 8.

9. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or

Brea Canyon Road as a whole may have been representative of a significant geographic pattern associated with transportation routes which has been present in its route since at least 1873: a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. During this period, stagecoach travelers would otherwise have to traverse the Puente Hills through the Whittier Narrows or circumvent them entirely by traveling south through Los Angeles and crossing the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

In order for linear resources such as roads, to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a modern traveler could no longer experience the historical route as intended. The segment of the 1933 road in the proposed Project site is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road section that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the proposed Project site cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads. As such, the Brea Canyon Road segment in the proposed Project site does not appear eligible under City of Pomona Landmark Criteria 9.

10. It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

The segment of Brea Canyon Road may not be considered one of the “few remaining examples” of an architectural or historical type in the City of Pomona, as the segment of Brea Canyon Road no longer possesses identifying or distinguishing characteristics of a given architectural or structural type, other than that of a road. Therefore, the segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 10.

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8 CEQA Impacts Analysis

8.1 Archaeological

Proposed ground disturbance includes significant grading and terracing of the hillside area northeast of the valley floor where the Development Area is proposed; minimal cut grading as well as significant fill grading within the valley floor; construction of 228 residential dwelling units, with 68 single-family units and 160 multi-family units; and associated utility installation, landscaping, and paving. The proposed ground disturbance is anticipated to extend up to 130 feet below current ground surface within focused areas of the hillside portions of the proposed Project site and no more than 20 feet below current ground surface within focused portions of the valley floor for removal and recompaction of undocumented artificial fill. Since significant fill soil is proposed to be deposited from the hillside portions to the current valley floor resulting in a total fill thickness of approximately 155 feet, no ground disturbance within native soils is expected to occur within a large portion of the Development Area proposed for building construction, utility, and retaining wall installation, landscaping and paving. Geotechnical studies have documented the prosed Project site Development Area as contain up to 10 feet of fill soils (LGC Geotechnical, Inc. 2020).

Considering the cultural sensitivity of the general area, documented by archival documents and resources located within and surrounding the proposed Project site and the presence of potentially intact native soils, the potential for unknown prehistoric and historic archaeological resources to exist within the proposed Project Development Area or within areas proposed for habitat restoration is possible. A CHRIS database records search, NAHC SLF search, background research, including a review of a geotechnical report, and both an archaeological pedestrian survey and ground penetrating radar survey were conducted as part of two archaeological resources assessments for this project. No archaeological resources were identified within the proposed Project Development Area or within areas proposed for habitat restoration as a result of these efforts.

As stated in CEQA Guidelines Section 15064.5(b)(1), a project causing a substantial adverse change in the significance of an historical resource is one that could result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, such that the significance of an historical resource would be materially impaired (i.e., altering those physical characteristics that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources as determined by a lead agency [the City of Pomona] for purposes of CEQA; or its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code).

No known significant archaeological resources, as defined by CEQA Section 15064.5, exist within the proposed Project Development Area or within areas proposed for habitat restoration. However, based on the identification of archaeological resources of both a prehistoric and historic nature located within and surrounding the general proposed Project site and the presence of potentially intact native soils, the potential for proposed disturbances to impact unknown prehistoric and historic archaeological resources is possible. If yet unknown archaeological resources, possessing the characteristics outlined in CEQA as significant, exist and are inadvertently encountered during implementation of the Project, there is potential for a substantial adverse change in the significance of an historical resource to occur. Measures included in the Section 10 have been recommended to ensure that the potential for impacts to unknown archaeological resources during proposed ground disturbing construction activities would be appropriately addressed consistent with CEQA and City of Pomona requirements and guidelines

with respect to archaeological resources. Implementation of these measures would ensure that archaeological resources encountered inadvertently are treated properly and in accordance with CEQA resulting in less than significant impacts to archaeological resources.

8.2 Built Environment

The segment of Brea Canyon Road was found to be ineligible under all national, state, and local criteria and cannot be considered a historical resource under CEQA. Properties and sites that are not considered historical resources under CEQA do not merit further consideration of potential impacts. One property was identified adjacent to the proposed Project site that is a qualified historical resource under CEQA: the Spadra Cemetery.

The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that conveys its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance. Such impacts are called substantial adverse changes. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired (PRC § 5020.1(q)). Demolition and destruction are examples of the most visible significant impacts; however, changes, alterations and relocation of historical resources may also be considered substantial adverse change.

8.2.1 Summary of Property Significance

As a City of Pomona Designated Historic Landmark, the Spadra Cemetery is already considered a historical resource under CEQA. According to the original application, Spadra Cemetery met the following local criteria:

- (1) Reflects special elements of the City's cultural, economic, political, architectural, or natural history;
- (2) is identified with important events/person, local, state, federal;
- (5) is the work of a noted architect, builder, designer or person;
- (6) is a unique location, view, vista, or physical characteristics; and
- (7) has significant architectural, structural design, or craftsmanship.

Additionally, as a result of this study, Spadra Cemetery is recommended individually eligible for the National Register under Criterion A and California Register under Criterion 1 at the local level, with a period of significance spanning 1868 to 1967 for its association with the founding and early history of Spadra. The Spadra Cemetery is also recommended individually eligible for the National Register under Criterion B and California Register under Criterion 2 for its association with exceptionally important, local historical figures: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier.

8.2.2 Physical Impacts of the Proposed Project

Spadra Cemetery is an approximately 2.35-acre property which lies adjacent to the northwestern edge of the proposed Project site and the Development Area, and is potentially subject to:

1. indirect impacts to the character-defining features of the Spadra Cemetery as a result of changes to the original, undeveloped setting of Elephant Hill in full view of the cemetery

2. direct impacts to individual headstones as a result of vibration from the blasting, substantial grading, earthmoving, fill, and construction activities planned along the Cemetery boundary.

Should the proposed Project be implemented, the excavation of Elephant Hill and the construction of modern houses and terrace walls, in full view of the cemetery, may result in substantial adverse changes to Spadra Cemetery's setting, which is an aspect of integrity which conveys the historical significance under Criteria A/1 and B/2. Changes would include a visual impact to the only viewshed from the cemetery which has remained unchanged and undeveloped since the cemetery's establishment in 1868.

The undeveloped viewshed of Elephant Hill contributes to the historical setting, feeling, and association of the cemetery and contributes to its ability convey its significance as an 1860s rural cemetery. The viewshed of Elephant Hill, unchanged for over 150 years, can thus be considered a character-defining feature and a "view or vista representing an established and familiarly visual feature" of Pomona under Criterion 6. The proposed Project would diminish the cemetery's integrity of setting, feeling, and association by changing the grade of Elephant Hill and adding incompatible vegetation that alters the appearance of the undeveloped hillside thus eliminating Spadra Cemetery's last remining historical viewshed from the time of its establishment in 1868. This viewshed contributes to the cemetery's eligibility as a historical resource under City of Pomona criterion 6.

The Project proposes changes to the topography of Elephant Hill, including the excavation of the top portion of the western face of the hill and extending and terracing of the lower portion of the hill. Terracing would involve the construction of 25 foot tall mechanically stabilized earth walls which would be visible from the cemetery. Exhibit 23 below provides a visual simulation of the viewshed from the southeastern-most corner of Spadra Cemetery and how it would be altered, as well as adequately showing the proximity of project grading and proposed landscaping which would come directly up to the southeastern boundary of Spadra Cemetery, with no buffer space proposed. The mechanically stabilized earth terrace walls, landscaping elements and trees, and some of the new housing located on top of the terraces would be visible from portions of the cemetery. The mature tree canopy of trees extant in the cemetery may obscure some of these impacts from view. Exhibit 24 shows the approximate viewshed of the proposed Project from Spadra Cemetery.

Exhibit 23. Existing Conditions (above) View from southeast corner of Cemetery Property – within fence; (below) Same view with visual simulation of proposed project





Source: Dudek 2022. Aesthetics technical report.

Exhibit 24. Aerial image showing the location of Spadra Cemetery, the proposed project, and the approximate viewshed of the project from Spadra Cemetery. The red arrow indicates the location of the visual simulations in Exhibit 23.



Source: Dudek 2022.

The second potential impact of the proposed Project are impacts from construction-related vibration. While excavation and grading will fall outside the property boundary of Spadra Cemetery and should not have any physical impact on headstones or come within the Spadra Cemetery parcel boundary, it is possible that blasting activities on the western face of Elephant Hill and soil compaction techniques to grade terraces may result in vibration-related impacts to fragile headstones, such as causing upright headstone to fall and causing fractures or cracks in headstones or curbs. The likelihood of vibration-related impacts is small, but still a possibility as heavy equipment operation and soil compaction will take place right up to the cemetery boundary.

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9 Analysis of Potential Adverse Changes: Spadra Cemetery

The proposed Project activities were analyzed in consideration of the substantial adverse change examples provided in CEQA Guidelines Section 15064.5(b). Below is a discussion of the adverse changes that may result from the proposed project on City of Pomona Designated Historic Landmark and proposed National Register/ California Register eligible site: Spadra Cemetery.

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

Potential adverse change. The integrity of setting for the Spadra Cemetery has been diminished since the period of significance by due to the changes caused new road construction; however, the relatively unaltered southeast boundary of Spadra Cemetery is a key visual component of the resource's integrity of setting, which conveys its significance under California Register Criteria 1 and 2. The cemetery's integrity of setting is diminished along the southwestern boundary, as SR 57 (completed in 1972) constitutes a visual and constant audible intrusion into the cemetery and replaced the smaller road present along this boundary during the period of significance from 1868 to 1967. Due to the current diminished setting, maintaining or losing integrity of setting will not have an impact on Spadra Cemetery's ability to convey its historical significance and intrinsic association with prominent historical figures. The proposed Project has the potential to demolish or materially alter the headstones of the cemetery through construction-related vibration impacts. Such changes would result in an adverse change to the physical characteristics of the historical resources, namely the materials, design, and workmanship of the cemetery, that convey its historical significance. Therefore, the proposed Project has the potential to cause a significant adverse change to Spadra Cemetery.

2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant;

Significant adverse change. Changes to the setting of Spadra Cemetery are proposed for this Project. Under City of Pomona Designated Historic Landmark criteria, Spadra Cemetery is, in part, significant because of its unique viewshed or vista. Although the landmark nomination for Spadra Cemetery from 2000 does not list specific character-defining features, it does suggest that because of its unique location and views of Elephant Hill, the undeveloped setting of the cemetery is an important physical characteristic. While the construction of the State SR 57 to the west and Union Pacific Railroad tracks right-of-way to the south has diminished large portions of the cemetery's surrounding setting, the view of Elephant Hill to the north is the only undeveloped viewshed from Spadra Cemetery since its establishment in 1868. Elephant Hill visually continues to read as an 1860s undeveloped early rural California hillside. The undeveloped viewshed contributes to the historical setting, association, and feeling of the cemetery and contributes to its ability convey its significance as an 1860s rural cemetery. The viewshed of

Elephant Hill, unchanged for over 150 years, can thus be considered a character-defining feature and also represents a "view or vista representing an established and familiarly visual feature" of Pomona under Criterion 6. The Project proposes changing the grading of Elephant Hill and adding incompatible vegetation that would diminish Elephant Hill's original appearance as a rural California hillside. Changes to the view from Spadra Cemetery will adversely affect the resource's ability to convey significance under local criterion 6. Therefore, the proposed Project will cause a significant adverse change to Spadra Cemetery by diminishing a physical characteristic that accounts for its inclusion in a local register.

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Potential adverse change. City of Pomona is the lead agency for the purposes of CEQA. On behalf of the City of Pomona, Dudek found the Spadra Cemetery to be eligible for inclusion on the California Register. Changes to the view from Spadra Cemetery will diminish the resource's ability to convey significance. The proposed Project has the potential to demolish or materially alter the headstones of the cemetery through construction-related vibration impacts. Such changes would result in an adverse change to the physical characteristics of the historical resources, namely the materials, design, and workmanship of the cemetery, which convey its historical significance. Therefore, the proposed Project has the potential to cause a significant adverse change to Spadra Cemetery.

10 Recommendations

California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources. The following recommendations are based on this framework.

Archaeological Resources Mitigation

Prior to commencement of construction activities for all phases of project implementation, the project applicant/owner/developer should retain a qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology and who has experience and is knowledgeable in the prehistoric and historic nature of the Pomona Valley as well as the history of the ancestral tribes geographically connected to the project site. Additionally, the term "Consulting Tribe/s" used throughout the following mitigation language is defined pursuant to PRC 21080.3.1 as California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site that may have expertise concerning their tribal cultural resources AND have requested and participated in formal AB 52 consultation for the project, which was closed on October 16th, 2023.

The selected qualified archaeological principal investigator would be retained to implement the following mitigation measures:

MM CUL-1 Impacts to cultural resources must be minimized through implementation of pre- and post-construction tasks. The Project proponent shall retain a qualified archaeological principal investigator (PI), who meets the Secretary of the Interior's (SOI) Professional Qualification Standards for archaeology, to assess information available (final grading and construction plans, geotechnical testing results, as-built plans, etc.), to determine the depth at which native soils exist and would be impacted by Project implementation, and to develop a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan). The purpose of the Plan is to outline a program of monitoring as well as treatment in the case of an inadvertent discovery of cultural resources during ground-disturbing activities. The Plan will identify the types of ground-disturbing activities that require monitoring, including, but not limited to, preconstruction site mobilization and testing, grubbing, removal of soils for remediation, construction grading, trenching, and other forms of excavation and the soil and sediment types that require monitoring. The Plan will require that both an archaeological monitor and Native American monitor be retained, and the Plan shall identify the responsibilities and authorities of these monitors, including their authority to stop or divert work if cultural resources are identified and to install temporary barriers to prevent impacts to such discoveries until treatment of the resource is concluded. This Plan should define the process to be followed for the identification and management of cultural resources in the Project area during construction. The plan will include a general discussion of the types of methods the archaeologist and Native American monitors would implement in the event of a discovery (e.g., types of excavation units, artifact analysis methods), as site specific methods and levels of effort depend on the type and size of site that is discovered. Existence of and importance of adherence to this Plan should be stated on all Project site plans intended for use by those conducting the ground disturbing activities. The Plan will also include the conditions under which Native American and archaeological monitoring is required pursuant to MM-CUL-3.

MM CUL-2 Prior to commencement of any construction activity for the Project, the Project proponent shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City for review and approval. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of cultural materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, tribal cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor, tribal monitor, and archaeologist retained for the Project..

MM CUL-3 A qualified archaeological monitor, working under the direction of the principal investigator (PI) that meets the Secretary of the Interior's Professional Qualification Standards, and a Native American monitor shall be present during initial ground disturbance. Initial ground disturbance is defined as initial construction-related earthmoving of sediments from their place of deposition. As it pertains to cultural resource (archaeological or Native American) monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current Project-related construction. The project proponent, construction manager, and other personnel responsible for ground-disturbing activities are required to coordinate with the PI, archaeological monitor, and Native American monitor to ensure a monitor is on site when initial ground-disturbance occurs. The project proponent, construction manager, and other personnel responsible for ground-disturbing activities will provide a minimum of 48 hours' notice to the PI and Native American monitor prior to ground disturbing activities to ensure monitors are properly scheduled. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance causing monitoring to be hindered by the distance (more than 200 feet apart) of the simultaneous activities. The PI shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) during initial ground disturbance based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.

In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop and the PI must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. If the PI determines that the find is not significant (e.g., if it is an isolated artifact), the PI and archaeological monitor may simply record the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as preparation and implementation of avoidance measures, significance testing, and/or data recovery may be warranted. Significance testing methods will be determined at the time of the discovery, as the methods depend on the type of site discovered. These methods typically would include limited hand excavation of shovel test pits, test units, and/or other excavation methods within the site to determine A) the horizontal and vertical

extent of the site, B) site integrity; and C) the potential for the site to meet one or more of the CRHR criteria. The PI, in consultation with the Native American monitor, will prepare an evaluation report describing the methods, analyses, and results of the significance testing, including a recommendation of significance under CEQA, and recommendations for avoidance and/or mitigation. The report will be reviewed and approved by the City. If the evaluation determines the resource is not significant under CEQA, construction activities in the area may resume after the City makes it determination. If the discovery is determined to be significant, construction activities may resume in that area only after the City has determined that significant impacts to the resource have been avoided or mitigated.

An archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, all implemented monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the City and the SCCIC.

MM CUL-4

In the event that human remains and associated funerary objects are inadvertently encountered during construction activities, the remains and funerary objects should be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

Vibration-Related Impacts Mitigation

Potential construction-related vibration impacts may be reduced to a less than significant level with the following mitigation incorporated. On behalf of the lead agency, the City of Pomona, Dudek proposes the following mitigation measure to reduce project impacts from vibration to a less than significant level.

MM CUL-5 The project proponent should inform construction personnel of the location and significance of Spadra Cemetery, and of the avoidance and protective measures that should be implemented when working near the Cemetery. Spadra Cemetery should be avoided and protected during all phases of construction of the proposed project through the installation of protective barrier(s) for

the Spadra Cemetery and individual headstones developed as part of the plan of action described below.

Prior to the start of work, a qualified architectural historian, meeting the Secretary of the Interior's Professional Qualifications Standards for architectural history (U.S. Department of the Interior, 2008) (Qualified Architectural Historian), should be retained to develop a plan of action for avoidance and protection of Spadra Cemetery, in coordination with the Spadra Cemetery property owner, Historical Society of Pomona Valley, the City of Pomona, and the project proponent. The plan should include at a minimum:

(1) Procedure to review all construction plans to ensure there is a notation of the Spadra Cemetery's location on all construction plans;

(2) Initial testing for potential vibration impacts. Should any potential vibration impacts to the upright or concrete-encased headstones be identified are part of the initial testing, construction methods and equipment uses will be reassessed to ensure that no element of the cemetery is damaged due to construction related ground-borne vibration activities;

(3) Details and timeline to conduct a preconstruction survey to document the existing condition of the Spadra Cemetery and all extant headstones (upright and encased in concrete) prior to the start of any ground disturbing work adjacent to the property;

(4) Procedures and timing for the placement and removal of a protective barrier(s) for the Spadra Cemetery property and individual headstones;

(5) A detailed plan for monitoring of the installation and removal of protective barriers, as well as notification procedures and monitoring for all project-related work within 100 feet of the Spadra Cemetery, by the Qualified Architectural Historian, or his or her designee;

(6) Details and timeline to conduct a post-construction survey to document the condition of the Spadra Cemetery and all extant headstones after completion of work described in the project description

The plan should include details and a deadline for the preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the Spadra Cemetery and compliance with protective measures. The plan should comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and should be memorialized in a technical memorandum, which should be submitted to the City of Pomona for review and approval. The final approved plan should be submitted to the City of Pomona no later than 30 days prior to the start of work. The plan should be provided to the construction foreman at a project kick-off meeting. The technical memorandum documenting the pre-construction and post-construction conditions should be submitted to the City of Pomona within 30 days of completion of work within 100 feet of the Spadra Cemetery and removal of the protective barriers.

MM NOI 3 As per the Blast, Drilling, Noise & Vibration Monitoring Plan, prior to any blasting, evaluations to the upright and concrete-encased headstones will be completed to document their present condition and to identify headstones which might be particularly sensitive to ground-borne vibration or air concussion related stressing. These evaluations will be outlined in the Blast, Drilling, Noise & Vibration Monitoring Plan to establish a site-

specific vibration limitation criterion. Blasting methods and blast design protocols will be implemented to ensure that ground-borne vibrations or air concussion level do not exceed the Plan requirements. Additionally, the Blast, Drilling, Noise & Vibration Monitoring Plan will require that a series of test-blasts and vibration analyses take place prior to any blasting in proximity to the cemetery in order to demonstrate the capability of the blasting contractor to perform work within limits set for blasting air concussion and ground vibration exposures to the headstones. A qualified acoustician or blasting contractor shall be retained to perform continuous vibration monitoring that will take place at the cemetery property-line to ensure that no headstones or other structures in the cemetery are damaged due to blasting related air concussion or ground-borne vibration activities.

View and Vista Impact Mitigation

The proposed Project would result in significant unavoidable impacts to the setting of the Spadra Cemetery because of the terracing of Elephant Hill. Changes to the view or vista will unavoidably impact the ability of Spadra Cemetery to convey significance under local criterion 6. Impacts to setting cannot be reduced to a less than significant level; however, Dudek proposes preparation of Historic American Landscape Survey (HALS) "Like" documentation of the Spadra Cemetery to document the state of the historic site prior to construction as a way to mitigate for the loss of its open space setting.

MM CUL-6 The project proponent should ensure preparation of Historic American Landscape Survey (HALS) "Like" documentation for the Spadra Cemetery. All work should be conducted by an architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards for architectural history and/or history (U.S. Department of the Interior, 2008) (Qualified Architectural Historian), The HALS 'Like" documentation should follow the guidelines set forth by the National Park Service (NPS) for HALS Short Format. This mitigation measure is being proposed in compliance with CEQA and does not necessitate approval of this documentation through NPS or the State Office of Historic Preservation. The HALS "Like" Short Format document should be limited to the following:

HALS "Like" Short Format:

- Black and White Photographs with large format negatives
- Photograph Index
- Written data form consisting of property description and historic context

Large format photography must be completed prior to issuance of any project related permitting or construction. Photographic documentation of the Spadra Cemetery should be prepared to the National Park Service's HALS standards. HALS standards require large-format black-and-white photography, with the original negatives having a minimum size of 4 inches by 5 inches. The photographer must be familiar with the recordation of historical resources in accordance with HALS guidelines, and digital photography, roll film, and manipulation of images are not acceptable. A minimum of 20 photographs must be taken, detailing the overall site, select intact upright and cement-encased headstones, existing setting, and surrounding viewsheds. Photographs must include a photo index, and field notes, and be identified and labeled using

HALS standards outlined in National Park Service's guidelines *Preparing HABS/HAER/HALS Documentation - Transmittal Guidelines*.

A draft laser copy (or digital PDF) of the finished photographs formatted to the photo index will be reviewed and approved by the City of Pomona and Historical Society of Pomona Valley prior to final archival prints being made. A copyright release form signed by the photographer releasing copyright of the large format photographs into the public domain for public benefit is required with the deliverables.

Two copies of the final, archival quality documentation will need to be provided to City of Pomona's Pomona Public Library Special Collections and Historical Society of Pomona Valley archival collections. Duplicate archival laser-copies (on acid-free paper) of the report and photographs should be submitted to the City of Pomona and the Historical Society of Pomona Valley. In summary two (2) full sets of survey prints, negatives, and report and two duplicate archival copies of surveys are required. The HALS "Like" Short Format documentation for the Spadra Cemetery must be submitted to repositories within 3 months of project completion.

MM-CUL-7 Prior to tree removal onsite, the project applicant shall prepare an Oak Tree Planting Plan which would be developed with the project applicant and city. Tree removal and replacement would tier off of the conditions proposed in MM BIO-12, which requires compliance with the City of Pomona's Tree Protection and Preservation Program. The City requires one 24-inch box oak tree to be planted for each oak tree removed. As a condition of approval for the Major Oak Tree Permit, a planting plan would be prepared. The plan would include the proposed locations for each of the new box oak trees adjacent of the perimeter of the Spadra Cemetery. a statement identifying the project applicant as responsible for watering and maintaining the trees, and a visual simulation showing the effectiveness of the new trees at visually screening and minimizing the view of the Project from the cemetery.

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11 Conclusions

As discussed above, significant adverse effects to Spadra Cemetery cannot be mitigated to a less-than-significant impact unless there are changes to the overall project design for those components which are visible from Spadra Cemetery. When a project-related impacts cannot be mitigated to a less-than-significant level even after the incorporation this is considered an **unavoidable and significant impact to historical resources.**

The recommended measures for potential impacts to archaeological resources and human remains would ensure the proper treatment of archaeological resources and human remains in the event either are inadvertently encountered during ground disturbing activities. With proper implementation of the recommended measures, the potential impact to archaeological resources and human remains is considered less then significant. Therefore, impacts to archaeological resources would be **less than significant with mitigation**.

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12 Summary of Findings and Management Recommendations

12.1 Summary of Findings

Dudek formally recorded and evaluated two properties over 45 years old that fell within or were immediately adjacent to the proposed Project site: a segment of Brea Canyon Road and Spadra Cemetery.

Brea Canyon Road was originally established circa 1873, but the segment in the proposed Project site was part of a 1933 realignment of the road and dates to that period. This road segment and much of the Brea Canyon Road route was abandoned in 1973 after the construction of SR 57 was completed. A segment of Brea Canyon Road will be demolished for the proposed Project. The segment of Brea Canyon Road does not appear eligible for listing in the NRHP or the CRHR due to a lack of historical associations or engineering merit. As such, the property does not appear to be a historical resource for the purposes of CEQA and has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). Therefore, it is not necessary to examine potential impacts to this property resulting from the implementation of the proposed Project.

Spadra Cemetery was originally established in 1868 and is already a City of Pomona Designated Historic Landmark (City of Pomona 2000a, 2000b), under criteria 1, 2, 5, 6 and 7. This study also found that Spadra Cemetery is eligible for listing under National Register Criteria A and B and California Register Criteria 1 and 2 at the local level, with a period of significance spanning 1868 to 1967. Spadra Cemetery also meets the required Criteria Considerations C and D, which may be applied to cemeteries or individual graves for people of exceptional historical importance. Therefore, Spadra Cemetery is considered a historical resource under CEQA. Analysis of project-related impacts found that vibration-related impacts could be mitigated to a less-than-significant level with mitigation incorporated; however, view and vista impacts, a key component of local City of Pomona Designated Historic Landmark criterion 6, could not be mitigated to a less than significant level. Therefore, the finding for the Project related to built environment historical resources is that a **Significant Unavoidable Impact** resulting from project activities is expected. All findings are summarized below in Table 5.

Table 4. Summary of Findings

Property Name	Property Type	NRHP/CRHR Significance Evaluation	City of Pomona Designated Historic Landmark Evaluation	Previous CHRS code (if applicable)	Assigned CHRS code	CEQA Finding
Within the proposed Project site						
Brea Canyon Road segment (1933)	Road	Not eligible	Not eligible	Not applicable	6Z: Found ineligible for NR, CR or local designation through survey evaluation.	No impact

Table 4. Summary of Findings

Property Name	Property Type	NRHP/CRHR Significance Evaluation	City of Pomona Designated Historic Landmark Evaluation	Previous CHRS code (if applicable)	Assigned CHRS code	CEQA Finding
Adjacent to the proposed Project site						
Spadra Cemetery	Cemetery	Eligible under Criteria A/1 and B/2; met Criteria Considerations C and D	Listed	Unknown	3S: Appears eligible for NR individually through survey evaluation 3CS: Appears eligible for CR individually through survey evaluation 5S1: Individually listed or designated locally	Significant impact, mitigation required

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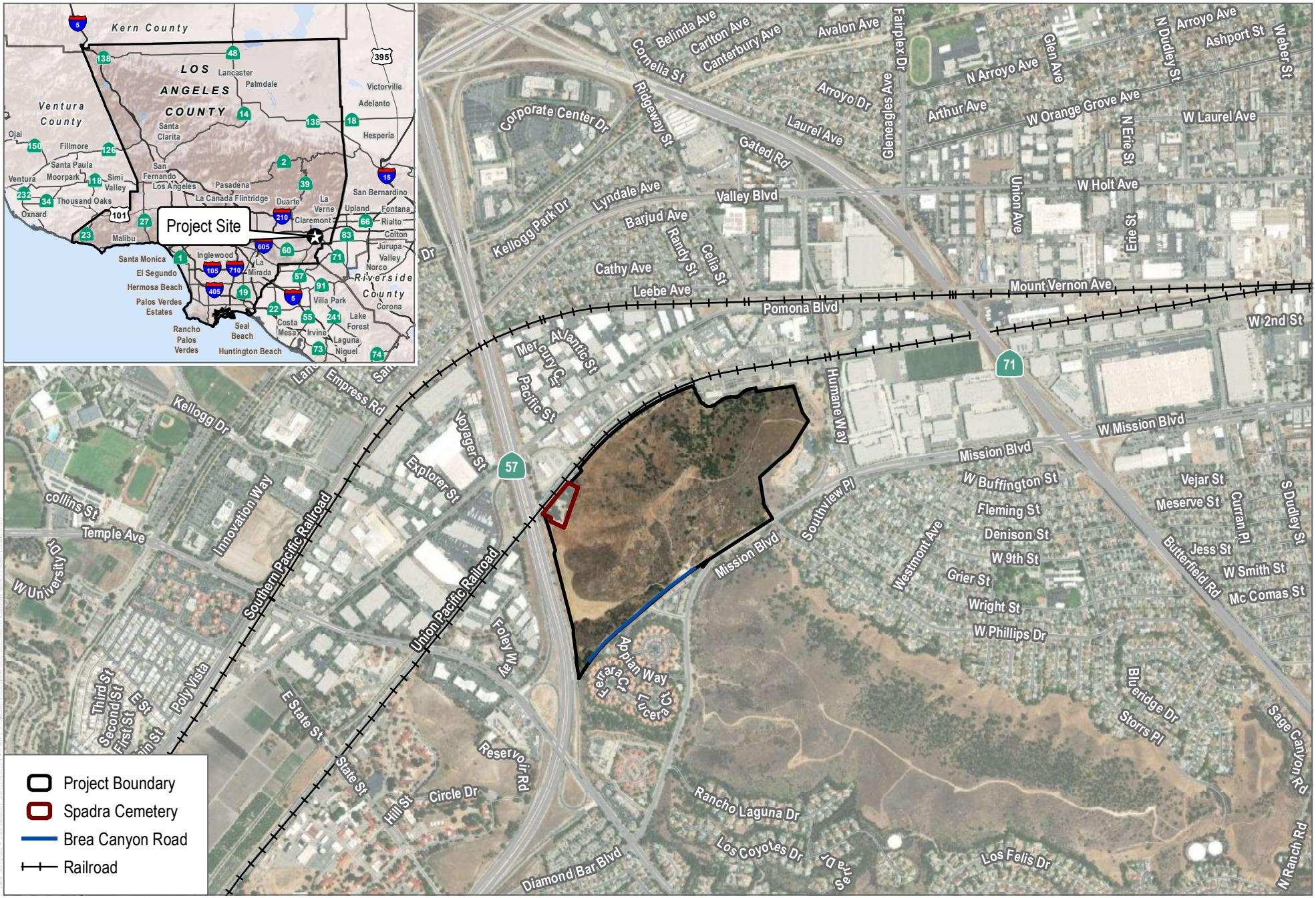
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14 Figures

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SOURCE: DigitalGlobe 2017

DUDEK

0 750 1,500 Feet

FIGURE 1

Project Location

Elephant Hill Cultural Report

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SOURCE: DigitalGlobe 2017

DUDEK

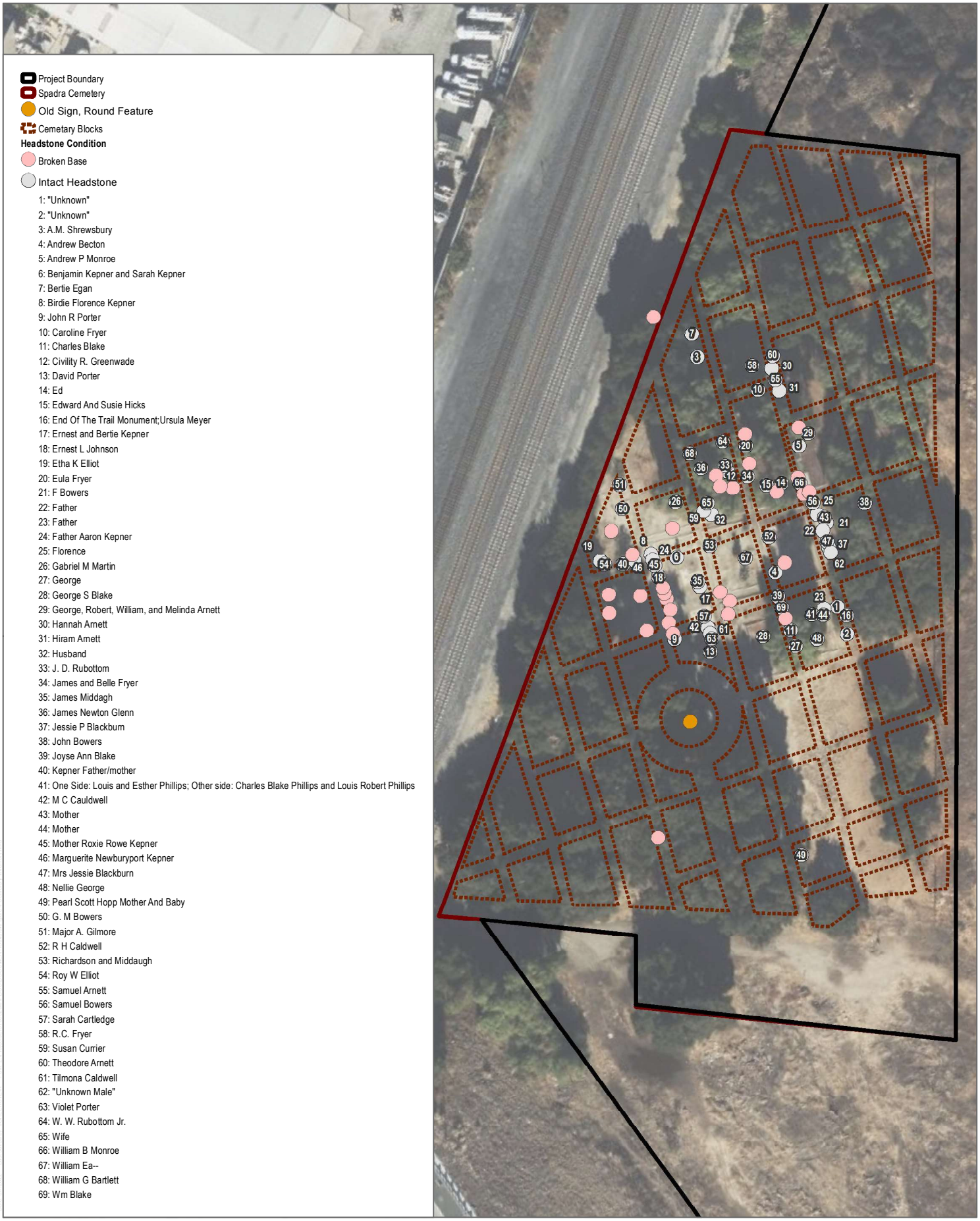
0 275 550 Feet

FIGURE 2

Built Environment Study Area

Elephant Hill Cultural Report

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SOURCE: DigitalGlobe 2017

DUDEK

0 35 70 Feet

FIGURE 3

Cemetery Inventory

Elephant Hill Cultural Report

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SOURCE: Bing Maps

DUDEK

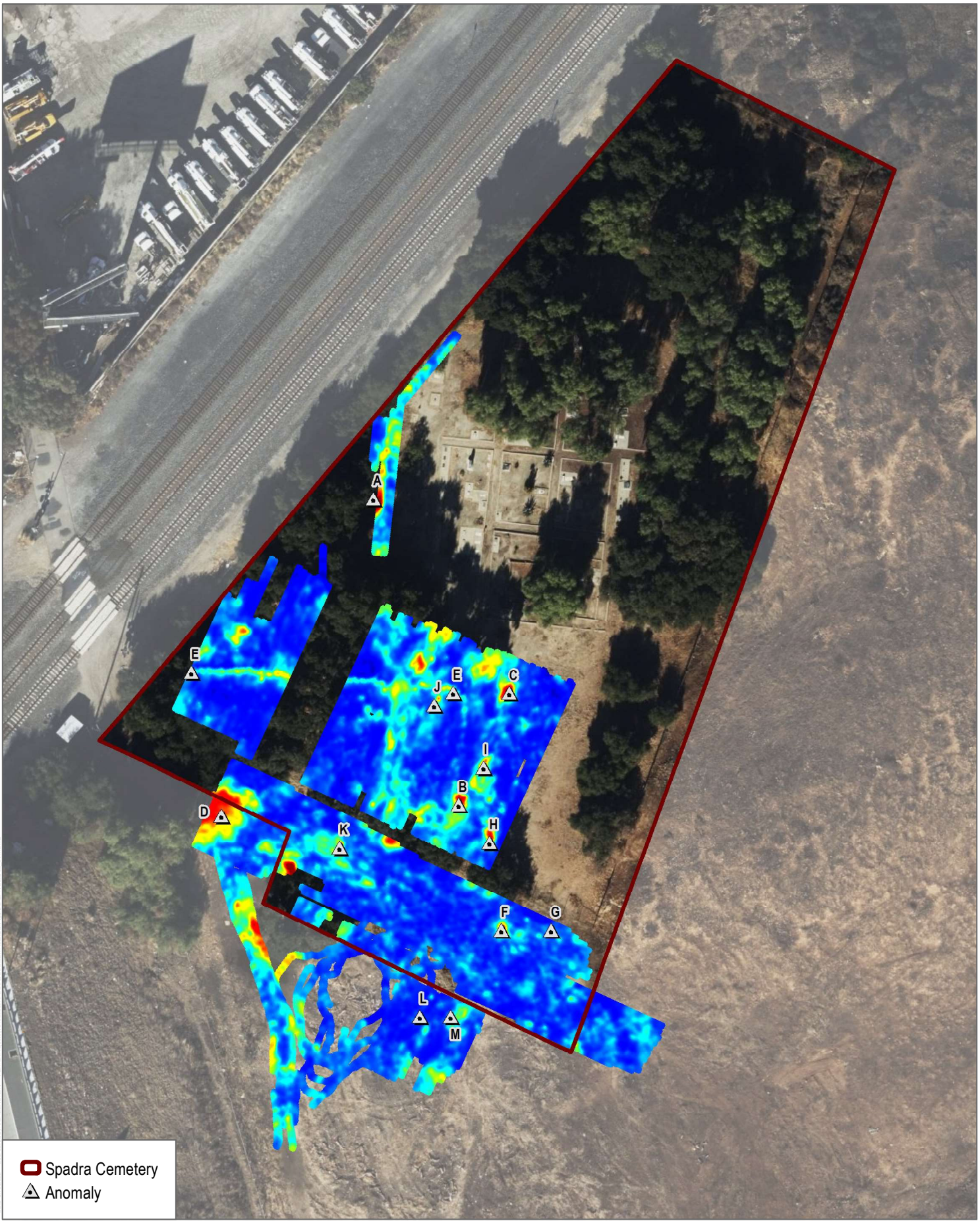
0 10 20 Meters
0 30 60 Feet

FIGURE A

GPR Survey Area

Elephant Hill Cultural Report

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SOURCE: Bing Maps

DUDEK

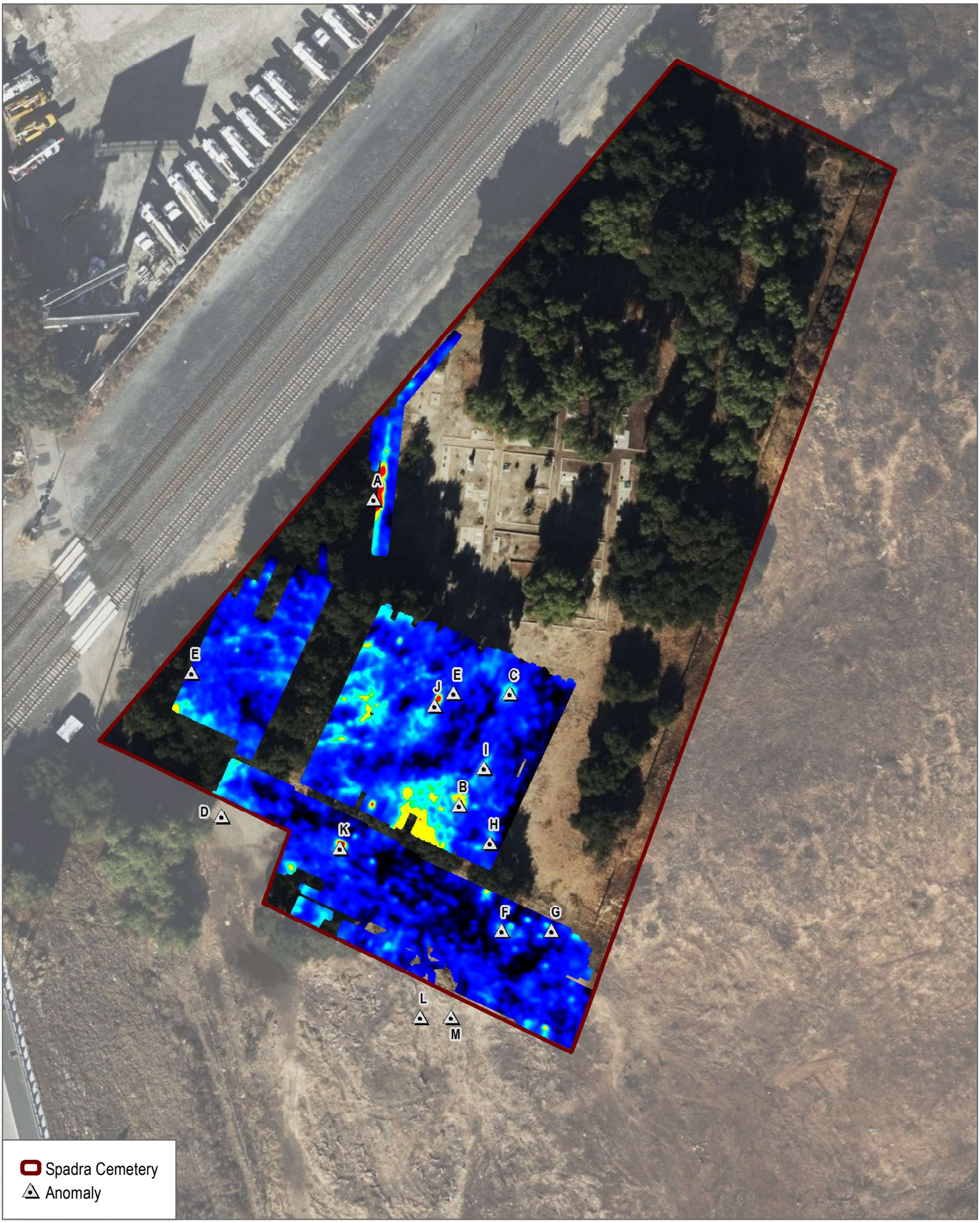
0 10 20 Meters
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FIGURE B

GPR Slice 0.3-0.4m

Elephant Hill Cultural Report

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SOURCE: Bing Maps

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0 10 20 Meters

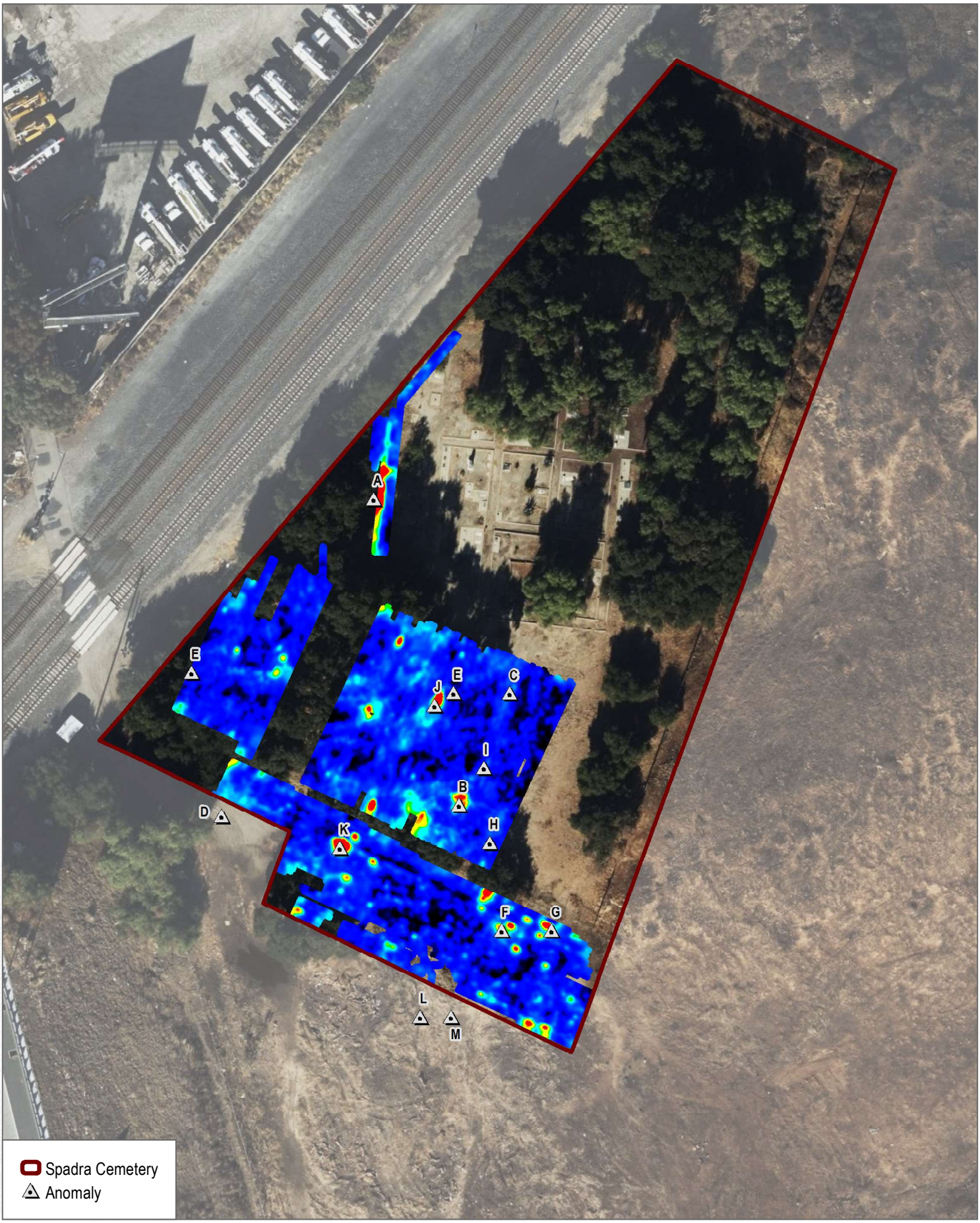
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FIGURE C

