

Appendix J

Cultural Resources Supplemental Survey Memorandum

December 4, 2025

13946.112

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County of Riverside
Planning Department
4080 Lemon Street, 12th Floor
Riverside, California 92501

Subject: Cultural Resources Supplemental Survey Memorandum for the Grace Solar Energy Center Project, Riverside County, California

Dear Ms. Thomson:

This letter memorandum serves as a supplemental cultural resources adequacy check performed by Dudek for Grace Solar Energy Center Project (Project), located in eastern Riverside County, California (Figure 1). The Project is located in Township 6 North, Range 21 East, Sections 12 and 14, and Township 6 North, Range 22 East, Sections 9, 15, 20, 21, and 22 of the McCoy Wash, California USGS 7.5 Minute Series Quadrangle. The Project would include up to 500 megawatts of photovoltaic solar generation and battery storage of up to 500 megawatt-hours. The Project would include two phases, including Phase 1 – Solar and Western Power Administration (WAPA) Tie-In and Phase 2 – Battery Energy Storage System (BESS) and Arlington Collocation. The Project is located on private lands (3,310-acres) with the transmission line located on private land within the solar facility boundary under Phase 1 and on U.S. Department of Interior, Bureau of Land Management (BLM)-administered land (395-acres) under Phase 2, in unincorporated Riverside County, California (Figure 2).

The County of Riverside (County) is the Lead Agency for compliance with the CEQA. The Project is an amendment to the previously approved Palo Verde Mesa Solar Project (Approved Project), which was approved by the County in August 2017 and supported by an Environmental Impact Report (SCH No. 2012081026) (County 2017). The entire solar facility boundary had been previously covered by a survey conducted by POWER ENGINEERS, INC. (POWER) for the Palo Verde Mesa Solar Project in 2013 (Rudolph et al. 2013) (Figure 2 and Confidential Appendix A). This document has already been finalized with County review and approval. The Approved Project includes a similar footprint to the proposed Project. Dudek performed a supplemental survey of previously recorded resources located within the Project Area of Potential Effect (APE). While the presently described effort was intended to confirm present conditions and the adequacy of existing documentation of cultural resources on privately owned lands, it should be noted that additional Project elements have since been added that fall on BLM lands. Information related to cultural resources investigations on BLM lands will be addressed in a future report. This memorandum provides a description of results of the cultural resource surveys conducted for the Project by Dudek in 2024 and 2025, building upon the surveys completed by POWER in 2012 (Rudolph et al. 2013).

A records search request was conducted at the Eastern Information Center (EIC) at the University of California, Riverside by EIC staff on May 19, 2023. The records search revealed that 61 cultural resources studies have been performed within 1-mile of the solar facility (privately owned lands) and transmission line boundaries (BLM lands), and a total of 851 cultural resources have been recorded within a 1-mile radius.

The 2013 cultural resources inventory report prepared by POWER identified a total of 10 new archaeological sites and 10 isolates within the APE (Rudolph et al. 2013). In addition, one previously recorded archaeological site, P-33-002846, extended into the solar facility and the site boundary was revised accordingly. Of the 11 archaeological sites, four, P-33-002846, P-33-020946, P-33-020948, and P-33-020949, are recommended eligible for the California Register of Historical Resources (CRHR).

Dudek conducted a supplemental pedestrian survey to confirm if conditions have changed since the 2012 pedestrian survey conducted by POWER. As previously noted, this memorandum provides the results of the adequacy check conducted by Dudek for the Project. Dudek has confirmed existing conditions to reflect those present at the time previous technical studies were completed, that POWER cultural resources methods and documentation met best practice and County standards. Due to the known presence of cultural resources within the APE, there is potential for subsurface cultural resources, therefore, it is recommended that a qualified archaeological monitor and Native American monitor are present during Project-related earth moving activities.