GPR Slice 0.6-0.7 m

Elephant Hill Cultural Report

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SOURCE: Bing Maps

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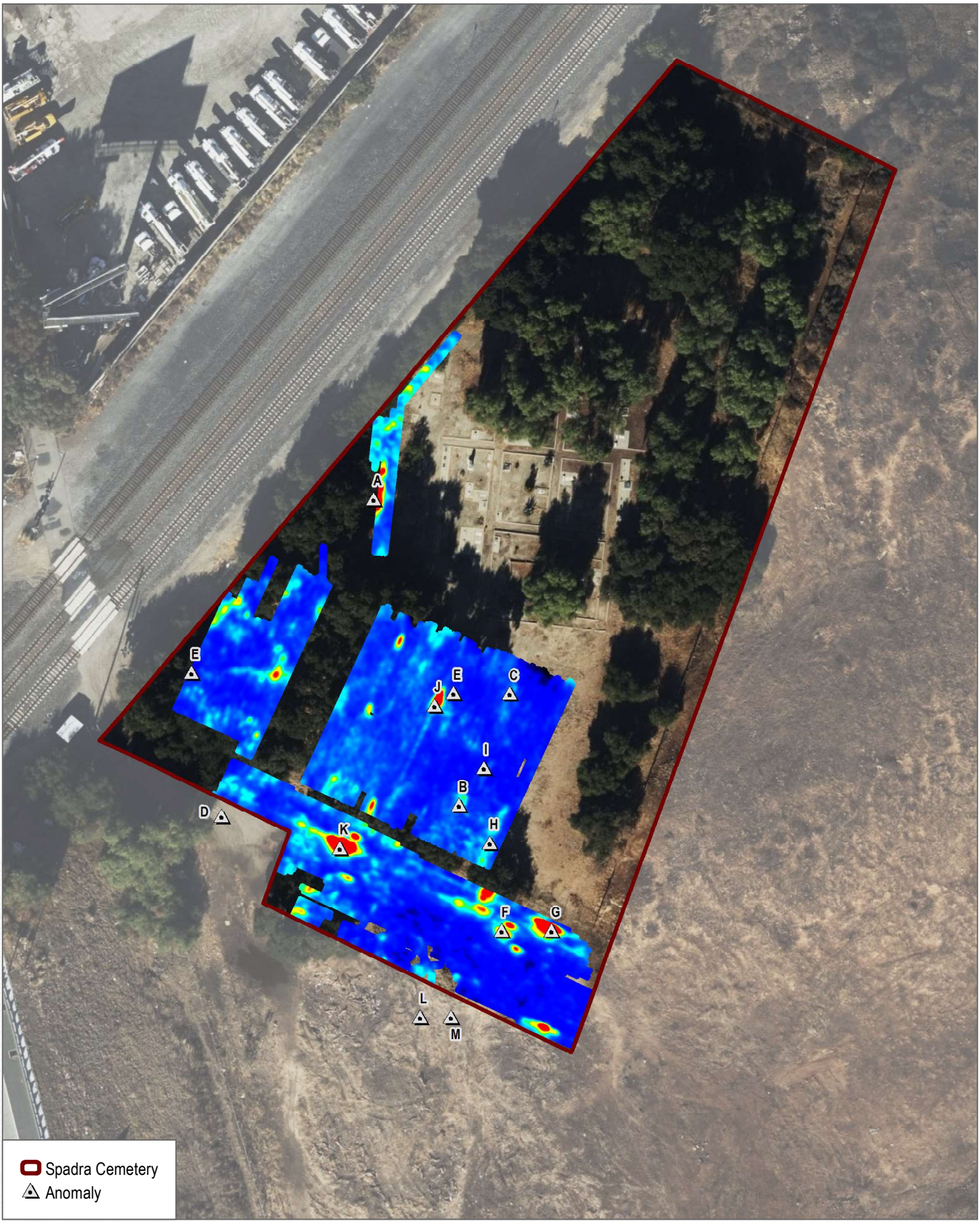
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0 30 60 Feet

FIGURE D

GPR Slice 0.9-1.0 m

Elephant Hill Cultural Report

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SOURCE: Bing Maps

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0 10 20 Meters
0 30 60 Feet

FIGURE E

GPR Slice 2.0-2.1 m

Elephant Hill Cultural Report

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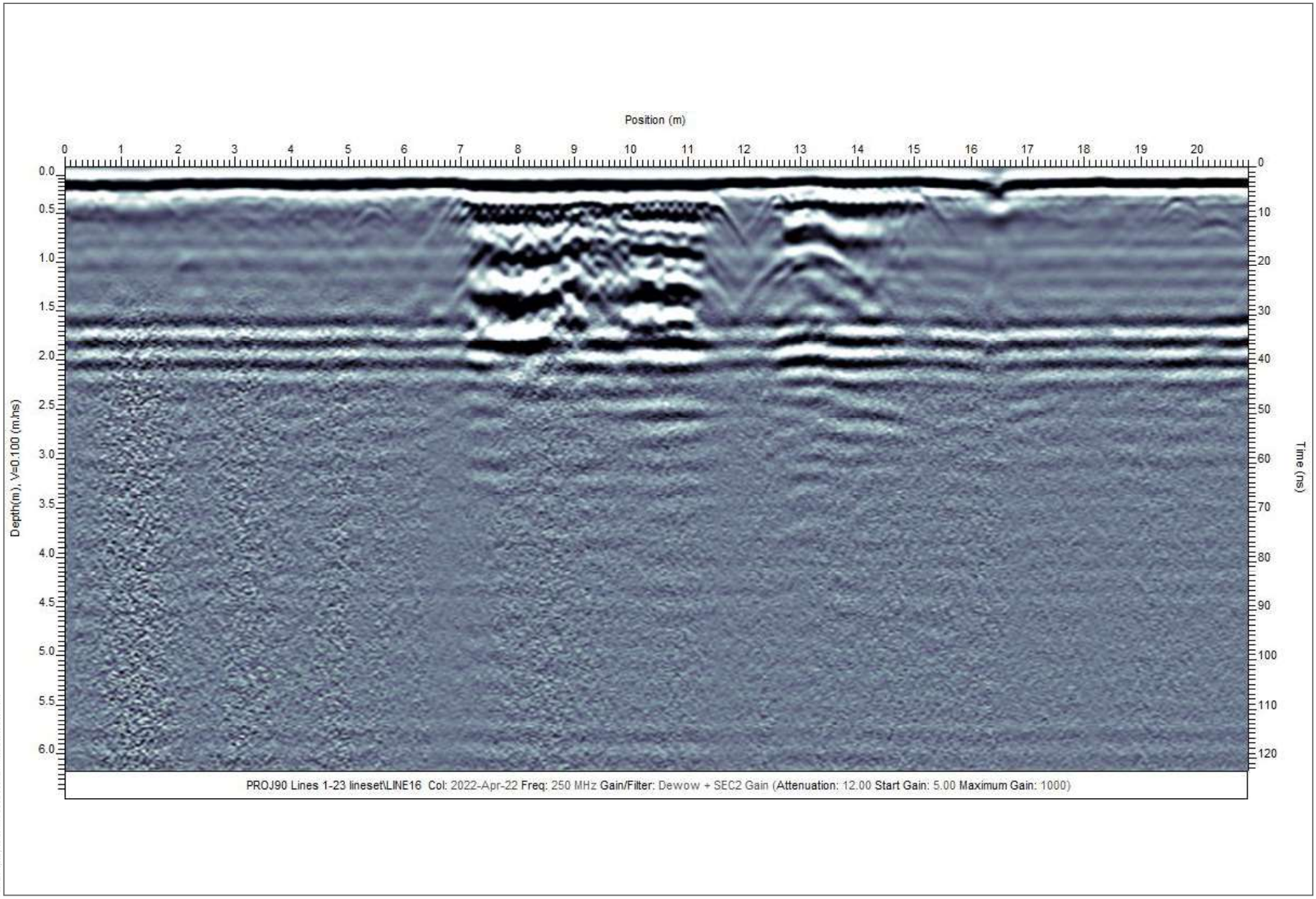


FIGURE F

Location A Radargram

Elephant Hill Cultural Report

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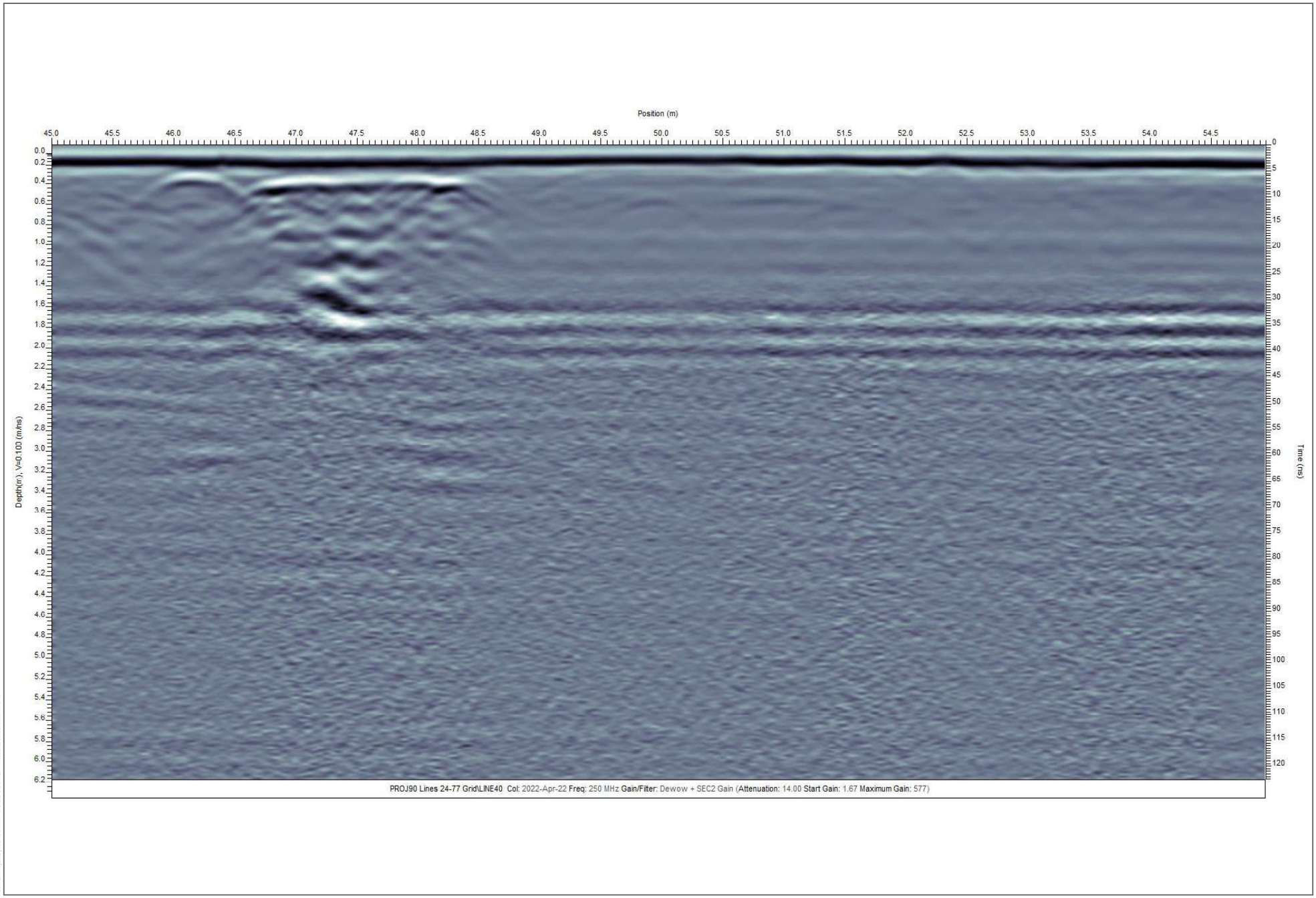


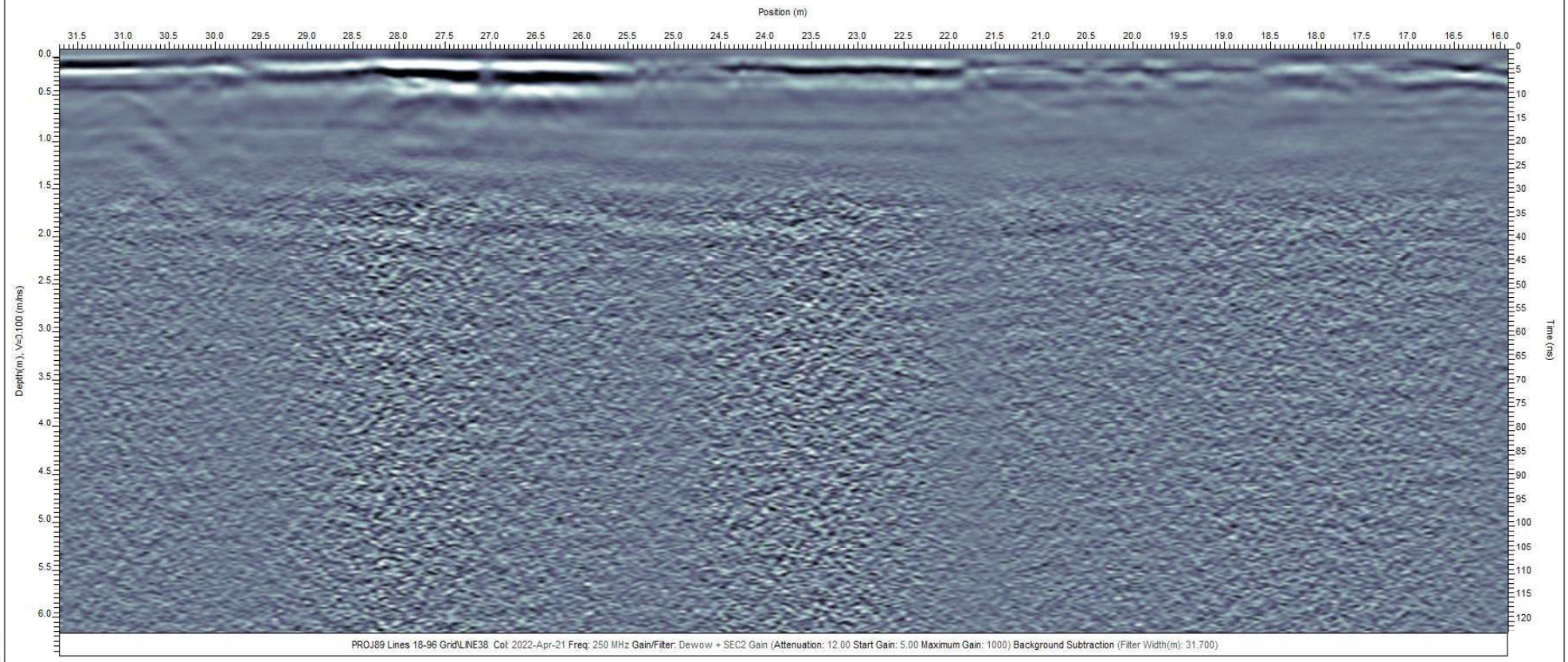
FIGURE G

Location B Radargram

Elephant Hill Cultural Report

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FIGURE H

Location C Radargram

Elephant Hill Cultural Report

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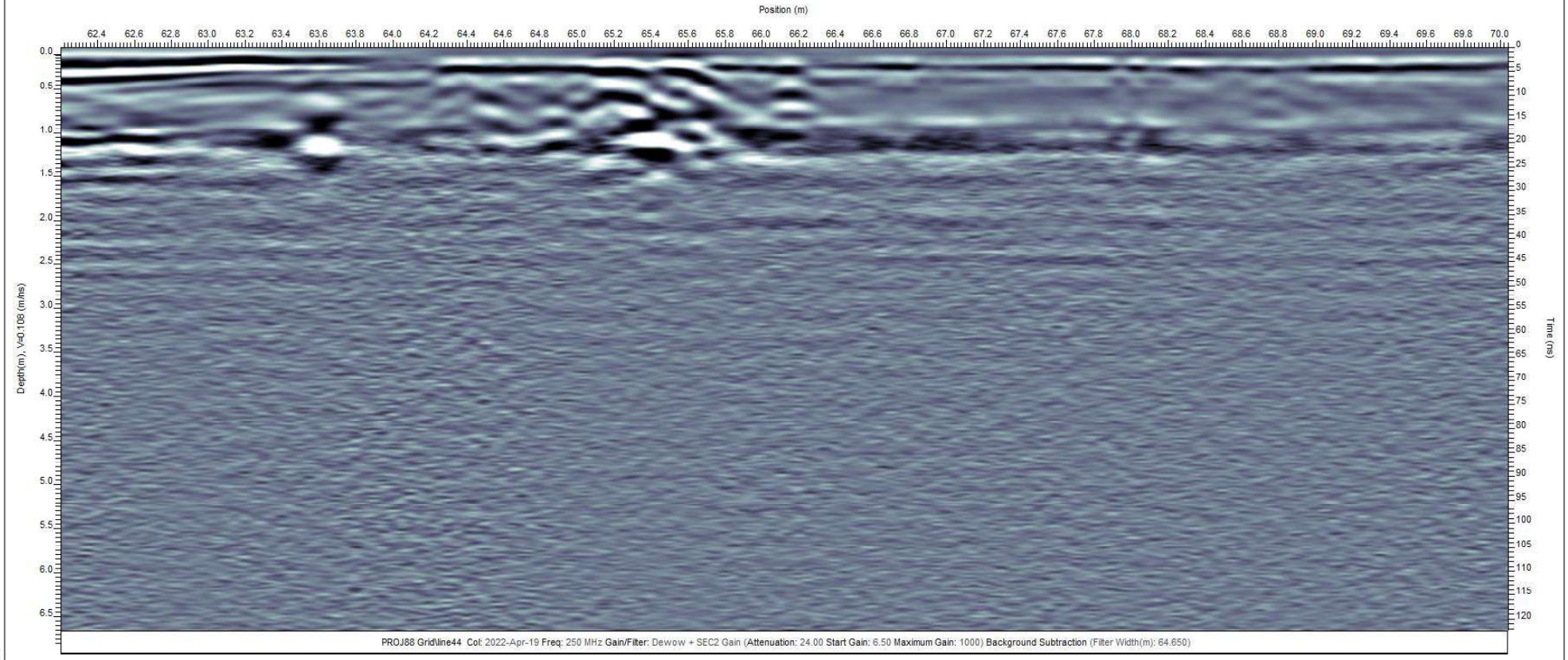


FIGURE I

Location F Radargram

Elephant Hill Cultural Report

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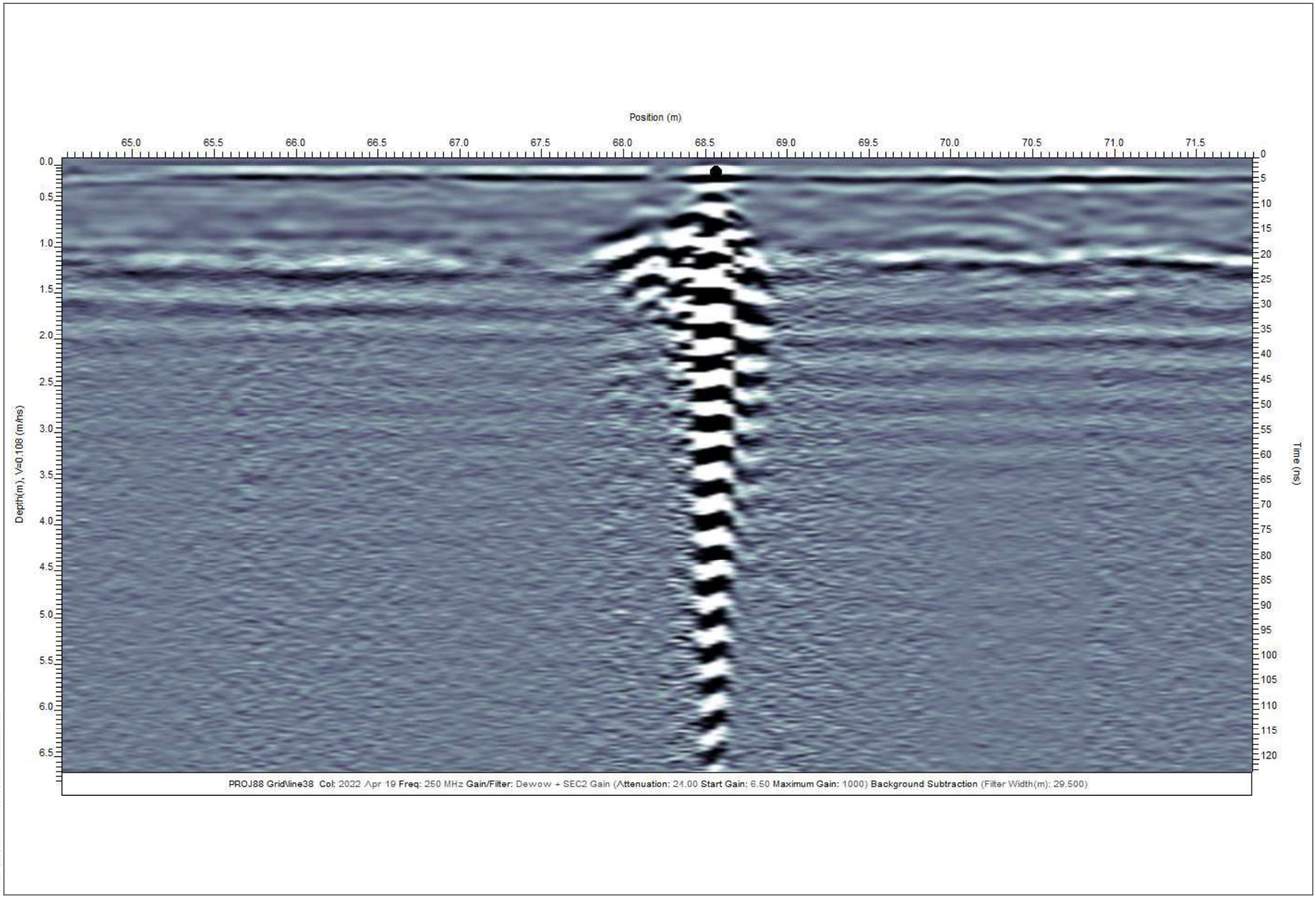


FIGURE J

Location G Radargram

Elephant Hill Cultural Report

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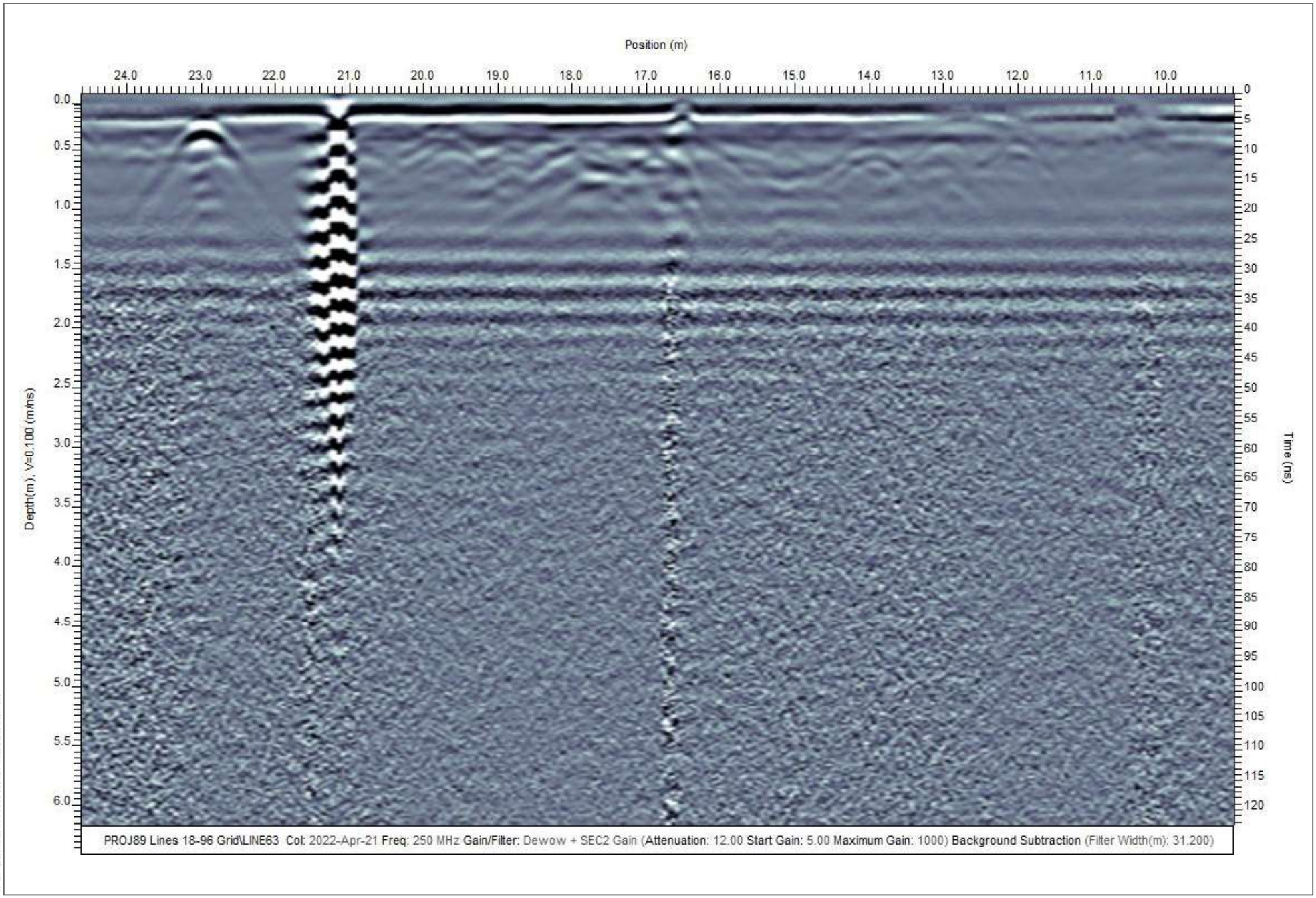


FIGURE K

Location J Radargram

Elephant Hill Cultural Report

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Appendix A
Preparers Qualifications

Caitlin Greeley

ARCHITECTURAL HISTORIAN

Caitlin Greeley (*she/her*) is an architectural historian with 2 years' professional experience. As part of her cultural resources management work, Ms. Greeley has conducted archival research, performed fieldwork, and authored multiple historic context statements. She also has experience preparing and contributing to California Department of Parks and Recreation (DPR) 523 forms. She has experience with consultation for Section 106 of the National Historic Preservation Act, Area of Potential Effect maps, Historic Resource Evaluation Reports, Historical Resource Inventories, Historic American Building Survey photography, reconnaissance and intensive-level surveys, and archival research.

Ms. Greeley meets the Secretary of the Interior's Professional Qualification Standards for both Architectural History and History. She has experience preparing environmental compliance documentation in support of projects that fall under the California Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA) and Sections 106 and 110 of the National Historic Preservation Act.

Prior to joining Dudek, Ms. Greeley gained extensive experience working in multicultural and multilingual environments. She has experience photographing historic buildings and writing conservation management statements for preservation and proposals for adaptive reuse of historic buildings.



Education

New York University (London)
MA, Historical and Sustainable Architecture, 2017

The College of Saint Scholastica,
BA, Humanities, 2014

Specialized Training

Historic American Building Survey/Historic American Engineering Record/Historic American Landscapes Survey Photography Training

Dudek Project Experience

As-Needed Historic Research Consultant, City of Coronado, California. Dudek is currently working with the City of Coronado Community Development Department to provide historic preservation services on an as-needed basis. Services scoped under the current contract include historic resources surveys; archival research; preparation of evaluation reports in consideration of the National Register of Historic Places (NRHP), the California Register of Historical Resources, and City of Coronado designation criteria; attendance at Historic Resource Commission and City Council hearings; and review of projects for conformance with the Secretary of the Interior's Standards for Rehabilitation. Ms. Greeley serves as an architectural historian for the task orders and is responsible for archival research and reporting. (2022)

SB2 Planning Grant Project, San Bernardino County, California. Dudek was retained to prepare a Cultural Resources Technical Report in support of the SB2 Planning Grant Project in San Bernardino County. Preparation of the report involved extensive archival research and historic context statement development. Ms. Greeley serves as an architectural historian for the project and is responsible for archival research and coauthoring the historic context statement. (2022)

Willow Tree Inn, City of Compton, California. Dudek was retained to prepare a historic resources evaluation, a Built Environment Inventory, and an evaluation report for the Willow Tree Inn located within the city limits of Compton. Preparation of the report involved extensive archival research, in-field research, historic context statement development, building development descriptions, historical significance evaluations, and DPR forms for the property. Ms. Greeley serves as an architectural historian for the project and is responsible for fieldwork, archival research, and writing building descriptions. (2022)

Relevant Previous Experience

California Housing and Community Investment Department of Los Angeles, City of Los Angeles, California. Ms. Greeley performed intake of incoming work orders of affordable housing projects and conducted historic research on each project site and neighboring properties. She evaluated properties throughout Los Angeles in compliance with Section 106 to determine potential eligibility of historic resources for designation on the NRHP. She also created the preliminary Area of Potential Effects boundary maps for the proposed project using Photoshop for visual presentation. She aided in making preliminary determinations to see if the proposed affordable housing project had an effect on surrounding properties eligible for the NRHP in accordance with Section 106. She coordinated with and provided training to coworkers on the intake process for the project. She conducted site survey of individual resources in the City of Los Angeles through photographic documentation and contributed to DPR forms. (2020–2021)

Cultural Assessment for Weatherization Projects for Homes, California Department of General Services, California. Ms. Greeley helped with the intake of reviews, assigned reviews to staff, and coordinated with agencies. She also conducted research on historic-age properties throughout California using assessor records, building permits, historic aerials, local ordinances, or surveys regarding local historic preservation to determine if the proposed project had an effect on properties eligible for the NRHP in accordance with Section 106. (2020–2022)

XpressWest Passenger Train Project, California and Nevada. Ms. Greeley performed administrative tasks and organized Section 106 consultation party documents. She also contributed to DPR forms and NRHP eligibility evaluations of individual resources. She conducted research on unknown parcels using historic photographs and spatial analysis programs such as Google Earth imaging. She edited survey photos through post-production software, such as Photoshop, for visual presentation. (2020)

Interstate 10/Mt. Vernon Avenue Improvement Project, City of Colton and Caltrans District 8, San Bernardino County, California. Ms. Greeley conducted a field survey to identify built environment resources requiring formal evaluation and participated in the identification of built resources subject to exemption per Attachment 4 of the Caltrans Section 106 Programmatic Agreement. She also researched and contributed to the City of Colton historic context statement in the draft Historical Resources Evaluation Report. Additionally, she prepared DPR forms for individual resources in the project Area of Potential Effect. (2020)

Fenix Marine Intermodal Railyard Expansion and Modernization Project, The Port of Los Angeles and Maritime Administration, California. Ms. Greeley researched consulting parties for the project and drafted consultation letters and tribal letters as part of the Section 106 process. She also contributed to the draft technical report and conducted a field survey of historic built environment resources. (2020)

Brad Comeau, MSc, RPA

ARCHAEOLOGIST

Brad Comeau is an archaeologist with 18 years' experience as a principal investigator, field director, archaeological monitor, and laboratory technician. He has conducted numerous surveys, evaluation excavations, and data recoveries, primarily in Southern California. He has also worked in Massachusetts, Virginia, Georgia, Arizona, Nevada, Washington, and England. His research interests include the role of experimentation in archaeology, copper production techniques, and lithic production. Mr. Comeau has also performed numerous ground-penetrating radar (GPR) studies in California and in the eastern United States.

Education

University of Sheffield
MSc, Experimental Archaeology, 2012

University of Massachusetts, Amherst
BA, Anthropology, 2004
BA, Italian Studies, 2004

Certifications

Register of Professional Archaeologists

Principal Investigator, Archaeology, State of Nevada

Principal Investigator, City of San Diego

Principal Investigator, County of San Diego

Principal Investigator, County of Riverside

Occupational Health and Safety Administration Hazardous Waste Operations and Emergency Response 40-hour Course, 2011

Professional Affiliations

Society for American Archaeology, 2012

Society for California Archaeology, 2008

Project Experience

Development

Otay Ranch Village 14 and Planning Areas 16/19 Project, Jackson Pendo Development Company, San Diego County, California. As principal investigator, directed a Phase II evaluation of over 50 archaeological sites within the area of direct impact for the primary project and an alternative project; performed lithic, ceramic, and groundstone analyses; was lead author of stand-alone combined Phase I and II technical reports for the main project and the alternative; prepared an addendum report for a third project design; and participated in on-site tribal consultation meetings with the County of San Diego, project proponent, and Tribes.

Newland Sierra Project, Newland Sierra LLC, San Diego County, California. As principal investigator, directed a Phase I pedestrian survey of on-site and off-site impact areas of a 1,985-acre residential and commercial subdivision; directed a Phase II evaluation excavation of one significant archaeological site; participated in multiple on-site and off-site Tribal consultation meetings with the County of San Diego, Tribes, and project proponent; initiated re-analysis of existing collections; co-authored the revised technical report; performed lithic, groundstone, and ceramic analyses; and discovered and treated human remains in accordance with state law.

Santa Barbara Police Department Project, Public Works Department, City of Santa Barbara, California. As GPR specialist, conducted a GPR study to identify mid-19th through mid-20th century historical features located under a 1.6-acre parking lot. Historical features and archaeological deposits consisted of privies wells and building foundations.

Valley View Project, Rice Ranch Ventures, County of Santa Barbara, California. As GPR specialist, conducted a GPR survey at an early 20th century historic period archaeological site to identify potential burials.

Prehistoric Archaeological Site GPR Survey, City of Yucaipa, California. As GPR specialist, conducted a GPR survey at an approximately 1-acre Native American archaeological site in the City of Yucaipa to identify potential burials, in conjunction with a forensic canine survey.

Hunter Subdivision, City of St. Helena, California. As GPR specialist, conducted a GPR study for a 17-acre residential development and ground-truthed GPR anomalies through excavation shovel test pits (STPs) at an archaeological site adjacent to a large burial complex.

Discovery Village South Project, City of San Marcos, California. As principal investigator, directed an archaeological survey of a 39-acre residential subdivision, directed evaluation excavations of five archaeological sites, and co-authored the technical report.

Port of Los Angeles Cultural Mitigation, Port of Los Angeles, California. As principal investigator, prepared the worker environmental awareness program training for compliance with mitigation measures.

Buena Vista Project, City of Los Angeles, California. As GPR specialist, performed a GPR study to identify the Zanja Madre water conveyance network for an 8-acre mixed-use residential and commercial development, performed a ground-truthing excavation to confirm the location of the Zanja segment found using GPR, identified an historic period archaeological site unrelated to the Zanja, and co-authored the technical report.

South Park Towers Development Project, City of Los Angeles, California. As principal investigator, performed a GPR study to identify the Zanja No. 8 water conveyance network for a mixed-use residential and commercial development.

East 8th Street Project, City of Los Angeles, California. As GPR Specialist, performed a GPR study to identify the Zanja No. 2 water conveyance network for a proposed industrial facility development project.

6th and Alameda Street Development Project, City of Los Angeles, California. As principal investigator, performed a GPR study to identify the Zanja No. 2 water conveyance network for a 15-acre mixed-use residential and commercial development.

Palmetto Street Project, City of Los Angeles, California. As principal investigator, performed a GPR study to identify the Zanja No. 2 water conveyance network for a mixed-use residential and commercial development.

Patton State Hospital Kitchen and Remodel Project, California Department of General Services, San Bernardino County, California. As principal investigator, directed the archaeological monitoring for development of a new kitchen for the National Register of Historic Places–listed Patton State Hospital, documented newly discovered historic features, identified avoidance measures to preserve features, and co-authored the monitoring report.

Ocean Creek LLC Project, Ocean Creek LLC, Oceanside, California. As principal investigator, directed a Phase I archaeological survey of a 19-acre mixed-use development project.

DD Mine Project, Mitchel Chadwick, Riverside County, California. As principal investigator, directed a Phase I archaeological survey of a 600-acre mining site and performed a Phase II evaluation of one historic-era archaeological site.

Bedford Road Repairs Monitoring, Wireless Infrastructure Services, Cleveland National Forest, Orange County, California. As principal investigator, directed the archaeological monitoring during road repairs, obtained the Archaeological Resources Protection Act permit, and prepared the monitoring report.

Ivanhoe Ranch Development, San Diego County, California. As field crew, performed a supplemental Phase II excavations to identify potential human remains and to delineate significant archaeological deposits and a late-prehistoric period archaeological site. Coordinated with the principal investigator regarding unit placements, testing strategy, etc.

Sycuan Fee to Trust, Sycuan Band of Mission Indians, San Diego County, California. As principal investigator, conducted a Phase I pedestrian survey of 40 acres of land to be transferred into the ownership of the Sycuan Band of Mission Indians in accordance with Section 106 of the National Historic Preservation Act .

Fairmount Ave Fire Station, City of San Diego, California. As principal investigator, directed archaeological and Native American monitoring for geotechnical exploration for a proposed fire station, directed the archaeological survey, and was primary author of the monitoring and survey report.

Van Boxtel Residence Project, Van Boxtel Family, San Miguel, California. As principal investigator, directed a Phase I survey for a 0.3-acre residential development and prepared the technical report for the County of Monterey.

Palm Avenue Distribution Project, IDS Real Estate Group, City of San Bernardino, California. As principal investigator, directed the archaeological/paleontological monitoring for the construction of a warehouse facility on a 37-acre parcel, directed evaluation excavation of a newly discovered prehistoric site, and was lead author of the monitoring report.

North Eastern Sphere Annexation Area, Sargent Town Planning Inc., Rancho Cucamonga, California. As principal investigator, directed a Phase I inventory of a 1500-acre parcel, co-authored the technical report, and performed field director duties for a portion of the survey.

background research into historic context of the project area, incorporating results into the report.

Artesian Road Project, The Harwood Group, Rancho Santa Fe, San Diego County, California. As principal investigator, directed a Phase I cultural resource study for a 25-acre residential project, coordinated the field crew schedule and tribal monitor, was primary author of the ARMR-format report, and performed the background research into the historic context of the project area, incorporating results into the report.

Vista Canyon Project, Los Angeles County, California. As principal investigator, conducted a GPR survey at the Mitchell-Dyer Family Cemetery, a 2,000 square foot, 19th century cemetery for boundary delineation.

Energy

Confidential Wind Energy Project, Lompoc, California. As field director, conducted Phase II evaluation efforts at 13 prehistoric sites; assisted with artifact analysis; prepared the testing plan; co-authored the evaluation testing report; prepared the mitigation plan to address the data recovery excavation, construction monitoring, and site capping efforts; and performed a GPR survey at three prehistoric sites. As co-principal investigator, directed a Phase III data recovery excavation at eight prehistoric sites, prepared end-of-fieldwork clearance memos for submittal to the County of Santa Barbara, directed field lab artifact processing and wet-screening, directed crews of 5 to 22 people, coordinated with Native American monitors, and performed a GPR survey at four archaeological sites in conjunction with data recovery efforts.

Confidential Solar Energy Project, Kern County, California. As field director, conducted a Phase III data recovery at one prehistoric site, excavated five thermal features, and coordinated with Native American monitors.

Groves Solar Project, Oak Grove, Westmoreland County, Virginia. As field director, performed a Phase I archaeological survey for a 125-acre solar energy project. The survey included both a pedestrian survey and excavation of STPs in accordance with Virginia cultural resource guidelines. Performed archival research at a local historical museum, performed a GPR survey at a historic period cemetery to identify potential burials outside the known cemetery, and co-authored the constraints analysis letter documenting the records search and historic map review for the project site.

Edwards Solar, Edwards Air Force Base, Los Angeles and Kern County, California. Provided in-house review for the cultural resources inventory and evaluation reports for the solar energy project.

Devers-Colorado River Substation No. I 500-Kilovolt Transmission Line Rating and Remediation Project, Riverside, California. Provided third-party review on behalf of the California Department of Fish and Wildlife for the cultural resources technical report and prepared the cultural resources and tribal cultural resources Mitigated Negative Declaration sections.

Apex to Crystal Transmission Line Project, Los Angeles Department of Water and Power, Clark County, Nevada. As field director, conducted a pedestrian survey for a 10-mile transmission line and co-authored the survey report.

Confidential Solar Project, Confidential Energy Client, Twiggs County, Georgia. As principal investigator, conducted an archaeological study to identify and relocate an abandoned historic period cemetery in accordance with Georgia state law. Performed a GPR and pedestrian survey on an approximately 1-acre area; prepared the work plan for removal of the cemetery, including documentation of the discovery, exhumation, and reinterment procedures; analyzed the remains; consulted with local genealogist; directed the exhumation of nine interred individuals; and performed archival research on known individuals in the cemetery. Coordinated all efforts with the County Coroner.

Jacumba Valley Ranch, Confidential Energy Client, Jacumba, San Diego County, California. As GPR specialist, conducted a GPR survey for potential burials and other subsurface archaeological features within a proposed solar energy project, per Native American consultation requests.

Confidential Solar Project, Confidential Energy Client, Kern County, California. As principal investigator, directed archaeological and Native American monitoring for a 144-acre solar energy project, co-authored the construction monitoring plan, directed evaluation of a newly discovered archaeological site, documented new isolates and one new archaeological site, and prepared the monitoring report.

Underground Utility District Projects, City of San Diego Transportation and Storm Water Department, California. As co-principal investigator, directed and scheduled the archaeological and Native American monitoring of 14 projects involving the installation of underground utility lines. Previously directed wet-screening of excavated sediments for human remains; attended pre-con meetings; provided scoping requirements for five other Underground Utility District projects, including archaeological excavations/evaluations; and performed a GPR study to identify potential historic burials associated with the Campo Santo Cemetery in Old Town, San Diego.

Block 8B Sherman Heights Underground Utility District Archaeological Monitoring, City of San Diego Public Works Department, California. As principal investigator, provided an internal review of the construction monitoring report prepared by the archaeological subcontractor.

Confidential Solar Project, Confidential Energy Client, County of Kings, California. As primary author, prepared archaeological and paleontological construction monitoring and inadvertent discovery work plan for construction of the project.

Confidential Project, Confidential Energy Client, San Diego County, California. As field director, conducted a pedestrian survey and evaluation of the 337-acre gen-tie portion of the solar project, directed a crew of between two and four people, prepared the gen-tie portion of the technical report, provided internal review and editing of the entire report based on agency comments, and prepared the cost and scoping proposal for the evaluation phase.

Confidential Solar Project, Confidential Energy Client, Boulevard, San Diego County, California. Provided internal review and editing of the evaluation report based on agency comments for the evaluation of 39 archaeological sites.

Confidential Solar Farm Project, Confidential Energy Client, Boulevard, San Diego County, California. Provided internal review and editing based on agency comments of a 231-acre survey report.

Confidential Solar Farm Project, Confidential Energy Client, Boulevard, San Diego County, California. Provided internal review and editing based on agency comments of a 35-acre survey report.

Confidential Solar Project, Bureau of Land Management, Riverside County, California. Contributed to third-party review for the BLM of the Phase I pedestrian survey report.

Confidential Solar Project, Confidential Energy Client, Riverside County, California. As principal investigator, performed a site visit and record search review of the project area, prepared the constraints analysis assessing the potential for sensitive cultural materials, directed a Phase I pedestrian survey of a 142-acre project area, and prepared the negative letter report of findings.

Occidental of Elk Hills Block Survey II, Occidental Petroleum, Taft, Kern County, California. As field director, conducted a pedestrian survey of 2,560 acres in the Elk Hills Oil Field, led a crew of six people, and prepared site forms and site descriptions for the technical report.

Federal

Bunker Hill Survey, GSR Corporation, Imperial Beach, California. As field director, conducted a Class III pedestrian survey of a road improvement and fence construction covering 7.6 acres for the border fence, directed a crew of two people, recorded a previously identified site for a future nomination to the National Register of Historic Places, prepared site form updates, and prepared the ARMR-format technical report of findings.

Imperial County Drill Sites Survey, U.S. Geological Survey, Imperial County, California. As field director, conducted a survey of two water well drilling sites, coordinated with the U.S. Border Patrol escort, and prepared the ARMR-format technical report of findings.

BLM Western Expansion Survey, TEC Environmental, Johnson Valley, California. As crew chief, surveyed various locations throughout the BLM Johnson Valley off-highway vehicle area, identified and recorded new sites, and coordinated the survey schedule with the field director.

Border Fence Project Survey and Monitoring, U.S. Army Corps of Engineers, San Diego County, California, and Pima, Santa Cruz, and Cochise Counties, Arizona. As archaeological monitor, monitored construction of the U.S./Mexico border fence, surveyed locations of proposed construction activity, mapped new archaeological sites, and directed construction activities away from archaeological resources.

Military

Lucy C. Bryant Cemetery GPR Investigation, Tennessee Army National Guard, Carroll County, Tennessee. As principal investigator, performed a GPR survey at a late-19th century family cemetery to identify potential graves and cemetery boundary delineation (in progress).

Tortoise Fence Installation Project, Tetra Tech Inc., Marine Corps Air Ground Combat Center Twentynine Palms, San Bernardino County, California. As principal investigator, directed archaeological monitoring during construction of exclusionary tortoise fencing around the western and southern expansion areas of the base and documented new isolates.

Camp Wilson Utility Upgrades Project, RQ Construction, Marine Corps Air Ground Combat Center Twentynine Palms, San Bernardino County, California. As co-principal investigator, directed archaeological monitoring efforts for demolition and upgrading utility lines at Camp Wilson, including water, stormwater, gas, sewer, and electric lines.

Fort Irwin Solar Project, Soitec LLC, Fort Irwin, San Bernardino County, California. As principal investigator, directed a pedestrian survey of 12 acres for a proposed solar generation facility. Prepared the technical report.

Level 3 Powerline Road Fiber-Optic Project, HP Communications Inc., Fort Irwin, San Bernardino County, California. As principal investigator, conducted an intensive pedestrian survey of approximately 10 acres. Prepared the ARMR-format technical report of findings.

Resource Management

ASRP Lower Satsop Phase II Project, Natural Systems Design, Grays Harbor County, Washington. As field crew, excavated shovel probes for a Phase I survey along the Satsop River.

Holmes Project Restoration, Inland Empire resource Conservation District, Riverside County, California. As principal investigator, directed a Phase I survey for a 335-acre habitat restoration project. Lead author of the survey report.

Dry Canyon Munition Response and Remediation, Los Padres National Forest, Ventura County, California. As principal investigator, directed the archaeological monitoring for unexploded ordinance sampling and remediation, prepared site forms for updated and newly discovered sites and isolates, and prepared the ARMR-format technical report for the U.S. Army Corps of Engineers.

Mission San Luis Rey Demonstration Survey, City of Oceanside, California. As GPR specialist and guest lecturer/ instructor, conducted a limited GPR survey at selected locations at the Mission San Luis Rey for undergraduate students at California State University, San Marcos under the direction of Micah Hale, PhD, and Ad Munoz, PhD.

St Algar's Farm Geochemical Testing, English Heritage, Frome, Somerset, United Kingdom. As a student volunteer, helped perform an X-ray fluorescence (XRF) field survey of a Roman-era glass and metalworking site with a portable XRF device. Excavated a 5 meter × 5-meter trench to groundtruth XRF anomalies.

Jennifer De Alba

Archaeologist

Jennifer De Alba is an archaeologist with 6 years' experience in both field and laboratory settings, specializing in archaeological and paleontological monitoring, survey, cataloging and curation preparation, technical writing, and data entry. Ms. De Alba has experience studying early hunter–gatherer cultures and has worked on historic archaeological sites, specifically with the Santa Barbara Trust for Historic Preservation at the Santa Barbara Presidio. She works extensively as a monitor and archaeological technician on numerous sites throughout Ventura, Santa Barbara, San Luis Obispo, and Los Angeles Counties; has assisted in archaeological excavations in Ventura, Kings, Santa Cruz and Santa Barbara Counties, as well as the City of Ojai; conducts background research; and verifies requirements are met for the collection and cataloging of artifacts.

Education

University of California, Santa Barbara
BA, Cultural Anthropology (Archaeology emphasis), History Minor, 2016

Santa Barbara City College
AA, Cultural Anthropology, 2010

Selected Project Experience

Compton Boulevard over Compton Creek and Wilmington Avenue over Compton Creek Bridge Replacement, Compton, California. Assisted in a Cultural Resources Study pursuant to CEQA and Section 106 of the NHPA and in conformance with Caltrans requirements. Tasks included background research for Archaeological Survey Reports (ASR) for each project.

Chapman University, Orange, California. Archaeological Letter Report completed in accordance with CEQA and Orange County. The project would include the adaptive re-use of the Killefer School with the potential to alter, expand, and/or reconstruct the existing ancillary buildings to be used for research, and/or offices for faculty and administration.

Orange County Fire Authority, Tustin, California. Assisted with a cultural resources study pursuant to CEQA. The project involves the construction of various fire training structures and restroom/shower and dorm facilities and installation of modular classrooms, lighting, landscaping, and associated circulation drive aisles and pedestrian connectivity (e.g., pedestrian bridge) and parking.

Palmetta Avenue Warehouse, Rialto, California. Assisted with preparation of a Cultural Resources Technical Report, in compliance with CEQA.

I-15 Industrial Park, Hesperia, California. Performed background research for a Cultural Resources Inventory Letter Report.

Hesperia Commerce Center II, Hesperia, California. Assisted in the preparation of a Supplemental Cultural Resources Inventory Letter Report, in compliance with CEQA and the City of Hesperia General Plan for cultural resources.

Banana Avenue Warehouse, Fontana, California. Assisted in completion of a Cultural Resource Records Search Results Letter.

Tribal Cultural Resource Report for 1000 Seward Street, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report, in compliance with CEQA.

Tribal Cultural Resource Report 1235 Vine Street, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report, in compliance with CEQA.

14800 Schulte Road Industrial, San Joaquin County, California. Performed background research for a Phase I Archaeological Study, in compliance with CEQA.

Tribal Cultural Resource Report for Artisan Hollywood Project, Hollywood, California. Performed background research for a Tribal Cultural Resource Report, in compliance with CEQA.

Agoura Village East Multi-Use Complex Cultural Resource Studies, Agoura Hills, California. Conducted background research and a field survey on previously recorded archaeological site CA-LAN-41. Assisted in compiling the results of an Extended Phase I investigation.

Angels Landing, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report and an Archaeological Resources Report, in compliance with CEQA.

Arcadia Hotel and Annex Mitigated Negative Declaration, Arcadia, California. Assisted in the preparation of an Initial Study/Mitigated Negative Declaration, in compliance with CEQA.

Century Trunk Line, Los Angeles, California. Assisted in creation of Cultural and Paleontological Resource Mitigation pamphlet and a Workers Education Awareness Program. Compile weekly monitoring memos for Los Angeles Department of Water and Power.

Creative Offices Specific Plan, Los Angeles, California. Assisted in the preparation of an Archaeological Resources Assessment, in compliance with CEQA.

District NoHo, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report and an Archaeological Resources Report, in compliance with CEQA.

Escondito Drive at Mile Marker 0.49, Los Angeles County, California. Assisted with preparation of a Cultural Resources Study Letter Report, in conformance with Section 106 of the National Historic Preservation Act

Hollywood and Cahuenga, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report and an Archaeological Resources Report, in compliance with CEQA.

LA Spring Street, Los Angeles, California. Performed background research for a Tribal Cultural Resource Report and an Archaeological Resources Report, in compliance with CEQA.

MetroWalk Development, Santa Clarita, California. Assisted with preparation of a Cultural Resources Inventory Report, in compliance with CEQA.

Rialto Energy Storage, Rialto, California. Assisted in preparations of a Cultural and Paleontological Resources Report, in compliance with CEQA.

Pacific Palisades Village 1, CAH Acquisitions Co. LLC, Pacific Palisades, California. Provided archaeological and paleontological monitoring for the large mixed-use project in accordance with the monitoring and mitigation treatment plan stated in the environmental impact report.

Fallin E. Steffen, MPS

ARCHITECTURAL HISTORIAN



Education

Tulane University,
New Orleans, LA
Masters of Preservation Studies, 2015

University of California,
Santa Cruz, CA
B.A. History of Art & Visual Culture, 2010

Fallin Steffen (*FAL-in STEF-in; she/her*) is an Architectural Historian with 6 years' experience in historic preservation, architectural conservation, and cultural resource management in the Monterey Bay Area and Northern California. Ms. Steffen's professional experience encompasses a variety of projects for local agencies, private developers, and homeowners in both highly urbanized and rural areas, including reconnaissance- and intensive-level surveys, preparation of resource-appropriate and city-wide historic contexts, and historical significance evaluations in consideration of the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), and local designation criteria. Additionally, Ms. Steffen was appointed as a Commissioner to the Santa Cruz City Historic Preservation Commission assisting Santa Cruz City Staff with design review and conformance with the Secretary of the Interior Standards for proposed residential, commercial, and municipal projects involving historic properties.

Ms. Steffen meets the Secretary of the Interior's Professional Qualification Standards for Architectural History. She is experienced with interdisciplinary projects spanning private and public development, transportation, and water infrastructure, and maintains experience forming educational sessions about the identification of and best practices for the preservation of historic resources.

Relevant Dudek Project Experience

500 San Benito Street, City of Hollister, California. Served as project manager and architectural historian for the project, provided consultation for the rehabilitation design, and authored the memorandum providing an analysis of how the project conforms with the Secretary of the Interior Standards. The purpose of the project was to rehabilitate the National Register of Historic Places Downtown Hollister Historic District contributing building located at 500 San Benito Street in the City of Hollister, California, for use as condominiums. The City of Hollister required a qualified architectural historian assess the proposed project, which involved the replacement of the original windows for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, specifically, the Standards for Rehabilitation. The results of the assessment found that the project conforms with the Standards for Rehabilitation. (September 2021)

Vista Woods Apartment Project, CEQA Compliance and HUD Permitting, Pinole, California. Served as architectural historian and co-authored the Built Environment Resources Inventory and Evaluation Report for the Vista Woods Apartment Project. The purpose of the project was to replace existing buildings on a development site comprising three parcels located in the City of Pinole, California with a new 4-story, 179-unit apartment complex providing affordable housing to seniors. As the project includes funding from the Department of Housing and Urban Development (HUD), the City of Pinole requested the document comply with Section 106 of the NHPA of 1966 and CEQA. Ms. Steffen authored the historical significance evaluation for 1106 San Pablo Avenue and its associated components. The significance evaluation determined that the property does not appear eligible for designation under NRHP, CRHR and local designation criteria. (August 2021)

Davenport Cooperage Barn Reconstruction Project, Davenport, Santa Cruz County, California. Served as project manager and architectural historian for the project and co-authored the historical significance investigation report. The purpose of the Project is to reconstruct the Davenport Cooperage Barn located in Davenport, California following the guidance for the Secretary of the Interior's Standards for Reconstruction so that following the reconstruction, the structure can be reevaluated and considered for local historical significance. The historical significance investigation report included both a built environment and an archeological investigation of the site to identify any remaining or previously unknown resources or features of the building, site, or setting needed to inform and accurate reconstruction of the building (July 2021)

The Delivery Station Building Project, Cultural Resources Inventory and Evaluation Report, San José, California. Served as architectural historian for the project, conducted fieldwork and co-authored the Cultural Resources Inventory and Evaluation Report. Dudek was retained by Kimley-Horn to complete a Historic Resources Evaluation for an industrial complex located in the City of San José, California. The purpose of the project is the replacement of the existing industrial complex with an approximate 94,325 square feet new warehouse building and site related improvements. The report entailed archival building development research in local repositories and the composition of an appropriate historic context focused on the history of San José , exterior survey fieldwork of the resources, and historical significance evaluations for the resources in consideration of NRHP, CRHP, and local designation requirements. As a result of the significance evaluation, the subject property does not appear eligible for listing in the NRHP, CRHR, or local inventory, due to a lack of significant architectural merit. (April 2021)

123 Independence Drive Mixed-Use Project, Department of Community Development, City of Menlo Park, California. Served as architectural historian and co-author of the Historical Resources Evaluation Report. The Sobrato Organization retained Dudek to prepare a cultural resources study in support of the 123 Independence Drive Mixed-Use Project located in the City of Menlo Park. The study included a pedestrian survey of the subject properties for buildings and structures over 45 years of age; building development and archival research for the identified properties located within the project site; recordation and evaluation of cultural resources identified within the study area for the NRHP, CRHR, and local eligibility criteria and integrity requirements; and an assessment of potential impacts to historical resources in conformance with the California Environmental Quality Act (CEQA) and all applicable local municipal code and planning documents. Ms. Steffen's efforts included exterior survey fieldwork of the resources and archival building development research in local repositories. (December 2020–Present)

St. Joseph's Hospital Master Plan Project, Stockton, California. Dudek was retained to complete a historical resources inventory and evaluation report in support of the proposed St. Joseph's Hospital Master Plan Project in Stockton, California. The project involves redevelopment of portions of the St. Joseph's Medical Center Complex, as well as expansion into several adjacent properties. Ms. Steffen served as architectural historian for the project and assisted in the intensive pedestrian survey of all properties, conducted building development and archival research, and was co-author of the report. (May 2020-September 2021)

As Needed Historic Research Consulting Services, City of Coronado, California. Served as architectural historian and co-author of the Historical Resources Evaluation Report. Dudek was retained by the City of Coronado to provide as-needed historic consulting services for projects in Coronado. Each evaluation involved the creation of an occupancy timeline, supplemental research on occupants, architect/builder, property, building development research, a pedestrian survey of the project area, a description of the surveyed resource, and completion of a historical significance evaluation report in consideration of designation criteria and integrity requirements. Acting as architectural historian, Ms. Steffen co-authored the historical resource evaluation report for a property located at 121 G Avenue in June of 2020. (2019–Present)

Kathryn Haley, MA

HISTORIC BUILT ENVIRONMENT LEAD



Kathryn Haley (*KATH-rin HAY-lee; she/her*) is a historic built environment resource specialist/architectural historian with 19 years' professional experience in historic/cultural resource management. Ms. Haley has worked on a wide variety of projects involving historic research, field inventory, and site assessment conducted for compliance with Section 106 of the National Historic Preservation Act (NHPA), National Environmental Policy Act (NEPA), and California Environmental Quality Act (CEQA). Ms. Haley specializes in evaluating properties for listing in the California Register of Historical Resources (CRHR); the National Register of Historic Places (NRHP). She has evaluated a wide variety of built environment resources throughout California, including water management structures (levees, canals, dams, and ditches), buildings (residential, industrial, and commercial), and linear resources (railroad alignments, roads, and bridges). She specializes in managing large-scale surveys of built environment resources, including historic district evaluations. She has prepared numerous Historic Resources Evaluation Reports (HRERs) and Historic Property Survey Reports (HPSRs) for the California Department of Transportation (Caltrans). Ms. Haley also worked on the San Jose to Merced section and Central Valley Wye section of the California High-Speed Rail Project, where she led the built environment survey, conducted property-specific research, prepared the Draft Historic Architectural Survey Report (HASR) and co-authored the environmental section for cultural resources.

Education

California State University, Sacramento MA, Public History, 2004

California State University, Sacramento BA, History, 2001

Professional Affiliations

California Council for the Promotion of History (former Treasurer)

California Preservation Foundation

She meets the Secretary of the Interior's Professional Qualification Standards for historian and architectural historian. Ms. Haley has also assisted in preparation of Historic Properties Inspection Reports (condition assessments) under the direction of the Naval Facilities Engineering Command (NAVFAC) in accordance with Section 106 and Section 110 of the NHPA. Moreover, Ms. Haley has served as project manager, coordinator, historian, and researcher for a wide variety of projects. She is also experienced in the preparation of Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) documents, as well as the preparation for National Register nominations.

Relevant Project Experience

On-Call Services for Department of Water Resources, Operations and Maintenance Division, State of California. Dudek was retained by the State of California's Department of Water Resources (DWR), Operations and Maintenance Division (O&M), to assist in a wide range of on-going environmental compliance efforts. Under this on-call contract, Ms. Haley serves as project manager for a task order focused on assisting DWR in efforts to streamline cultural resources environmental documentation for O&M projects. Dudek is also preparing several built environment technical reports for several projects under this contract. Ms. Haley led the creation of a standardized historic context statement for State Water Project (SWP), as well as Historical Resources Technical Reports for various SWP maintenance projects. Technical reports have been prepared for O&M projects at the following sites: Dyer Dam and Reservoir, Patterson Dam and Reservoir, Clifton Court Forebay, California Aqueduct Milepost 230. (2020–Ongoing)

Laguna Creek Diversion Retrofit Project, CEQA Compliance and U.S. Army Corps of Engineers permitting, City of Santa Cruz, Bonny Doon, California. As lead architectural historian, co-authored the Cultural Resources Inventory, Evaluation and Finding of Effect Report for the Laguna Creek Diversion Retrofit Project. The purpose of the project is to retrofit the existing 1890 Laguna Creek Diversion Facility in Bonny Doon, California with a new intake and sediment control system. Co-authored the historical significance evaluation of the Laguna Creek Diversion Facility and is associated components. The significance evaluation determined that the Laguna Creek Dam appears individually eligible as a historic resource/property under NRHP/CRHR Criterion A/1, and Santa Cruz County Criterion 2 as a well-preserved masonry water management structure dating to 1890. It is a physical example of pioneering water management infrastructure in California and is significant for its association with early advances in water management in California, specifically through creation of the City of Santa Cruz's first municipal water distribution system. All other associated facility buildings and structures were found not eligible under all NRHP, CRHR, and local designation criteria, and the project effects assessment recommends that the project would have a less than significant impact on historical resources (CEQA)/no adverse effect on historic properties. (June 2020–Ongoing)

Historic Resources Compliance Report for the Crowther Sewer Pipeline Project, City of Placentia, Orange County, California. The City of Placentia proposes to upsize the existing sewer pipeline under Crowther Avenue, Placentia Avenue, and Orangethorpe Avenue by constructing a completely independent pipeline parallel to the existing pipeline, which would be capped and left in place once the new pipeline is completed. All cultural resources work was conducted according to Caltrans guidelines for compliance with CEQA. Provided QA/QC for the Historic Resources Compliance Report. (2020-ongoing)

University of California Berkeley, Clark Kerr Campus Beach Volleyball Complex Environmental Impact Report, University of California Berkeley, Alameda County, California. Dudek is in the process of assisting the University of California Berkeley (UC Berkeley) with an Environmental Impact Report (EIR) for the Clark Kerr Campus (CKC) Beach Volleyball Complex Project, which is located within NRHP District No. 82000962 *State Asylum for the Deaf, Dumb, and Blind* (also known as *California Schools for the Deaf and Blind*) (historic district). The historic district is also considered a City of Berkeley Landmark. UC Berkeley is proposing to partially demolish CKC Building 21/NRHP California Schools for the Deaf and Blind Building B-11, which is a contributing building to the historic district. The partial demolition of CKC Building 21 is being pursued due to the seismic safety risk posed by the building pursuant to the University of California's Seismic Safety Policy, as well as certain obligations under the CKC Covenants, which limit the ability of the campus to construct new buildings on the CKC. This subject building has been vacant since at least the late 1970s. To comply with Public Resources Code (PRC) Section 5024(b), regarding state-owned historical resources, UC Berkeley must consult with the State Historic Preservation Officer (SHPO) on the project. Is serving as lead architectural historian on the project, assisting UC Berkeley with SHPO correspondence and preparing the technical finding of effect/Secretary of the Interior's Standards (SOIS) analysis for the project. Will work with UC Berkeley on mitigation development if necessary. (January 2020–Ongoing)

California State University (CSU), Fresno, Central Utility Plant Modernization Project, Fresno, California. The CSU Fresno Central Utility Plant Modernization Project is intended to renovate and modernize the existing Central Utility Plant. The cultural resources study included the review of a CHRIS records search completed by Dudek in 2018 covering the project area; the development of a Built Environment Study Area; archival and building development research for buildings located within the project site; evaluation of buildings for NRHP, CRHR, California Historical Landmark, and local eligibility criteria and integrity requirements; and an assessment of impacts to historical resources in compliance with CEQA and PRC Sections 5024 and 5024.5 for state-owned resources. Ms. Haley provided QA/QC for the cultural resources study. Her role in the preparation of the study included the required exterior survey of campus buildings over 45 years of age scheduled for substantial alteration as part of the proposed project. This project also entailed extensive archival research and the preparation of historic context covering the development of the CSU system and the CSU Fresno campus, and the preparation of significance evaluations and accompanying DPR forms for each resource. (November 2020–Ongoing)

Mitigation Implementation for 3093 Broadway (HABS and Interpretative Signage), The Martin Group, City of Oakland, Alameda County, California. Dudek was retained by The Martin Group to prepare documentation required under CEQA for the 3093 Broadway Project, which resulted in a significant impact of a CEQA historical resource. Preparation of local-level HABS documentation of the Connell Motor Company Building in Oakland, California and interpretative signage were included as mitigation requirements outlined in the EIR for this project. In coordination with the City of Oakland, Dudek assisted The Martin Group in implementation of the required mitigation. Dudek prepared the HABS documentation and created the interpretive signage for the building that documented the history of the Connell Motor Company building following its demolition in 2016 and integration of the showroom façade into the new complex located at the site completed in 2019. Tasks involved in completing this work included intensive research related to the Connell Motor Company building, writing the HABS report, and the compilation of all known existing physical evidence related to the building. Additionally, the information compiled as part of the HABS documentation was used to produce the text and graphics for the interpretative signage in the form of an informational plaque documenting the historic significance of the Connell Building that is now featured at the new complex. Provided senior-level technical support and QA/QC. (2020)

Santa Cruz Water Rights Project CEQA Compliance, City of Santa Cruz, Santa Cruz County, California. As lead architectural historian, co-authored the Cultural Resources Inventory and Evaluation Report for the Santa Cruz Water Rights Project. The proposed project included 11 proposed undertakings related to water rights and infrastructure improvements for five water districts in 11 non-contiguous locations in Santa Cruz County, California. As the project includes both project-level and programmatic-level components, the City requested the document comply with Section 106 of the NHPA and CEQA as federal permits may be needed and/or federal funding may be used for some of the undertakings in the future. Provided QA/QC on the historical significance evaluations of the two historic-era properties (over 45 years of age) identified within the area of potential effect (APE). Both properties were found not eligible for designation under NRHP, CRHR, and local designation criteria. Wrote the project- and program-level impact analysis in the CEQA EIR cultural resources section for built environment resources. (July 2020–Ongoing)

Municipal Waterways Maintenance Project CEQA Compliance and ACOE permitting, City of San Diego, California. Dudek developed the Municipal Waterways Maintenance Plan (MWMP) in close coordination with the City of San Diego and prepared a program EIR for the City's on-going stormwater facility maintenance program. The MWMP details the planned maintenance activities, specific facility maintenance locations, biological compensatory mitigation sites, agency permitting procedures, and includes site-specific facility maintenance plans and/or technical summaries for stormwater conveyance channels, ditches, structures, and basins throughout eight watersheds within the City's municipal boundaries. Dudek prepared a program EIR for the maintenance program, including cultural resources as one of the associated technical studies. Provided senior-level guidance on built environment resources for the project and QA/QC on the technical documentation. (January 2019–Ongoing)

Santa Cruz Wharf Maintenance Project CEQA Compliance and U.S. Army Corps of Engineers permitting, City of Santa Cruz, California. The purpose of this project is to replace and/or repair storm-damaged piles supporting the Santa Cruz Municipal Wharf in Santa Cruz, California. The Dudek built environment team conducted fieldwork and co-authored the Evaluation and Finding of Effect Report for the Santa Cruz Wharf Maintenance Project. The report was prepared in compliance with Section 106 and in support of the permitting process with the U.S. Army Corps of Engineers (ACOE). Although the Wharf was previously evaluated under CRHR and local criteria by another historian in recent years, no NRHP criteria evaluation existed. Co-authored all documentation related to the Wharf, including the significance evaluation that recommended the Wharf as eligible under NRHP Criterion A for its continued associations with the industrial development, transportation, commerce, and recreation development of Santa Cruz and under Criterion C as a distinctive engineering structure known to be the longest wooden pier structure located along the United States west coast. Additionally, a detailed effects assessment determined that

the proposed Wharf Maintenance project would have a less than significant impact on historical resources (CEQA)/no adverse effect on historic properties (Section 106). No mitigation or management recommendations were necessary to support the no adverse effect finding. Provided senior-level guidance throughout the project and QA/QC on the technical report. (2020)

California State University, Chico, Master Plan EIR, City of Chico, Butte County, California. Served as lead architectural historian and co-author of the cultural resources technical study prepared in support of the California State University (CSU) Chico Master Plan EIR. Her role in the preparation of the study included the required exterior survey of campus and university farm buildings and in some cases, interior survey fieldwork involving all buildings and structures on campus over 45 years of age scheduled for demolition and/or substantial alteration as part of Phase 1 and 2 of the proposed Master Plan. This project also entailed extensive archival research and the preparation of historic context covering the development of the CSU system and the CSU Chico campus, and the preparation of significance evaluations and accompanying DPR forms for each resource. (2019-2020)

Judicial Council of California Historical Resource Evaluation Report for the Stanley Mosk Courthouse, City of Los Angeles, Los Angeles County, California. To comply with PRC Section 5024(b), the Judicial Council of California (JCC) must submit to SHPO an inventory of all structures over 50 years of age under JCC jurisdiction that are listed in or that may be eligible for inclusion in the NRHP, or registered or that may be eligible for registration as a California Historical Landmark (CHL). The Stanley Mosk Courthouse was found eligible for designation for the NRHP, CHL, CRHR, and Los Angeles Historic Cultural Monument list under Criterion A/1 and C/3. Provided QA/QC for the final report. (2019)

1624 Mission Street, SOIS Compliance Analysis, City and County of Santa Cruz, California. Dudek was retained to review the proposed project to rehabilitate the locally listed historic resource located at 1624 Mission Street in the City of Santa Cruz, California. The City of Santa Cruz required that a qualified architectural historian assess the proposed project, which involved the replacement of the wooden storefront window wall and full-light metal door, the concrete entry slab, wall and stairs, and the addition of a new front railing for conformance with SOIS for the Treatment of Historic Properties, specifically, the Standards for Rehabilitation. Project work entailed consultation to design a suitable replacement storefront after structural failure caused by a storm. Dudek also drafted the memorandum providing an analysis of how the project conforms to SOIS. Provided senior level technical support and QA/QC. (2019)

Globemaster Corridor Specific Plan, City of Long Beach, Los Angeles County, California. The project proposed to implement the Globemaster Corridor Specific Plan (GCSP), a planning and regulatory framework for redevelopment of an area adjacent to the Long Beach Airport and the surrounding residential and business community, which includes rezoning portions of the GCSP area, and a mobility plan that implements new streets and pedestrian connectors. Since the GCSP does not directly propose changes to the buildings or structures in the Plan area, the cultural resources report takes a programmatic overview and offers potential impacts analysis and mitigation measures for future development. Provided QA/QC for the Draft EIR/Environmental Impact Statement (EIS) Cultural Resources Chapter for the GCSP project. (2018)

Kate Kaiser, MSHP

ARCHITECTURAL HISTORIAN

Kate Kaiser (*KAYT KY-zer; she/her*) is an architectural historian with 10 years' experience as a cultural resource manager in California, Nevada, Oregon, Washington, and Hawai'i. Ms. Kaiser meets the Secretary of the Interior's Professional Qualification Standards for both architectural history and archaeology.

Ms. Kaiser specializes in California Environmental Quality Act (CEQA) compliance, National Historic Preservation Act (NHPA) Section 106 and Section 110 compliance, Historic Resource Evaluation Reports (HRER), historical resource inventories (HRI), environmental impact report (EIR) chapters, Historic American Building Survey (HABS) level documentation, archival research, adverse effects or impacts analysis, cultural landscapes, and geographic information systems (GIS).



Education

University of Oregon
MS, Historic Preservation, 2017

Boston University
BA, Archaeology, 2009

Professional Affiliations

Wrightwood Historical Society – Board Member

Association for Preservation Technology – Southwest

California Preservation Foundation

Society for California Archaeology

National Trust for Historic Preservation

Recent Dudek Project Experience

On Call Historic Built Environment Services California Department of Water Resources, Various Locations, California. Dudek was retained by the California Department of Water Resources (DWR) to prepare Built Environment Inventory and Evaluation Reports for various State Water Project maintenance projects. Over the course of this multiyear project, Dudek is providing technical assistance to DWR by in creating individual and statewide historical context statements and significance evaluations for State-owned water infrastructure. As architectural historian, Ms. Kaiser has authored HRERs and findings of effects for the following structures (2020–Present):

- Oroville Dam and spillway (2022)
- Cedar Springs Dam and spillway (2022)
- South Bay Aqueduct (2021)
- Patterson Dam and reservoir (2021)
- Clifton Court Forebay (2021)
- California Aqueduct segments (2020-2021)
- San Luis Field Division Operations and Maintenance Center (2021, 2022)
- Gianelli Pumping-Generating Plant (2022)
- Dos Amigos Pumping Plant (2021, 2022)
- Coalinga Operations and Maintenance Subcenter (2021)
- B.F. Sisk Dam/San Luis Reservoir Historic District (2021, 2022).

Historical Resources Technical Report for The Meadows at Bailey Canyon Specific Plan Project, NUWI Sierra Madre LLC, Sierra Madre, California. Dudek was retained by NUWI Sierra Madre LLC to complete a historical resources technical report for The Meadows at Bailey Canyon Specific Plan Project. A portion of the proposed project

included a section of the Mater Dolorosa Retreat Center property at 700 North Sunnyside Avenue. The Mater Dolorosa Retreat Center contains four buildings, 17 historic-age structures, five modern structures, and multiple landscape elements, including paths, trails, stairs, and historic-aged trees. As coauthor, Ms. Kaiser prepared the historic built environment report components, conducted fieldwork and archival research, wrote the historical context, and prepared the property evaluation for this report. As a result of this study, the Mater Dolorosa Retreat Center property does not appear eligible for listing in the NRHP or CRHR, or as a City of Sierra Madre Landmark, due to significant alterations that have compromised the integrity of the property as a whole. (2020–2021)

Historic American Buildings Survey Written Documentation for Pomona City Stables, City of Pomona, California. Dudek was retained by the City of Pomona to complete HABS-level documentation of the Pomona City Stables, which was damaged and partially collapsed in 2017. Ms. Kaiser served as architectural historian and author of the HABS documentation for the Pomona City Stables building, constructed in 1909. Ms. Kaiser also coordinated fieldwork and building recordation; outreach to archives, libraries, and historical societies; and HABS documentation product packaging for the City of Pomona. (2020–2021)

Cultural Resources Technical Report for Arroyo Seco Canyon Project, City of Pasadena Water and Power Department, California. Dudek was retained by the City of Pasadena Water and Power Department to complete a Cultural Resources Technical Report for the Arroyo Seco Canyon Project Areas. Ms. Kaiser served as architectural historian and coauthor for the Cultural Resources Technical Report. The report included conducting a CHRIS record search, fieldwork, archival research, historical context development, and development of building descriptions and significance evaluations for six historic-aged engineering buildings and structures within the proposed project area. Dudek recommended that all buildings and structures were ineligible for listing in the NRHP or CRHR, except for the Behner Water Treatment Plant, and provided impacts analysis for City of Pasadena Arroyo Seco Stone Wall design elements present in the project area. Dudek also prepared the EIR for the project, and Ms. Kaiser authored the relevant Cultural Resources Report section and impacts analysis related to the Behner Water Treatment Plant historic resource. (2019–2021)

HRER for the Stanley Mosk Courthouse, Judicial Council of California, Los Angeles, California. Dudek was retained by the Judicial Council of California to prepare an evaluation of the Stanley Mosk Los Angeles County Courthouse building, located at 111 N. Hill Street. To comply with California Public Resources Code, Section 5024(b), the Judicial Council of California must submit to SHPO an inventory of all structures more than 50 years old under the Judicial Council of California's jurisdiction that are 1) listed in, or may be eligible for inclusion in, the NRHP or that are 2) registered, or may be eligible for registration, as a California Historical Landmark. Ms. Kaiser served as architectural historian and author of the HRER. Preparation of the report involved extensive archival research, interior and exterior survey fieldwork, historic context development, material descriptions, historical significance evaluations, and California Department of Parks and Recreation (DPR) forms for the Stanley Mosk Courthouse. The Stanley Mosk Courthouse was found eligible for designation for the NRHP, California Historical Landmark, CRHR, and Los Angeles Historic Cultural Monument list under Criteria A/1 and C/3. (2019)

Northside Specific Plan Draft EIR, City of Riverside, Riverside and Colton, California. Dudek was retained by the City of Riverside to prepare the Northside Specific Plan Draft EIR. Ms. Kaiser served as architectural historian and coauthor of the Cultural Resources chapter. The chapter involved developing a historic context, conducting a record search, and documenting results for the 17 subareas of the Northside Specific Plan Area. Once potential resources were identified and recorded, Ms. Kaiser prepared an impacts analysis and mitigation measures for the future development of the Northside Specific Plan Area. The Northside Specific Plan proposed changes to zoning and the potential redevelopment of a 1,423-acre area in the City of Riverside, the City of Colton, and unincorporated areas within Riverside County, including the proposed rehabilitation and redevelopment of a parcel containing a historic adobe. (2019)

Linda Kry, BA, RA

ARCHAEOLOGIST

Linda Kry is an archaeologist with 16 years' experience in cultural resource management specializing in various aspects of cultural resources investigations within Southern and Central California. Ms. Kry's experience includes archival research, intensive-level and reconnaissance surveys, artifact analysis, cataloging and and processing of artifact collections for curation, ground penetrating radar investigations, assisting CEQA lead agencies with Assembly Bill 52 and Senate Bill 18 notification and consultation process, and authoring technical reports pursuant to CEQA and Section 106 of the National Historic Preservation Act (NHPA). Ms. Kry's extensive experience includes the management of cultural resources specialists in support of various aspects of cultural resources compliance, construction monitoring, Native American consultation, archaeological testing and treatment, and prehistoric and historical resource significance evaluations.

Education

University of California, Los Angeles
BA, Anthropology, 2006

Cerritos College
AA, Anthropology, 2004

Certifications

Registered Archaeologist (RA) # 4672

Professional Affiliations

Society for California Archaeology

Society for Historical Archaeology

Selected Project Experience

Buena Vista Project, City of Los Angeles, California. Archaeological lead for a cultural resources study in support of a development project in the heart of Chinatown. The project footprint includes the mapped alignment of the Zanja Madre network, a series of interconnected historic-era irrigation system that was established during the 1700s and discontinued in the early 1900s. The study included the use of a ground-penetrating radar (GPR) to locate the presence of the Zanja Madre within the Project's footprint. Conducted a GPR survey and contributed to the reporting of the GPR results and the impacts analysis for cultural resources in the CEQA document. The City of Los Angeles is the lead agency under CEQA.

Palmetto Street Project, Los Angeles, California. Conducted GPR testing for the project to determine the location of the zanja system subsurface within the project site to provide appropriate recommendations in support Project needs. Responsibilities included providing management oversight and reporting for a TCR report and an archaeological assessment/GPR report for the Project. Studies prepared are in support of the impacts analysis for archaeological and tribal cultural resources in the CEQA document.

South Park Towers Project, Los Angeles, California. Conducted GPR testing for the project to determine the location of the zanja system subsurface within the project site to provide appropriate recommendations in support Project needs. As archaeological lead, responsibilities included management oversight and reporting for a tribal cultural resources report and an archaeological assessment/GPR report for the project. Studies prepared are in support of the impact analysis for archaeological and tribal cultural resources in the CEQA document.

2159 Bay Street Project, City of Los Angeles, California. The project involves the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to four levels of subterranean parking, and two two-story commercial buildings. As archaeological lead, provided management oversight and reporting for archaeological and tribal cultural resources to assist in the analysis of impacts in the CEQA document.

LA Spring Street Project, City of Los Angeles, California. The project involves a new mixed-use development proposed on a 1.61-acre site. As archaeological lead, provided management oversight and reporting for archaeological and tribal cultural resources to assist in the analysis of impacts in the CEQA document.

8th, Grand and Hope Project, City of Los Angeles, California. Archaeological lead providing management oversight and reporting for tribal cultural resources and archaeological studies in support of a proposed 45-story mixed-use project in Downtown Los Angeles studies to assist in the analysis of impacts in the CEQA document. Studies prepared are in support of the impacts analysis for archaeological and tribal cultural resources in the CEQA document.

313-333 San Vicente Boulevard Project, Eyestone Environmental, Los Angeles, California. Archaeological lead providing management oversight and reporting for a TCR study for a project that proposes to develop a 19-story, multi-family residential building and the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral of Our Lady of Mount Lebanon – Saint Maronite Catholic Cathedral. Studies prepared are in support of the impacts analysis for archaeological and tribal cultural resources in the CEQA document. The City of Los Angeles is the lead agency under CEQA.

1000 Seward Street Project, Los Angeles, California. Archaeological lead providing management oversight and reporting for TCR study for a proposed development project in the City of Los Angeles. Study prepared is in support of the impacts analysis for TCRs in the CEQA document.

1235 Vine Street Project, Plus Development, Los Angeles, California. Archaeological lead providing management oversight and reporting for TCR study for a proposed development project in the City of Los Angeles. Study prepared is in support of the impacts analysis for TCRs in the CEQA document.

Bellwood Avenue Project, Los Angeles, Los Angeles County, California. Archaeological lead providing management oversight and reporting for a Tribal Cultural Resources study for a project that proposes to develop a new eldercare facility on a 2.22-acre site in the West Los Angeles Community Plan are of the City of Los Angeles.

City of Colton Modern Pacific 88-DU Residential Project, City of Colton, Colton, California. Archaeological lead for a Phase I cultural resources study and Extended Phase I subsurface probing effort in accordance with CEQA. The City of Colton is proposing the development of 89-detatched single-family homes on an approximately 41.58-acre site within a single tract.

Sand Canyon Resort, City of Santa Clarita, Santa Clarita, California. Archaeological lead for a cultural resources study for a project that proposes to develop an abandoned, approximately 75-acre existing open space into a new resort and spa in an effort to become the premiere golf destination in northern Los Angeles County. Tasks include management of the technical study including the archival research, pedestrian survey, and reporting of the study results. Additionally, authored the Cultural and Tribal Cultural Resources chapters for the Environmental Impact Report.

Creek at Dominguez Hills, Plentitude Holdings LLC, Carson, California. Served as contributing author for the environmental impact report for a development project that consists of approximately 532,500 square feet of buildings, including: a multiuse indoor sports complex; youth learning experience facility; indoor skydiving facility; public golf recreation facility; marketplace; clubhouse; recreation and dining center; a sports wellness center; and restaurants. Alternatively, a specialty grocery store may be developed in place of some of the restaurant uses.

Carol Kimmelman Sports and Academic Resources Center Project, Carson, Los Angeles County, California. As archaeological lead, provided management oversight and reporting for cultural resources, including conducting the impacts analysis for archaeological and TCRs in the CEQA document for the project. The project involves redevelopment of 87 acres in the northeastern portion of the existing 187-acre Victoria Golf Course site for public recreation purposes.

Allison Lyons, MSHP

SENIOR ARCHITECTURAL HISTORIAN

Education

Columbia University, M.S., Historic Preservation, 2010

Scripps College, B.A., European Studies, 2006

Allison Lyons (*AL-ih-suhn LYE-ons; she/her*) is an architectural historian with 12 years' experience throughout the western United States in all elements of cultural resources management. Her expertise includes the preparation of environmental compliance documents in accordance with the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act, focusing on the evaluation of historical resources and analysis of project impacts. As a historic preservation consultant, she has been involved in the preparation of numerous large-scale historic resources surveys, Historic American Buildings Survey/Historic American Engineering Record recordation, Federal Rehabilitation Tax Credit and Mills Act Historic Property Contract applications, local landmark nominations, and evaluations of eligibility for a wide variety of projects and property types throughout California. She is highly experienced in writing National Register of Historic Places (NRHP) nominations and historic context statements for local governments. Ms. Lyons meets the Secretary of the Interior's Professional Qualifications Standards for history and architectural history pursuant to Title 36, Part 61, of the Code of Federal Regulations, Appendix A.

Previous Experience

Los Angeles Department of Water and Power Century Trunk Line, Los Angeles Department of Water and Power, City of Los Angeles, California. Dudek was retained by Los Angeles Department of Water and Power to prepare an Avoidance and Protection Plan for Air Raid Siren No. 150. The resource is eligible for the NRHP and California Register of Historical Resources and as a City of Los Angeles Historic-Cultural Monument under Criteria A/1/1 and C/3/3 for its association with World War II and Cold War military infrastructure, and is a historical resource under CEQA. Ms. Lyons is serving as a senior architectural historian, providing quality assurance/quality control for the Post-Construction Monitoring Report. (2021–Present)

City of Coronado Historic Context Statement and Historic Resources Inventory, City of Coronado, California. Dudek is currently in the process of preparing a historic context statement and historic resources inventory survey for all properties at least 50 years old within City of Coronado limits. Following current professional methodology standards and procedures developed by the California Office of Historic Preservation and the National Park Service, Dudek developed a detailed historic context statement for the City that identifies and discusses the important themes, patterns of development, property types, and architectural styles prevalent throughout the City. Dudek also conducted a reconnaissance-level survey of all properties within City limits that are at least 50 years old to identify individual properties and groupings of properties (i.e., historic districts) with potential for historical significance under City Criterion C (properties that possess distinctive characteristics of an architectural style; are valuable for the study of a type, period, or method of construction; and have not been substantially altered). This document also developed registration requirements for resource evaluation that are specific to Coronado, in consideration of both historical significance and integrity requirements. Acting as senior architectural historian, reviewed and wrote sections of the historic context statement. (2019–Present)

City of West Hollywood Residential Properties in the R2, R3, and R4 Multiple-Family Zoning Districts Historic Context Statement, West Hollywood, California. In 2020, the City of West Hollywood began a phased project to update the 2008 citywide survey of Residential Properties in the R2, R3, and R4 Multiple-Family Zoning Districts. Ms. Lyons co-authored the historic context statement prepared as the first part of the project. (2020–2021)

Downtown Buena Park Project, Historical Resources Technical Report and Impacts Analysis (for CEQA), Buena Park, Orange County, California. Merlone Geier is proposing to redevelop a vacant Stiles & Robert Clements-designed Sears building at the Buena Park Downtown Mall in the City of Buena Park. The redevelopment plans include residential units, amenity and lobby space, and parking. The Sears building, auto center, and surrounding parking lots that were historically connected to the Downtown Buena Park Mall. Following the initial construction of the Sears building in 1959, the Buena Park Downtown Mall was expanded in multiple stages throughout a 50-year development period. To determine if the project would have a significant impact on historical resources, Dudek evaluated the entire Buena Park Downtown Mall for historical significance and integrity in consideration of National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) designation criteria. Dudek determined that the Buena Park Downtown Mall, including the Sears building, did not appear eligible under any NRHP or CRHR designation criteria due to a lack of significant historical associations, architectural merit, and compromised integrity and the Project would result in a less than significant impact to historical resources under CEQA. Ms. Lyons served as a senior architectural historian, providing quality assurance/quality control for the Historical Resources Technical Report. (2021)

8730 Sunset Boulevard Billboard Project Historical Resource Assessment Report, City of West Hollywood, California. The 8730 Sunset Boulevard Billboard Project consists of installation and operation of a new billboard and associated façade improvements at the existing "Sunset Towers" building. The Sunset Towers building at 8730 Sunset Boulevard was constructed in the 1950s and 1960s over the course of two phases. A smaller building was constructed on the northern portion of the parcel between 1957 and 1959. Dudek was retained by the City of West Hollywood to complete this Historic Resource Assessment, an intensive-level evaluation, as part of the environmental review of the proposed project in compliance with CEQA. This study included an intensive survey of the exterior of the Sunset Towers building by a qualified architectural historian; building development and archival research; development of an appropriate historic context; and evaluation of the Sunset Towers building for historical significance and integrity in consideration of NRHP, CRHR, and City of West Hollywood Cultural Heritage Preservation Ordinance designation criteria. Ms. Lyons served as a senior architectural historian and main author of the Historic Resource Assessment of the Sunset Towers building. (2021)

Anne Banning Community House of the Assistance League of Southern California, 1370 St Andrews St. Historic-Cultural Monument Application, Los Angeles, California. Paul R. Williams designed a Community House for the Assistance League of Southern California, a leading Los Angeles philanthropy, in 1961. The two-story, American Colonial Revival-style Anne Banning Community House served the League's need for a business environment combined with gracious, elegant space for entertaining—teas, luncheons, and privately hosted events. Adaptive reuse of the building was proposed in 2017 and Ms. Lyons completed a City of Los Angeles Historic-Cultural Monument application for the building before construction, identifying the property as significant for its association with an important women's club and architecturally significant as a good example of the Late American Colonial Revival style designed by the master architect Paul R. Williams. (2018–2020)

Four Gables Apartment Building Historic Structure Report and Mills Act Contract Application, West Hollywood, California. The Four Gables apartment building was designed by Leland A. Bryant in a French Chateauesque style. The 16-unit apartment building was completed in 1927. Ms. Lyons prepared an Architectural Features and Treatment Recommendations report as part of an application for a Mills Act contract with the City of West Hollywood. (2019)

Heather McDaniel McDevitt, RPA

ARCHAEOLOGIST

Heather McDaniel McDevitt (*HEH-thur mick-DAN-yul mick-DEH-vitt; she/her*) is an archaeologist and cultural resources lead with 16 years' cultural resource management experience throughout North America with a specialized focus in California. Ms. McDevitt has served as a principal investigator, lab director, and project manager in the public and private sector on all manner of projects, including surveys, testing, site significance evaluations and recordation, data recovery, and laboratory analysis. Her technical expertise encompasses vertebrate and invertabrate analysis, human osteology, geographic information system (GIS), and ground penetrating radar.

As a bioarchaeologist, Ms. McDevitt combines physical anthropology and archaeology in the study of faunal and human remains to reveal ancient lifeways. Her specific area of GIS research is the use of predictive modeling and remote sensing to better understand settlement and subsistence patterns, which can be used to forecast areas of potential impacts and assist in mitigating damage to cultural resources more efficiently. Ms McDevitt also specializes in the tribal consultation process and in the preparation of California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documentation.

Ms. McDevitt has worked on projects for the National Park Service, U.S. Environmental Protection Agency, National Aeronautics and Space Administration, U.S. Bureau of Land Management, the Smithsonian Institute, California State Parks, California Department of Transportation, and various private and environmental firms. Ms. McDevitt's professional experience in CRM provides significant knowledge and practical experience with state and federal regulations, such as NEPA, Section 106 of the National Hictoric Preservation Act (NHPA), and CEQA. Ms. McDevitt has also served as an adjunct professor at community and state institutions for courses in physical and cultural anthropology, archaeology, and GIS.



Education

California State University, Northridge
MA, Public Archaeology
MA, GIS (ABT)
BA, Anthropology

Certifications

Registered Professional Archaeologist (RPA)

CEQA Training through Advanced, AEP

GIS Professional Certificate

HAZWOPER Training, Hydrogeologic

Professional Affiliations

American Anthropological Association

American Institute of Archaeology

Society for American Archaeology

Society for California Archaeology

Project Experience

On-Call Management

On-Call Archaeological Services, County of Santa Barbara, California. As supervising archaeologist, managed Dudek's on-call archaeological, historical services, including but not limited to monitoring, archaeological record searches, historical research, architectural history, surveys for both prehistoric and historical resources, extended Phase I surveys, test excavations, data recovery, Native American coordination, coordination with the Native American Heritage Commission, Assembly Bill (AB) 52 support, treatment protocols, feasibility/concept plan studies and recommendations, hiring and management of applicable subconsultants and specialty disciplines as required, preparation of management plans, and design and implementation of mitigation methods.

On-Call Engineering Contract, City of Santa Barbara Public Works Department, Santa Barbara, California. As supervising archaeologist, addressed all cultural services generated as a result of Dudek's on-call engineering contract, including but not limited to monitoring, archaeological record searches, historical research, architectural history, surveys for both prehistoric and historical resources, extended Phase I surveys, test excavations, data recovery, Native American coordination, coordination with the Native American Heritage Commission, AB 52 support, treatment protocols, feasibility/concept plan studies and recommendations, hiring and management of applicable subconsultants and specialty disciplines as required, preparation of management plans, and design and implementation of mitigation methods. All services conducted in accordance with City of Santa Barbara Master Environmental Assessment cultural guidelines, CEQA, and if appropriate NEPA.

5-Year On-Call Cultural Services, City of Ventura, California. As supervising archaeologist, managed Dudek's contract for the City of Ventura on-call archaeological and historical services, including but not limited to monitoring, archaeological record searches, historical research, architectural history, surveys for both prehistoric and historical resources, extended Phase I surveys, test excavations, data recovery, Native American coordination, coordination with the Native American Heritage Commission, AB 52 support, treatment protocols, feasibility/concept plan studies and recommendations, hiring and managing applicable subconsultants and specialty disciplines as required, preparation of management plans, and design and implementation of mitigation methods. Potential projects include municipal infrastructure improvements, such as domestic water distribution system, sanitary sewer collection system, storm drainage collection system, and other undertakings as determined.

Development

Paradiso Residential Development, Extended Phase I and Phase II Archaeological Investigation, Compliance Monitoring and Reporting, Santa Barbara County, California. As principal investigator and supervising archaeologist, designed work plans and managed crews conducting Phase I and multiple Extended Phase I Archaeological Investigations, prepared technical reports and Construction Mitigation and Monitoring Treatment Plan. Currently serves as project manager for all archaeological and Native American monitoring, facilitation of pre- and continual-construction meetings, coordination and supervision of archaeological technician crew in all aspects, as well as necessary document preparation and agency/client consultation.

Single Family Residence at 5567 Calle Arena, Extended Phase I and Phase II Archaeological Investigation, Compliance Monitoring and Reporting, Carpinteria, California. As principal investigator and supervising archaeologist, designed and implemented research design evaluating previously recorded archaeological site CA-SBA-7, ethnohistoric Chumash village *Mishopshnow*, and California Historic Landmark No. 535. Supervised and conducted excavations intended to delineate horizontal and vertical extent of the site and site significance. Performed analysis on recovered remains, Native American consultation, preparation of final reports, and implementation of recommended avoidance strategies and mitigation measures, including archaeological and Native American monitoring.

749/759 Ward Drive, Compliance Monitoring and Reporting, Industrial Development, Goleta, California. As project manager and supervising archaeologist, managed all archaeological and Native American monitoring efforts of construction activities that involved management of monitoring staff; monitoring strategies; providing recommendations to agency, construction, and project management staff; and regular field visit verification memos and final monitoring report to the agency.

7465 Hollister Avenue Compliance Monitoring and Reporting for Residential Utility Trenching. Daniel Guggenheim, Goleta, California. As project manager and supervising archaeologist, managed all archaeological and Native American monitoring efforts of utility trenching throughout the mobile home park, including creation and implementation of cultural resource monitoring and treatment plan, supervision of monitoring staff, site visits,

cultural awareness training of construction personnel, providing recommendations to construction and project management staff based project design, providing City with field visit verification reports for compliance with reporting requirements, and preparation of final monitoring report.

Santa Barbara Polo Villas, 3250-3282 Via Real, Phase I, Extended and Supplemental Phase I Archaeological Investigation, Carpinteria, California. As principal investigator and supervising archaeologist, conducted extended Phase I investigation, including research design and work plan creation, field direction, coordination and management of archaeological technician crew during excavations and Native American monitors, field documentation, final report preparation, as well as communication with and providing regulatory recommendations to agency staff.

Marriott Residence Inn, Phase III Data Recovery Program and Compliance Monitoring and Reporting within CA-SBA-58, Goleta, California. As laboratory manager, lead project analyst, and on-call human osteologist, developed methodology for research design, supervised complete laboratory research, managed all specific collections for expert analysis, managed and trained six archaeological technicians for processing of the recovered archaeological assemblage, conducted faunal analysis and osteological analysis of recovered human remains, and prepared remains for reburial. Prepared final human osteological report and portions of the project's data recovery report. Compliance monitoring included daily construction monitoring, preparation of daily logs, guidance to construction and project management staff based on project design and inadvertent discoveries and coordination with Native American monitors.

235 North La Luna Residential Development, Phase II Archaeological Study, City of Ojai, California. As principal investigator and supervising archaeologist, developed research design and work plan to verify the horizontal and vertical significance of the archaeological site CA-VEN-139 in Ojai, California, which was previously recorded as extending partially into the proposed project site. Responsibilities included consultation with client (who was in the contingency period of purchasing the project site) to determine the logistical and financial feasibility of developing the property, communication with tribal stakeholders and communicating regulatory recommendations to agency staff.

Oak Hills Project, Vandenberg Village, Phase I, Site Distribution Analysis and Extended Phase I Archaeological Investigation, Santa Barbara County, California. As project archaeologist and field director, conducted initial Phase I intensive ground survey, designed and implemented research design to address concerns of local Tribe including intra-site analysis for all known archaeological sites located within a one-mile radius of the project site to determine potential to encounter unknown cultural resources based on the environmental and cultural landscape characteristics and creation of a predictive model for the area. Supervised excavations intended to determine presence or absence of cultural materials within proposed areas of ground disturbance, consulted with tribal representatives, and composed final reports.

Direct Relief Warehouse, Phase III Data Recovery Program within CA-SBA-59, Goleta, California. As laboratory manager and lead project analyst, developed methodology for research design, supervised complete laboratory research, managed all specific collections for expert analysis, managed and trained six archaeological technicians for processing of archaeological remains, conducted complete faunal analysis of assemblage, and prepared portions of the technical report. Served as on-call human osteologist for project.

Santa Barbara Armory NEPA – Indian Health Service Environmental Assessment and Section 106 Compliance Service, Santa Barbara, California. As project manager, conducted a NEPA Environmental Assessment, Section 106 Compliance Services in support of the proposed change of use, from an armory regulated by the Federal Health and Human Services Agency to a museum regulated by the Indian Health and Human Services Agency, and change in ownership for the property located at 3237 State Street in the City of Santa Barbara. This work is

being conducted pursuant to NEPA, Section 106 of the NHPA, CEQA, and the City of Santa Barbara's Municipal Code §22.22.035. Execution of a memorandum of agreement has been employed to mitigate the adverse of the transfer of the U.S. Army Reserve Center Property, an eligible historic properties property, out of federal ownership. Tasks included close coordination with the State Historic Preservation Officer; IHS Environmental Coordinator; and federal, state, and local agencies.

Education

San Luis Obispo County Community College District, CEQA Compliance Monitoring and Reporting, Cuesta College North and South Campus, San Luis Obispo County, California. As supervising archaeologist, managed monitoring efforts for improvements occurring at both the current San Luis Obispo campus and future Paso Robles campus. Involved supervision of monitoring staff, site visits, cultural awareness training of construction personnel, providing recommendations to construction and project management staff based project design, assisting with implementing the mitigation plan, providing the district with field visit verification reports for compliance with reporting requirements, and preparation of final monitoring report.

Resource Management

Lower Arroyo Burro Open Space Phase I Archaeological Survey Report and Historic Structures and Sites Report and Arroyo Burro Restoration at Barger Creek, Santa Barbara, California. As project archaeologist, conducted an intensive ground survey to determine the potential of cultural resources within the project area, researched support for the historic structures and sites, investigated the area for the City of Santa Barbara, Parks and Recreation, Creeks Division for the Arroyo Burro Creek Restoration effort.

Transportation

Las Positas Road at Cliff Drive Roundabout Phase I Archaeological Survey Report, Santa Barbara, California. As project archaeologist, conducted intensive ground survey, background research, and archival map/document and historic aerial analysis to determine previous land use and disturbance and the potential of cultural resources within project area, including right-of-way adjacent to a significant prehistoric site, CA-SBA-575. Coordinated with City and California Department of Transportation (Caltrans) staff to define the area of potential effect and prepared the final reports according to City and Caltrans requirements.

Princeton Road Widening Phase I Archaeological Survey Report, Historic Property Survey Report and Historic Resources Evaluation Report, Moorpark, California. As project manager, coordinated both archaeological and built environment efforts for completion of a Historic Property Survey Report, Historic Resources Evaluation Report, and Archaeological Survey Report. As project archaeologist, conducted intensive ground survey, background research, and archival map/document and historic aerial analysis to determine the potential of cultural resources within project area, inside right-of-way and extending into multiple adjacent parcels, contiguous to prehistoric site, CA-VEN-786. Coordinated with City and Caltrans staff to define the area of potential effect and composed final report according to Caltrans requirements.

Brenda Lee Rogers

ARCHAEOLOGIST

Brenda Lee Rogers is a professional archaeologist with more than 30 years of archaeological experience in the U.S. Since 1991, she has conducted field and laboratory studies of archaeological sites in California, Delaware, Illinois, Nevada, New Jersey, New York and Pennsylvania. She has supervised large field crews of archaeologists, and provided training in excavation strategies, map drafting, artifact illustrations, site tours, press relations, and processing artifacts. Ms. Rogers also has considerable experience proofreading and organizing paperwork, editing and co-writing reports. She has also been involved in teaching students of all ages about archaeology. Ms. Rogers has served as an Archaeological Site Steward in California off and on since 2009. She has a current 40-hour HAZWOPER certificate.

Education

Bard College
BA, Anthropology, 1990

Professional Affiliations

Society of California Archaeology

Ventura County Archaeological Society

Selected Relevant Experience

La Canada/Flintridge I-210 Soundwall Improvements Project, Ardurra, La Cañada, California. Served as field archaeologist. Completed a field survey along the I-210 corridor ahead of the construction of a series of soundwalls. Assisted in completion of technical report.

River Supply Conduit Unit-7, Burbank, California Served as paleontological monitor. Conducted construction monitoring of a shaft excavation in an urban environment. Documented work with photographs and prepared a daily written report. (2021)

Colima Road Improvement Project, Hacienda Heights, California Served as field archaeologist. Documented several viewpoint locations along improvement corridor, located through KMZ files. Submitted photographs with a photo log. (2021)

Mulholland Highway Repair, Santa Monica Mountains, California Served as archaeological monitor. Conducted construction monitoring of L.A. County Department of Public Work's repair of a damaged slope undermining the highway. Prepared daily monitoring reports. (2021)

PCH and Trancas Canyon Bridge Replacement, Malibu, California Served as archaeological monitor. Conducted construction monitoring of trenching across the PCH to enable SoCAL Gas to replace an existing gas main. Prepared daily monitoring reports. Client: Rincon (2021)

Pedestrian Hybrid Crossing, PCH, Malibu, California Served as field archaeologist. Assisted in a field survey of CA-VEN-1. Client: DUKE (2020)

6th Street Viaduct, Downtown Los Angeles, California . Served as paleontological monitor. Conducted construction monitoring of large scale drilling within the project area. Screened soils for paleontological materials. Prepared daily monitoring and boring reports, including soil profile maps. Client: DUKE (2020)

Rice Avenue Grade Separation, Oxnard, California Served as archaeological monitor. Conducted construction monitoring of geoprobe testing of the project area. Client: DUKE (2020)

Hollister Avenue-State Street Improvement Project, Goleta, California Served as field archaeologist. Excavated shovel test pits and test units to delineate and sample subsurface deposits. Dry screened all soils for artifacts and ecofacts, mapped STP locations using GPS technology, prepared unit profile maps. Client: Rincon (2018)

San Gabriel Reservoir Post-Fire Emergency Project, LADWP, San Gabriel Mountains, California. Served as archaeological monitor. Conducted construction monitoring of entire San Gabriel Reservoir and SPS Fill Area. The work includes large scale grading, vegetation removal, borrow pit digging, pioneering, and drilling. Led many WEAP training sessions for new construction laborers and operators. Worked closely with biologists to document all construction activities that impact the drainage. (2021)

San Gabriel Reservoir Post-Fire Emergency Project, LADWP, San Gabriel Mountains, California Served as field archaeologist. Conducted an extensive field survey of the San Gabriel Reservoir with other archaeologists, documenting soils and any historic or prehistoric artifacts. (2021)

Watts Learning and Health Pavilion Project, Watts, California. Served as paleontological monitor. Conducted construction monitoring of all ground disturbance for an underground parking structure. Documented work with photographs and prepared a daily written report. (2021)

Goleta Sanitary District, BioSolids Energy Phase I, Goleta, California. Served as archaeological monitor and field archaeologist. Conducted construction monitoring of pothole trenching via Vermeer Vactron, a process of forced water excavation with storage of sediments and water slurry in a holding tank. Water screened approximately 56 gallons of sediment and slurry to recover artifacts and ecofacts. Prepared a written report with photo documentation. (2021)

Goleta Sanitary District Testing, Goleta, California. Served as field archaeologist. Excavated a shovel test pit to collect data on subsurface remains ahead of ground disturbance to relocate existing buried infrastructure. All sediments were water screened for collection. Used Collector to plot location of STO. Prepared daily work report. (2021)

Santa Anita Debris Dam, Arcadia, California. Served as field archaeologist. Surveyed existing debris dam and its surrounding landscape to determine presence or absence of cultural resources ahead of L.A. County Department of Public Work's seismic strengthening project. Documented areas surveyed with photographs and prepared a written report and photo log. (2021)

Archaeological Survey of Moorpark Avenue, Moorpark, California. Served as field archaeologist. Surveyed a residential block, focusing on historic structures and 2 empty lots. Photographed and recorded structures, conducted research at City Hall and prepared a survey report of project area. Client: Rincon (2015)

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Appendix B

CONFIDENTIAL Records Search Results

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Appendix C
Cemetery Inventory

Headstone Inventory

Spadra Cemetery encompasses 2.35 acres of land in southwest portion of the City of Pomona in the former City of Spadra. A brief summary and description of the cemetery is included in Section 4.2 Built Environment Results: Spadra Cemetery of the main report.

The table below inventories extant headstones at Spadra Cemetery and sorts them by Block and Lot, when this information was available. The headstones were mapped during the field visit and corroborated against cemetery records held by the Historical Society of Pomona Valley. Headstones that were in a block or lot that did not match the cemetery records are noted. Materials, style, and any meaningful symbols are noted in the table. Condition is also noted, and photographs of the headstones in their various states are included.

- Good condition indicates an upright and relatively undamaged headstone.
- Fair condition indicates a headstone that may be preserved in place in cement on the ground.
- Poor condition indicates a broken and unreadable headstone or base only.

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
11	1	Theodore R. Arnett	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Good (no damage noted) **Inscription:** "1880-1933" **Notes:** none	 (IMG_3422)
11	2	Hannah Arnett	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Good (no damage noted) **Inscription:** "1848-1936" **Notes:** none	 (IMG_3426)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
11	3	Samuel Edward Arnett	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Good (no damage noted) **Inscription:** "1856-1926" **Notes:** none	 (IMG_3427)
11	4	Hiram Arnett	**Material**: black granite **Type**: Block style monument with flat top and rusticated base **Symbology**: flowers, curling page **Condition:** Fair (broken from base and laid flat, legible) **Inscription:** "At rest/ Hiram E. Son of S. E. & H. Arnett/Feb. 28, 1891/May 9, 1911"" **Notes:** none	 (IMG_3429)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
12	n/a	Rev. R. C. Fryer	**Material**: Limestone and/or marble **Type**: Tablet style monument with highboy (segmented arch with ornate ears) top **Symbology**: none noted **Condition:** Fair (broken from base, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Died/Dec. 8, 1888/Aged/67 Yrs. 10 Mo's/& 7 D'ys" **Notes:** Headstone MOVED should be at Block 18, lot 15	 (IMG_3374)
12	n/a	Caroline Fryer	**Material**: Marble **Type**: Tablet style monument with highboy (segmented arch with ornate ears) top **Symbology**: curling outline **Condition:** Fair (broken from base, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Died/Oct. 30, 1879/Aged/56 Ys 7Ms/ 13 Ds" **Notes:** Headstone MOVED should be at Block 18, lot 14	 (IMG_3376)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
13	15	Bertie M. Egan	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: minor corner detail **Condition:** Good (no damage noted) **Inscription:** "Wife/1873-1949/Mother" **Notes:** none	 (IMG_3369)
13	21	A.M. Shrewsbury	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: minor corner detail **Condition:** Good (no damage noted) **Inscription:** "1846-1975" **Notes:** none	 (IMG_3370)
13	n/a	Unmarked Base	**Material**: Marble **Type**: Base only **Symbology**: n/a **Condition:** Poor (Base only) **Inscription:** n/a **Notes:** appears on, or just outside the curb for this block	 (IMG_3368)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
15	8	G. M. Bowers	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: plant designs in each corner **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "G. M. Bowers/ 1853 - 1881" **Notes:** none	 (IMG_3559)
15	5	Major A. Gilmor	**Material**: Marble **Type**: Tablet style monument with rounded top **Symbology**: lined border, Freemason symbol in top/center of headstone **Condition:** Fair (fallen, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Major A. Gilmor/ Born/ April 20th 1834/ July 30th 1879/----/Dearest Brother thou hast left us/ And thy loss we deeply feel/ But t'was God that has bereft us/ He can all our sorrows heal" **Notes:** smooth base below	 (IMG_3556)

Table C-1. Built Environment Results within the Study Area

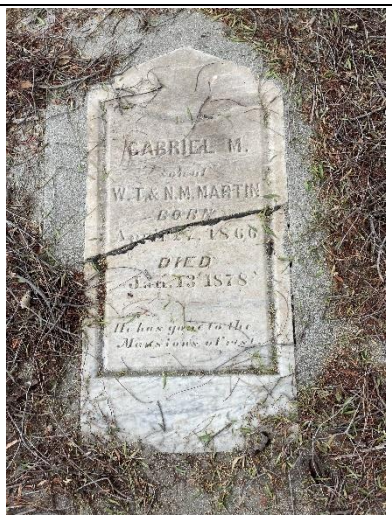
Block	Lot	Name on Marker	Resource Description	Photograph
15	n/a	Unmarked Base	**Material**: Marble **Type**: Base only **Symbology**: n/a **Condition:** Poor (Base only) **Inscription:** n/a **Notes:** appears on, or just outside the curb for this block	 (IMG_3561)
16	10	Gabriel M. Martin	**Material**: Marble **Type**: Tablet style monument with gabled top **Symbology**: lined border; symbol in gable too faded to discern **Condition:** Fair (fallen, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Gabriel M. / son of/ W. T. & N. M. Martin/ Born/ April 22, 1866/ Died/ Jan. 13, 1878/ 'He has gone to the mansions of rest'" **Notes:** none	 (IMG_0227)
16	n/a	Broken Base	**Material**: Marble and granite **Type**: Base only **Symbology**: n/a **Condition:** Poor (Base only) **Inscription:** N/a **Notes:** across the block from the Richardson/Middagh headstone	 (IMG_3552)

Table C-1. Built Environment Results within the Study Area

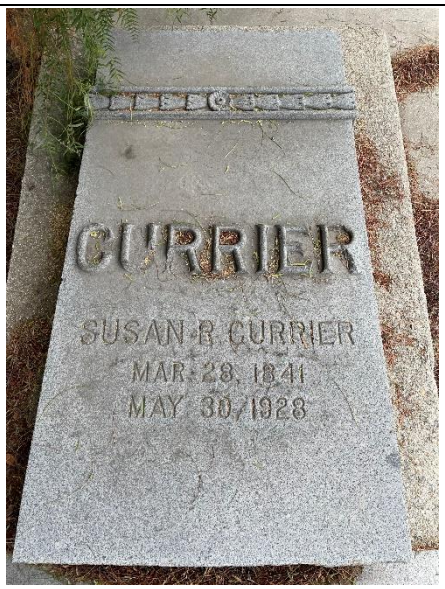
Block	Lot	Name on Marker	Resource Description	Photograph
17	1	Alvin T. Currier	**Material**: Gray granite **Type**: Block style monument with slated top, close to round surface **Symbology**: stylized vines and leaves **Condition:** Good (No damage, in original format, legible) **Inscription:** "Husband" **Notes:** Paired with monument which reads "Wife" immediately beside the larger "Currier" monument shown below	 (IMG_3396)  (IMG_3399)
17	2-3	Susan R. Currier	**Material**: Gray granite **Type**: Block style monument with flat top **Symbology**: band with flowers, leaves **Condition:** Fair (broken from base and laid flat, legible) **Inscription:** "Currier/Susan R. Currier/ Mar. 28, 1891/ May 20 1928" **Notes:** None	 (IMG_0220)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
17	7	William G. Bartlett	**Material**: Gray granite **Type**: Block style monument with flat top, rusticated sides **Symbology**: None **Condition:** Fair (broken from base and laid flat, legible) **Inscription:** "William G. Bartlett/1843-1927" **Notes:** None	 (IMG_3402)
17	8	James Newton Glenn	**Material**: Gray granite **Type**: Block style monument with flat top, rusticated sides **Symbology**: Freemasons symbol with G in center at top **Condition:** Fair (broken from base and laid flat, legible) **Inscription:** "Dec. 29, 1863 / Oct. 26, 1903" **Notes:** None	 (IMG_0226)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
17	14	W. W. Rubottom Jr.	**Material**: Limestone and/or marble **Type**: Tablet style monument with rounded top **Symbology**: rounded border in top 3/4 **Condition:** Fair (fallen, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "In Memory of /Born /Dec 23, 1863,/Died May 14, 1874 / J. Miller/LA" **Notes:** headstone mason has signed the bottom right corner	 (IMG_3379)
17	16	J.D. Rubottom	**Material**: Limestone and/or marble **Type**: Tablet style monument with rounded top **Symbology**: rounded border in top 3/4; Freemason symbol in top/center of headstone with G in center **Condition:** Fair (fallen, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "In memory of/Born Oct. 21, 1836/ Died/ Jun. 12, 1875/J Miller/LA" **Notes:** headstone mason has signed the bottom right corner	 (IMG_3382)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
17	17	Civility R. Greenwade	**Material:** Limestone and/or marble **Type:** Tablet style monument with rounded top **Symbology:** rounded border in top 3/4 **Condition:** Fair (fallen, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Born/March 10, 1840/ Aged 35 years 11/mo's & 27 days" **Notes:** smooth base just below tablet	 (IMG_3385)
17	n/a	Broken Monument	**Material:** Concrete and marble **Type:** Base only **Symbology:** unknown **Condition:** Poor (headstone piece is missing, base only) **Inscription:** None **Notes:** East of J. N. Glenn headstone, west of Civility Greenwade	 (IMG_3387)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
17	n/a	Broken Monument	**Material:** Marble **Type**: Base only **Symbology**: unknown **Condition:** Poor (headstone piece is missing, base only) **Inscription:** None **Notes:** Next to above broken monument	 (IMG_3388)
17	n/a	Broken Monument	**Material:** Concrete **Type**: Base only **Symbology**: unknown **Condition:** Poor (headstone piece is missing, base only) **Inscription:** None **Notes:** Next to Civility Greenwade	 (IMG_3391)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
18	8	Eula Fryer	**Material**: Limestone and/or marble **Type**: Tablet style monument with rounded top **Symbology**: None **Condition:** Fair (broken from base, cracked, most pieces accounted for, partially legible, encased in concrete) **Inscription:** "In Memory/ of /Eul--/--/James M Belle Fryer/ Born /March – 1878/ Died/ Nov. 21,----/ [4 line illegible poem] **Notes:** smooth base just below tablet	 (IMG_3410)
18	n/a	Broken Monument	**Material:** Tan limestone **Type**: Base only **Symbology**: unknown **Condition:** Poor (headstone piece is missing, base only) **Inscription:** None **Notes:** Located left (east) of Eula Fryer; on corner	 (IMG_3408)

Table C-1. Built Environment Results within the Study Area

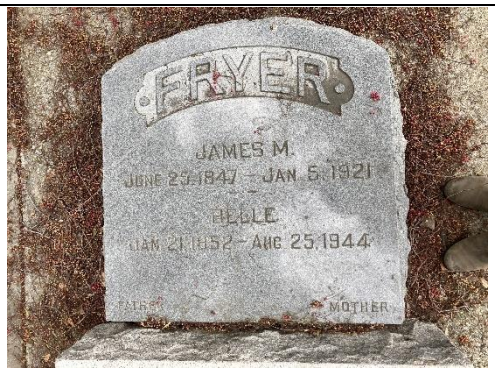
Block	Lot	Name on Marker	Resource Description	Photograph
18	n/a	Broken headstone	**Material:** Gray granite **Type**: smooth-sided; base only **Symbology**: unknown **Condition:** Poor (headstone piece is missing, base only) **Inscription:** None **Notes:** Located right (west) of Eula Fryer, left (east) of James and Belle Fryer	 (IMG_3413)
18	4-6	Fryer, James M and Belle	**Material:** Gray granite **Type:** Block style monument with segmented arch top, rusticated sides **Symbology**: none noted **Condition:** Fair (broken from base and laid flat, but headstone is whole, legible) **Inscription:** "James M./ June 25, 1847 – Jan. 5, 1921/ Belle/ Jan. 21, 1852 – Aug. 25, 1944/ Father / Mother" **Notes:** Paired with large, rusticated base	 (IMG_3415)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
18	n/a	Broken Monument	**Material:** Gray granite **Type:** Base only for pedestal square-sided monument (potential obelisk or column) **Symbology**: none noted **Condition:** Poor (broken, base only) **Inscription:** None noted **Notes:** Immediately right (west) of Hicks monument	 (IMG_3417)
18	30-31	Hicks, Edward and Susie	**Material:** Gray granite **Type:** Block style monument with segmented arch top, rusticated sides and base **Symbology**: Stylized curls to side of name **Condition:** Good (whole, legible) **Inscription:** "Hicks /Edward /July 30, 1861–Dec. 5, 1937/Susie / Jan. 1, 1864–Dec. 31, 1920" **Notes:** Paired with large, rusticated base	 (IMG_3418)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
18	32	Ed.	**Material:** Gray granite **Type:** Block style monument with flat top **Symbology**: None **Condition:** Fair (broken from base, laid flat, legible, encased in concrete) **Inscription:** "Ed" **Notes:** Potentially paired with "Hicks" monument	 (IMG_3421)
19	7	Robert S. Arnett	**Material**: marble **Type**: A 4-sided pedestal style monument with an obelisk and vaulted top **Symbology**: oak, ivy plants, a cross at the top **Condition:** Fair (broken from base and upright next to base, legible) **Inscription:** "ARNETT/Robert S./ Arnett/May 23, 1818/ Aug 14 1905"" **Notes:** paired with four-sided monument that reads Robert S. Arnett, William Arnett, Melinda Arnett, George Arnett	 (IMG_0177)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
19	8	George Arnett	**Material**: gray granite **Type**: A 4-sided pedestal style monument with an obelisk and vaulted top **Symbology**: oak, ivy plants, cross at the top **Condition:** Fair (broken from base, upright and legible) **Inscription:** "George C./Arnett/Oct 21 1854/ Sept 30 1886"" **Notes:** one side of four-sided Arnett monument	 (IMG_3436)
19	9	William Arnett	**Material**: gray granite **Type**: A 4-sided pedestal style monument with an obelisk and vaulted top **Symbology**: oak, ivy plants, a cross at the top **Condition:** Fair (broken from base, upright and legible) **Inscription:** "William/Arnett/May 16, 1859/Nov 28, 1885"" **Notes:** one side of four-sided Arnett monument	 (IMG_0179)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
19	10	Melinda E. Arnett	**Material**: gray granite **Type**: A 4-sided pedestal style monument with an obelisk and vaulted top **Symbology**: oak, ivy plants, a cross at the top **Condition:** Fair (broken from base, upright and legible) **Inscription:** "Melinda E./ Wife of/ R. S. Arnett/ Apr 18, 1827/Dec 23, 1868"" **Notes:** the first burial at Spadra Cemetery	 (IMG_3435)
19	n/a	Broken Headstone	**Material**: Cement and Marble **Type**: Base only **Symbology**: n/a **Condition:** Poor (base only) **Inscription:** n/a **Notes:** Next to Arnett Obelisk	 (IMG_3434)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
19	3	Andrew Monroe	**Material**: gray granite **Type**: Block style monuments with segmented arch **Symbology**: none **Condition:** Fair (broken from base, legible, encased in concrete) **Inscription:** "Andrew Monroe/Nov 16, 1831/ May 21, 1906" **Notes:** base just below tablet	 (IMG_0182)
19	2	William Monroe	**Material**: Marble **Type**: Tablet style monument with rounded top **Symbology**: rounded tassel border in top ¾ **Condition:** Fair (broken from base, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "In Memory of/William B. Monroe/BORN/ Jan. 28, 1829/DIED/Nov. 3, 1887" **Notes:** base just below tablet	 (IMG_0186)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
19	n/a	Broken Headstone	**Material**: Marble **Type**: Base only with metal pins **Symbology**: n/a **Condition:** Poor (base only) **Inscription:** n/a **Notes:** Next to William Monroe	 (IMG_3446)
19	n/a	Broken Headstone	**Material**: Marble **Type**: Base only **Symbology**: n/a **Condition:** Poor (base only) **Inscription:** n/a **Notes:** Next to William Monroe	 (IMG 3451)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
23	5	Franklin Bowers	**Material**: black granite **Type**: Block style monument with segmented arch **Symbology**: plant foliage at top **Condition:** Fair (broken from base, laid flat, mostly legible, encased in concrete) **Inscription:** "F. Bowers/Oct 2 1841 Feb 12 1911/ -- Illegible" **Notes:** smooth base just below tablet	 (IMG_0195)
23	8	Florence Bowers	**Material**: black granite **Type**: Block style monument with rounded top close to the ground surface **Symbology**: none **Condition:** Fair (legible, encased in concrete) **Inscription:** "Florence" **Notes:** situated next to F. Bowers	 (IMG_0198)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
23	9	Samuel Bowers and Baby Bowers	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Samuel M. Bowers/1869-1954/Baby Bowers 1900 **Notes:** none	 (IMG_0199)
23	10	John Bowers	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "John Bowers/1872-1967" **Notes:** Last burial in Spadra Cemetery	 (IMG_7988)
23	4	Mrs. Jessie Blackburn	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Mrs. Jessie Blackburn/Dec. 27, 1949" **Notes:** none	

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
				(IMG_0193)
23	3	Jessie P. Blackburn	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Jessie P. Blackburn/April 24/1866/April 25, 1964" **Notes:** next to F. Bowers	 (IMG_0192)
23	2	Unknown Male	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Unknown Male" **Notes:** none	 (IMG_0191)

Table C-1. Built Environment Results within the Study Area

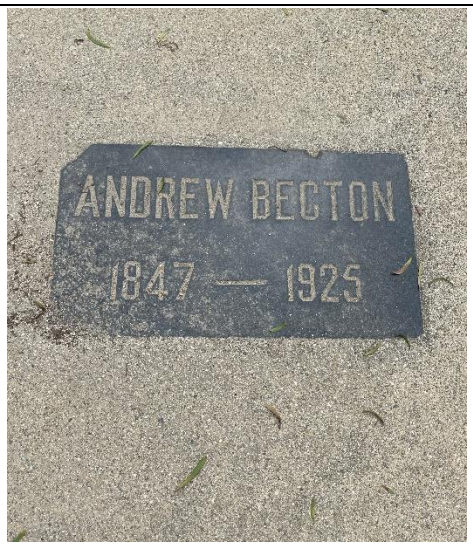
Block	Lot	Name on Marker	Resource Description	Photograph
24	7	R. H. C. Caldwell	**Material**: Marble **Type**: Tablet style monument with gabled top **Symbology**: lined border with beveled designs and a tree **Condition:** Fair (broken from base, cracked, but all pieces accounted for, partially legible, encased in concrete) **Inscription:** "R. H. C. Caldwell/—/ Dec. 3 1878/Aged/25 Yrs 9 Mos/ [4 line illegible poem] **Notes:** smooth base just below tablet	 (IMG_0201)
24	2	Andrew Becton	**Material**: black marble **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Andrew Becton/1847-1925" **Notes:**	 (IMG_0202)

Table C-1. Built Environment Results within the Study Area

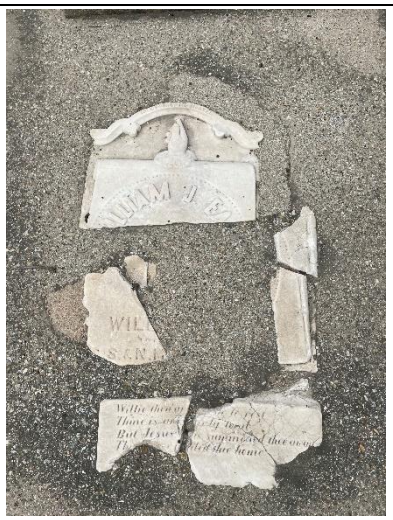
Block	Lot	Name on Marker	Resource Description	Photograph
24	n/a	Unmarked	**Material**: gray granite **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** located near Andrew Becton headstone	 (IMG_0203)
25	14	William J. Ea---	**Material**: Marble **Type**: Tablet style monument with gabled top **Symbology**: banner at top that reads "Meet Me in Heaven" above a hand pointing upwards **Condition:** Poor (broken from base, cracked, not all pieces are accounted for, partially legible, encased in concrete) **Inscription:** "William J. Ea---/ Will--/--/S. & N. M. --/ [4 line illegible poem] **Notes**: potentially headstone for William J. Eads	 (IMG_0205)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
25	6-9	William & Linda Richardson, Samuel & Catherine Middagh	**Material**: black granite **Type**: Block style monument with segmented arch, flush with the ground surface **Symbology**: none **Condition:** Fair (broken from base, legible, encased in concrete) **Inscription:** "Richardson/ William/1878 ---1954/ Linda/1896 ----- 1948/ Middagh/Samuel A./1852 ---- 1944/ Catherine A./ 1862 ---- 1950" **Notes:** smooth base below	 (IMG_0217)
26	10-12	Benjamin Kepner, Sarah Kepner, Ida Kepner	**Material**: black granite **Type**: Block style monument with gabled top **Symbology**: none **Condition:** Good (legible, upright, whole) **Inscription:** "Benj. H. Kepner/ 1817-1893/ Sarah E. Kepner/ 1821-1895/ Ida M. Kepner Baker/ 1864-1896" **Notes:** Kepner inscribed on the back	 (IMG_0235)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
26	15	James Middagh	**Material**: limestone and/or marble **Type**: Tablet style monument with arched top **Symbology**: none **Condition:** Fair (fallen, broken, but most pieces accounted for, legible, encased in concrete) **Inscription:** "In loving Remembrance of/ James Middagh/ Died/ Mar. 12, 1890/ Aged/ --- yrs. 11 Mo's/" **Notes:** none	 (IMG_0237)
26	16-17	Ernest L. Kepner, Bertie L. Middaugh	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Ernest L. Kepner/ 1883 -1885/ Bertie L. Middaugh/ 1883-1885" **Notes:** none	 (IMG_0238)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
26	9	Birdie Florence Kepner	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Birdie/ Florence V. Kepner/ 1882- 1899" **Notes:** none	 (IMG_0249)
26	8	Aaron Kepner	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Father/ Aaron E. Kepner/ 1849 - 1931" **Notes:** none	 (IMG_0248)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
26	7	Roxie R. Kepner	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Mother/ Roxie Rowe Kepner/ 1849-1932" **Notes:** none	 (IMG_0247)
26	5	Ernest L. Johnson	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Ernest L. Johnson/ 1867- 1921" **Notes:** None	 (IMG_0246)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
26	n/a	Unmarked	**Material**: limestone and/or marble **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8046)
26	n/a	Unmarked	**Material**: limestone and/or marble **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8045)
26	n/a	Unmarked	**Material**: limestone and/or marble **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8044)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
26	n/a	Unmarked	**Material**: limestone and/or marble **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8043)
27	12	Marguerite Newbury Kepner	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Marguerite Newbury/ Kepner/ 1888-1952" **Notes:** none	 (IMG_0251)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
27		Kepner	**Material**: black granite **Type**: Block style monument with a slanted surface, rusticated sides **Symbology**: none **Condition:** Good (legible, upright, whole) **Inscription:** "Kepner/ Father Mother" **Notes:** none	 (IMG_0252)
27	7	Etha K. Elliott	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Etha K. Elliott/ 1875- 1965" **Notes:** none	 (IMG_0256)

Table C-1. Built Environment Results within the Study Area

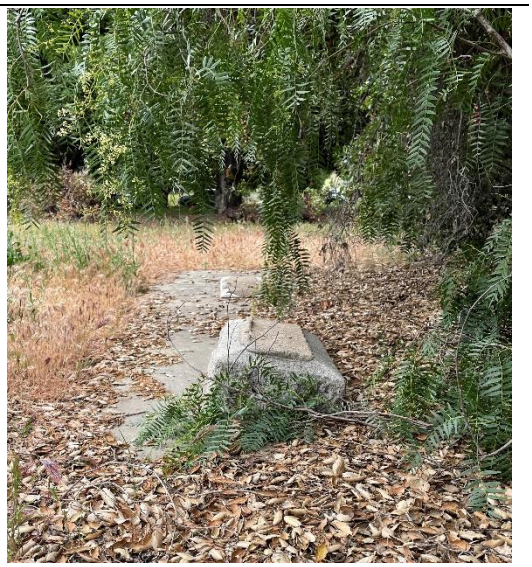
Block	Lot	Name on Marker	Resource Description	Photograph
27	6	Roy W. Elliott	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: none **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Roy W. Elliott/ 1874- 1955" **Notes:** none	 (IMG_0257)
27	n/a	Unmarked	**Material**: gray granite **Type**: Rusticated base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_0258)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
27	n/a	Unmarked	**Material**: Marble **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8061)
32	5	Sarah Cartledge	**Material:** Limestone and/or marble **Type:** Tablet style monument with rounded top **Symbology:** rounded border in top 3/4 **Condition**: Fair (fallen, broken, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Born/ in Burke Co., Ga./ June 21, 1815/ died/ September 21 [illegible]" **Notes:** none	 (IMG_3336)

Table C-1. Built Environment Results within the Study Area

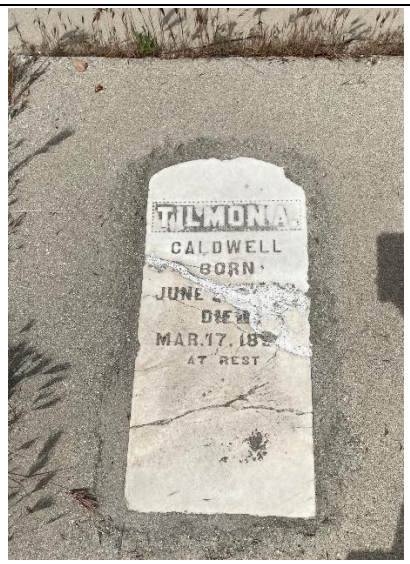
Block	Lot	Name on Marker	Resource Description	Photograph
32	6	M.C. Caldwell	**Material**: limestone and/or marble **Type**: Tablet style monument with rounded top **Symbology**: circle cut out with open book, plant vine **Condition:** Fair (fallen, broken, but all pieces accounted for, legible, encased in concrete) **Inscription:** "M.C. Caldwell/ Born/ -- Union Co. ---/Died/ at --- Sept 22 1887/ Aged/ --- 7 mo's 7 dys./ Beloved ---/ --- Caldwell" **Notes:** none	 (IMG_0240)
32	7	Tilmona Caldwell	**Material**: Limestone and/or marble **Type**: Tablet style monument with rounded top **Symbology**: dotted border around Tilmona **Condition:** Fair (fallen, cracked, all pieces accounted for, legible, encased in concrete) **Inscription:** "Tilmona./ Caldwell/ Born/ June ---/ Died/ Mar. 17, 189---/ At Rest" **Notes:** none	 (IMG_0241)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
32	8	Violet Porter	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Mother/ Violet R. Porter/ 1886- 1924" **Notes:** none	 (IMG_0243)
32	9	David C. W. Porter	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Father/ David C. W. Porter/ 1871- 1932" **Notes:** none	 (IMG_0242)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
32	2	John R. Porter	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Brother/ John R. Porter/ 1919- 1948" **Notes:** none	 (IMG_0244)
32	n/a	Unmarked	**Material**: gray granite **Type**: elevated smooth-sided, crosshatched base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** none	 (IMG_8041)
32	n/a	Unmarked	**Material**: gray granite **Type**: elevated smooth-sided, crosshatched base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** located next to headstone for John Porter	 (IMG_8040)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
33		George S. Blake	**Material**: Limestone and/or marble **Type**: Tablet style monument with highboy top **Symbology**: lined border, Freemason symbol in top/center of headstone **Condition:** Fair (broken from base, cracked, partially legible, encased in concrete) **Inscription:** "George S. Blake/ Born/ ---- /Died/ ---/ [8 line illegible poem]" **Notes:** smooth base below	 (IMG_0229)
33	n/a	Unmarked	**Material**: gray granite **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** located next to George S. Blake headstone	 (IMG_0233)

Table C-1. Built Environment Results within the Study Area

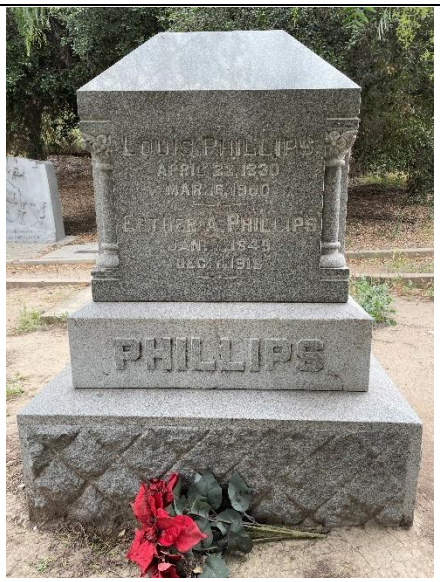
Block	Lot	Name on Marker	Resource Description	Photograph
33	n/a	Unmarked	**Material**: gray granite **Type**: smooth-sided, base only **Symbology**: none **Condition:** Poor (headstone piece is missing, base only) **Inscription:** "n/a" **Notes:** located next to George S. Blake headstone	 (IMG_0234)
34	14-15	Louis and Esther Phillips	**Material**: gray granite **Type**: Block style monument with vaulted, beveled top **Symbology**: flowers, engaged columns on each side, crosshatched base **Condition:** Good (legible, whole) **Inscription:** "Louis Phillips/ April 22, 1830/Mar. 16, 1900/ Esther A. Phillips/ Jan. 7, 1849/ Dec. 1, 1918/ Phillips" **Notes:** Charles Blake and Louis Phillips is on other side of headstone	 (IMG_0213)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
34	17	Charles Blake Phillips, Louis Robert Phillips	**Material**: gray granite **Type**: Block style monument with vaulted beveled top **Symbology**: flowers, columns on each side, crosshatched base **Condition:** Good (legible, whole) **Inscription:** "Charles Blake/ Beloved Son of Louis & Esther A./ Phillips/ April 26, 1870/Jan. 1, 1902/ Louis Robert/ Phillips/ Aug. 30, 1872/ June 26, 1928" **Notes:** the other side is Louis and Esther Phillips' headstone	 (IMG_0214)
34	18	Nellie George	**Material**: gray granite **Type**: Block style monument with segmented arch, flush with the ground surface **Symbology**: none **Condition:** Fair (broken from base, flush, legible, encased in concrete) **Inscription:** "Nellie B. George/ Sept. 9, 1868/ Dec. 13, 1920" **Notes:** smooth base below	 (IMG_0216)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
34	8	Joyse Ann Blake	**Material**: Marble **Type**: Tablet style monument with rounded top **Symbology**: lined border, circle cut out, hand with finger pointing upwards **Condition:** Fair (broken from base, cracked, but all pieces accounted for, legible, encased in concrete) **Inscription:** "Joyse Ann Blake/Born/ Febr. 7, 1813./Sept. 1872./'Sleep sweet mother, and/take thy rest,/God called thee home,/and thought it best.'" **Notes:** none	 (IMG_0209)
34	7	William Blake	**Material**: Limestone and/or marble **Type**: Base only for round, pedestal monument (potential column or urn topper) **Symbology**: none **Condition:** Fair (broken from base and laid flat, but headstone is whole, legible, missing top piece) **Inscription:** "Wm. Blake/ Feb. 16, 1812/ Dec. 2, 1897/ At Rest/ Blake" **Notes:** square base below	 (IMG_0208)

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
34	3	Charles H. Blake	**Material**: Limestone and/or marble **Type**: Tablet style monument with gabled top **Symbology**: cross and "HIS" in stylized script **Condition:** Fair (broken from base, legible, encased in concrete) **Inscription:** "In Memory of/ Charles H. Blake/ Died/ April 25, 1871/ Aged 29 y'rs 8 mo's/ and 10 days."	 (IMG_0207)
34	n/a	George	**Material**: gray granite and marble **Type**: Block style monument with flat top atop quilted base **Symbology**: crosshatched base **Condition:** Good (legible, whole) **Inscription:** "George" **Notes:** located behind Nellie George headstone, next to Charles Blake headstone; potentially "Esther F. George"	 (IMG_0206)
35	8	"Unknown"	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Poor (flush, cracked, and missing pieces, encased in concrete) **Inscription:** "Unk–wn"	

Table C-1. Built Environment Results within the Study Area

Block	Lot	Name on Marker	Resource Description	Photograph
				(IMG_7991)
35	9	Ursula Meyer	**Material**: gray granite **Type**: Block style monument with segmented arch **Symbology**: relief modeled on the James Earle Fraser work "End of the Trail" **Condition:** Good (upright and relatively undamaged headstone) **Inscription:** "'The End of the Trail'/ Ursula Ponedel Meyer/ June 16, 1903- Sept 29, 1935 " **Notes:** Alternative Name: Ella Belle Ponedel	 (IMG_0190)
35	10	Unknown	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Unknown"	 (IMG_7989)
53		Pearl Scott Hopp and baby	**Material**: black granite **Type**: Block style monument flush with the ground surface **Symbology**: lined border **Condition:** Fair (flush, legible, encased in concrete) **Inscription:** "Pearl Scott Hopp/ 1887 – 1909/ Mother and Baby" **Notes:** located much further from other graves	 (IMG_0148)

Appendix D
DPR Forms

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #
Trinomial
NRHP Status Code 3S/3CS/5S1

Other Listings_____
Review Code Reviewer Date

Page 1 **of** 33 ***Resource Name or #:** (Assigned by recorder) Spadra Cemetery
P1. Other Identifier:_____
*__P2. Location:__ ☐ **Not for Publication** ☒ **Unrestricted**
***a. County** Los Angeles **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
USGS 7.5' Quad San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; NW ¼ **of** SW ¼ **of Sec** 26; San Bernardino **B.M.**
c. Address 2850 Pomona Blvd. City Pomona Zip 91768
d. UTM: (Give more than one for large and/or linear resources) Zone 11S , 426088.82 mE/ 3768146.26 mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
Directions to Resource: From the Pomona Boulevard underpass for SR57, turn south towards Elephant Hill and enter an unnamed road towards the Cemetery. This road shares a driveway with the business Altec, 2882 Pomona Boulevard, Drive south along the unnamed road, pass through the unlocked gate marked Spadra Cemetery, continue south and cross the railroad tracks. Park and walk northeast towards the Spadra Cemetery fenceline.
Parcel Number: 8707-020-900; Elevation: 728-740 feet amsl; Decimal Degrees: 34.051408°, -117.800104°

***P3a. Description**: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
Spadra Cemetery, originally established in 1868, encompasses a 2.35-acre roughly triangular-shaped property tapering towards the northeastern end, situated at the base of Elephant Hill, east of SR 57, and south of the Union Pacific railroad tracks and the industrial/manufacturing district located along Pomona Boulevard. *See continuation sheet.*

***P3b. Resource Attributes:** (List attributes and codes) HP40. Cemetery

***P4. Resources Present:** ☐Building ☒Structure ☐Object ☒Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a. Photograph or Drawing



P5b. Description of Photo: (view, date, accession #): Overview of Cemetery from approximate center looking southwest, towards proposed Project site 4/20/2022, IMG_3334

***P6. Date Constructed/Age and Source:**
☒ Historic ☐Prehistoric ☐ Both

***P7. Owner and Address:**
Historical Society of Pomona Valley
585 E. Holt Avenue
Pomona, CA 91767

***P8. Recorded by**: (Name, affiliation, and address)
Kate Kaiser, MSHP and Caitlin Greeley, MA
Dudek, 38 N. Marengo Avenue
Pasadena, CA 91101

***P9. Date Recorded:**
04/20/2022

***P10. Survey Type:** (Describe)
Intensive-level

*P11. Report Citation:
Kaiser et al. (Kaiser, Kate, Heather McDaniel-McDevitt, Caitlin Greeley, Allison Lyons, Fallin Steffen, Brad Comeau, and Jennifer De Alba. 2022. Cultural Resources Inventory and Evaluation Report for the Elephant Hill Project. Prepared by Dudek for City of Pomona Development Services Department, June 2022.

*Attachments: ☐NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List):

State of California - The Resources Agency Primary # _____
DEPARTMENT OF PARKS AND RECREATION HRI# _____

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Spadra Cemetery ***NRHP Status Code** 3S/3CS/5S1

B1. Historic Name: Spadra Cemetery
B2. Common Name: Spadra Cemetery
B3. Original Use: Cemetery B4. Present Use: Historical Landmark
***B5. Architectural Style:** Rural Cemetery property type
***B6. Construction History:** (Construction date, alterations, and date of alterations)
1868: Cemetery Established for first burial
1898: Spadra Cemetery Association is incorporated to handle cemetery business
1967: Last burial
1971: Property ownership transfers to historical Society of Pomona Valley

***B7. Moved?** ☒No ☐Yes ☐Unknown **Date:** _____ **Original Location:** _____
***B8. Related Features:**
None

B9a. Architect: None b. Builder: Unknown
***B10. Significance: Theme** _____ **Area** _____
Period of Significance _____ **Property Type** _____ **Applicable Criteria** _____
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

One previously identified resource was identified within the Built Environment Study Area and adjacent to the Project site: the Spadra Cemetery. Spadra Cemetery was originally established in 1868 and hosted its final burial in 1967. It is a Designated Historic Landmark for City of Pomona, and was approved October 16, 2000 (City of Pomona 2000a, 2000b). The 2022 evaluation recommended that Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. It also recommends Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Spadra Cemetery also met the conditions of Criteria Considerations C and D.

See Continuation Sheet.

B11. Additional Resource Attributes: (List attributes and codes) _____

***B12. References:**

See Continuation Sheet.

B13. Remarks:

***B14. Evaluator:** Kate G. Kaiser, MSHP
***Date of Evaluation:** 6/1/2022

(Sketch Map with north arrow required.)

See Continuation Sheet

(This space reserved for official comments.)

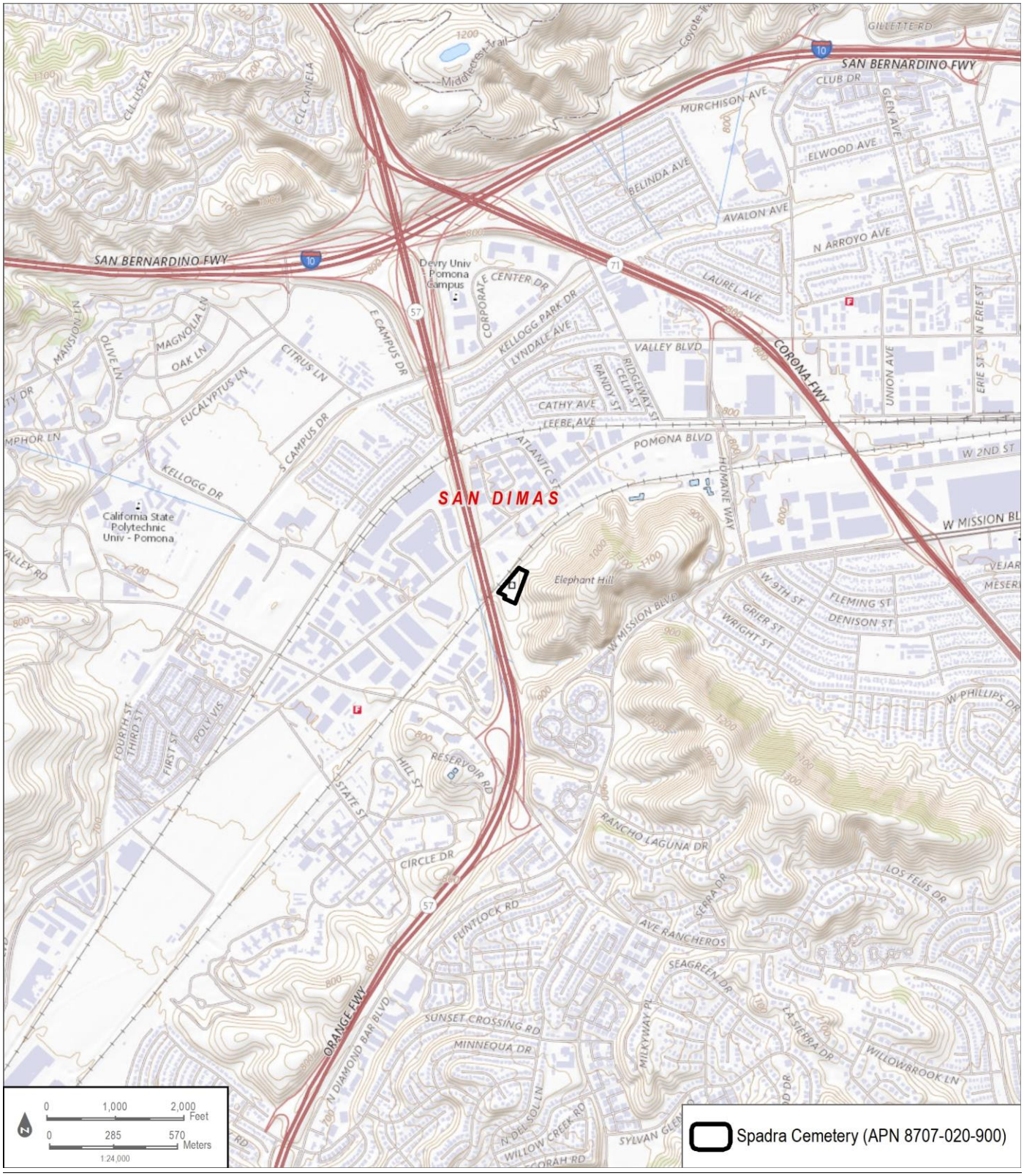
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

Page 3 **of** 33
***Map Name:** San Dimas, Calif.

***Resource Name or #** (Assigned by recorder) Spadra Cemetery
***Scale:** 1:24,000 ***Date of map:** 2022



P3a. Description (Continued):

Spadra Cemetery, originally established in 1868, encompasses a 2.35-acre roughly triangular shaped property tapering towards the northeastern end, situated at the base of Elephant Hill, east of SR 57, and south of the Union Pacific railroad tracks and the industrial/manufacturing district located along Pomona Boulevard. Though the north and southwest boundaries have had extensive construction, improvements, and setting changes over time, the boundary line against Elephant Hill to the east remains completely unchanged as Elephant Hill has remained undeveloped since the founding of the cemetery.

The original layout of the cemetery is intact, with 63 blocks arranged in a north-south-east west grid, slightly offset from the actual property boundary lines, and one circle with a sign in the center near the southwestern edge of the property. There are some blocks with curbing and between the block curbs are pedestrian pathways further reinforcing the grid pattern throughout the cemetery. Though there is a road that leads up to the entrance along the southwestern edge, there are no roads through the cemetery itself. Signage in the cemetery is also limited to a single upright metal sign with no discernable lettering remaining in the center of the circle. Outside of the cemetery property there is an access road from Pomona Boulevard which is gated, but that gate and the signage on it dates to the 2000s.

Though there are no buildings present at Spadra Cemetery, there are several intact gravestone markers as well as damaged markers which have been laid flat and preserved in place in a concrete block. A considerable number of markers have been damaged or lost; however, given the age of the cemetery and multiple conditions, including changes in ownership and lack of onsite security, the loss of these markers does not diminish the significance of the Spadra Cemetery to a degree that it no longer retains integrity (see evaluation below). Markers were made of a variety of materials with the earlier markers tending to be slimmer limestone or marble and later markers tending to be granite. Flat markers and upright markers consist of a mix of types, including:

- A pedestal style monument with an obelisk and vaulted top
- A pedestal style monument with a column
- Block style monuments with flat tops
- Block style monuments with segmental arch
- Block style monuments with beveled tops
- Block style monuments flush with the ground surface
- Block style monuments with a slanted surface, usually close to the ground surface
- Tablet style monuments with flat tops
- Tablet style monuments with rounded tops
- Tablet style monuments with gabled tops
- Tablet style monuments with segmental arch tops
- Tablet style monuments with highboy (segmented arch with ornate ears)tops

Nearly all markers, with few exceptions (flush block style markers, or more ornate pieces), had bases. Bases were wider and thicker that the markers themselves and were both smooth and rusticated types. Most markers appear to be attached to these bases with metal pins, though others are simply fitted into a socket and cemented into place. In places where no marker could be found, the base was present and in good condition. There were at least two more ornate monuments in the cemetery. One was the marker for Ursula Ponedel Meyer, placed in 1935, which was a large, granite, block style monument with a heavy rusticated base with a stylized carving of a Native American with braids on horseback, with the caption “End of the trail.” Meyer’s monument art was modeled on the famous bronze sculpture

created by James Earle Fraser for the Panama-Pacific International Exposition in 1915 of the same subject and title. The other is the Phillips family monument which is an elaborate block-style granite monument on a double base, featuring corners carved to rounded, engaged columns and a hipped roof,

No fencing is present around the headstones or blocks themselves, only curbs. Curbs tended to be of two types: curbs with rounded coping, and curbs with rusticated and edged coping. All curbs appear to have completely closed the block area, not leaving any openings by design. Some curbs were damaged and portions were missing. Finally, while there have been a few modern plantings of succulents and agave, the cemetery retains many of its historical plantings, consisting of pepper trees and canyon live oaks, many of which appear in the earliest aerials from 1928, and relatively younger oaks which appear to have been planted around the property boundary circa 1938.

Exhibits 1 through 7 below show overviews of the cemetery and examples of key cemetery components. A complete documentation of markers, intact, damaged, or otherwise, can be found in Appendix C: Cemetery Inventory. A map of all the intact and broken markers can be viewed in Figure 4. Cemetery Inventory.

Exhibit 1. Overview of Spadra Cemetery from the entrance fence, looking northeast



Source: (IMG_3278)

Exhibit 2. Overview of cemetery from northeast side, looking southwest.



Source: (IMG_7837)

Exhibit 3. Overview of Cemetery from western edge of curbing, looking northeast



Source: (IMG_3618)

Exhibit 4. Example of a "good condition" monument: intact, upright headstone (Ursula P. Meyer)



Source: (IMG_3474)

Exhibit 5. Example of a fair condition monument: headstones laid flat and encased on concrete; in background, examples of poor condition monuments where there was only a base.



Source: (IMG_3521)

Exhibit 6. Example: roundabout feature with rounded curb and metal sign post (sign missing), looking northeast



Source: (IMG_3608)

Exhibit 7. Example: showing typical footpath widths and curbing, looking southwest



Source: (IMG_3622)

B10. Significance (Continued):

Historical Context: History of Spadra (1866-1961)

The town of Spadra began as part of Rancho San Jose, a land grant awarded to Ricardo Vejar. In 1861, Louis Shlesinger and Heiman Tischler in Los Angeles helped Ricardo Vejar mortgage the property. At this time, lending to Vejar was considered a good investment because in the previous year, 1860, his cattle and lands had produced $40,000 in income, making him the fourth richest man in Los Angeles County. Though Vejar might have been able to pay off the mortgage under typical conditions, in the winter of 1861-1862 rain fell for a month, causing catastrophic floods along all major and minor watersheds in Los Angeles County, San Bernardino County, San Diego County, and including areas later sectioned off to become Orange and Riverside County. The terrible floods were followed by severe droughts beginning in 1862 that extended for three years. Finally, national market uncertainty caused by the Civil War brought incredible financial stress to California. In 1862, Vejar was foreclosed upon by Schlesinger and Tischler, starting first with his chattel loan, which recalled his animals, and followed with his house and acreage in early 1863 (Bracket 1920, pp. 75-76; Los Angeles Star 1863, p. 3).

Shortly after assuming ownership of the property, Schlesinger reportedly died in the shipwreck of the *Ada Hancock*, which sank after an explosion in April 1863. Tischler was not well received as the new owner of Rancho San Jose, and he reportedly did not pay his employees to manage the herd of cattle he received in the chattel loan foreclosure. Tischler and his friend Edward Newman were ambushed while traveling to the rancho. Newman was killed. As a result, Tischler hired a young Louis Phillips, a Prussian immigrant who had been operating a small ranch in Boyle Heights, close to the City of Los Angeles, to handle affairs at Rancho San Jose. Within months, Tischler decided to divest himself of Rancho San Jose and sold the property to Phillips for $30,000. Phillips prospered at Rancho San Jose and, by most accounts, was well-liked as he paid his employees, did not take on debt, and was honest with his neighbors and workers. Phillips eventually began reaching out to other settlers in the nearby community of El Monte to form a town that eventually became Spadra. Phillips was married to El Monte settler Esther Blake in 1866 by Reverend Richard C. Fryer, another El Monte settler and the first Baptist minister in the region (Bracket 1920, p. 77-79; Driscoll 1950, p. 34; Shires 1967, pp. 3-4).

In 1866, Phillips approached William Rubottom, another resident of El Monte, who was then operating an inn in Cucamonga (present day Rancho Cucamonga) about building an inn close to Rancho San Jose. Rubottom established a hotel and a stagecoach station along the Overland Stage's Los Angeles-San Bernardino Road, later the Butterfield Stage route. Rubottom had maintained a stage station in Cucamonga as well, but after moving to Spadra, Rubottom's stage station became the premier horse team-switching station in the area. In 1867, a post office was established and the new community was named "Spadra" for Spadra Bluffs in Arkansas, Rubottom's hometown (Exhibit 8). After the post office was established, other settlers came from El Monte including Reverend Richard C. Fryer and Caroline Fryer, Senator Alvan T. Currier, Charles Blake and his family, A.B. Caldwell, Susan Caldwell and their family, and George, John, and Jim Egan. Reverend Fryer went on to establish a Baptist ministry in Spadra in 1870 and became the first Baptist Church in the Pomona Valley (Brackett 1920, p. 79-80, 136; Driscoll 1950, p. 34-35; Plender 1970, p. 20-21; Shares 1967, p. 3).

Exhibit 8. Exterior view of Rubottom Hotel and stagecoach station, ca. 1860.



Source: California Historical Society Collection, Digital Library, University of Southern California

In 1873, after Phillips was contracted for a right-of-way across his land, the Southern Pacific railroad began construction east from Los Angeles. Until mid-1875, Spadra was the eastern terminus of the Los Angeles line. Freight, machinery, and crops all had to transfer between rail and stagecoach in Spadra, and for the years between 1866 and 1876, Spadra saw increased economic activity. At the height of this activity, more families permanently moved to Spadra. In 1875, Louis Phillips began building two-story, brick, Second Empire-style Mansion on present day Pomona Boulevard. By 1876, the railroad had extended to the new town of Pomona (established in 1875), and then onward towards Colton. With the increase in railroad commerce, the stagecoach commerce, travel, and freighting dwindled. Spadra returned to place for agricultural production, primarily dealing with hay and alfalfa and selling horses through the late 1870s and 1880s. After the brief increase in economic activity in the mid-1870s, life at Spadra became more rural. The nearby town of Pomona, established in 1875, was quickly growing into a small metropolis, as the platted town allowed more growth than at Spadra, where town growth was limited by the large tracts of agricultural land owned by the prominent town families. Louis Phillips, who sold the land Pomona was developed on, is also credited as the Pomona town founder. Spadra's main street did not grow beyond its post office, a saloon, a hotel, three stores, two blacksmith shops, and the school (Exhibit 9). In the hills southeast of town, a limestone quarry crushed rocks for cement and mortar, though like the other industries in town, the quarry remained largely local (Brackett 1920, p. 114-115, 147; Plender 1970, 21-22, 24; Dorsey 1924, 20-23).

Exhibit 9. Map, Early Spadra 1837-1916



Source: California Special Collections, Pomona Public Library

During the 1880s the scale of economic activity began shifting entirely to Pomona, reversing the earlier trend where Spadra was considered primary and Pomona secondary. Established in Louis Phillips' sheep pasture, Pomona grew especially during the land boom years between 1882 and 1887 when thousands of lots were sold in Pomona. By 1886, the City of Pomona's population exceeded 5,000. In 1887, Pomona incorporated and displaced Spadra as the primary city in eastern Los Angeles County. Pomona's prominence in the local Pomona Valley was solidified when, in 1891, the Atchison, Topeka, and Santa Fe (ATSF) Railroad bypassed Spadra entirely in favor of having a depot in Pomona. All passenger trains on the Southern Pacific also routed through Pomona, instead of Spadra. (Plender 1970, p. 30; Shires 1967, p. 11-12).

In the 1890s, there was a brief resurgence of Spadra after the neighboring City of Pomona voted to become a dry town and adhere to the temperance movement's demands. However, that revival brought no permanent settlers or business (Piersol 1964, p. 25). According to most sources, Spadra ceased to grow after 1890. Children of the original settlers all, without exception, left Spadra when they came of age, though original settlers remained in Spadra until they died. Lifelong resident and schoolteacher J.M. Fryer wrote in the *Pomona Progress Bulletin* (Bracket 1920, p. 221; The Bulletin 1919a, p. 16):

> You see, years ago, as the people began to settle in this vicinity all of them had large families and the children attended the Spadra School. But when the children grew up, they scattered out into other places, leaving the old folks at home. None of them wanted to sell their land, for they think it is good enough for them, so there has been but little opportunity for families with children of school age to locate in this district during the more recent years.

Serious decline in Spadra continued until the town was left with less than 200 residents. The Baptist ministry established by Reverend Fryer in 1870 moved to the City of Pomona in the early twentieth century (Pomona Progress-Bulletin 1945, p. 1). In 1902, the Rubottom Hotel was demolished. In 1919, the City of Pomona successfully fought for the new state hospital, called the Pacific Colony, not to be located in the city due to a municipal water concern. The Pacific Colony for the mentally ill and incapacitated was instead pushed into Spadra, where it was established on 1,500 acres (The Bulletin 1919b, p. 6). Instead of stimulating the local economy or inviting growth, the Pacific Colony was designed to be self-sufficient and there was no substantial increase in Spadra's population. The same year, the Spadra School closed and the building was sold (Pomona Progress-Bulletin 1920, p. 9). In 1926, the City of Pomona located their sanitation plant just outside of Spadra at Pomona's western edge. During the 1930s, there was little growth in Spadra, but conversely, the Pacific Colony expanded significantly during the Great Depression years, growing from 27 inmates in 1927 to 720 inmates by 1934. The institution was chronically overcapacity until more expansions in the post-World War II years. The expansions, and multiple mass escapes of inmates led to an increased feeling of crime and undesirability for Spadra (Lira 2015, pp. 49-51).

The 1950s were a period of intensive development for the City of Pomona, and Pomona began to view the sparsely-populated Spadra as a location for the City's less-desirable businesses, including industrial and manufacturing sites. Pomona attempted to relocate a local airport to Spadra. While this was unsuccessful, Pomona continued to try to expand west. By 1953, Pomona's western city border expanded further towards Pomona and several new housing subdivisions appeared in the former citrus groves between Mission Boulevard/Brea Canyon Road and Pomona Boulevard (NETR 2022). Shortly after, the City of Pomona voted to dissolve the Spadra School district and absorb the schools and students into the Pomona School District. (Pomona Progress-Bulletin 1954, p. 6). In 1955, the Spadra post office was closed (Pomona Progress-Bulletin 1955, p. 13). In 1956, the Kellogg campus of California Polytechnic University, Pomona (Cal Poly Pomona) opened in northwest Spadra, relocated from its previous location in San Dimas, on lands leased from the Pacific Colony state hospital (later the Pacific State Hospital and Lanterman State Hospital) and inherited from the Kellogg estate. As the school expanded its campus, it also grew more and more towards the town center of Spadra (Chavez et al. 2016). In 1957, a large landfill for the City of Pomona was established over a 128-acre site in Spadra (Pomona Progress Bulletin 1958a, p. 17).

After several unsuccessful attempts in 1958 and again in 1960, Spadra was annexed to the City of Pomona in two portions. The first annexation included the area northwest of Pomona Boulevard strip and the second annexation took the railroad right of way and Spadra Cemetery area. At this time, there were only 140 registered voters in Spadra able to participate in the annexation vote (Exhibit 10)(Piersol 1964, p. 25; Pomona Progress-Bulletin 1960, p. 17; Pomona Progress-Bulletin 1961, p. 13).

Exhibit 10. Western Pomona Looking South-West Over Spadra, March 8, 1955, Photographer Robert C. Frampton; Spadra Cemetery and Elephant Hill in top left of photograph



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

After annexation, Spadra transitioned to the manufacturing and industrial district for the City of Pomona. In 1972, the Orange Freeway (present day SR 57) was dedicated, cutting from Interstate 10 south towards Orange County by way of Brea Canyon (Pomona Progress-Bulletin 1969, p. 1; 1972, p. 11). As a result of the highway construction and expansion of the City of Pomona, all but two of the original elements of Spadra have been destroyed. The remaining portions of Spadra include the Louis Phillips Mansion on Pomona Boulevard (the Alvan T. Currier House was moved to the same property in an attempt to preserve it) and the Spadra Cemetery, hidden south of the railroad and north of Elephant Hill. The Historical Society of Pomona Valley acquired the Phillips Mansion in 1966, and Spadra Cemetery in 1971. Since 1971, multiple community efforts have been made to protect these remaining properties from demolition (Daily News-Post 1972, p. 2; Historical Society of Pomona Valley 2022; Los Angeles Times 2002a, p. 3. Meares 2017).

Spadra Cemetery (1868-present)

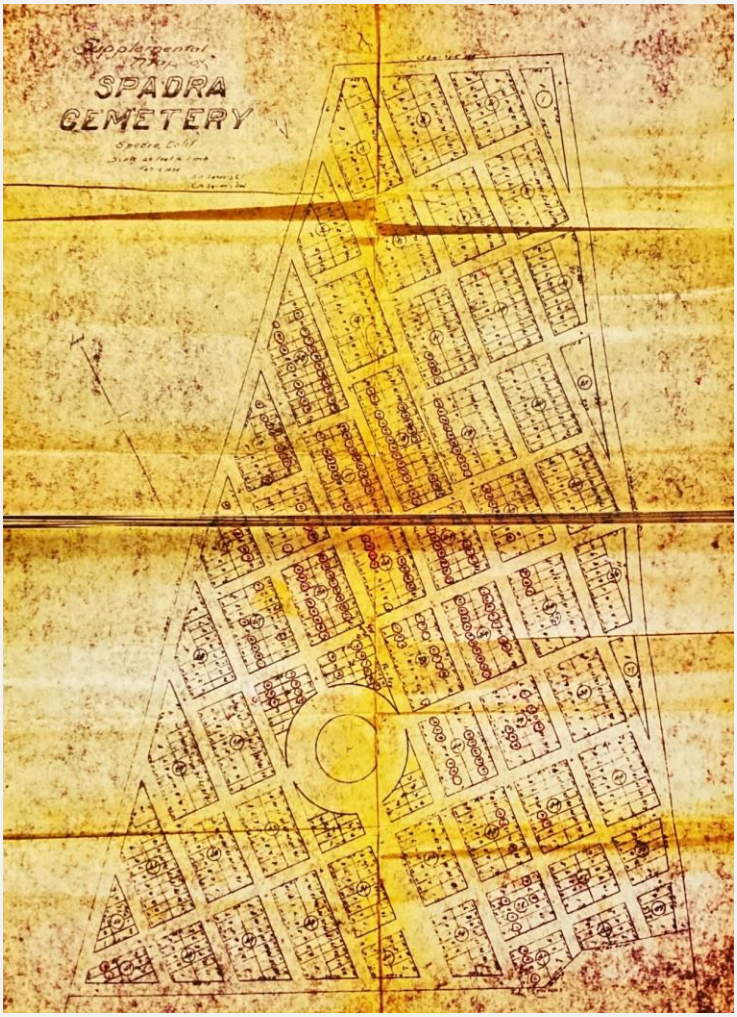
Spadra Cemetery was formed just two years after the community was officially founded. In 1867, Louis Phillips deeded 250 acres to Reverend Richard C. Fryer, the Baptist minister who had administered his marriage. This transfer was a donation to Fryer's ministry and constituted the first Protestant cemetery in Pomona Valley. The very first burial at Spadra was that of Melinda Arnett, wife of Richard S. Arnett and matriarch of one of the many families that moved from El Monte to Spadra. She died in 1868, a year after the land for the cemetery was deeded. The Cemetery was laid out across 2.5 acres with 63 blocks or 922 total lots and a central circle. Though not officially designed by a known architect or landscape architect, the Spadra Cemetery adhered to the principles of a "Rural Cemetery," with an isolated location against Elephant Hill, picturesque setting, long-term shade plantings, and regular rectangular plots fitted to the oblong cemetery property. Major families in town all purchased family blocks in the Spadra Cemetery, including the Arnett,

Blake, Bowers, Clark, Caldwell, Currier, Egan, Fryer, Greenwood, Hewets, Kepner, Lilly, Middagh, Phillips, Rubottom, and Shrewsbury families. Others without family plots were also buried in the cemetery (Brackett 1920, p. 80; Spadra Cemetery Association 1948, pp. 1-24; Swank 1973, pp. 5-8).

Burials progressed normally for the decades following the cemetery's established. The diary of Kewen Dorsey, long-time Spadra resident and grandson of Uncle Billy Rubottom, dating from 1875 to 1892 records many of the burials in Spadra Cemetery. From the cemetery's initial dedication to the time the Spadra Cemetery Association assumed ownership in 1898, there were approximately 73 recorded burials and most of the prominent Spadra families buried some family members in their blocks.[1] Others were also interred at the cemetery, including townspeople buried without families or relations in state, an unnamed member of the Apache tribe, and dozens of infants or children. In 1898, The Spadra Cemetery Association was formed to control the cemetery affairs and install a caretaker position to care for and guard the cemetery. Only 25 blocks were actually in use by families at the time of this organization's incorporation, the remaining blocks were left unfilled (Exhibit 11) (Dorsey 1924, pp. 20-27; Historical Society of Pomona Valley 1973; Los Angeles Times 1898, p. 5; Spadra Cemetery Association 1948, 1971; Swank 1973, pp. 5-8).

[1] Several burials in the sources shared by Pomona Public Library and the Historical Society of Pomona Valley record internment at a given block and lot but lack the internment date and in some cases the name of the person who was buried. Though their block and lot are recorded, many of these entries are marked simply "child," "unknown," or "unknown baby."

Exhibit 11. Supplemental Map of Spadra Cemetery, 1898, drawn by W.H. and C.H. Sanders, civil engineers



Source: Spadra folders, Local Collections, Historical Society of Pomona Valley

In the twentieth century, there were fewer burials overall, and the Spadra Cemetery Association made no attempt to sell the unclaimed blocks to new families. According to cemetery records, until 1936, the cemetery was able to sustain itself with donations only, but after this date, charged $20 for "stockholders" and $25 for non-stockholders for the cost of a lot. As the town of Spadra declined, so too did the cemetery, with just seven burials in the 1940s, eleven in the 1950s and seven in the 1960s (Historical Society of Pomona Valley 1973; Spadra Cemetery Association 1948). Additionally, as burials declined, there was less income for the Spadra Cemetery Association to pay for the caretaker and the cemetery was subject to an increase in vandalism. Several particularly damaging vandalism events in 1937, 1948, and 1958 toppled or broke over 50 headstones (Pomona Progress Bulletin 1937, p. 3; Pomona Progress Bulletin 1948, p. 22; Pomona Progress Bulletin 1958b, p. 29). The final burial at Spadra Cemetery was John Bowers in February 1967, a full 100 years after the first burial at Spadra. As of the final burial, there were approximately 210 people interred at Spadra Cemetery (Exhibit 1) (Historical Society of Pomona Valley 1973; Swank 1973, pp. 5-8).

Exhibit 12. Spadra Cemetery near Pomona Boulevard, about 1964



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

In 1971, the Spadra Cemetery Association declared their intent to dissolve the organization due to lack of activity and inability to defend the cemetery from vandals. The cemetery was deeded to the Historical Society of Pomona Valley later the same year. Though vandalism continued under the new ownership, a preservation and maintenance program was also started by volunteers and the Historic Society in 1975 (McPhillips 1971, letter; McPhillips 1972, letter; Los Angeles County Recorder 1972; Pomona Progress-Bulletin 1971, p. 15; Pomona Progress-Bulletin 1975, p. 48; Pomona Progress Bulletin 1984, p. 298).

After the Historical Society of Pomona Valley assumed ownership, there were two more major events at Spadra Cemetery. In 1990, after decades of vandalism, the Historical Society of Pomona Valley began a preservation program to protect the remaining headstones at Spadra Cemetery. Vehicle damage, gun damage, theft, and general vandalism had broken many of the tablet-style headstones and leaving them upright was no longer considered optimal for their preservation. The Historical Society hired Bill Beck to design a solution that would take remaining tablet-style headstone and some of the smaller block-style headstones, lay them flat, and encase them in concrete (Beck 1990, letter). In another attempt at protection, in 2000, Alice Page of the Historical Society of Pomona Valley nominated the Spadra Cemetery as a Designated Historic Landmark. The Landmark was accepted by City Council in October 2000 (City of Pomona 2000a, City of Pomona 2000b).

People of Significance Buried at Spadra Cemetery

Louis Phillips (April 22, 1829 – March 16, 1900)

Louis Phillips was born in Posen, Prussia on April 22, 1829. He emigrated to the United States with his older brother at the age of thirteen and lived in Louisiana. He worked in mercantile trade while living in Louisiana. In 1850, he relocated to California where he was a miner, then worked as a store owner in San Francisco. In 1853, he purchased land on the San Gabriel River and became a farmer. He arrived in Spadra in 1863 and eventually owned the 12,000-acre Rancho San Jose estate. He became the founder of the City of Pomona as well as one of the largest property owners in Los Angeles County at the time. He married Esther Blake, and together they had five children: Charles, Louis, George, Mrs. Frank George, and Kate Cecil. Esther Phillip's brothers, Charles and George, worked as merchants in the Phillip's business. Phillips died in Spadra on March 16, 1900 (San Francisco Call 1900, p. 25; Pomona Progress Bulletin 1900, p. 1; Shires 1967, p. 3-4).

William "Uncle Billy" Rubottom (December 27, 1809 – October 13, 1885)

William Rubottom, known as "Uncle Billy," was born on December 27, 1809, in Wayne County, Missouri. In 1852, William and his father Ezekiel Rubottom migrated to California from Arkansas, settling in Willow Grove, part of present-day El Monte. In the 1860s, William moved to present-day Rancho Cucamonga, where he constructed and operated an inn along the San Bernardino Road, before he relocated to the Spadra area in 1866 where he established another hotel there and a stagecoach station. The area was known as "Rubottom's" because the main attraction was the Rubottom Hotel. His daughter-in-law, Susan Glenn, moved to Spadra in the 1860s, and her hospitality and cooking contributed to the success of the Rubottom Hotel. Other settlers arrived in Rubottom's due to its proximity to the stagecoach route through Spadra. After a post office was built in 1870, "Rubottom's" was renamed Spadra after Rubottom's home in Arkansas, Spadra Bluffs. Rubottom became the first postmaster and is credited as the founder of Spadra. His daughter, Civility Rubottom Dorsey, married Captain Hilliard Pierce Dorsey. Mr. Dorsey founded the first Worship Master of Los Angeles Lodge No. 42, Free and Accepted Mason in 1854. They had a son, Kewen Dorsey, who became a beloved citizen of Spadra, and wrote a series of diaries about his life in Spadra. Rubuttom murdered his son-in-law Dorsey after Dorsey attacked him, and raised his grandson Kewen. William spent his last years with Kewen before his death on October 13, 1885, in Spadra. Rubottom's personality was a component in remembering his role in the town, not only for embodying the self-starting spirit of the early American era, but also its violence. Rubottom was accused of having murdered someone at knifepoint in Spadra Bluffs, Arkansas, and was known for having stopped the hanging of Dona Maria Merced Rain in Cucamonga (Blackstock 2005; Brackett 1920, p. 79, 80, 87; Dorsey 1970, p. 19; Driscoll 1950, p. 35-36; Historical Society of Pomona Valley ND, p. 1; Pomona Progress Bulletin 1935, p. 12).

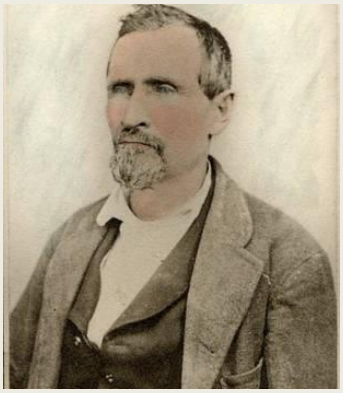


Exhibit 6. William "Uncle Billy" Rubottom (Portrait Photographs Collection, Pomona Public Library)

Richard C. Fryer (January 31, 1821 – December 8, 1888)

Reverend Richard C. Fryer was born in Alabama on January 31, 1821. He relocated to Arkansas before migrating to El Monte, California in 1852 to farm. Fryer became the first Baptist minister in Southern California after starting a church out of his house. He was one of the early settlers of Spadra as of 1867, after Louis Phillips gifted him 250 acres for his Baptist ministry due in part to Fryer having officiated Phillips' marriage to Esther Blake in 1866. Fryer held church services first in his home, then at the Spadra School House until 1883, when services were moved to Pomona to the First Baptist Church. Reverend Fryer also served as a member of the State Assembly. He lived in Spadra until 1887 when he relocated to Los Angeles, where he died on December 8, 1888 (Brackett 1920, p. 80; Pomona Progress Bulletin 1945, p. 1; California Genealogy 2022; a Grave 2022).



Exhibit 6. Richard C. Fryer (Historical Society of Pomona Valley)

Alvan T. Currier (April 30, 1840 – August 13, 1921)

Alvan T. Currier was born in Franklin County, Maine on April 30, 1840. He migrated to California and settled in Spadra. He was a rancher, owning a 2,400 acres ranch, the second largest ranch in the area next to Louis Phillips. Currier was a philanthropist and the director of First National Bank of Pomona. He helped construct the YMCA and First Baptist Church in Pomona. In 1898 he was elected State Senator for the Republican Party. He married Susan R. Glenn Rubottom Currier, daughter of Uncle Billy Rubottom. On August 13, 1921, Alvan died in Los Angeles. His residence was relocated to Louis Phillip's property in 2002 for restoration (Los Angeles Times 2002b, p. 2; Brackett 1920, p. 148, 212-213).

Property Type: Rural Cemetery

The "Rural Cemetery" typology is defined in *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Places* (NPS Bulletin 41), as drawing from romantic and picturesque notions of garden and landscape design in the mid-nineteenth century to create cemeteries that were separate from the churchyard models of the colonial and early settlement periods. These "Rural Cemetery" types typically featured manicured lawns, border plantings, shade trees, and irregular plot arrangements, incorporating plantings and natural topography, and focusing on circulation and pathways to guide visitor experience. The style has roots in European gardening and landscape design from the 1840s though 1880s that were guided by the work of landscape architects such as Lancelot "Capability" Brown, William Kent, or John Claudius Loudon. The "rural" movement applied not only to cemeteries, but also to formal gardens, public and private parks, and parkways and scenic routes (NPS 1992, p. 5-6).

In *NPS Bulletin 41*, the National Park Service (NPS) provides registration requirements and definitions for cemetery properties ordinarily that are not considered eligible for inclusion in the National Register of Historic Places unless they meet special requirements. *NPS Bulletin 41* establishes thresholds of significance for the four National Register criteria,

which must be met in addition to the Criteria Considerations in order for a cemetery or burial place to be eligible for listed in the NRHP.

Criterion A. *NPS Bulletin 41* clearly states that to be eligible under Criterion A, the burial place must me associated with a "clearly important" event or trend and that the connection must be "unmistakable." The bulletin gives several examples of cemeteries representing important events or trends in their given community or cultural history (NPS 1992, p. 9).

There are many ways in which a cemetery might represent an important aspect of a community's or a culture's history through association with a specific event or by representing broader patterns of attitudes or behavior. Cemeteries may be significant for their association with a community's initial settlement or early history, or a broader region's exploration or settlement. Cemeteries may also be significant for associations with specific events as well as long-term trends, such as political shifts, battles, or deaths of state leaders. By virtue of being a cemetery and relatively unchanged, or instance, a cemetery might be able to convey the proper context and integrity of a battleground, when no other location with high integrity may remain. Cemeteries are also often the last available location associated with a historic event, so when there is no other property or location that can convey a historical event, such as a fire, slave rebellion, mining accident or earthquake, the burial grounds where survivors of that event are interred may be used in substitute (NPS 1992, p. 9-10).

Cemeteries and burial places may also be related to the history of mortuary practices in general, such as the transition from crowded churchyards to more romantic or idyllic park-like settings, or the popularization of cremation in the nineteenth and early twentieth centuries (NPS 1992, p. 10-11).

Criterion B is focused on the person or group with which the burial place is associated must be of "outstanding importance" to the community, State, or nation. Cemeteries, as well as individual graves, may be eligible under Criterion B. Examples include cemeteries that contain the graves of numerous persons who made outstanding contributions to the history of the State or area in which their graves are located (NPS 1992, p. 11). The key component here is to strive for that "outstanding importance" character, and that there should be either a person of overwhelming importance or an overwhelming number of important individuals buried in a cemetery.

Criterion C has more to do with the craftsmanship of the gravestones or tombs themselves and/or the overall design of cemetery (if designed at all), than the people buried there or the historical circumstances of the cemeteries. As with residences, religious buildings, education buildings, or commercial buildings, there is a variety of monument styles, patterns, iconography, materials and craftsman practices that may be present in a cemetery. Under Criterion C, grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleum), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication. Alternatively, such property types may represent the work of master artists or craftspeople or possess the highest artistic distinction. In addition to "architecture," appropriate areas of significance would include art or landscape design (NPS 1992, pp. 12-13).

Criterion D Burial places can be eligible for their potential to yield information about cultural and ethnic groups. Under Criterion D, the common requirements are that the property have information to contribute and the contributed information is considered important. Whether information yielded is important or not is often determined by research design or a set of research questions. Though Criterion D commonly applies to archeological research, study of burials

and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

In additional to needing to be eligible under one of the four criteria for evaluation, cemeteries and burial places also must meet the requirements of Criteria Considerations. The relevant Criteria Considerations are:

> Criterion Consideration A, a religious property, "if it derives its primary significance from architectural or artistic distinction or historical importance;
>
> Criterion Consideration C, "a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life"; and
>
> Criterion Consideration D, "a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events" (NPS 1992, p. 33).

California guidance for the assessment of historic cemeteries defers to NPS guidance for eligibility and does not offer its own, specific criterion considerations.

Though there are several Criterion Considerations relevant to cemeteries, Criterion Consideration D is the most applicable here. Criterion Consideration D explains (NPS 1992, p. 16),

> A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events. As collective burial places, cemeteries are the focus of many individual expressions commemorating family members and spiritual beliefs. In and of itself, this characteristic does not qualify a burial place for listing in the National Register. However, when a burying ground is of sufficient age and scope to represent more, such as patterns of early settlement or the values of a society generally, National Register Criteria Consideration D provides for its eligibility. Cemeteries nominated for the importance of the information they may impart may be eligible for listing without application of Criteria Consideration D.
>
> To be considered a person of transcendent importance, an individual would have to meet the same test as that for a grave. To qualify for its age, a cemetery must date from an early period within its geographic and cultural context. The age of a burial place might be considered early relative to the period for which we have information about human activity, or relative to the exploration, settlement, and development of an area by a particular group. As with any other type of property, a cemetery may be eligible for the quality of design represented in its funerary art, construction or engineering techniques, landscape architecture, or other values recognized under National Register Criterion C. Likewise, under Criterion A, a cemetery may possess significant associations with historic events, including general events that reflect important broad patterns in our history.

To be considered under Criterion Consideration D, a cemetery must already be eligible under NRHP Criteria A, B, or C, and be:

- A historic cemetery containing the graves of a number of persons of outstanding importance – those whose activities determined the course of events in local, State, or national history; or those whose activities were especially important in reflecting significant cultural currents of the time.
- A cemetery possessing important historic associations from a community's early period of settlement, or which reflects important aspects of community history.
- A cemetery that embodies the principles of an aesthetic movement or tradition of design and monumentation through its overall plan and landscaping, its grave markers and funerary sculpture, or its buildings and structures.
- A cemetery that is associated through its burials with a single important historical event such as a pivotal military battle.
- A cemetery that embodies the folkways, burial customs, or artistic traditions of an ethnic or cultural group whose impact on the community or region was significant but is not well documented in other resources. (NPS 1992, pp. 16-17)

Integrity is the final threshold for finding cemeteries eligible for the NRHP. According to *NPS Bulletin 41*, all aspects of integrity are considered for NRHP eligibility: location, design, setting, materials, workmanship, feeling, and association. A cemetery property must have all aspects of integrity; however, they must have those aspects of integrity necessary to convey significance under the NRHP Criteria they are eligible under. So location, setting, feeling, and association are essential to those properties nominated under Criterion A and B, while design, materials and workmanship are essential under Criterion C. This section also gives instruction for nominating cemeteries that may have expanded over time, or have non-historic elements included due to burials made outside of the period of significance. In some cases, where there is extreme age or rarity of resource, more allowances can be made for alterations, damage or loss of historic features (NPS 1992, pp. 18-19).

Of note, there are special instructions given for improvements to the cemetery property, particularly to beautification efforts by well-meaning caretakers or lot owners. "Improvements" affect historic integrity. Replacement of historical components with modern features, such as exchanging original headstones, replacing fencing or wall materials, adding elaborate monuments or statuary, and in some cases, making elaborate planting plan changes all reduce integrity and diminish the authentic historic character of the cemetery. In order to a evaluate the impact of such improvements, the features which are crucial components of historic character must be clearly defined and prioritized for preservation (NPS 1992, p. 19).

Significance Evaluation

One previously identified resource was identified: the Spadra Cemetery. Spadra Cemetery was originally established in 1868 and hosted its final burial in 1967. It is a Designated Historic Landmark for City of Pomona, and was approved October 16, 2000 (City of Pomona 2000a, 2000b). The Landmark application was completed hand (not typed) and two pages in length. The applicant, Alice Page, checked boxes that the cemetery was eligible for local landmark because it:

- Reflects special elements of the City's cultural, economical, political, architectural, or natural history;
- is identified with important events/person, local, state, federal;
- is the work of a noted architect, builder, designer or person;

- is a unique location, view, vista, or physical characteristics; and
- has significant architectural, structural design, or craftsmanship.

In the "Historical Attributes" section, Page writes that Spadra Cemetery is the "First cemetery in the Pomona Valley. It is the burial site of many members of the early prominent families of Pomona Valley." No more detail or justification was available in the City Council meeting minutes, landmark application prepared by Page, or other sources.

Spadra Cemetery has not been formally evaluated against National Register or California Register criteria before. Dudek evaluated the Spadra Cemetery under National and California Register criteria in order to fully assess potential impacts under CEQA. This report recommends that Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. It also recommends Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Spadra Cemetery also met the conditions of Criteria Considerations C and D. Below, an evaluation of Spadra Cemetery under National and California Register criteria is presented. This evaluation relies on the property type analysis and thresholds of significance established in the *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Place*s. Findings in this section do not undo or delegitimize the local City of Pomona Designated Historic Landmark listing.

National Register of Historic Places/California Register of Historical Resources Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. There are only two remaining, extant historical resources in the former town of Spadra: Spadra Cemetery (est. 1868) and the Phillips Mansion (built 1873). All other original homes, farms, fields, businesses and buildings or structures have been demolished. Under Criterion A/1, Spadra Cemetery has a period of significance which spans from its establishment in 1868 after the death of Melinda Arnett, wife of Richard S. Arnett and member of one of the earliest families to come to Spadra from nearby El Monte; to 1967 which marks the final burial at Spadra Cemetery, which was for John A. Bowers. Spadra Cemetery is sited on approximately 2.35 acres of land, part of the 250 acres Louis Phillips set aside for Reverend Richard C. Fryer, a Baptist minister and one of the earliest settlers of Pomona along with the Rubottom and Arnett families.

As discussed above in the historical context, Spadra was one of the earliest communities established in the American period in this region, located along important stage and rail routes, and had a brief but important impact as the eastern extent of the County of Los Angeles, before Spadra was incorporated into the City of Pomona. Archival research indicates that Spadra Cemetery is the last remaining property in the former town of Spadra that can be understood as representative of the community as a whole. The only other resource remaining in the area related to Spadra is the mansion of Spadra's town founder Louis Phillips, built in 1873, and is not directly associated with the founding of the town so much as it is associated with the brief period of Spadra as a major economic shipping and trade location with arrival of the Southern Pacific Railroad

between 1873 and 1874. Therefore, the Spadra Cemetery is directly related to the clearly important event: the establishment and earliest history of Spadra and is eligible because it is the last available location that can be associated with this historical event, all of which are registration requirements for cemeteries as outlined in *NPS Bulletin 41* (NPS 1992, p. 9-10). It was the first Protestant cemetery in Pomona Valley. Spadra Cemetery was a key community component of Reverend Richard C. Fryer's Baptist ministry in Spadra, but the cemetery was used as a final resting place for any non-Catholic and resident of Spadra. Typically, local pioneer cemeteries of this era rejected non-Catholics. Though there has been damage to and theft of headstones at Spadra Cemetery, both Melinda Arnett, the first burial, and John Bowers, the last burial headstones are still present and in relatively undamaged states at the cemetery.

The cemetery also retains adequate integrity to convey significance under Criteria A/1: location, feeling, association and setting. This is discussed in full in the "Integrity" section below.

Therefore, because of (1) its clear association with the founding and early history of Spadra, (2) its position as the last remaining example of a property that can convey that historical significance, and (3) its high degree of those aspects of integrity that are necessary to convey its historical significance, Spadra Cemetery is recommended eligible for the National Register under Criterion A and California Register under Criterion 1 at the local level, with a period of significance spanning 1868 to 1967.

Criterion B/2: That are associated with the lives of persons significant in our past.

Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Except for Phillips, these important figures have no other extant location which could convey their historical importance. To be found eligible under Criterion B/2 the property has to be directly tied to an important person *and* the place where that individual conducted or produced the work for which he or she is known. *NPS Bulletin 41* allows for special consideration under Criterion B/2 if the burial place is associated with someone of "outstanding importance" to the community, State, or nation and that the burial place contains the graves of numerous persons who made outstanding contributions to the history of the State or area in which their graves are located (NPS 1992 p. 11). Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier are individuals interred at the Spadra Cemetery who are of "outstanding importance."

William "Uncle Billy" Rubottom was the first person to be invited to reside in Spadra by Phillips. Spadra is named for Rubottom's hometown, Spadra Bluffs, Arkansas. Rubottom opened the first stage station and hotel in Spadra, which was a critical stop along the Los Angeles-San Bernardino Road and the Butterfield Stage Route. Intermittent stage stations were important along such routes so that stages could water and rest horses or switch them out after a particularly strenuous journey. Rubottom also served intermittently as the postmaster for Spadra and is of obvious outstanding local importance to Spadra. There are no extant sites associated with Rubottom in California or Arkansas which can convey his significance – only the cemetery remains. Rubottom's hotel was demolished in 1902, and his home was demolished in the 1950s. Prior to his participation in the founding of Spadra, Rubottom owned the Sycamore Inn in present-day Rancho Cucamonga, burned down and was rebuilt as a Craftsman style mansion in 1920 and no longer retains physical historical association with Rubottom's period of ownership.

Reverend Richard C. Fryer is responsible for establishing Spadra Cemetery as the first Protestant Cemetery in Pomona Valley as part of his Baptist ministry. Fryer was instrumental in convincing other El Monte residents to relocate to Spadra, after

Phillips brought Fryer over by gifting him a significant acreage for his ministry. Fryer's church services were held first in his home, then at the Spadra School House after 1870, and no actual church was established in Spadra. In 1883, just a few years before his death, the Baptist congregation moved to Pomona when the First Baptist Church at Fourth and Park was opened, though Fryer remained in Spadra until just a few months before his death. The congregation later moved again, and the First Baptist Church building in Pomona was demolished in 1957. Fryer's Spadra home was also demolished, like many of Spadra's buildings, in the 1950s. The Spadra School House was demolished in 1920. Therefore, there is no property, other than Spadra Cemetery, remaining that can convey the historical importance of Reverend Fryer and his role in establishing the community.

Alvan T. Currier was another early settler of Spadra; a locally important landowner second in acreage only to Louis Phillips; trustee to various local banks, churches and schools; Los Angeles county sheriff; and state senator. He is of outstanding importance locally and at the state level. Currier married Susan Rubottom Glenn, daughter of "Uncle Billy" Rubottom. One building in Spadra was associated with Currier. The Currier house was moved to the Phillips Mansion property in an effort to preserve it from demolition in the early 2000s, but in doing so, the location and setting of the Currier House were diminished to the extent that the property no longer conveys its historical significance. Other buildings associated with Currier, such as the Currier Block in downtown Los Angeles have been demolished and were not associated with the productive life of Alvan T. Currier, but with businesses or people who inhabited them. Currier partially funded the construction of buildings such as the First Bank of Pomona building, but his participation in the funding of this building is not associated with his productive life. Finally, while some of Currier's important achievements may have been conducted at the State Capitol building in Sacramento during his time as a state senator, Currier's more substantial and long term important achievements during the productive years of his life took place in Spadra while he served as the sheriff and as a trustee for local businesses.

One important person interred at the cemetery has other locations which could potentially convey historical significance better than Spadra Cemetery. Louis R. Phillips was the founder and earliest American settler of Spadra and is also attributed as the town founder of City of Pomona since he sold the land Pomona was platted on to land developers. Phillips's donations and land sales to residents of El Monte attracted people to Spadra. Phillips held many important positions in the town as well as the county, including postmaster and county supervisor, in addition to at one time being one of the richest men in Los Angeles County. Phillips, his spouse Esther Blake, and their extended family and children are all interred at Spadra Cemetery. He is of obvious outstanding importance locally. The Phillips Mansion, the only other remaining historic site in Spadra, could potentially convey Phillips' historical significance better than Spadra Cemetery.

As demonstrated above, the Spadra Cemetery maintains a high degree of historical association with at least four early Spadra citizens who were of exceptional local importance and is the only extant historical property which can convey their significance. All four of these exceptionally locally important figures were interred at Spadra Cemetery during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 2 at the local level, with a period of significance spanning 1868 to 1967.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Spadra Cemetery is a Rural Cemetery property type, originally established in 1868 for the first burial and platted immediately afterwards. According to the significance thresholds as defined in *NPS Bulletin 41* under Criterion C for this property type,

grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleums), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication (NPS 1992, pp. 12-13). Though the Spadra Cemetery is a unique and well-preserved historical location with obvious historical associations both to the founding and early years of Spadra as well as to historical figures of outstanding importance, the physical monuments at Spadra Cemetery are typical tablet or block style monuments that were common during the late nineteenth and early twentieth centuries. No particularly excellent examples of workmanship or design were present, and most of the monuments were plain or had very simple floral, freemason, or religious imagery, all of which remain common in the twenty-first century. None of the monuments at Spadra Cemetery of themselves appeared to be excellent, undamaged representatives of their stylistic type.

One monument, that of Ella Belle "Ursula" Ponedel Meyer, was of note. Meyer's 1935 monument is large, granite, block style monument with particularly artistic, stylized WPA-style carving of a Native American with braids on horseback, with the caption "End of the trail." This monument design and its title, a Native American on horseback in bas relief, are copies of a plaster relief of a similar subject done by artist James Earle Fraser for the Panama-Pacific International Exposition in 1915 (Blackstock 2014). Though an artful rendering, the version on Meyer's headstone is derivative of the original pieces and is not representative of a master artist or a good example of a grave-associated artwork.

One craftsperson and headstone maker, a "J. Miller" from Los Angeles, crafted at least two headstones in Spadra Cemetery for the Rubottom family in the 1870s; however, archival research did not uncover any details about Miller or his business, and therefore he cannot be elevated to the level of master craftsperson.

The Spadra Cemetery property does not meet the thresholds for significance under National Register Criterion C or California Register Criterion 3 as established in *NPS Bulletin 41* for cemeteries or burial places. It does not appear to be a good representation of the "Rural Cemetery" type, does not appear to have good representations of any stylistic type, period, methods of construction, or fabrication for its headstones, nor does it have any monuments which could represent the work of master craftspeople, or possess high artistic distinction. Therefore, the Spadra Cemetery property does not appear eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

Though Criterion D/4 commonly applies to archaeological research, study of burials and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an archaeological resources assessment for this project. No cultural (cultural or tribal cultural) resources were identified within the proposed project site as a result of these efforts. However, as previously mentioned Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra (reasoning for this finding is further explained in the determination for criterion D/2). Additionally, GPR survey results reveal the potential for unmarked graves to exist within the Spadra Cemetery property. These unmarked graves have potential to reveal information about the historic period and the community of Spadra that is not yet known.

As demonstrated above, the Spadra Cemetery has the potential to yield information important to history in both the study of individuals known to be interred within the cemetery but also those possibly interred. Information yet to be revealed has the potential to illuminate yet unknown information about the town of Spadra during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 4 at the local level, with a period of significance spanning 1868 to 1967.

Criteria Considerations

As a cemetery property type, Spadra Cemetery must qualify as eligible under one of the four standard criteria for significance as well as at least one criteria consideration. As demonstrated above, Spadra Cemetery is eligible under National Register Criteria A and B and California Register Criteria 1 and 2 at the local level, with a period of significance spanning 1868 to 1967. There are at least four Criteria Considerations which may be applied to cemeteries:

A a religious property deriving primary significance from architectural or artistic distinction or historical importance;

B a building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;

C a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life;

D a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events;

Of these, Criterion Consideration C and Criterion Consideration D to apply to Spadra Cemetery, as it (A) is not a religious property that derives significance from its historical importance or architectural distinction, and (B) Spadra Cemetery remains in its original location and hosts no moved graves that were uncovered during archival research.

As discussed above in National Register Criteria B and California Register Criteria 2, Spadra Cemetery contains (Criteria Consideration C) at least three graves of historical figures of outstanding importance where there is no other extant location which can be directly associated with his or her productive life: Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier. These people meet the threshold for exceptional importance at the local level and there are no buildings still in existence associated with their productive lives. A complete discussion of each person is included above.

As discussed above National Register Criteria A and B and California Register Criteria 1 and 2, Spadra Cemetery also (Criteria Consideration D) derives its primary significance from graves of persons of transcendent local importance (Louis Phillips, Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier), from its age (established 1868, exceptionally early for its geographical context), and from association with historic events (the founding and early years of Spadra). Because Spadra Cemetery is an early Los Angeles County community's cemetery and is associated both with that first year after a post office was officially established as well as the town founders and leaders, Spadra Cemetery meets the thresholds for this Criteria Considerations.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45).

To be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. The Spadra Cemetery also retains adequate integrity to convey significance under Criteria A/1: location, setting, design, feeling, and association, strengthened especially by it being the last remaining such site that can be associated with the town's founding.

The cemetery retains its original **location**, sited on the 2.35-acre property established by Reverend R.C. Fryer on land gifted to him to begin his Baptist ministry in Spadra. The cemetery location and boundary remain unchanged since the cemetery's establishment in 1868. It has not been expanded or reduced in size.

Spadra Cemetery retains a degree of its original **setting** as well because of the natural feature of Elephant Hill, which dominates the view of the cemetery and forms a natural southeastern boundary. The ATSF (now Union Pacific and Metrolink) Railroad along the northern boundary was established in the 1880s and falls within the period of significance. The cemetery's integrity of setting is diminished along the southwestern boundary, as SR 57 (completed in 1972) constitutes a visual and constant audible intrusion into the cemetery and replaced the smaller road present along this boundary during the period of significance.

The cemetery retains its integrity of **design** as the original block and lots system appear to have persisted, despite dozens of vandalism event and damage in the mid and late twentieth century; however, integrity of **workmanship** and **materials** are diminished by the vandalism events as well as diminished by the preservation strategy of preserving damaged headstones in the ground in cement, rather than preserving them upright in their original configurations. A high degree of material and workmanship integrity are not required under National Register Criterion A or B or California Register Criterion 1 or 2 to be considered eligible.

Spadra Cemetery is able to adequately convey the **feeling** of a nineteenth century, small Rural Cemetery established for one specific town, through its boundaries, the original layout of the block and lot system, dozens of original plantings, and secluded setting against the completely undeveloped backdrop of Elephant Hill.

Finally, Spadra Cemetery retains its historical **association** with the specific historical event for which it is significant: the founding and early years of Spadra. Spadra Cemetery had a clear role in the town founding and subsequent years where town amenities such as businesses, a post office, a rail depot, the first church, and the cemetery were established, but before the 1873-1875 economic boom associated with the years that Spadra served as the terminus of the Southern Pacific Railroad line, before it extended to Pomona and on to the City of Colton. This historical association is especially strengthened by the cemetery's role as the last remaining property that can be associated with the town's founding.

Therefore, the Spadra Cemetery retains adequate integrity to convey significance under National Register Criteria A and B and California Register Criteria 1 and 2.

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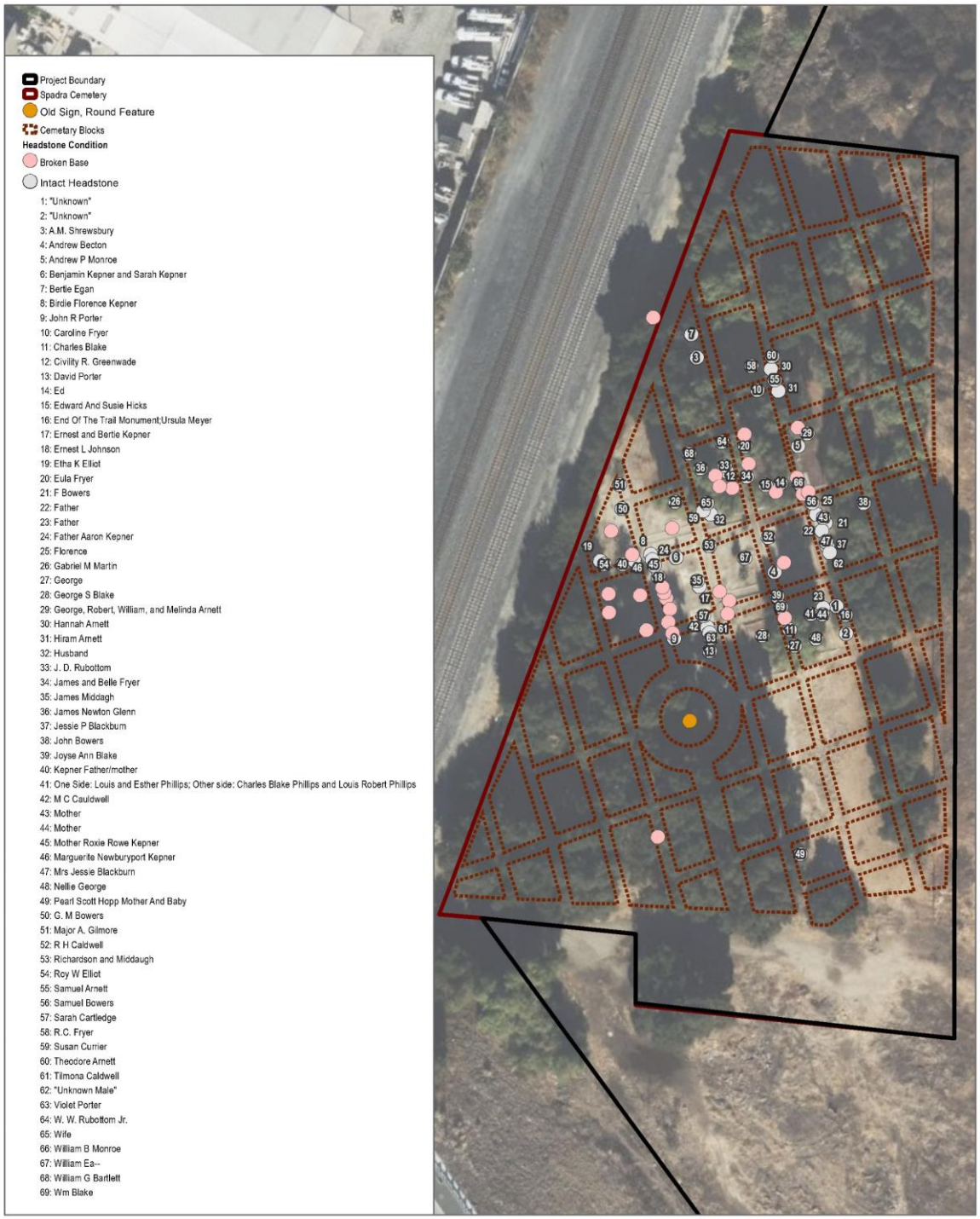
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Sketch Map (Continued):



SOURCE: DigitalGlobe 2017

DUDEK 0 35 70 Feet

FIGURE 4
Cemetery Inventory
Elephant Hill Cultural Report

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings_____
Review Code Reviewer Date

Page 1 **of** 15 ***Resource Name or #:** (Assigned by recorder) Brea Canyon Road
P1. Other Identifier: Spadra-Fullerton Road; Spadra- Anaheim Road; Old Brea Road; Old Diamond Bar Road
*__P2. Location:__ ☐ **Not for Publication** ☒ **Unrestricted**
***a. County** Los Angeles County **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
***b. USGS 7.5' Quad** San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; NW ¼ **of** NW ¼ **of Sec** 35; San Bernardino **B.M.**
USGS 7.5' Quad San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; SE ¼ **of** SW ¼ **of Sec** 26; San Bernardino **B.M.**
c. Address [none] City Pomona Zip 91766
d. UTM: Northeast extent Zone 11S , 426565.09 mE/ 3767912.98 mN
Sorrento Drive crossing Zone 11S , 426396.31 mE/ 3767781.80 mN
Southwest extent Zone 11S , 426181.02 mE/ 3767583.51 mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
Directions: From the intersection of Mission Boulevard and Sorrento Drive in the City of Pomona, turn northwest onto Sorrento Drive and go to the end of the road. Walk past the gate and you will be on the road segment; Elevation: 859-862 feet amsl; Decimal Degrees (northeast extent) 34.048368°, -117.796311° (southwest extent) 34.047640° , -117.797921°

***P3a. Description**: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
See continuation sheet.

***P3b. Resource Attributes:** (List attributes and codes) AH7. Roads/Trails/Railroad Grades

***P4. Resources Present:** ☐Building ☒Structure ☐Object ☐Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



P5b. Description of Photo: (view, date, accession #): View facing south west, 04/20/22, IMG_3332

***P6. Date Constructed/Age and Source:** ☒ Historic ☐Prehistoric ☐ Both

***P7. Owner and Address:** Los Angeles County, 2040 W Holt Avenue, Pomona, CA 91766

***P8. Recorded by**: (Name, affiliation, and address)
Kate G. Kaiser, MSHP, Dudek
38 N. Marengo Avenue
Pasadena, CA 91101

***P9. Date Recorded:** 4/20/2022

***P10. Survey Type:** (Describe) Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
Kaiser et. al. 2022. Cultural Resources Inventory and Evaluation Report for the Elephant Hill Project, Prepared for the City of Pomona, June 2022

*Attachments: ☐NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☒Linear Feature Record ☐Milling Station Record ☐Rock Art Record☐Artifact Record ☐Photograph Record ☐ Other (List):

State of California - The Resources Agency Primary # _____
DEPARTMENT OF PARKS AND RECREATION HRI# _____

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Brea Canyon Road ***NRHP Status Code** 6Z

B1. Historic Name: Brea Canyon Road; Spadra-Fullerton Road; Spadra-Anaheim Road; Old Brea Road; Old Diamond Bar Road

B2. Common Name: Brea Canyon Road

B3. Original Use: Road B4. Present Use: None (abandoned)

***B5. Architectural Style:** None noted

***B6. Construction History:** (Construction date, alterations, and date of alterations)

1873 – Route between Spadra and Anaheim established through Brea Canyon
1909 – Brea Canyon Road paved for the first time
1923 – repaved
1933 – Northern portion of route shifted from Pomona Boulevard south to canyon south of Elephant Hill
1972 – SR 57 completed, making Brea Canyon superfluous
1973 – County of Los Angeles officially abandons segment of Brea Canyon Road in the project site, realigns Mission Boulevard to the south

***B7. Moved?** ☐No ☒Yes ☐Unknown **Date:** 1933 **Original Location:** along Pomona Boulevard

***B8. Related Features:**

None noted

B9a. Architect: County of Los Angeles Roads Department b. Builder: Griffith Company

***B10. Significance: Theme** n/a **Area** n/a

Period of Significance n/a **Property Type** n/a **Applicable Criteria** n/a

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Brea Canyon Road was created as early as 1873, when a route between Spadra and Anaheim was established through Brea Canyon Road. In 1933, the original 1873 route was shifted south to the valley south of Elephant Hill, where the project site segment is located, before turning south to cross the Puente Hills into Orange County does not meet any of the criteria for listing in the NRHP or CRHR, either individually or as part of an existing historic district, or as a local landmark, as demonstrated below. As such, the property does not appear to be a historical resource for the purposes of CEQA and has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). On the continuation sheets is a complete analysis of the historical context and evaluation of this property against national, state, and local criteria,

See continuation sheet.

B11. Additional Resource Attributes: (List attributes and codes) _____

***B12. References:**

See continuation sheet.

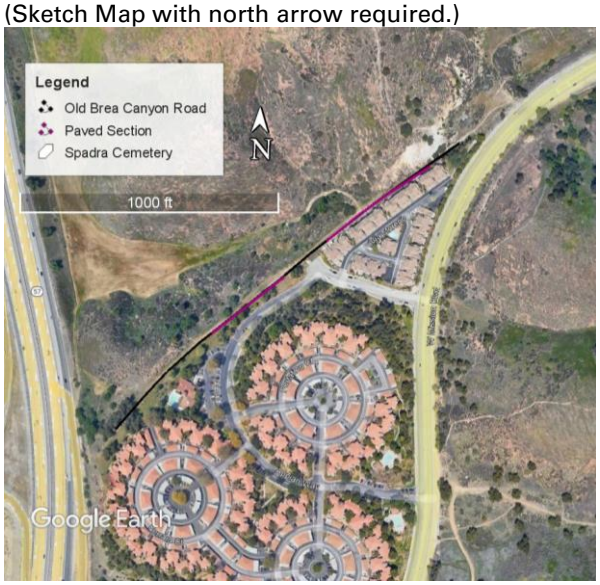
B13. Remarks:

***B14. Evaluator:** Kate G. Kaiser, MSHP

***Date of Evaluation:** 06/01/2022

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LINEAR FEATURE RECORD

Primary #
HRI#
Trinomial

 ***Resource Name or #** (Assigned by recorder) Brea Canyon Road

L1. Historic and/or Common Name: Brea Canyon Road; Spadra-Fullerton Road; Spadra-Anaheim Road; Old Brea Road; Old Diamond Bar Road

L2a. Portion Described: ☐ Entire Resource ☒ Segment ☐ Point Observation
Designation: Segment between Mission Boulevard and SR 57

b. Location of point or segment: (Provide UTM coordinates, decimal degrees, legal description, and any other useful locational data. Show the area that has been field inspected on a Location Map.)
Northeast extent Zone 11S , 426565.09 mE/ 3767912.98 mN
Sorrento Drive crossing Zone 11S , 426396.31 mE/ 3767781.80 mN
Southwest extent Zone 11S , 426181.02 mE/ 3767583.51 mN

The segment recorded for this project extended from the defunct road's intersection with Mission Boulevard to the northeast and extends southwest until the landform is cutoff before SR 57.

L3. Description: (Describe construction details, materials, and artifacts found at this segment/point. Provide plans/sections as appropriate.)

The remaining, extant segment of Brea Canyon Road appears to be constructed of smooth, fine aggregate concrete, stamped intermittently with a contractor's stamp, arranged in a narrow strip. An asphalt road is either not present or has been removed in the segment area. A through-cut feature is part of the road feature and appears south of the Sorrento Drive intersection. Very little remains of the original road materials, but the original roadbed route is still evident and graded to be nearly flat, only changing a few feet in elevation from one end to the other.

L4. Dimensions: (In feet for historic features and meters for prehistoric features)

a. Top Width:	44 feet (approximate)
b. Bottom Width	10 feet – 6 inches
c. Height or Depth	(ground surface, no depth)
d. Length of Segment	1,687 feet

L5. Associated Resources: None noted

L6. Setting: (Describe natural features, landscape characteristics, slope, etc., as appropriate.):
The segment of Brea Canyon road recorded for this project emerges from the canyon where present-day Mission Boulevard is located ad follows the northwestern face of the hill south of Elephant Hill towards SR-57. The area faces northwest to an undeveloped, natural area vegetated by grasses, sparse mature trees, and occasional boulder outcroppings.

L4e. Sketch of Cross-Section (include scale)



L8a. Photograph, Map or Drawing



L7. Integrity Considerations:
Not eligible, integrity not assessed; poor condition

L8b. Description of Photo, Map, or Drawing (View, scale, etc.)
View looking northeast; 4/20/2022; IMG_7917

L9. Remarks:
None noted

L10. Form Prepared by: (Name, affiliation, and address)
Kate G. Kaiser, MSHP
Dudek, 38 N. Marengo Ave.
Pasadena, CA, 91101

L11. Date: 6/1/2022

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #_____
HRI# _____
Trinomial_____

Page 4 **of** 15
***Map Name:** San Dimas, Calif.

***Resource Name or #** (Assigned by recorder) Brea Canyon Road
***Scale:** 1:24,000 ***Date of map:** 2022



P3a. Description (Continued):

A segment of Brea Canyon Road is within the Project site. Brea Canyon Road is a former Los Angeles County Road that extended from City of Pomona to City of Brea (now in Orange County) via Brea Canyon. A route through this area has existed since as early as 1873; however, the route that follows present-day Mission Boulevard in the Built Environment Study Area before rejoining the original 1873 route south of Spadra was constructed in 1933 by Griffith Contracting Company. Much of the 1933 road material through the segment in the Built Environment Study Area is destroyed or heavily altered. Only two strips of pavement remain and much of that is damaged. Paved sections are also only a single lane in width, when the original 1933 roadbed was at least two lanes in width (Exhibits 1, 2). Two through-cut[1] features also existed to facilitate the route through Elephant Hill, both of which have been altered significantly and the southern faces of these features were demolished to accommodate residential housing developments in the 1980s and the mid-2000s (Exhibit 3). The entire surveyed segment was 1,678 feet or 0.32 miles in length. The primary construction material is a smooth-surfaced concrete, rather than coarser aggregate asphalt. Extant portions of pavement are limited to single lanes, roughly eight (8) feet in width. On one location, just southwest of the Sorrento Drive crossing, there is a contractor stamp which reads "Griffith Company Contractors, June 3, 1933, Station 452+60" (Exhibit 4).

Exhibit 1. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking west



Source: (IMG_7798)

[1] A "through-cut" refers to when a linear feature, such as a road or railroad, cuts into a hill slope where there is a cut slope on both sides of the linear feature. Through-cuts may be employed when engineering a grade around the outer edge of a ridge or slope is not possible.

Exhibit 2. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking northeast



Source: (IMG_7796)

Exhibit 3. View of eastern through-cut, looking east. Left portion is original, while right portion has been partially demolished by residential development



Source: IMG_3295

Exhibit 4. View of contractor stamp, looking west



Source: IMG_7804

B10. Significance (Continued): Historical Context: Old Brea Road (1933-1973)

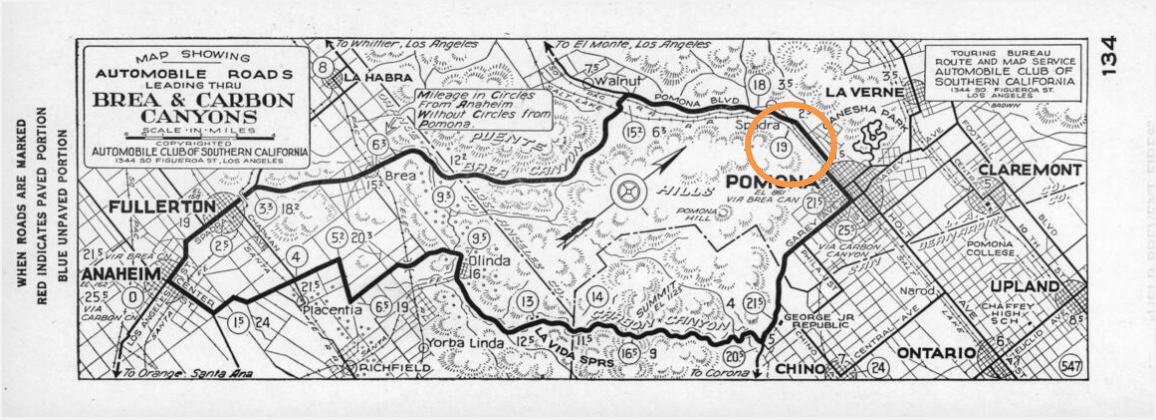
The road known today as Brea Canyon Road was initially comprised of several regional roads that were utilized as a contiguous public thoroughfare between the areas surrounding the cities of Spadra and Anaheim. A route between Spadra and Anaheim was designated beginning in 1873, when plans for a dirt road was announced through Brea Canyon (Los Angeles Herald 1873, p. 2). Brea Canyon Road, since at least 1873 has been a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. Before that time, stagecoach travelers would have to traverse the Puente Hills through of the Whittier Narrows or travel through Los Angeles and cross the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

Paving efforts began along sections of the roadway in the early 1910s. The first was between 1911 and 1912 with the improvement of the section of the road located in Los Angeles County. A 3.80-mile section of the road located in Orange County was improved in 1912 (Santa Ana Daily Register 1911, p.4; 1912, p.3). The *Santa Ana Daily Register* reported in 1912 that the nature of the improvements in Orange County would consist of the original, narrow dirt roads being widened to a standardized 20- to 24-foot width, which were then surfaced with an oil macadam pavement material (Santa Ana Daily Register 1912, p. 3).

In the 1920s, the County of Los Angeles implemented additional improvements to the section of the Brea Canyon Road within its own county jurisdiction. The section of the improved Brea Canyon Road lead from the western outskirts of

Pomona along Pomona Boulevard, through Spadra, then south along Brea Canyon, skirting past the town of Walnut in Los Angeles County before terminating north of Brea at the Los Angeles County limit (See Exhibit 5, top) (Los Angeles Times 1923, p. 124). The upgraded 6-mile roadway was twenty feet wide on straightaway sections and twenty-four feet wide on curved sections to allow for consistent driving speed along the length of the roadway. The 6- to 8-inch-thick concrete roadway was installed over either native soil or a bed of decomposed granite. Construction of the road was overseen by the Road Commissioner of Los Angeles County, George W. Jones, and the engineer of construction, A.B. Boyd (Los Angeles Times 1923, p. 124). In 1930, 650 Arizona Ash, Casuarina, and Chinese Elm trees were planted along the shoulders of the Brea Canyon Road (Pomona Progress Bulletin 1930, p. 5).

Exhibit 5. Above – 1923 Map showing Automobile Roads leading through Brea & Carbon Canyon Roads
Below – 1931 Map showing the same route, now following Mission Boulevard, south of Elephant Hill.





Source: Automobile Club of Southern California collection, 1892-1963, Digital Libraries, University of Southern California

The segment of road that intersects the Project site includes a position of 5th Avenue and Mission Boulevard in Pomona then southwest to the road segment within the Project site, before rejoining the existing segment south towards Brea Canyon, that was initially graded and paved following a bid for construction opened by the State of California in 1932 (See Exhibit 5, bottom) (Pomona Progress Bulletin 1932, p. 11). The extension was intended as the first section of a proposed 5th Avenue highway that would connect the City of Pomona to the City of Los Angeles by establishing

connections between existing roadways including the Brea Canyon Road (Pomona Progress Bulletin 1933, p. 9). The Griffith Company, contractors (Exhibit 6), won the contract and were responsible for the construction of the extension, running through the hills east of Pomona towards the existing Brea Canyon Road. The *Pomona Progress Bulletin* reported in February 1933 that, "In the top of Elephant Hill there is now a huge gap thru which the highway will pass. More blasting and much grading remains to be done there before the route is ready for the concrete (Pomona Progress Bulletin 1933, p. 9)." This extension eventually became a recognized portion of the Brea Canyon Road. Following the completion of the 5th Avenue extension, the Brea Canyon Road became a recognized section of the State highway system.

Exhibit 6. Photograph of the Griffith Company stamp, still visible along Brea Canyon Road extant segment today (April 2022)



Source: IMG_7803

By 1955, planning for the La Brea Freeway (also known as the Orange Freeway) was in progress, which was intended to streamline travel between Orange and Los Angeles Counties (Los Angeles Times 1955, p.13). This freeway, renamed State Route 57 (SR 57) as part of the state-wide renumbering of California Highways that took place in 1964, follows the route of the original Brea Canyon Road (California Highways 2021). By 1972, the Orange Freeway, SR 57 was complete and connected Pomona and San Dimas, as well as an interchange with Interstate 10 to Orange County, through Brea Canyon (Pomona Progress-Bulletin 1972, p. 11). The Orange Freeway superseded the original Brea Canyon Road, and otherwise rendered sections of the connective roadway redundant in the decades after Orange Freeway's construction. The segment of Brea Canyon Road between Temple Avenue and Mission Boulevard that intersects the Project site was officially abandoned in 1973 following the passage of California Highway Commission Resolution A 398, which found that the section of "…superseded highway is no longer necessary for State Highway purposes." (Division of Highways 1973, p. 86-7). In the years following the road abandonment, several residential subdivisions were constructed adjacent to the Brea Canyon Road segment near the Project site, and only a few remaining artifacts of the road are still present (NETR 2022; UCSB 2022).

National Register of Historic Places/California Register of Historical Resources Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Archival research indicates that a stage route and later an automobile route has been located in Brea Canyon since as early as 1873, but the road segment within the Built Environment Study Area which will be partially demolished by Project activities dates to 1933, when the road shifted from its original alignment along Pomona Boulevard south to Mission Boulevard, before rejoining the original road route towards Orange County. The earliest versions of the road from the nineteenth century would have been placed in the canyon out of necessity, as the route would have provided safe, level passage for stage coaches and horses, despite being located along a seasonal creek which often damaged the road. The route along Mission Boulevard, cutting south of Elephant Hill, represents a deviation from the original route and cannot be considered part of that 1873 road segment's historical context. The segment of Brea Canyon Road was an early twentieth century inter-city route, one of many maintained by Los Angeles County. The 1933 route along Mission Boulevard was part of a Los Angeles County Roads Department (i.e. Public Works) initiative to pave and maintain longer routes between major cities, such as Pomona and Brea.

In order to convey significance for an association with early twentieth century inter-city routes, the road must have sufficient integrity, which the segment of Brea Canyon Road does not. From its bisection by the Orange Freeway in the late 1960s, to the county's abandonment of the section within the Project site in 1973, to the construction of nearby residential developments which partially destroyed the remaining alignment in the 1990s and again in the 2000s, the Brea Canyon Road segment in the Project site lacks sufficient integrity of location, setting, design, feeling and association necessary to convey significance under National Register Criterion A or California Register Criterion 1. The road segment in the Project site does not adhere to the original alignment of Brea Canyon Road, and no longer serves as a road since the 1973 abandonment, losing all of its historical association with the County Roads Department and the historical trend of inter-city roadwork in the 1930s.

Further, archival research did not uncover any specific events that happened at this segment of Brea Canyon Road. The road does not appear to have had a demonstrable impact on the surrounding communities of Spadra or Pomona. Research also did not uncover a relationship between The segment of Brea Canyon Road and the expansion of residential subdivisions in Pomona from the 1940s through the 1990s. Therefore, the property does not appear eligible under National Register Criterion A and California Register Criterion 1.

Criterion B/2: That are associated with the lives of persons significant in our past.

To be found eligible under National Register Criterion B and California Register Criterion 2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research indicates The segment of Brea Canyon Road is not directly associated with any specific persons known to be historically important figures at the national, state, or local level. Further, The segment of Brea Canyon Road is a County Roads Department project that represents the collective efforts of many people who worked on the road and it is not known to be a place where any historically significant person or group of people conducted or produce work for which they are known. Due to a lack of identified significant associations with important persons in history, the Brea Canyon Road segment in the Built Environment Study Area is recommended ineligible under National Register Criterion B or California Register Criterion 2.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

In order for linear resources such as roads to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a modern traveler could no longer experience the historical route as intended.

Brea Canyon Road was first designated in 1873, however the segment of Brea Canyon Road in the Built Environment Study Area was a new route designated in 1933 by Los Angeles County Roads Department, and represents a deviation from the original 1873 alignment, which would have followed Pomona Boulevard west from Pomona, then turned southwest at Spadra to follow the San Jose Creek, before finally entering Brea Canyon to traverse the Puente Hills.

The segment of the 1933 road in the Built Environment Study Area is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the Built Environment Study Area cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads.

The segment of Brea Canyon Road was originally constructed in 1933 by Griffith Company Contractors and officially abandoned in 1973 by the County. The road appears to have been a narrow, two-lane route, and constructed of concrete. It is in a depleted state and few materials of the original road remain along this 1,678 foot long road segment, other than the original alignment. No novel construction methods appear to have been used to create the road, both concrete paving and through-cuts are typical of road construction and engineering for this period. So little of the original materials and workmanship remain that it cannot be called a good example of any specific road type, period or method of construction. A County Roads Department employee would have designed the road, rather than a named engineer or architect and the road segment cannot be considered to be the work of a master architect or engineer. Griffith Company contractors do not appear to have been master builders, and the remains of the segment of Brea Canyon Road cannot be considered representative of their work. The road also does not possess high artistic value. The last component of Criterion C/3, representing a significant and distinguishable entity whose components may lack individual distinction, is typically applicable to districts. The segment of Brea Canyon Road does not appear likely to contribute to a potential historic district, due to the lack of a cohesive grouping of intact properties in the area. Therefore, The segment of Brea Canyon Road does not appear eligible under National Register Criterion C and California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

National Register Criterion D and California Register Criterion 4 generally apply to archaeological resources, but may apply to a built environment resource in instances where a resource may contain valuable information about such topics as

construction techniques or human activity. The segment of Brea Canyon Road is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic road construction methods, materials, or technologies.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45). As The segment of Brea Canyon Road does not meet any of the required significance Criteria, a discussion of integrity is not required.

City of Pomona Designated Historic Landmark Statement of Significance

In addition to evaluating The segment of Brea Canyon Road against NRHP and CRHR criteria, the City of Pomona has their own criteria to evaluate local landmarks.

1. *It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;*

As discussed above in Criteria A/1 and C/3, The segment of Brea Canyon Road cannot be considered to exemplify or reflect special element of the City of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

2. *It is identified with persons or events significant in local, state, or national history;*

As discussed above in Criteria B/2, The segment of Brea Canyon Road is not identified with persons or events significant in local, state, or national history. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 2.

3. *It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road does not embody distinctive characteristics of a style, type, period, or method of construction due to its lack of remaining material and impacts to the original road design and cannot be considered a valuable example of the use of indigenous materials or craftsmanship. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

4. *It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;*

As discussed above in Criteria A/1, The segment of Brea Canyon Road does not contribute to the significance of a geographically definable concentration of historic or scenic properties, or any historic district or area. The road also does not belong to a thematically related group of interrelated or otherwise similar properties that are unified aesthetically, such as a thematic historic district of roads, and in addition, archival research did not identify such a thematic group. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 4.

5. *It is the work of a notable builder, designer, landscape designer or architect;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road was designed by an unnamed Los Angeles County Roads Department engineer and constructed by Griffith Company Contractors in 1933. No evidence was found to indicate these entities rise to the level of a "notable builder, designer, landscape designer or architect." Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 5.

6. *It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;*

While The segment of Brea Canyon Road is located in an undeveloped area, with a view towards northeast Elephant Hill and northwest to the campus of Cal Poly Pomona, the road segment does not constitute a unique location or a view "representing an established and familiar" overview of the community. A better example of such a view or vista overlooking the city or the Cal Poly Pomona campus might be the summit of Elephant Hill, which has remained an undeveloped, natural space during all the periods of Spadra and Pomona's growth. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 6.

7. *It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road lacks many aspects of integrity, including the original design, materials and workmanship, which have deteriorated since the road's abandonment in 1973. Additionally, the materials and elements of design which remain intact are neither a significant structural achievement nor innovative for the period of construction. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 7.

8. *It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;*

As discussed above in City of Pomona Criteria 4, The segment of Brea Canyon Road does not appear to be part of a thematically or visually unified historic district, or similar to other distinctive properties based on a historical or architectural motif. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 8.

9. *It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or*

Brea Canyon Road as a whole may have been representative of a significant geographic pattern associated with transportation routes which has been present in its route since at least 1873: a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. During this period, stagecoach travelers would otherwise have to traverse the Puente Hills through of the Whittier Narrows or circumvent them entirely by traveling south through Los Angeles and crossing the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

In order for linear resources such as roads, to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a

modern traveler could no longer experience the historical route as intended. The segment of the 1933 road in the Project site is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road section that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the Project site cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads. As such, the Brea Canyon Road segment in the Project site does not appear eligible under City of Pomona Landmark Criteria 9.

10. *It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.*

The segment of Brea Canyon Road may not be considered one of the "few remaining examples" of an architectural or historical type in the City of Pomona, as The segment of Brea Canyon Road no longer possesses identifying or distinguishing characteristics of a given architectural or structural type, other than that of a road. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 10.

B12. References (Continued):

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Los Angeles Times. 1955. "Brea Canyon Freeway Plan Pushed." Newspapers.com: *The Los Angeles Times* (Los Angeles, CA). July 16, 1955, p.13

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Pomona Progress Bulletin. 1933. "Grading, Paving of Holt and 5th Avenue Highways Now Partially Completed." Newspapers.com: *The Pomona Progress Bulletin* (Pomona, CA) February 14, 1933, p. 9

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Santa Ana Daily Register. 1912. "Full Text of Highway Commission Report to Supervisors Given." Newspaper.com: *Santa Ana Daily Register* (Santa Ana, CA). August 13, 1912, pgs. 1, 3.

Appendix D
DPR Forms

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State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #
Trinomial
NRHP Status Code 3S/3CS/5S1

Other Listings_____
Review Code Reviewer Date

Page 1 **of** 33 ***Resource Name or #:** (Assigned by recorder) Spadra Cemetery
P1. Other Identifier:_____
*__P2. Location:__ ☐ **Not for Publication** ☒ **Unrestricted**
***a. County** Los Angeles **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
USGS 7.5' Quad San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; NW ¼ **of** SW ¼ **of Sec** 26; San Bernardino **B.M.**
c. Address 2850 Pomona Blvd. City Pomona Zip 91768
d. UTM: (Give more than one for large and/or linear resources) Zone 11S , 426088.82 mE/ 3768146.26 mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
Directions to Resource: From the Pomona Boulevard underpass for SR57, turn south towards Elephant Hill and enter an unnamed road towards the Cemetery. This road shares a driveway with the business Altec, 2882 Pomona Boulevard, Drive south along the unnamed road, pass through the unlocked gate marked Spadra Cemetery, continue south and cross the railroad tracks. Park and walk northeast towards the Spadra Cemetery fenceline.
Parcel Number: 8707-020-900; Elevation: 728-740 feet amsl; Decimal Degrees: 34.051408°, -117.800104°

***P3a. Description**: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
Spadra Cemetery, originally established in 1868, encompasses a 2.35-acre roughly triangular-shaped property tapering towards the northeastern end, situated at the base of Elephant Hill, east of SR 57, and south of the Union Pacific railroad tracks and the industrial/manufacturing district located along Pomona Boulevard. *See continuation sheet.*

***P3b. Resource Attributes:** (List attributes and codes) HP40. Cemetery

***P4. Resources Present:** ☐Building ☒Structure ☐Object ☒Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a. Photograph or Drawing



P5b. Description of Photo: (view, date, accession #): Overview of Cemetery from approximate center looking southwest, towards proposed Project site 4/20/2022, IMG_3334

***P6. Date Constructed/Age and Source:**
☒ Historic ☐Prehistoric ☐ Both

***P7. Owner and Address:**
Historical Society of Pomona Valley
585 E. Holt Avenue
Pomona, CA 91767

***P8. Recorded by**: (Name, affiliation, and address)
Kate Kaiser, MSHP and Caitlin Greeley, MA
Dudek, 38 N. Marengo Avenue
Pasadena, CA 91101

***P9. Date Recorded:**
04/20/2022

***P10. Survey Type:** (Describe)
Intensive-level

*P11. Report Citation:
Kaiser et al. (Kaiser, Kate, Heather McDaniel-McDevitt, Caitlin Greeley, Allison Lyons, Fallin Steffen, Brad Comeau, and Jennifer De Alba. 2022. Cultural Resources Inventory and Evaluation Report for the Elephant Hill Project. Prepared by Dudek for City of Pomona Development Services Department, June 2022.

*Attachments: ☐NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List):

State of California - The Resources Agency Primary # _____
DEPARTMENT OF PARKS AND RECREATION HRI# _____

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Spadra Cemetery ***NRHP Status Code** 3S/3CS/5S1

B1. Historic Name: Spadra Cemetery
B2. Common Name: Spadra Cemetery
B3. Original Use: Cemetery B4. Present Use: Historical Landmark
***B5. Architectural Style:** Rural Cemetery property type
***B6. Construction History:** (Construction date, alterations, and date of alterations)
1868: Cemetery Established for first burial
1898: Spadra Cemetery Association is incorporated to handle cemetery business
1967: Last burial
1971: Property ownership transfers to historical Society of Pomona Valley

***B7. Moved?** ☒No ☐Yes ☐Unknown **Date:** _____ **Original Location:** _____
***B8. Related Features:**
None

B9a. Architect: None b. Builder: Unknown
***B10. Significance: Theme** _____ **Area** _____
Period of Significance _____ **Property Type** _____ **Applicable Criteria** _____
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

One previously identified resource was identified within the Built Environment Study Area and adjacent to the Project site: the Spadra Cemetery. Spadra Cemetery was originally established in 1868 and hosted its final burial in 1967. It is a Designated Historic Landmark for City of Pomona, and was approved October 16, 2000 (City of Pomona 2000a, 2000b). The 2022 evaluation recommended that Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. It also recommends Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Spadra Cemetery also met the conditions of Criteria Considerations C and D.

See Continuation Sheet.

B11. Additional Resource Attributes: (List attributes and codes) _____

***B12. References:**

See Continuation Sheet.

B13. Remarks:

***B14. Evaluator:** Kate G. Kaiser, MSHP
***Date of Evaluation:** 6/1/2022

(Sketch Map with north arrow required.)

See Continuation Sheet

(This space reserved for official comments.)

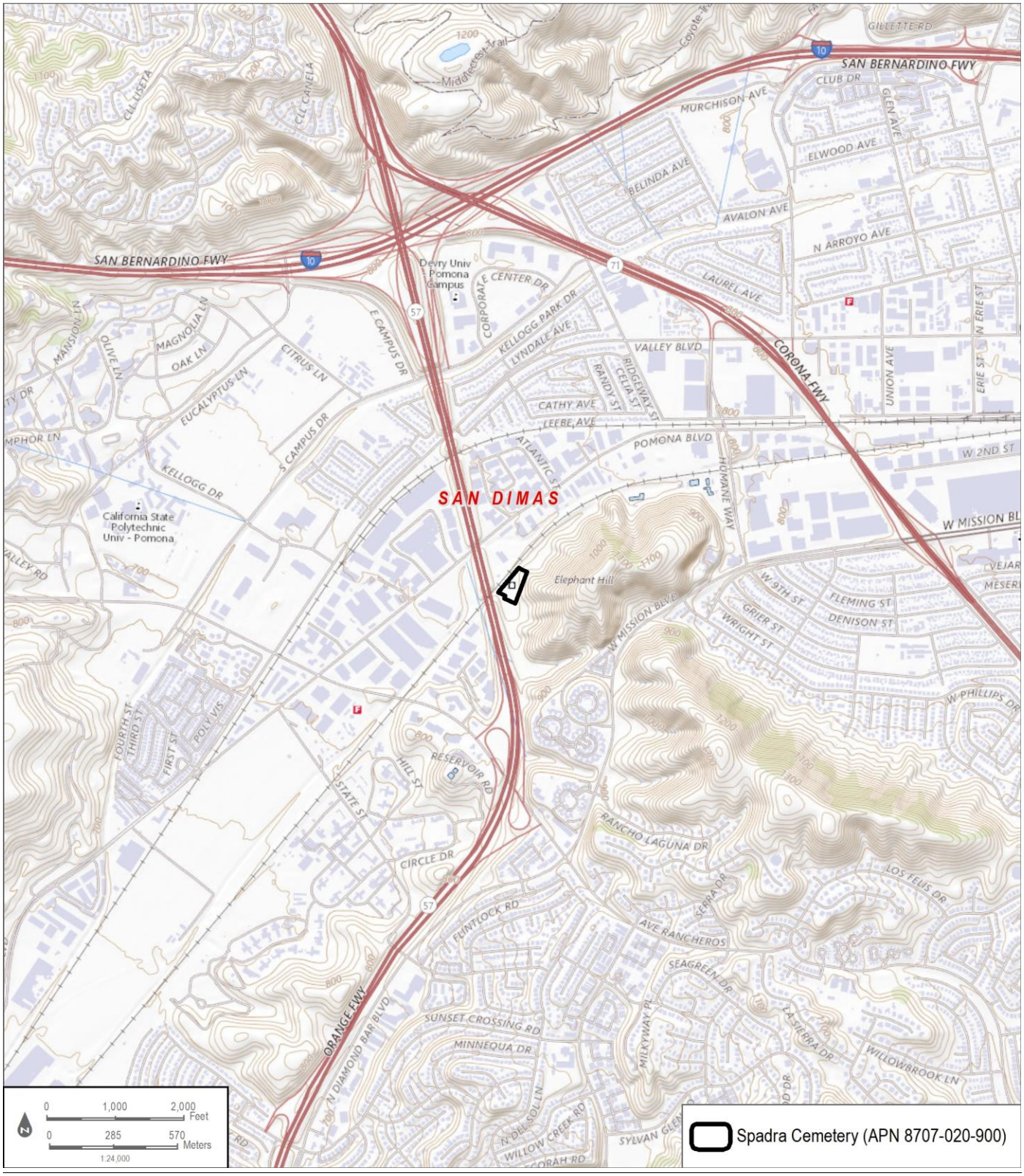
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

Page 3 **of** 33
***Map Name:** San Dimas, Calif.

***Resource Name or #** (Assigned by recorder) Spadra Cemetery
***Scale:** 1:24,000 ***Date of map:** 2022



P3a. Description (Continued):

Spadra Cemetery, originally established in 1868, encompasses a 2.35-acre roughly triangular shaped property tapering towards the northeastern end, situated at the base of Elephant Hill, east of SR 57, and south of the Union Pacific railroad tracks and the industrial/manufacturing district located along Pomona Boulevard. Though the north and southwest boundaries have had extensive construction, improvements, and setting changes over time, the boundary line against Elephant Hill to the east remains completely unchanged as Elephant Hill has remained undeveloped since the founding of the cemetery.

The original layout of the cemetery is intact, with 63 blocks arranged in a north-south-east west grid, slightly offset from the actual property boundary lines, and one circle with a sign in the center near the southwestern edge of the property. There are some blocks with curbing and between the block curbs are pedestrian pathways further reinforcing the grid pattern throughout the cemetery. Though there is a road that leads up to the entrance along the southwestern edge, there are no roads through the cemetery itself. Signage in the cemetery is also limited to a single upright metal sign with no discernable lettering remaining in the center of the circle. Outside of the cemetery property there is an access road from Pomona Boulevard which is gated, but that gate and the signage on it dates to the 2000s.

Though there are no buildings present at Spadra Cemetery, there are several intact gravestone markers as well as damaged markers which have been laid flat and preserved in place in a concrete block. A considerable number of markers have been damaged or lost; however, given the age of the cemetery and multiple conditions, including changes in ownership and lack of onsite security, the loss of these markers does not diminish the significance of the Spadra Cemetery to a degree that it no longer retains integrity (see evaluation below). Markers were made of a variety of materials with the earlier markers tending to be slimmer limestone or marble and later markers tending to be granite. Flat markers and upright markers consist of a mix of types, including:

- A pedestal style monument with an obelisk and vaulted top
- A pedestal style monument with a column
- Block style monuments with flat tops
- Block style monuments with segmental arch
- Block style monuments with beveled tops
- Block style monuments flush with the ground surface
- Block style monuments with a slanted surface, usually close to the ground surface
- Tablet style monuments with flat tops
- Tablet style monuments with rounded tops
- Tablet style monuments with gabled tops
- Tablet style monuments with segmental arch tops
- Tablet style monuments with highboy (segmented arch with ornate ears)tops

Nearly all markers, with few exceptions (flush block style markers, or more ornate pieces), had bases. Bases were wider and thicker that the markers themselves and were both smooth and rusticated types. Most markers appear to be attached to these bases with metal pins, though others are simply fitted into a socket and cemented into place. In places where no marker could be found, the base was present and in good condition. There were at least two more ornate monuments in the cemetery. One was the marker for Ursula Ponedel Meyer, placed in 1935, which was a large, granite, block style monument with a heavy rusticated base with a stylized carving of a Native American with braids on horseback, with the caption “End of the trail.” Meyer’s monument art was modeled on the famous bronze sculpture

created by James Earle Fraser for the Panama-Pacific International Exposition in 1915 of the same subject and title. The other is the Phillips family monument which is an elaborate block-style granite monument on a double base, featuring corners carved to rounded, engaged columns and a hipped roof,

No fencing is present around the headstones or blocks themselves, only curbs. Curbs tended to be of two types: curbs with rounded coping, and curbs with rusticated and edged coping. All curbs appear to have completely closed the block area, not leaving any openings by design. Some curbs were damaged and portions were missing. Finally, while there have been a few modern plantings of succulents and agave, the cemetery retains many of its historical plantings, consisting of pepper trees and canyon live oaks, many of which appear in the earliest aerials from 1928, and relatively younger oaks which appear to have been planted around the property boundary circa 1938.

Exhibits 1 through 7 below show overviews of the cemetery and examples of key cemetery components. A complete documentation of markers, intact, damaged, or otherwise, can be found in Appendix C: Cemetery Inventory. A map of all the intact and broken markers can be viewed in Figure 4. Cemetery Inventory.

Exhibit 1. Overview of Spadra Cemetery from the entrance fence, looking northeast



Source: (IMG_3278)

Exhibit 2. Overview of cemetery from northeast side, looking southwest.



Source: (IMG_7837)

Exhibit 3. Overview of Cemetery from western edge of curbing, looking northeast



Source: (IMG_3618)

Exhibit 4. Example of a "good condition" monument: intact, upright headstone (Ursula P. Meyer)



Source: (IMG_3474)

Exhibit 5. Example of a fair condition monument: headstones laid flat and encased on concrete; in background, examples of poor condition monuments where there was only a base.



Source: (IMG_3521)

Exhibit 6. Example: roundabout feature with rounded curb and metal sign post (sign missing), looking northeast



Source: (IMG_3608)

Exhibit 7. Example: showing typical footpath widths and curbing, looking southwest



Source: (IMG_3622)

B10. Significance (Continued):

Historical Context: History of Spadra (1866-1961)

The town of Spadra began as part of Rancho San Jose, a land grant awarded to Ricardo Vejar. In 1861, Louis Shlesinger and Heiman Tischler in Los Angeles helped Ricardo Vejar mortgage the property. At this time, lending to Vejar was considered a good investment because in the previous year, 1860, his cattle and lands had produced $40,000 in income, making him the fourth richest man in Los Angeles County. Though Vejar might have been able to pay off the mortgage under typical conditions, in the winter of 1861-1862 rain fell for a month, causing catastrophic floods along all major and minor watersheds in Los Angeles County, San Bernardino County, San Diego County, and including areas later sectioned off to become Orange and Riverside County. The terrible floods were followed by severe droughts beginning in 1862 that extended for three years. Finally, national market uncertainty caused by the Civil War brought incredible financial stress to California. In 1862, Vejar was foreclosed upon by Schlesinger and Tischler, starting first with his chattel loan, which recalled his animals, and followed with his house and acreage in early 1863 (Bracket 1920, pp. 75-76; Los Angeles Star 1863, p. 3).

Shortly after assuming ownership of the property, Schlesinger reportedly died in the shipwreck of the *Ada Hancock*, which sank after an explosion in April 1863. Tischler was not well received as the new owner of Rancho San Jose, and he reportedly did not pay his employees to manage the herd of cattle he received in the chattel loan foreclosure. Tischler and his friend Edward Newman were ambushed while traveling to the rancho. Newman was killed. As a result, Tischler hired a young Louis Phillips, a Prussian immigrant who had been operating a small ranch in Boyle Heights, close to the City of Los Angeles, to handle affairs at Rancho San Jose. Within months, Tischler decided to divest himself of Rancho San Jose and sold the property to Phillips for $30,000. Phillips prospered at Rancho San Jose and, by most accounts, was well-liked as he paid his employees, did not take on debt, and was honest with his neighbors and workers. Phillips eventually began reaching out to other settlers in the nearby community of El Monte to form a town that eventually became Spadra. Phillips was married to El Monte settler Esther Blake in 1866 by Reverend Richard C. Fryer, another El Monte settler and the first Baptist minister in the region (Bracket 1920, p. 77-79; Driscoll 1950, p. 34; Shires 1967, pp. 3-4).

In 1866, Phillips approached William Rubottom, another resident of El Monte, who was then operating an inn in Cucamonga (present day Rancho Cucamonga) about building an inn close to Rancho San Jose. Rubottom established a hotel and a stagecoach station along the Overland Stage's Los Angeles-San Bernardino Road, later the Butterfield Stage route. Rubottom had maintained a stage station in Cucamonga as well, but after moving to Spadra, Rubottom's stage station became the premier horse team-switching station in the area. In 1867, a post office was established and the new community was named "Spadra" for Spadra Bluffs in Arkansas, Rubottom's hometown (Exhibit 8). After the post office was established, other settlers came from El Monte including Reverend Richard C. Fryer and Caroline Fryer, Senator Alvan T. Currier, Charles Blake and his family, A.B. Caldwell, Susan Caldwell and their family, and George, John, and Jim Egan. Reverend Fryer went on to establish a Baptist ministry in Spadra in 1870 and became the first Baptist Church in the Pomona Valley (Brackett 1920, p. 79-80, 136; Driscoll 1950, p. 34-35; Plender 1970, p. 20-21; Shares 1967, p. 3).

Exhibit 8. Exterior view of Rubottom Hotel and stagecoach station, ca. 1860.



Source: California Historical Society Collection, Digital Library, University of Southern California

In 1873, after Phillips was contracted for a right-of-way across his land, the Southern Pacific railroad began construction east from Los Angeles. Until mid-1875, Spadra was the eastern terminus of the Los Angeles line. Freight, machinery, and crops all had to transfer between rail and stagecoach in Spadra, and for the years between 1866 and 1876, Spadra saw increased economic activity. At the height of this activity, more families permanently moved to Spadra. In 1875, Louis Phillips began building two-story, brick, Second Empire-style Mansion on present day Pomona Boulevard. By 1876, the railroad had extended to the new town of Pomona (established in 1875), and then onward towards Colton. With the increase in railroad commerce, the stagecoach commerce, travel, and freighting dwindled. Spadra returned to place for agricultural production, primarily dealing with hay and alfalfa and selling horses through the late 1870s and 1880s. After the brief increase in economic activity in the mid-1870s, life at Spadra became more rural. The nearby town of Pomona, established in 1875, was quickly growing into a small metropolis, as the platted town allowed more growth than at Spadra, where town growth was limited by the large tracts of agricultural land owned by the prominent town families. Louis Phillips, who sold the land Pomona was developed on, is also credited as the Pomona town founder. Spadra's main street did not grow beyond its post office, a saloon, a hotel, three stores, two blacksmith shops, and the school (Exhibit 9). In the hills southeast of town, a limestone quarry crushed rocks for cement and mortar, though like the other industries in town, the quarry remained largely local (Brackett 1920, p. 114-115, 147; Plender 1970, 21-22, 24; Dorsey 1924, 20-23).

Exhibit 9. Map, Early Spadra 1837-1916



Source: California Special Collections, Pomona Public Library

During the 1880s the scale of economic activity began shifting entirely to Pomona, reversing the earlier trend where Spadra was considered primary and Pomona secondary. Established in Louis Phillips' sheep pasture, Pomona grew especially during the land boom years between 1882 and 1887 when thousands of lots were sold in Pomona. By 1886, the City of Pomona's population exceeded 5,000. In 1887, Pomona incorporated and displaced Spadra as the primary city in eastern Los Angeles County. Pomona's prominence in the local Pomona Valley was solidified when, in 1891, the Atchison, Topeka, and Santa Fe (ATSF) Railroad bypassed Spadra entirely in favor of having a depot in Pomona. All passenger trains on the Southern Pacific also routed through Pomona, instead of Spadra. (Plender 1970, p. 30; Shires 1967, p. 11-12).

In the 1890s, there was a brief resurgence of Spadra after the neighboring City of Pomona voted to become a dry town and adhere to the temperance movement's demands. However, that revival brought no permanent settlers or business (Piersol 1964, p. 25). According to most sources, Spadra ceased to grow after 1890. Children of the original settlers all, without exception, left Spadra when they came of age, though original settlers remained in Spadra until they died. Lifelong resident and schoolteacher J.M. Fryer wrote in the *Pomona Progress Bulletin* (Bracket 1920, p. 221; The Bulletin 1919a, p. 16):

> You see, years ago, as the people began to settle in this vicinity all of them had large families and the children attended the Spadra School. But when the children grew up, they scattered out into other places, leaving the old folks at home. None of them wanted to sell their land, for they think it is good enough for them, so there has been but little opportunity for families with children of school age to locate in this district during the more recent years.

Serious decline in Spadra continued until the town was left with less than 200 residents. The Baptist ministry established by Reverend Fryer in 1870 moved to the City of Pomona in the early twentieth century (Pomona Progress-Bulletin 1945, p. 1). In 1902, the Rubottom Hotel was demolished. In 1919, the City of Pomona successfully fought for the new state hospital, called the Pacific Colony, not to be located in the city due to a municipal water concern. The Pacific Colony for the mentally ill and incapacitated was instead pushed into Spadra, where it was established on 1,500 acres (The Bulletin 1919b, p. 6). Instead of stimulating the local economy or inviting growth, the Pacific Colony was designed to be self-sufficient and there was no substantial increase in Spadra's population. The same year, the Spadra School closed and the building was sold (Pomona Progress-Bulletin 1920, p. 9). In 1926, the City of Pomona located their sanitation plant just outside of Spadra at Pomona's western edge. During the 1930s, there was little growth in Spadra, but conversely, the Pacific Colony expanded significantly during the Great Depression years, growing from 27 inmates in 1927 to 720 inmates by 1934. The institution was chronically overcapacity until more expansions in the post-World War II years. The expansions, and multiple mass escapes of inmates led to an increased feeling of crime and undesirability for Spadra (Lira 2015, pp. 49-51).

The 1950s were a period of intensive development for the City of Pomona, and Pomona began to view the sparsely-populated Spadra as a location for the City's less-desirable businesses, including industrial and manufacturing sites. Pomona attempted to relocate a local airport to Spadra. While this was unsuccessful, Pomona continued to try to expand west. By 1953, Pomona's western city border expanded further towards Pomona and several new housing subdivisions appeared in the former citrus groves between Mission Boulevard/Brea Canyon Road and Pomona Boulevard (NETR 2022). Shortly after, the City of Pomona voted to dissolve the Spadra School district and absorb the schools and students into the Pomona School District. (Pomona Progress-Bulletin 1954, p. 6). In 1955, the Spadra post office was closed (Pomona Progress-Bulletin 1955, p. 13). In 1956, the Kellogg campus of California Polytechnic University, Pomona (Cal Poly Pomona) opened in northwest Spadra, relocated from its previous location in San Dimas, on lands leased from the Pacific Colony state hospital (later the Pacific State Hospital and Lanterman State Hospital) and inherited from the Kellogg estate. As the school expanded its campus, it also grew more and more towards the town center of Spadra (Chavez et al. 2016). In 1957, a large landfill for the City of Pomona was established over a 128-acre site in Spadra (Pomona Progress Bulletin 1958a, p. 17).

After several unsuccessful attempts in 1958 and again in 1960, Spadra was annexed to the City of Pomona in two portions. The first annexation included the area northwest of Pomona Boulevard strip and the second annexation took the railroad right of way and Spadra Cemetery area. At this time, there were only 140 registered voters in Spadra able to participate in the annexation vote (Exhibit 10)(Piersol 1964, p. 25; Pomona Progress-Bulletin 1960, p. 17; Pomona Progress-Bulletin 1961, p. 13).

Exhibit 10. Western Pomona Looking South-West Over Spadra, March 8, 1955, Photographer Robert C. Frampton; Spadra Cemetery and Elephant Hill in top left of photograph



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

After annexation, Spadra transitioned to the manufacturing and industrial district for the City of Pomona. In 1972, the Orange Freeway (present day SR 57) was dedicated, cutting from Interstate 10 south towards Orange County by way of Brea Canyon (Pomona Progress-Bulletin 1969, p. 1; 1972, p. 11). As a result of the highway construction and expansion of the City of Pomona, all but two of the original elements of Spadra have been destroyed. The remaining portions of Spadra include the Louis Phillips Mansion on Pomona Boulevard (the Alvan T. Currier House was moved to the same property in an attempt to preserve it) and the Spadra Cemetery, hidden south of the railroad and north of Elephant Hill. The Historical Society of Pomona Valley acquired the Phillips Mansion in 1966, and Spadra Cemetery in 1971. Since 1971, multiple community efforts have been made to protect these remaining properties from demolition (Daily News-Post 1972, p. 2; Historical Society of Pomona Valley 2022; Los Angeles Times 2002a, p. 3. Meares 2017).

Spadra Cemetery (1868-present)

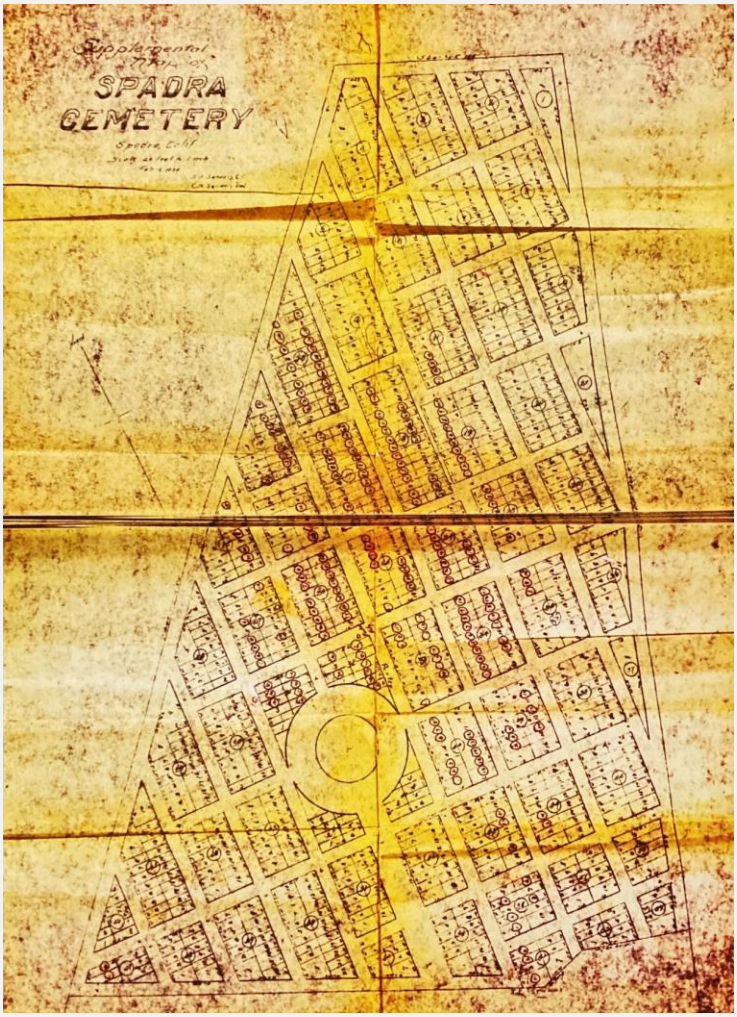
Spadra Cemetery was formed just two years after the community was officially founded. In 1867, Louis Phillips deeded 250 acres to Reverend Richard C. Fryer, the Baptist minister who had administered his marriage. This transfer was a donation to Fryer's ministry and constituted the first Protestant cemetery in Pomona Valley. The very first burial at Spadra was that of Melinda Arnett, wife of Richard S. Arnett and matriarch of one of the many families that moved from El Monte to Spadra. She died in 1868, a year after the land for the cemetery was deeded. The Cemetery was laid out across 2.5 acres with 63 blocks or 922 total lots and a central circle. Though not officially designed by a known architect or landscape architect, the Spadra Cemetery adhered to the principles of a "Rural Cemetery," with an isolated location against Elephant Hill, picturesque setting, long-term shade plantings, and regular rectangular plots fitted to the oblong cemetery property. Major families in town all purchased family blocks in the Spadra Cemetery, including the Arnett,

Blake, Bowers, Clark, Caldwell, Currier, Egan, Fryer, Greenwood, Hewets, Kepner, Lilly, Middagh, Phillips, Rubottom, and Shrewsbury families. Others without family plots were also buried in the cemetery (Brackett 1920, p. 80; Spadra Cemetery Association 1948, pp. 1-24; Swank 1973, pp. 5-8).

Burials progressed normally for the decades following the cemetery's established. The diary of Kewen Dorsey, long-time Spadra resident and grandson of Uncle Billy Rubottom, dating from 1875 to 1892 records many of the burials in Spadra Cemetery. From the cemetery's initial dedication to the time the Spadra Cemetery Association assumed ownership in 1898, there were approximately 73 recorded burials and most of the prominent Spadra families buried some family members in their blocks.[1] Others were also interred at the cemetery, including townspeople buried without families or relations in state, an unnamed member of the Apache tribe, and dozens of infants or children. In 1898, The Spadra Cemetery Association was formed to control the cemetery affairs and install a caretaker position to care for and guard the cemetery. Only 25 blocks were actually in use by families at the time of this organization's incorporation, the remaining blocks were left unfilled (Exhibit 11) (Dorsey 1924, pp. 20-27; Historical Society of Pomona Valley 1973; Los Angeles Times 1898, p. 5; Spadra Cemetery Association 1948, 1971; Swank 1973, pp. 5-8).

[1] Several burials in the sources shared by Pomona Public Library and the Historical Society of Pomona Valley record internment at a given block and lot but lack the internment date and in some cases the name of the person who was buried. Though their block and lot are recorded, many of these entries are marked simply "child," "unknown," or "unknown baby."

Exhibit 11. Supplemental Map of Spadra Cemetery, 1898, drawn by W.H. and C.H. Sanders, civil engineers



Source: Spadra folders, Local Collections, Historical Society of Pomona Valley

In the twentieth century, there were fewer burials overall, and the Spadra Cemetery Association made no attempt to sell the unclaimed blocks to new families. According to cemetery records, until 1936, the cemetery was able to sustain itself with donations only, but after this date, charged $20 for "stockholders" and $25 for non-stockholders for the cost of a lot. As the town of Spadra declined, so too did the cemetery, with just seven burials in the 1940s, eleven in the 1950s and seven in the 1960s (Historical Society of Pomona Valley 1973; Spadra Cemetery Association 1948). Additionally, as burials declined, there was less income for the Spadra Cemetery Association to pay for the caretaker and the cemetery was subject to an increase in vandalism. Several particularly damaging vandalism events in 1937, 1948, and 1958 toppled or broke over 50 headstones (Pomona Progress Bulletin 1937, p. 3; Pomona Progress Bulletin 1948, p. 22; Pomona Progress Bulletin 1958b, p. 29). The final burial at Spadra Cemetery was John Bowers in February 1967, a full 100 years after the first burial at Spadra. As of the final burial, there were approximately 210 people interred at Spadra Cemetery (Exhibit 1) (Historical Society of Pomona Valley 1973; Swank 1973, pp. 5-8).

Exhibit 12. Spadra Cemetery near Pomona Boulevard, about 1964



Source: Pomona Landmarks Collection, Digital Collection, Pomona Public Library

In 1971, the Spadra Cemetery Association declared their intent to dissolve the organization due to lack of activity and inability to defend the cemetery from vandals. The cemetery was deeded to the Historical Society of Pomona Valley later the same year. Though vandalism continued under the new ownership, a preservation and maintenance program was also started by volunteers and the Historic Society in 1975 (McPhillips 1971, letter; McPhillips 1972, letter; Los Angeles County Recorder 1972; Pomona Progress-Bulletin 1971, p. 15; Pomona Progress-Bulletin 1975, p. 48; Pomona Progress Bulletin 1984, p. 298).

After the Historical Society of Pomona Valley assumed ownership, there were two more major events at Spadra Cemetery. In 1990, after decades of vandalism, the Historical Society of Pomona Valley began a preservation program to protect the remaining headstones at Spadra Cemetery. Vehicle damage, gun damage, theft, and general vandalism had broken many of the tablet-style headstones and leaving them upright was no longer considered optimal for their preservation. The Historical Society hired Bill Beck to design a solution that would take remaining tablet-style headstone and some of the smaller block-style headstones, lay them flat, and encase them in concrete (Beck 1990, letter). In another attempt at protection, in 2000, Alice Page of the Historical Society of Pomona Valley nominated the Spadra Cemetery as a Designated Historic Landmark. The Landmark was accepted by City Council in October 2000 (City of Pomona 2000a, City of Pomona 2000b).

People of Significance Buried at Spadra Cemetery

Louis Phillips (April 22, 1829 – March 16, 1900)

Louis Phillips was born in Posen, Prussia on April 22, 1829. He emigrated to the United States with his older brother at the age of thirteen and lived in Louisiana. He worked in mercantile trade while living in Louisiana. In 1850, he relocated to California where he was a miner, then worked as a store owner in San Francisco. In 1853, he purchased land on the San Gabriel River and became a farmer. He arrived in Spadra in 1863 and eventually owned the 12,000-acre Rancho San Jose estate. He became the founder of the City of Pomona as well as one of the largest property owners in Los Angeles County at the time. He married Esther Blake, and together they had five children: Charles, Louis, George, Mrs. Frank George, and Kate Cecil. Esther Phillip's brothers, Charles and George, worked as merchants in the Phillip's business. Phillips died in Spadra on March 16, 1900 (San Francisco Call 1900, p. 25; Pomona Progress Bulletin 1900, p. 1; Shires 1967, p. 3-4).

William "Uncle Billy" Rubottom (December 27, 1809 – October 13, 1885)

William Rubottom, known as "Uncle Billy," was born on December 27, 1809, in Wayne County, Missouri. In 1852, William and his father Ezekiel Rubottom migrated to California from Arkansas, settling in Willow Grove, part of present-day El Monte. In the 1860s, William moved to present-day Rancho Cucamonga, where he constructed and operated an inn along the San Bernardino Road, before he relocated to the Spadra area in 1866 where he established another hotel there and a stagecoach station. The area was known as "Rubottom's" because the main attraction was the Rubottom Hotel. His daughter-in-law, Susan Glenn, moved to Spadra in the 1860s, and her hospitality and cooking contributed to the success of the Rubottom Hotel. Other settlers arrived in Rubottom's due to its proximity to the stagecoach route through Spadra. After a post office was built in 1870, "Rubottom's" was renamed Spadra after Rubottom's home in Arkansas, Spadra Bluffs. Rubottom became the first postmaster and is credited as the founder of Spadra. His daughter, Civility Rubottom Dorsey, married Captain Hilliard Pierce Dorsey. Mr. Dorsey founded the first Worship Master of Los Angeles Lodge No. 42, Free and Accepted Mason in 1854. They had a son, Kewen Dorsey, who became a beloved citizen of Spadra, and wrote a series of diaries about his life in Spadra. Rubuttom murdered his son-in-law Dorsey after Dorsey attacked him, and raised his grandson Kewen. William spent his last years with Kewen before his death on October 13, 1885, in Spadra. Rubottom's personality was a component in remembering his role in the town, not only for embodying the self-starting spirit of the early American era, but also its violence. Rubottom was accused of having murdered someone at knifepoint in Spadra Bluffs, Arkansas, and was known for having stopped the hanging of Dona Maria Merced Rain in Cucamonga (Blackstock 2005; Brackett 1920, p. 79, 80, 87; Dorsey 1970, p. 19; Driscoll 1950, p. 35-36; Historical Society of Pomona Valley ND, p. 1; Pomona Progress Bulletin 1935, p. 12).

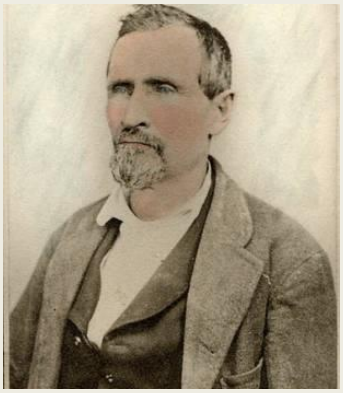


Exhibit 6. William "Uncle Billy" Rubottom (Portrait Photographs Collection, Pomona Public Library)

Richard C. Fryer (January 31, 1821 – December 8, 1888)

Reverend Richard C. Fryer was born in Alabama on January 31, 1821. He relocated to Arkansas before migrating to El Monte, California in 1852 to farm. Fryer became the first Baptist minister in Southern California after starting a church out of his house. He was one of the early settlers of Spadra as of 1867, after Louis Phillips gifted him 250 acres for his Baptist ministry due in part to Fryer having officiated Phillips' marriage to Esther Blake in 1866. Fryer held church services first in his home, then at the Spadra School House until 1883, when services were moved to Pomona to the First Baptist Church. Reverend Fryer also served as a member of the State Assembly. He lived in Spadra until 1887 when he relocated to Los Angeles, where he died on December 8, 1888 (Brackett 1920, p. 80; Pomona Progress Bulletin 1945, p. 1; California Genealogy 2022; a Grave 2022).



Exhibit 6. Richard C. Fryer (Historical Society of Pomona Valley)

Alvan T. Currier (April 30, 1840 – August 13, 1921)

Alvan T. Currier was born in Franklin County, Maine on April 30, 1840. He migrated to California and settled in Spadra. He was a rancher, owning a 2,400 acres ranch, the second largest ranch in the area next to Louis Phillips. Currier was a philanthropist and the director of First National Bank of Pomona. He helped construct the YMCA and First Baptist Church in Pomona. In 1898 he was elected State Senator for the Republican Party. He married Susan R. Glenn Rubottom Currier, daughter of Uncle Billy Rubottom. On August 13, 1921, Alvan died in Los Angeles. His residence was relocated to Louis Phillip's property in 2002 for restoration (Los Angeles Times 2002b, p. 2; Brackett 1920, p. 148, 212-213).

Property Type: Rural Cemetery

The "Rural Cemetery" typology is defined in *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Places* (NPS Bulletin 41), as drawing from romantic and picturesque notions of garden and landscape design in the mid-nineteenth century to create cemeteries that were separate from the churchyard models of the colonial and early settlement periods. These "Rural Cemetery" types typically featured manicured lawns, border plantings, shade trees, and irregular plot arrangements, incorporating plantings and natural topography, and focusing on circulation and pathways to guide visitor experience. The style has roots in European gardening and landscape design from the 1840s though 1880s that were guided by the work of landscape architects such as Lancelot "Capability" Brown, William Kent, or John Claudius Loudon. The "rural" movement applied not only to cemeteries, but also to formal gardens, public and private parks, and parkways and scenic routes (NPS 1992, p. 5-6).

In *NPS Bulletin 41*, the National Park Service (NPS) provides registration requirements and definitions for cemetery properties ordinarily that are not considered eligible for inclusion in the National Register of Historic Places unless they meet special requirements. *NPS Bulletin 41* establishes thresholds of significance for the four National Register criteria,

which must be met in addition to the Criteria Considerations in order for a cemetery or burial place to be eligible for listed in the NRHP.

Criterion A. *NPS Bulletin 41* clearly states that to be eligible under Criterion A, the burial place must me associated with a "clearly important" event or trend and that the connection must be "unmistakable." The bulletin gives several examples of cemeteries representing important events or trends in their given community or cultural history (NPS 1992, p. 9).

There are many ways in which a cemetery might represent an important aspect of a community's or a culture's history through association with a specific event or by representing broader patterns of attitudes or behavior. Cemeteries may be significant for their association with a community's initial settlement or early history, or a broader region's exploration or settlement. Cemeteries may also be significant for associations with specific events as well as long-term trends, such as political shifts, battles, or deaths of state leaders. By virtue of being a cemetery and relatively unchanged, or instance, a cemetery might be able to convey the proper context and integrity of a battleground, when no other location with high integrity may remain. Cemeteries are also often the last available location associated with a historic event, so when there is no other property or location that can convey a historical event, such as a fire, slave rebellion, mining accident or earthquake, the burial grounds where survivors of that event are interred may be used in substitute (NPS 1992, p. 9-10).

Cemeteries and burial places may also be related to the history of mortuary practices in general, such as the transition from crowded churchyards to more romantic or idyllic park-like settings, or the popularization of cremation in the nineteenth and early twentieth centuries (NPS 1992, p. 10-11).

Criterion B is focused on the person or group with which the burial place is associated must be of "outstanding importance" to the community, State, or nation. Cemeteries, as well as individual graves, may be eligible under Criterion B. Examples include cemeteries that contain the graves of numerous persons who made outstanding contributions to the history of the State or area in which their graves are located (NPS 1992, p. 11). The key component here is to strive for that "outstanding importance" character, and that there should be either a person of overwhelming importance or an overwhelming number of important individuals buried in a cemetery.

Criterion C has more to do with the craftsmanship of the gravestones or tombs themselves and/or the overall design of cemetery (if designed at all), than the people buried there or the historical circumstances of the cemeteries. As with residences, religious buildings, education buildings, or commercial buildings, there is a variety of monument styles, patterns, iconography, materials and craftsman practices that may be present in a cemetery. Under Criterion C, grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleum), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication. Alternatively, such property types may represent the work of master artists or craftspeople or possess the highest artistic distinction. In addition to "architecture," appropriate areas of significance would include art or landscape design (NPS 1992, pp. 12-13).

Criterion D Burial places can be eligible for their potential to yield information about cultural and ethnic groups. Under Criterion D, the common requirements are that the property have information to contribute and the contributed information is considered important. Whether information yielded is important or not is often determined by research design or a set of research questions. Though Criterion D commonly applies to archeological research, study of burials

and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

In additional to needing to be eligible under one of the four criteria for evaluation, cemeteries and burial places also must meet the requirements of Criteria Considerations. The relevant Criteria Considerations are:

> Criterion Consideration A, a religious property, "if it derives its primary significance from architectural or artistic distinction or historical importance;
>
> Criterion Consideration C, "a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life"; and
>
> Criterion Consideration D, "a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events" (NPS 1992, p. 33).

California guidance for the assessment of historic cemeteries defers to NPS guidance for eligibility and does not offer its own, specific criterion considerations.

Though there are several Criterion Considerations relevant to cemeteries, Criterion Consideration D is the most applicable here. Criterion Consideration D explains (NPS 1992, p. 16),

> A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events. As collective burial places, cemeteries are the focus of many individual expressions commemorating family members and spiritual beliefs. In and of itself, this characteristic does not qualify a burial place for listing in the National Register. However, when a burying ground is of sufficient age and scope to represent more, such as patterns of early settlement or the values of a society generally, National Register Criteria Consideration D provides for its eligibility. Cemeteries nominated for the importance of the information they may impart may be eligible for listing without application of Criteria Consideration D.
>
> To be considered a person of transcendent importance, an individual would have to meet the same test as that for a grave. To qualify for its age, a cemetery must date from an early period within its geographic and cultural context. The age of a burial place might be considered early relative to the period for which we have information about human activity, or relative to the exploration, settlement, and development of an area by a particular group. As with any other type of property, a cemetery may be eligible for the quality of design represented in its funerary art, construction or engineering techniques, landscape architecture, or other values recognized under National Register Criterion C. Likewise, under Criterion A, a cemetery may possess significant associations with historic events, including general events that reflect important broad patterns in our history.

To be considered under Criterion Consideration D, a cemetery must already be eligible under NRHP Criteria A, B, or C, and be:

- A historic cemetery containing the graves of a number of persons of outstanding importance – those whose activities determined the course of events in local, State, or national history; or those whose activities were especially important in reflecting significant cultural currents of the time.
- A cemetery possessing important historic associations from a community's early period of settlement, or which reflects important aspects of community history.
- A cemetery that embodies the principles of an aesthetic movement or tradition of design and monumentation through its overall plan and landscaping, its grave markers and funerary sculpture, or its buildings and structures.
- A cemetery that is associated through its burials with a single important historical event such as a pivotal military battle.
- A cemetery that embodies the folkways, burial customs, or artistic traditions of an ethnic or cultural group whose impact on the community or region was significant but is not well documented in other resources. (NPS 1992, pp. 16-17)

Integrity is the final threshold for finding cemeteries eligible for the NRHP. According to *NPS Bulletin 41*, all aspects of integrity are considered for NRHP eligibility: location, design, setting, materials, workmanship, feeling, and association. A cemetery property must have all aspects of integrity; however, they must have those aspects of integrity necessary to convey significance under the NRHP Criteria they are eligible under. So location, setting, feeling, and association are essential to those properties nominated under Criterion A and B, while design, materials and workmanship are essential under Criterion C. This section also gives instruction for nominating cemeteries that may have expanded over time, or have non-historic elements included due to burials made outside of the period of significance. In some cases, where there is extreme age or rarity of resource, more allowances can be made for alterations, damage or loss of historic features (NPS 1992, pp. 18-19).

Of note, there are special instructions given for improvements to the cemetery property, particularly to beautification efforts by well-meaning caretakers or lot owners. "Improvements" affect historic integrity. Replacement of historical components with modern features, such as exchanging original headstones, replacing fencing or wall materials, adding elaborate monuments or statuary, and in some cases, making elaborate planting plan changes all reduce integrity and diminish the authentic historic character of the cemetery. In order to a evaluate the impact of such improvements, the features which are crucial components of historic character must be clearly defined and prioritized for preservation (NPS 1992, p. 19).

Significance Evaluation

One previously identified resource was identified: the Spadra Cemetery. Spadra Cemetery was originally established in 1868 and hosted its final burial in 1967. It is a Designated Historic Landmark for City of Pomona, and was approved October 16, 2000 (City of Pomona 2000a, 2000b). The Landmark application was completed hand (not typed) and two pages in length. The applicant, Alice Page, checked boxes that the cemetery was eligible for local landmark because it:

- Reflects special elements of the City's cultural, economical, political, architectural, or natural history;
- is identified with important events/person, local, state, federal;
- is the work of a noted architect, builder, designer or person;

- is a unique location, view, vista, or physical characteristics; and
- has significant architectural, structural design, or craftsmanship.

In the "Historical Attributes" section, Page writes that Spadra Cemetery is the "First cemetery in the Pomona Valley. It is the burial site of many members of the early prominent families of Pomona Valley." No more detail or justification was available in the City Council meeting minutes, landmark application prepared by Page, or other sources.

Spadra Cemetery has not been formally evaluated against National Register or California Register criteria before. Dudek evaluated the Spadra Cemetery under National and California Register criteria in order to fully assess potential impacts under CEQA. This report recommends that Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. It also recommends Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Spadra Cemetery also met the conditions of Criteria Considerations C and D. Below, an evaluation of Spadra Cemetery under National and California Register criteria is presented. This evaluation relies on the property type analysis and thresholds of significance established in the *National Register Bulletin 41: Guidelines or Evaluating and Registering Cemeteries and Burial Place*s. Findings in this section do not undo or delegitimize the local City of Pomona Designated Historic Landmark listing.

National Register of Historic Places/California Register of Historical Resources Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Spadra Cemetery is eligible for the National Register under Criterion A and California Register under Criterion 1 for its historical association with the founding and settlement of Spadra, one of the first American-era settlements in eastern Los Angeles County. There are only two remaining, extant historical resources in the former town of Spadra: Spadra Cemetery (est. 1868) and the Phillips Mansion (built 1873). All other original homes, farms, fields, businesses and buildings or structures have been demolished. Under Criterion A/1, Spadra Cemetery has a period of significance which spans from its establishment in 1868 after the death of Melinda Arnett, wife of Richard S. Arnett and member of one of the earliest families to come to Spadra from nearby El Monte; to 1967 which marks the final burial at Spadra Cemetery, which was for John A. Bowers. Spadra Cemetery is sited on approximately 2.35 acres of land, part of the 250 acres Louis Phillips set aside for Reverend Richard C. Fryer, a Baptist minister and one of the earliest settlers of Pomona along with the Rubottom and Arnett families.

As discussed above in the historical context, Spadra was one of the earliest communities established in the American period in this region, located along important stage and rail routes, and had a brief but important impact as the eastern extent of the County of Los Angeles, before Spadra was incorporated into the City of Pomona. Archival research indicates that Spadra Cemetery is the last remaining property in the former town of Spadra that can be understood as representative of the community as a whole. The only other resource remaining in the area related to Spadra is the mansion of Spadra's town founder Louis Phillips, built in 1873, and is not directly associated with the founding of the town so much as it is associated with the brief period of Spadra as a major economic shipping and trade location with arrival of the Southern Pacific Railroad

between 1873 and 1874. Therefore, the Spadra Cemetery is directly related to the clearly important event: the establishment and earliest history of Spadra and is eligible because it is the last available location that can be associated with this historical event, all of which are registration requirements for cemeteries as outlined in *NPS Bulletin 41* (NPS 1992, p. 9-10). It was the first Protestant cemetery in Pomona Valley. Spadra Cemetery was a key community component of Reverend Richard C. Fryer's Baptist ministry in Spadra, but the cemetery was used as a final resting place for any non-Catholic and resident of Spadra. Typically, local pioneer cemeteries of this era rejected non-Catholics. Though there has been damage to and theft of headstones at Spadra Cemetery, both Melinda Arnett, the first burial, and John Bowers, the last burial headstones are still present and in relatively undamaged states at the cemetery.

The cemetery also retains adequate integrity to convey significance under Criteria A/1: location, feeling, association and setting. This is discussed in full in the "Integrity" section below.

Therefore, because of (1) its clear association with the founding and early history of Spadra, (2) its position as the last remaining example of a property that can convey that historical significance, and (3) its high degree of those aspects of integrity that are necessary to convey its historical significance, Spadra Cemetery is recommended eligible for the National Register under Criterion A and California Register under Criterion 1 at the local level, with a period of significance spanning 1868 to 1967.

Criterion B/2: That are associated with the lives of persons significant in our past.

Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra: Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier. Except for Phillips, these important figures have no other extant location which could convey their historical importance. To be found eligible under Criterion B/2 the property has to be directly tied to an important person *and* the place where that individual conducted or produced the work for which he or she is known. *NPS Bulletin 41* allows for special consideration under Criterion B/2 if the burial place is associated with someone of "outstanding importance" to the community, State, or nation and that the burial place contains the graves of numerous persons who made outstanding contributions to the history of the State or area in which their graves are located (NPS 1992 p. 11). Louis Phillips, William "Uncle Billy" Rubottom, Reverend Richard C. Fryer, and Alvan T. Currier are individuals interred at the Spadra Cemetery who are of "outstanding importance."

William "Uncle Billy" Rubottom was the first person to be invited to reside in Spadra by Phillips. Spadra is named for Rubottom's hometown, Spadra Bluffs, Arkansas. Rubottom opened the first stage station and hotel in Spadra, which was a critical stop along the Los Angeles-San Bernardino Road and the Butterfield Stage Route. Intermittent stage stations were important along such routes so that stages could water and rest horses or switch them out after a particularly strenuous journey. Rubottom also served intermittently as the postmaster for Spadra and is of obvious outstanding local importance to Spadra. There are no extant sites associated with Rubottom in California or Arkansas which can convey his significance – only the cemetery remains. Rubottom's hotel was demolished in 1902, and his home was demolished in the 1950s. Prior to his participation in the founding of Spadra, Rubottom owned the Sycamore Inn in present-day Rancho Cucamonga, burned down and was rebuilt as a Craftsman style mansion in 1920 and no longer retains physical historical association with Rubottom's period of ownership.

Reverend Richard C. Fryer is responsible for establishing Spadra Cemetery as the first Protestant Cemetery in Pomona Valley as part of his Baptist ministry. Fryer was instrumental in convincing other El Monte residents to relocate to Spadra, after

Phillips brought Fryer over by gifting him a significant acreage for his ministry. Fryer's church services were held first in his home, then at the Spadra School House after 1870, and no actual church was established in Spadra. In 1883, just a few years before his death, the Baptist congregation moved to Pomona when the First Baptist Church at Fourth and Park was opened, though Fryer remained in Spadra until just a few months before his death. The congregation later moved again, and the First Baptist Church building in Pomona was demolished in 1957. Fryer's Spadra home was also demolished, like many of Spadra's buildings, in the 1950s. The Spadra School House was demolished in 1920. Therefore, there is no property, other than Spadra Cemetery, remaining that can convey the historical importance of Reverend Fryer and his role in establishing the community.

Alvan T. Currier was another early settler of Spadra; a locally important landowner second in acreage only to Louis Phillips; trustee to various local banks, churches and schools; Los Angeles county sheriff; and state senator. He is of outstanding importance locally and at the state level. Currier married Susan Rubottom Glenn, daughter of "Uncle Billy" Rubottom. One building in Spadra was associated with Currier. The Currier house was moved to the Phillips Mansion property in an effort to preserve it from demolition in the early 2000s, but in doing so, the location and setting of the Currier House were diminished to the extent that the property no longer conveys its historical significance. Other buildings associated with Currier, such as the Currier Block in downtown Los Angeles have been demolished and were not associated with the productive life of Alvan T. Currier, but with businesses or people who inhabited them. Currier partially funded the construction of buildings such as the First Bank of Pomona building, but his participation in the funding of this building is not associated with his productive life. Finally, while some of Currier's important achievements may have been conducted at the State Capitol building in Sacramento during his time as a state senator, Currier's more substantial and long term important achievements during the productive years of his life took place in Spadra while he served as the sheriff and as a trustee for local businesses.

One important person interred at the cemetery has other locations which could potentially convey historical significance better than Spadra Cemetery. Louis R. Phillips was the founder and earliest American settler of Spadra and is also attributed as the town founder of City of Pomona since he sold the land Pomona was platted on to land developers. Phillips's donations and land sales to residents of El Monte attracted people to Spadra. Phillips held many important positions in the town as well as the county, including postmaster and county supervisor, in addition to at one time being one of the richest men in Los Angeles County. Phillips, his spouse Esther Blake, and their extended family and children are all interred at Spadra Cemetery. He is of obvious outstanding importance locally. The Phillips Mansion, the only other remaining historic site in Spadra, could potentially convey Phillips' historical significance better than Spadra Cemetery.

As demonstrated above, the Spadra Cemetery maintains a high degree of historical association with at least four early Spadra citizens who were of exceptional local importance and is the only extant historical property which can convey their significance. All four of these exceptionally locally important figures were interred at Spadra Cemetery during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 2 at the local level, with a period of significance spanning 1868 to 1967.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Spadra Cemetery is a Rural Cemetery property type, originally established in 1868 for the first burial and platted immediately afterwards. According to the significance thresholds as defined in *NPS Bulletin 41* under Criterion C for this property type,

grave monuments, grave-associated art works, funerary buildings or structures (such as sarcophagi or mausoleums), and landscapes associated with burial places must be good representatives of their stylistic type, period, methods of construction, or fabrication (NPS 1992, pp. 12-13). Though the Spadra Cemetery is a unique and well-preserved historical location with obvious historical associations both to the founding and early years of Spadra as well as to historical figures of outstanding importance, the physical monuments at Spadra Cemetery are typical tablet or block style monuments that were common during the late nineteenth and early twentieth centuries. No particularly excellent examples of workmanship or design were present, and most of the monuments were plain or had very simple floral, freemason, or religious imagery, all of which remain common in the twenty-first century. None of the monuments at Spadra Cemetery of themselves appeared to be excellent, undamaged representatives of their stylistic type.

One monument, that of Ella Belle "Ursula" Ponedel Meyer, was of note. Meyer's 1935 monument is large, granite, block style monument with particularly artistic, stylized WPA-style carving of a Native American with braids on horseback, with the caption "End of the trail." This monument design and its title, a Native American on horseback in bas relief, are copies of a plaster relief of a similar subject done by artist James Earle Fraser for the Panama-Pacific International Exposition in 1915 (Blackstock 2014). Though an artful rendering, the version on Meyer's headstone is derivative of the original pieces and is not representative of a master artist or a good example of a grave-associated artwork.

One craftsperson and headstone maker, a "J. Miller" from Los Angeles, crafted at least two headstones in Spadra Cemetery for the Rubottom family in the 1870s; however, archival research did not uncover any details about Miller or his business, and therefore he cannot be elevated to the level of master craftsperson.

The Spadra Cemetery property does not meet the thresholds for significance under National Register Criterion C or California Register Criterion 3 as established in *NPS Bulletin 41* for cemeteries or burial places. It does not appear to be a good representation of the "Rural Cemetery" type, does not appear to have good representations of any stylistic type, period, methods of construction, or fabrication for its headstones, nor does it have any monuments which could represent the work of master craftspeople, or possess high artistic distinction. Therefore, the Spadra Cemetery property does not appear eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

Though Criterion D/4 commonly applies to archaeological research, study of burials and cemeteries may also produce important information. Such sites include Native American burial sites and funerary practices, but also extend to social and ethnic groups not closely recorded in modern history, such as enslaved groups, immigrants, or early settlers (NPS 1992, p. 13).

A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an archaeological resources assessment for this project. No cultural (cultural or tribal cultural) resources were identified within the proposed project site as a result of these efforts. However, as previously mentioned Spadra Cemetery is eligible for the National Register under Criterion B and California Register under Criterion 2, because it is the final resting place of at least four individuals of outstanding importance to the town of Spadra (reasoning for this finding is further explained in the determination for criterion D/2). Additionally, GPR survey results reveal the potential for unmarked graves to exist within the Spadra Cemetery property. These unmarked graves have potential to reveal information about the historic period and the community of Spadra that is not yet known.

As demonstrated above, the Spadra Cemetery has the potential to yield information important to history in both the study of individuals known to be interred within the cemetery but also those possibly interred. Information yet to be revealed has the potential to illuminate yet unknown information about the town of Spadra during the period of significance established under Criteria A/1: 1868-1967. Therefore, Spadra Cemetery is recommended eligible for listing on the National Register under Criterion B and California Register under Criterion 4 at the local level, with a period of significance spanning 1868 to 1967.

Criteria Considerations

As a cemetery property type, Spadra Cemetery must qualify as eligible under one of the four standard criteria for significance as well as at least one criteria consideration. As demonstrated above, Spadra Cemetery is eligible under National Register Criteria A and B and California Register Criteria 1 and 2 at the local level, with a period of significance spanning 1868 to 1967. There are at least four Criteria Considerations which may be applied to cemeteries:

A a religious property deriving primary significance from architectural or artistic distinction or historical importance;

B a building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;

C a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life;

D a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events;

Of these, Criterion Consideration C and Criterion Consideration D to apply to Spadra Cemetery, as it (A) is not a religious property that derives significance from its historical importance or architectural distinction, and (B) Spadra Cemetery remains in its original location and hosts no moved graves that were uncovered during archival research.

As discussed above in National Register Criteria B and California Register Criteria 2, Spadra Cemetery contains (Criteria Consideration C) at least three graves of historical figures of outstanding importance where there is no other extant location which can be directly associated with his or her productive life: Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier. These people meet the threshold for exceptional importance at the local level and there are no buildings still in existence associated with their productive lives. A complete discussion of each person is included above.

As discussed above National Register Criteria A and B and California Register Criteria 1 and 2, Spadra Cemetery also (Criteria Consideration D) derives its primary significance from graves of persons of transcendent local importance (Louis Phillips, Reverend Richard C. Fryer, William "Uncle Billy" Rubottom, and Alvan T. Currier), from its age (established 1868, exceptionally early for its geographical context), and from association with historic events (the founding and early years of Spadra). Because Spadra Cemetery is an early Los Angeles County community's cemetery and is associated both with that first year after a post office was officially established as well as the town founders and leaders, Spadra Cemetery meets the thresholds for this Criteria Considerations.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45).

To be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. The Spadra Cemetery also retains adequate integrity to convey significance under Criteria A/1: location, setting, design, feeling, and association, strengthened especially by it being the last remaining such site that can be associated with the town's founding.

The cemetery retains its original **location**, sited on the 2.35-acre property established by Reverend R.C. Fryer on land gifted to him to begin his Baptist ministry in Spadra. The cemetery location and boundary remain unchanged since the cemetery's establishment in 1868. It has not been expanded or reduced in size.

Spadra Cemetery retains a degree of its original **setting** as well because of the natural feature of Elephant Hill, which dominates the view of the cemetery and forms a natural southeastern boundary. The ATSF (now Union Pacific and Metrolink) Railroad along the northern boundary was established in the 1880s and falls within the period of significance. The cemetery's integrity of setting is diminished along the southwestern boundary, as SR 57 (completed in 1972) constitutes a visual and constant audible intrusion into the cemetery and replaced the smaller road present along this boundary during the period of significance.

The cemetery retains its integrity of **design** as the original block and lots system appear to have persisted, despite dozens of vandalism event and damage in the mid and late twentieth century; however, integrity of **workmanship** and **materials** are diminished by the vandalism events as well as diminished by the preservation strategy of preserving damaged headstones in the ground in cement, rather than preserving them upright in their original configurations. A high degree of material and workmanship integrity are not required under National Register Criterion A or B or California Register Criterion 1 or 2 to be considered eligible.

Spadra Cemetery is able to adequately convey the **feeling** of a nineteenth century, small Rural Cemetery established for one specific town, through its boundaries, the original layout of the block and lot system, dozens of original plantings, and secluded setting against the completely undeveloped backdrop of Elephant Hill.

Finally, Spadra Cemetery retains its historical **association** with the specific historical event for which it is significant: the founding and early years of Spadra. Spadra Cemetery had a clear role in the town founding and subsequent years where town amenities such as businesses, a post office, a rail depot, the first church, and the cemetery were established, but before the 1873-1875 economic boom associated with the years that Spadra served as the terminus of the Southern Pacific Railroad line, before it extended to Pomona and on to the City of Colton. This historical association is especially strengthened by the cemetery's role as the last remaining property that can be associated with the town's founding.

Therefore, the Spadra Cemetery retains adequate integrity to convey significance under National Register Criteria A and B and California Register Criteria 1 and 2.

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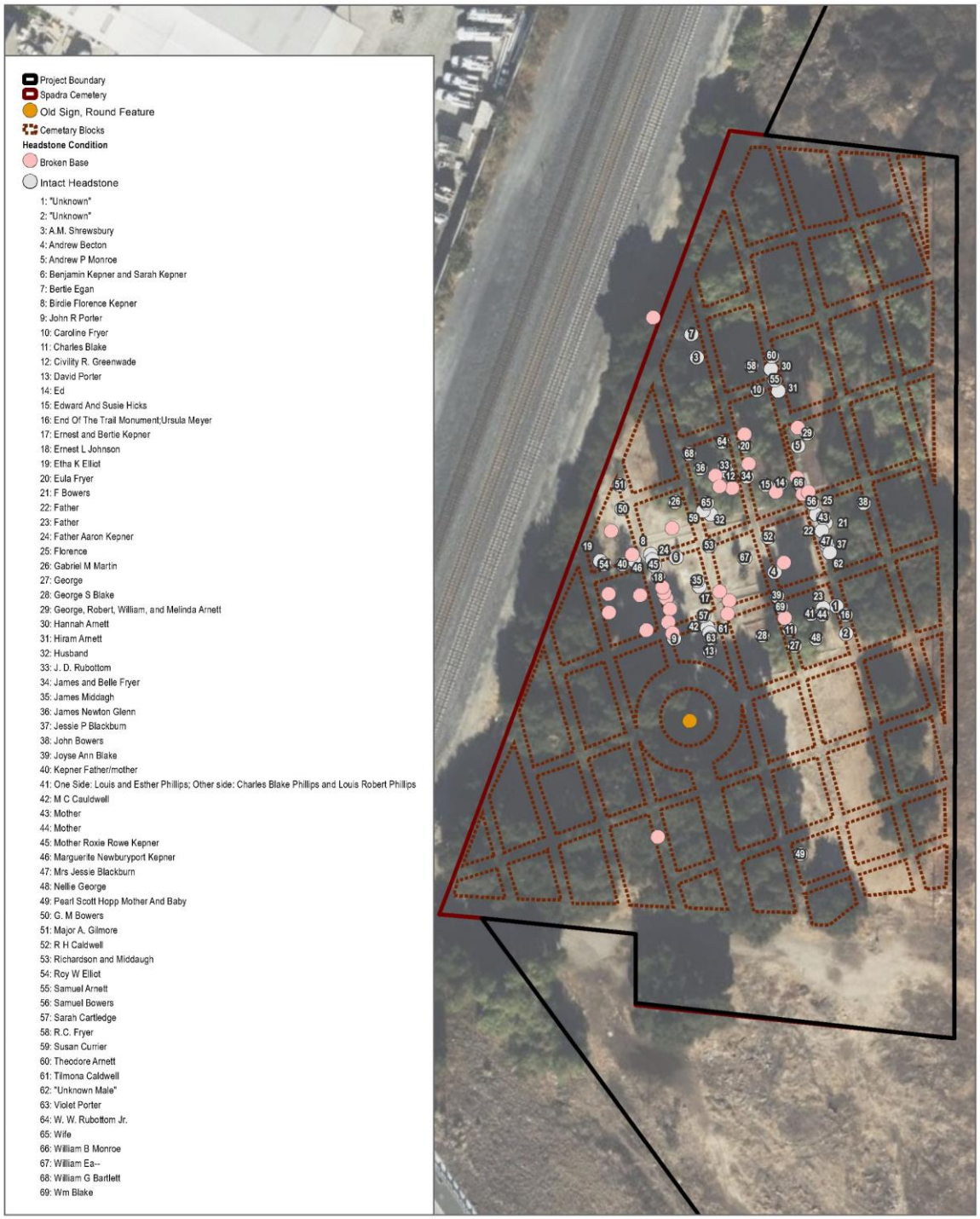
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Swank, Mary C. 1973. *Pomona Cemeteries*. Volumes 1. Pomona, CA: Pomona Valley Genealogical Society. Book held by the California Special Collections Room, Pomona Public Library.

UCSB (University of California, Santa Barbara). 2022. Historic Aerial Photographs Elephant Hill Area dating from 1928, 1938, 1946, 1949, 1953, 1960, 1968, 1973, 1976, 1977, 1981, 1982, 1983, 1989, 1990, 1994, 2001, and 2007. Map & Imagery Laboratory (MIL) UCSB Library, Electronic Resource. Accessed May 16, 2022. http://mil.library.ucsb.edu/ap_indexes/FrameFinder.

Wheeler, Stuart and Esther. 1983. Pomona Valley Scrapbook. No Publisher, personal collection of clippings. Book held by the California Room, Pomona Public Library.

Sketch Map (Continued):



SOURCE: DigitalGlobe 2017

DUDEK 0 35 70 Feet

FIGURE 4
Cemetery Inventory
Elephant Hill Cultural Report

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings_____
Review Code Reviewer Date

Page 1 **of** 15 ***Resource Name or #:** (Assigned by recorder) Brea Canyon Road
P1. Other Identifier: Spadra-Fullerton Road; Spadra- Anaheim Road; Old Brea Road; Old Diamond Bar Road
*__P2. Location:__ ☐ **Not for Publication** ☒ **Unrestricted**
***a. County** Los Angeles County **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
***b. USGS 7.5' Quad** San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; NW ¼ **of** NW ¼ **of Sec** 35; San Bernardino **B.M.**
USGS 7.5' Quad San Dimas, Calif. **Date** 2018 **T** 01S; **R** 09W; SE ¼ **of** SW ¼ **of Sec** 26; San Bernardino **B.M.**
c. Address [none] City Pomona Zip 91766
d. UTM: Northeast extent Zone 11S , 426565.09 mE/ 3767912.98 mN
Sorrento Drive crossing Zone 11S , 426396.31 mE/ 3767781.80 mN
Southwest extent Zone 11S , 426181.02 mE/ 3767583.51 mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
Directions: From the intersection of Mission Boulevard and Sorrento Drive in the City of Pomona, turn northwest onto Sorrento Drive and go to the end of the road. Walk past the gate and you will be on the road segment; Elevation: 859-862 feet amsl; Decimal Degrees (northeast extent) 34.048368°, -117.796311° (southwest extent) 34.047640° , -117.797921°

***P3a. Description**: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
See continuation sheet.

***P3b. Resource Attributes:** (List attributes and codes) AH7. Roads/Trails/Railroad Grades

***P4. Resources Present:** ☐Building ☒Structure ☐Object ☐Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



P5b. Description of Photo: (view, date, accession #): View facing south west, 04/20/22, IMG_3332

***P6. Date Constructed/Age and Source:** ☒ Historic ☐Prehistoric ☐ Both

***P7. Owner and Address:** Los Angeles County, 2040 W Holt Avenue, Pomona, CA 91766

***P8. Recorded by**: (Name, affiliation, and address)
Kate G. Kaiser, MSHP, Dudek
38 N. Marengo Avenue
Pasadena, CA 91101

***P9. Date Recorded:** 4/20/2022

***P10. Survey Type:** (Describe) Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none.")
Kaiser et. al. 2022. Cultural Resources Inventory and Evaluation Report for the Elephant Hill Project, Prepared for the City of Pomona, June 2022

*Attachments: ☐NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☒Linear Feature Record ☐Milling Station Record ☐Rock Art Record☐Artifact Record ☐Photograph Record ☐ Other (List):

State of California - The Resources Agency Primary # _____
DEPARTMENT OF PARKS AND RECREATION HRI# _____

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Brea Canyon Road ***NRHP Status Code** 6Z

B1. Historic Name: Brea Canyon Road; Spadra-Fullerton Road; Spadra-Anaheim Road; Old Brea Road; Old Diamond Bar Road

B2. Common Name: Brea Canyon Road

B3. Original Use: Road B4. Present Use: None (abandoned)

***B5. Architectural Style:** None noted

***B6. Construction History:** (Construction date, alterations, and date of alterations)

1873 – Route between Spadra and Anaheim established through Brea Canyon
1909 – Brea Canyon Road paved for the first time
1923 – repaved
1933 – Northern portion of route shifted from Pomona Boulevard south to canyon south of Elephant Hill
1972 – SR 57 completed, making Brea Canyon superfluous
1973 – County of Los Angeles officially abandons segment of Brea Canyon Road in the project site, realigns Mission Boulevard to the south

***B7. Moved?** ☐No ☒Yes ☐Unknown **Date:** 1933 **Original Location:** along Pomona Boulevard

***B8. Related Features:**

None noted

B9a. Architect: County of Los Angeles Roads Department b. Builder: Griffith Company

***B10. Significance: Theme** n/a **Area** n/a

Period of Significance n/a **Property Type** n/a **Applicable Criteria** n/a

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Brea Canyon Road was created as early as 1873, when a route between Spadra and Anaheim was established through Brea Canyon Road. In 1933, the original 1873 route was shifted south to the valley south of Elephant Hill, where the project site segment is located, before turning south to cross the Puente Hills into Orange County does not meet any of the criteria for listing in the NRHP or CRHR, either individually or as part of an existing historic district, or as a local landmark, as demonstrated below. As such, the property does not appear to be a historical resource for the purposes of CEQA and has been assigned a California Historical Resource Status Code of 6Z (found ineligible for the NRHP, CRHR, or local designation through survey evaluation). On the continuation sheets is a complete analysis of the historical context and evaluation of this property against national, state, and local criteria,

See continuation sheet.

B11. Additional Resource Attributes: (List attributes and codes) _____

***B12. References:**

See continuation sheet.

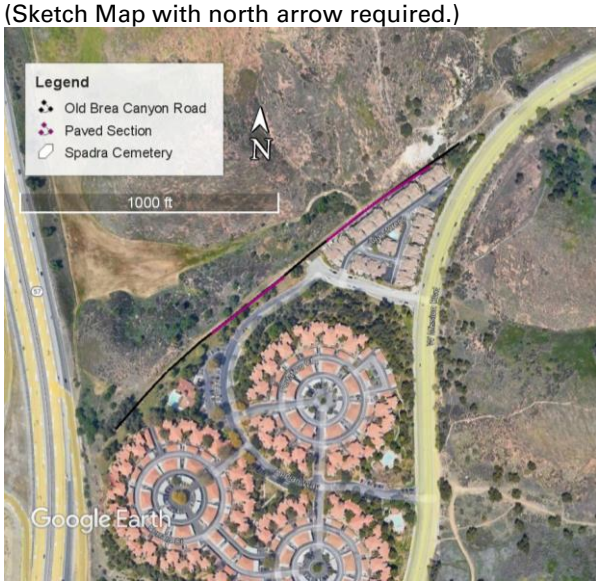
B13. Remarks:

***B14. Evaluator:** Kate G. Kaiser, MSHP

***Date of Evaluation:** 06/01/2022

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LINEAR FEATURE RECORD

Primary #
HRI#
Trinomial

 ***Resource Name or #** (Assigned by recorder) Brea Canyon Road

L1. Historic and/or Common Name: Brea Canyon Road; Spadra-Fullerton Road; Spadra-Anaheim Road; Old Brea Road; Old Diamond Bar Road

L2a. Portion Described: ☐ Entire Resource ☒ Segment ☐ Point Observation
Designation: Segment between Mission Boulevard and SR 57

b. Location of point or segment: (Provide UTM coordinates, decimal degrees, legal description, and any other useful locational data. Show the area that has been field inspected on a Location Map.)
Northeast extent Zone 11S , 426565.09 mE/ 3767912.98 mN
Sorrento Drive crossing Zone 11S , 426396.31 mE/ 3767781.80 mN
Southwest extent Zone 11S , 426181.02 mE/ 3767583.51 mN

The segment recorded for this project extended from the defunct road's intersection with Mission Boulevard to the northeast and extends southwest until the landform is cutoff before SR 57.

L3. Description: (Describe construction details, materials, and artifacts found at this segment/point. Provide plans/sections as appropriate.)

The remaining, extant segment of Brea Canyon Road appears to be constructed of smooth, fine aggregate concrete, stamped intermittently with a contractor's stamp, arranged in a narrow strip. An asphalt road is either not present or has been removed in the segment area. A through-cut feature is part of the road feature and appears south of the Sorrento Drive intersection. Very little remains of the original road materials, but the original roadbed route is still evident and graded to be nearly flat, only changing a few feet in elevation from one end to the other.

L4. Dimensions: (In feet for historic features and meters for prehistoric features)

a. Top Width:	44 feet (approximate)
b. Bottom Width	10 feet – 6 inches
c. Height or Depth	(ground surface, no depth)
d. Length of Segment	1,687 feet

L5. Associated Resources: None noted

L6. Setting: (Describe natural features, landscape characteristics, slope, etc., as appropriate.):
The segment of Brea Canyon road recorded for this project emerges from the canyon where present-day Mission Boulevard is located ad follows the northwestern face of the hill south of Elephant Hill towards SR-57. The area faces northwest to an undeveloped, natural area vegetated by grasses, sparse mature trees, and occasional boulder outcroppings.

L4e. Sketch of Cross-Section (include scale)



L8a. Photograph, Map or Drawing



L7. Integrity Considerations:
Not eligible, integrity not assessed; poor condition

L8b. Description of Photo, Map, or Drawing (View, scale, etc.)
View looking northeast; 4/20/2022; IMG_7917

L9. Remarks:
None noted

L10. Form Prepared by: (Name, affiliation, and address)
Kate G. Kaiser, MSHP
Dudek, 38 N. Marengo Ave.
Pasadena, CA, 91101

L11. Date: 6/1/2022

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #_____
HRI# _____
Trinomial_____

Page 4 **of** 15
***Map Name:** San Dimas, Calif.

***Resource Name or #** (Assigned by recorder) Brea Canyon Road
***Scale:** 1:24,000 ***Date of map:** 2022



P3a. Description (Continued):

A segment of Brea Canyon Road is within the Project site. Brea Canyon Road is a former Los Angeles County Road that extended from City of Pomona to City of Brea (now in Orange County) via Brea Canyon. A route through this area has existed since as early as 1873; however, the route that follows present-day Mission Boulevard in the Built Environment Study Area before rejoining the original 1873 route south of Spadra was constructed in 1933 by Griffith Contracting Company. Much of the 1933 road material through the segment in the Built Environment Study Area is destroyed or heavily altered. Only two strips of pavement remain and much of that is damaged. Paved sections are also only a single lane in width, when the original 1933 roadbed was at least two lanes in width (Exhibits 1, 2). Two through-cut[1] features also existed to facilitate the route through Elephant Hill, both of which have been altered significantly and the southern faces of these features were demolished to accommodate residential housing developments in the 1980s and the mid-2000s (Exhibit 3). The entire surveyed segment was 1,678 feet or 0.32 miles in length. The primary construction material is a smooth-surfaced concrete, rather than coarser aggregate asphalt. Extant portions of pavement are limited to single lanes, roughly eight (8) feet in width. On one location, just southwest of the Sorrento Drive crossing, there is a contractor stamp which reads "Griffith Company Contractors, June 3, 1933, Station 452+60" (Exhibit 4).

Exhibit 1. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking west



Source: (IMG_7798)

[1] A "through-cut" refers to when a linear feature, such as a road or railroad, cuts into a hill slope where there is a cut slope on both sides of the linear feature. Through-cuts may be employed when engineering a grade around the outer edge of a ridge or slope is not possible.

Exhibit 2. Segment of Brea Canyon Road at intersection with Sorrento Drive, looking northeast



Source: (IMG_7796)

Exhibit 3. View of eastern through-cut, looking east. Left portion is original, while right portion has been partially demolished by residential development



Source: IMG_3295

Exhibit 4. View of contractor stamp, looking west



Source: IMG_7804

B10. Significance (Continued): Historical Context: Old Brea Road (1933-1973)

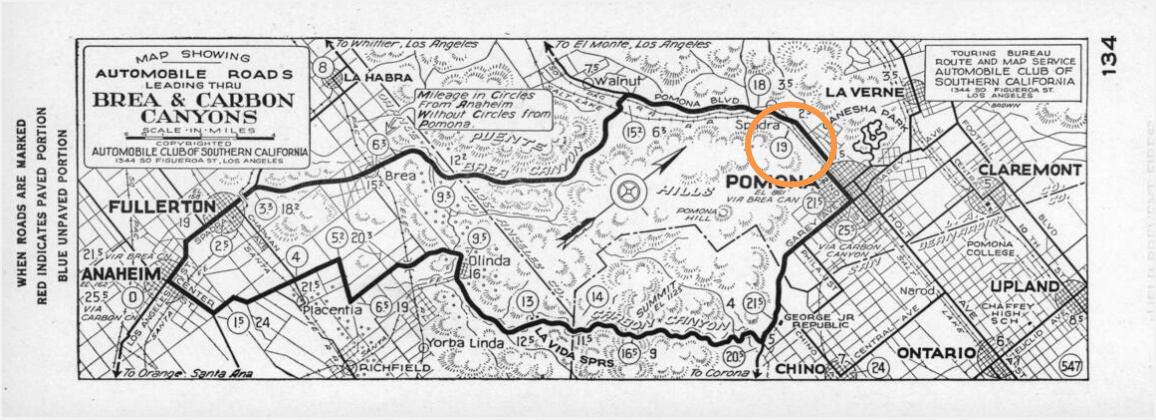
The road known today as Brea Canyon Road was initially comprised of several regional roads that were utilized as a contiguous public thoroughfare between the areas surrounding the cities of Spadra and Anaheim. A route between Spadra and Anaheim was designated beginning in 1873, when plans for a dirt road was announced through Brea Canyon (Los Angeles Herald 1873, p. 2). Brea Canyon Road, since at least 1873 has been a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. Before that time, stagecoach travelers would have to traverse the Puente Hills through of the Whittier Narrows or travel through Los Angeles and cross the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

Paving efforts began along sections of the roadway in the early 1910s. The first was between 1911 and 1912 with the improvement of the section of the road located in Los Angeles County. A 3.80-mile section of the road located in Orange County was improved in 1912 (Santa Ana Daily Register 1911, p.4; 1912, p.3). The *Santa Ana Daily Register* reported in 1912 that the nature of the improvements in Orange County would consist of the original, narrow dirt roads being widened to a standardized 20- to 24-foot width, which were then surfaced with an oil macadam pavement material (Santa Ana Daily Register 1912, p. 3).

In the 1920s, the County of Los Angeles implemented additional improvements to the section of the Brea Canyon Road within its own county jurisdiction. The section of the improved Brea Canyon Road lead from the western outskirts of

Pomona along Pomona Boulevard, through Spadra, then south along Brea Canyon, skirting past the town of Walnut in Los Angeles County before terminating north of Brea at the Los Angeles County limit (See Exhibit 5, top) (Los Angeles Times 1923, p. 124). The upgraded 6-mile roadway was twenty feet wide on straightaway sections and twenty-four feet wide on curved sections to allow for consistent driving speed along the length of the roadway. The 6- to 8-inch-thick concrete roadway was installed over either native soil or a bed of decomposed granite. Construction of the road was overseen by the Road Commissioner of Los Angeles County, George W. Jones, and the engineer of construction, A.B. Boyd (Los Angeles Times 1923, p. 124). In 1930, 650 Arizona Ash, Casuarina, and Chinese Elm trees were planted along the shoulders of the Brea Canyon Road (Pomona Progress Bulletin 1930, p. 5).

Exhibit 5. Above – 1923 Map showing Automobile Roads leading through Brea & Carbon Canyon Roads
Below – 1931 Map showing the same route, now following Mission Boulevard, south of Elephant Hill.





Source: Automobile Club of Southern California collection, 1892-1963, Digital Libraries, University of Southern California

The segment of road that intersects the Project site includes a position of 5th Avenue and Mission Boulevard in Pomona then southwest to the road segment within the Project site, before rejoining the existing segment south towards Brea Canyon, that was initially graded and paved following a bid for construction opened by the State of California in 1932 (See Exhibit 5, bottom) (Pomona Progress Bulletin 1932, p. 11). The extension was intended as the first section of a proposed 5th Avenue highway that would connect the City of Pomona to the City of Los Angeles by establishing

connections between existing roadways including the Brea Canyon Road (Pomona Progress Bulletin 1933, p. 9). The Griffith Company, contractors (Exhibit 6), won the contract and were responsible for the construction of the extension, running through the hills east of Pomona towards the existing Brea Canyon Road. The *Pomona Progress Bulletin* reported in February 1933 that, "In the top of Elephant Hill there is now a huge gap thru which the highway will pass. More blasting and much grading remains to be done there before the route is ready for the concrete (Pomona Progress Bulletin 1933, p. 9)." This extension eventually became a recognized portion of the Brea Canyon Road. Following the completion of the 5th Avenue extension, the Brea Canyon Road became a recognized section of the State highway system.

Exhibit 6. Photograph of the Griffith Company stamp, still visible along Brea Canyon Road extant segment today (April 2022)



Source: IMG_7803

By 1955, planning for the La Brea Freeway (also known as the Orange Freeway) was in progress, which was intended to streamline travel between Orange and Los Angeles Counties (Los Angeles Times 1955, p.13). This freeway, renamed State Route 57 (SR 57) as part of the state-wide renumbering of California Highways that took place in 1964, follows the route of the original Brea Canyon Road (California Highways 2021). By 1972, the Orange Freeway, SR 57 was complete and connected Pomona and San Dimas, as well as an interchange with Interstate 10 to Orange County, through Brea Canyon (Pomona Progress-Bulletin 1972, p. 11). The Orange Freeway superseded the original Brea Canyon Road, and otherwise rendered sections of the connective roadway redundant in the decades after Orange Freeway's construction. The segment of Brea Canyon Road between Temple Avenue and Mission Boulevard that intersects the Project site was officially abandoned in 1973 following the passage of California Highway Commission Resolution A 398, which found that the section of "…superseded highway is no longer necessary for State Highway purposes." (Division of Highways 1973, p. 86-7). In the years following the road abandonment, several residential subdivisions were constructed adjacent to the Brea Canyon Road segment near the Project site, and only a few remaining artifacts of the road are still present (NETR 2022; UCSB 2022).

National Register of Historic Places/California Register of Historical Resources Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Archival research indicates that a stage route and later an automobile route has been located in Brea Canyon since as early as 1873, but the road segment within the Built Environment Study Area which will be partially demolished by Project activities dates to 1933, when the road shifted from its original alignment along Pomona Boulevard south to Mission Boulevard, before rejoining the original road route towards Orange County. The earliest versions of the road from the nineteenth century would have been placed in the canyon out of necessity, as the route would have provided safe, level passage for stage coaches and horses, despite being located along a seasonal creek which often damaged the road. The route along Mission Boulevard, cutting south of Elephant Hill, represents a deviation from the original route and cannot be considered part of that 1873 road segment's historical context. The segment of Brea Canyon Road was an early twentieth century inter-city route, one of many maintained by Los Angeles County. The 1933 route along Mission Boulevard was part of a Los Angeles County Roads Department (i.e. Public Works) initiative to pave and maintain longer routes between major cities, such as Pomona and Brea.

In order to convey significance for an association with early twentieth century inter-city routes, the road must have sufficient integrity, which the segment of Brea Canyon Road does not. From its bisection by the Orange Freeway in the late 1960s, to the county's abandonment of the section within the Project site in 1973, to the construction of nearby residential developments which partially destroyed the remaining alignment in the 1990s and again in the 2000s, the Brea Canyon Road segment in the Project site lacks sufficient integrity of location, setting, design, feeling and association necessary to convey significance under National Register Criterion A or California Register Criterion 1. The road segment in the Project site does not adhere to the original alignment of Brea Canyon Road, and no longer serves as a road since the 1973 abandonment, losing all of its historical association with the County Roads Department and the historical trend of inter-city roadwork in the 1930s.

Further, archival research did not uncover any specific events that happened at this segment of Brea Canyon Road. The road does not appear to have had a demonstrable impact on the surrounding communities of Spadra or Pomona. Research also did not uncover a relationship between The segment of Brea Canyon Road and the expansion of residential subdivisions in Pomona from the 1940s through the 1990s. Therefore, the property does not appear eligible under National Register Criterion A and California Register Criterion 1.

Criterion B/2: That are associated with the lives of persons significant in our past.

To be found eligible under National Register Criterion B and California Register Criterion 2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research indicates The segment of Brea Canyon Road is not directly associated with any specific persons known to be historically important figures at the national, state, or local level. Further, The segment of Brea Canyon Road is a County Roads Department project that represents the collective efforts of many people who worked on the road and it is not known to be a place where any historically significant person or group of people conducted or produce work for which they are known. Due to a lack of identified significant associations with important persons in history, the Brea Canyon Road segment in the Built Environment Study Area is recommended ineligible under National Register Criterion B or California Register Criterion 2.

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

In order for linear resources such as roads to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a modern traveler could no longer experience the historical route as intended.

Brea Canyon Road was first designated in 1873, however the segment of Brea Canyon Road in the Built Environment Study Area was a new route designated in 1933 by Los Angeles County Roads Department, and represents a deviation from the original 1873 alignment, which would have followed Pomona Boulevard west from Pomona, then turned southwest at Spadra to follow the San Jose Creek, before finally entering Brea Canyon to traverse the Puente Hills.

The segment of the 1933 road in the Built Environment Study Area is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the Built Environment Study Area cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads.

The segment of Brea Canyon Road was originally constructed in 1933 by Griffith Company Contractors and officially abandoned in 1973 by the County. The road appears to have been a narrow, two-lane route, and constructed of concrete. It is in a depleted state and few materials of the original road remain along this 1,678 foot long road segment, other than the original alignment. No novel construction methods appear to have been used to create the road, both concrete paving and through-cuts are typical of road construction and engineering for this period. So little of the original materials and workmanship remain that it cannot be called a good example of any specific road type, period or method of construction. A County Roads Department employee would have designed the road, rather than a named engineer or architect and the road segment cannot be considered to be the work of a master architect or engineer. Griffith Company contractors do not appear to have been master builders, and the remains of the segment of Brea Canyon Road cannot be considered representative of their work. The road also does not possess high artistic value. The last component of Criterion C/3, representing a significant and distinguishable entity whose components may lack individual distinction, is typically applicable to districts. The segment of Brea Canyon Road does not appear likely to contribute to a potential historic district, due to the lack of a cohesive grouping of intact properties in the area. Therefore, The segment of Brea Canyon Road does not appear eligible under National Register Criterion C and California Register Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

National Register Criterion D and California Register Criterion 4 generally apply to archaeological resources, but may apply to a built environment resource in instances where a resource may contain valuable information about such topics as

construction techniques or human activity. The segment of Brea Canyon Road is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic road construction methods, materials, or technologies.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation states that the integrity of a property is based upon the historical significance and character-defining features of that property, and that "only after significance is fully established can you proceed to the issue of integrity" (NPS 1995, p. 45). As The segment of Brea Canyon Road does not meet any of the required significance Criteria, a discussion of integrity is not required.

City of Pomona Designated Historic Landmark Statement of Significance

In addition to evaluating The segment of Brea Canyon Road against NRHP and CRHR criteria, the City of Pomona has their own criteria to evaluate local landmarks.

1. *It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;*

As discussed above in Criteria A/1 and C/3, The segment of Brea Canyon Road cannot be considered to exemplify or reflect special element of the City of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

2. *It is identified with persons or events significant in local, state, or national history;*

As discussed above in Criteria B/2, The segment of Brea Canyon Road is not identified with persons or events significant in local, state, or national history. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 2.

3. *It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road does not embody distinctive characteristics of a style, type, period, or method of construction due to its lack of remaining material and impacts to the original road design and cannot be considered a valuable example of the use of indigenous materials or craftsmanship. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 1.

4. *It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;*

As discussed above in Criteria A/1, The segment of Brea Canyon Road does not contribute to the significance of a geographically definable concentration of historic or scenic properties, or any historic district or area. The road also does not belong to a thematically related group of interrelated or otherwise similar properties that are unified aesthetically, such as a thematic historic district of roads, and in addition, archival research did not identify such a thematic group. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 4.

5. *It is the work of a notable builder, designer, landscape designer or architect;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road was designed by an unnamed Los Angeles County Roads Department engineer and constructed by Griffith Company Contractors in 1933. No evidence was found to indicate these entities rise to the level of a "notable builder, designer, landscape designer or architect." Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 5.

6. *It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;*

While The segment of Brea Canyon Road is located in an undeveloped area, with a view towards northeast Elephant Hill and northwest to the campus of Cal Poly Pomona, the road segment does not constitute a unique location or a view "representing an established and familiar" overview of the community. A better example of such a view or vista overlooking the city or the Cal Poly Pomona campus might be the summit of Elephant Hill, which has remained an undeveloped, natural space during all the periods of Spadra and Pomona's growth. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 6.

7. *It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;*

As discussed above in Criteria C/3, The segment of Brea Canyon Road lacks many aspects of integrity, including the original design, materials and workmanship, which have deteriorated since the road's abandonment in 1973. Additionally, the materials and elements of design which remain intact are neither a significant structural achievement nor innovative for the period of construction. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 7.

8. *It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;*

As discussed above in City of Pomona Criteria 4, The segment of Brea Canyon Road does not appear to be part of a thematically or visually unified historic district, or similar to other distinctive properties based on a historical or architectural motif. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 8.

9. *It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning; or*

Brea Canyon Road as a whole may have been representative of a significant geographic pattern associated with transportation routes which has been present in its route since at least 1873: a road or byway from the Spadra/Pomona region through the Puente Hills to Orange County, by way of Brea Canyon. This road would have provided a quick route to the Orange County cities of Brea, Fullerton, and Anaheim in the nineteenth century. During this period, stagecoach travelers would otherwise have to traverse the Puente Hills through of the Whittier Narrows or circumvent them entirely by traveling south through Los Angeles and crossing the Los Angeles River at a time when it was a natural, wide, and dangerous riverbed. Alternative routes such as these would have added days or weeks to travel.

In order for linear resources such as roads, to convey significance and remain functional, repairs, widenings, material changes, and changes to setting may be allowed and the resource could still convey significance. However, changes to the original alignment of the road fundamentally change historical location and feeling of the original route such that a

modern traveler could no longer experience the historical route as intended. The segment of the 1933 road in the Project site is not representative of the original 1873 route. The segment in the Built Environment Study Area immediately south of Elephant Hill deviates from the original 1873 route along Pomona Boulevard, San Jose Creek, and Brea Canyon Road. The segment in the Built Environment Study Area was part of the 1933 route, but this original alignment of this segment has been cut off at Mission Boulevard, where the previously intersected SR 57. Further, this segment is no longer an operable road, having been abandoned by the county in 1973. The entirety of the road section that provided a course from Spadra to Brea was destroyed and the course now falls under the route of SR 57. Therefore, the segment of Brea Canyon Road in the Project site cannot be considered reflective of this specific 1933 geographical pattern. Better examples of historic routes from this 1933 period, which remain intact, in use, and adhering to the original alignment could be Mission Boulevard itself, Tonner Canyon Road, or Carbon Creek Canyon Roads. As such, the Brea Canyon Road segment in the Project site does not appear eligible under City of Pomona Landmark Criteria 9.

10. *It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.*

The segment of Brea Canyon Road may not be considered one of the "few remaining examples" of an architectural or historical type in the City of Pomona, as The segment of Brea Canyon Road no longer possesses identifying or distinguishing characteristics of a given architectural or structural type, other than that of a road. Therefore, The segment of Brea Canyon Road does not appear eligible under City of Pomona Landmark Criteria 10.

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