1 Project Description

The Project includes the entitlement, construction, operation, maintenance, and decommissioning of the Grace Solar Energy Center Project. The Project is a utility-scale solar photovoltaic (PV) electrical generating and storage facility that would generate and deliver renewable electricity to the statewide electricity transmission grid. The Project would aggregate approximately 3,705 acres, including approximately 3,310 acres of private land and 395 acres of land administered by the BLM, Palm Springs-South Coast Field Office. The Project's solar facilities (solar site) would include up to 500 megawatts (MW) of PV solar generation and battery storage with a capacity of up to 500 MW. The Project would also include transmission lines, collector substation, operations and maintenance (O&M) building, access roads, and collection lines.

The Project would include two phases, including Phase 1 – WAPA Tie-In and Phase 2 – BESS and Arlington Collocation. Under Phase 1, the Project would construct the solar facility, ancillary facilities, and an approximately 3.5-mile transmission line to interconnect with the existing Parker – Blythe 161 kilovolt (kV) transmission line owned by WAPA on private land. The Phase 1 transmission line would interconnect through a tie-in with the existing Parker – Blythe 161 kV transmission line owned by WAPA using a new 161 kV switchyard. The Phase 1 solar facility and ancillary facilities could also utilize the Phase 2 transmission line. Under Phase 2, the Project would construct a grid-charge BESS and ancillary facilities on private land and an approximately 10.5-mile transmission line to interconnect with the Southern California Edison (SCE) 230-kV Colorado River Substation located on BLM-administered land. The majority of the Phase 2 transmission line (8.6 miles) would utilize the existing open-circuit of the double-circuit Arlington transmission line; and therefore, would be located within an existing right-of-way (ROW). The 395-acre area on BLM-administered lands would be limited to the transmission line in Phase 2. The BLM will perform a separate review of the components on BLM-administered land (CACA-106313356) under the National Environmental Policy Act (NEPA).

2 Cultural Context and Regulatory Framework

The broader cultural context, regulatory context, and Project background are discussed in detail within the many previous Blythe, McCoy, and Palo Verde Solar pre-construction studies (Jordan 2011; Jordan and Tennyson 2011; Keller 2010; Rudolph et al. 2013; Tennyson 2011; Tennyson et al. 2010; Vargas 2010).

3 Methods and Results

This cultural resource investigation consisted of a records search of the Project APE (privately owned lands) and transmission line boundaries (BLM lands) and a surrounding 1-mile radius at the EIC located at the University of California, Riverside and a supplemental pedestrian survey. The survey included sampling of areas with the highest probability for supporting the presence of cultural resources and the locations of previously recorded resources located within the Project APE.

The pedestrian survey for this Project was performed by Dudek Archaeologists David Alexander and Jessica Colston on September 4 and September 5, 2024, April 30, 2025, and December 3, 2025. Representatives from the Agua Caliente Band of Cahuilla Indians, Cahuilla Band of Indians, and Colorado River Indian Tribes accompanied the crew during the survey. As noted, the crew revisited previously surveyed sites within the APE and relocated artifact concentrations, features, and landforms as identified by POWER in the survey phase. The sites were then subjected to close-interval surface survey, with less than 5-meter intervals, and pin-flagging of artifacts to confirm the originally mapped items and site boundaries.

Within each transect, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. All fieldwork was documented using field notes, digital photography, a Global Positioning System (GPS) receiver with sub-meter accuracy, iPad technology with close-scale field maps, and aerial photographs. Location-specific photographs were taken using an Apple 11th Generation iPad equipped with 8 MP resolution and Esri's Field Maps app. Accuracy of this device ranged between 3 meters and 10 meters.

3.1 Eastern Information Center Records Search

A records search at the EIC was conducted by EIC staff on May 19, 2023, for the Project APE (privately owned lands) and transmission line boundaries (BLM lands) and a surrounding 1-mile radius (Confidential Appendix B). The records search identified 61 previous cultural resources studies that have been performed within 1-mile of the Project APE (privately owned lands) and transmission line boundaries (BLM lands). Of the 61 previous studies, 28 cover a portion of the APE and transmission line boundaries (Table 1). Additionally, eight studies not yet on file with the EIC have been added; six studies cover adjacent solar projects on BLM lands located outside of the Project APE and two studies cover the Project APE. These two studies include an inventory report prepared by POWER for the Palo Verde Mesa Solar Project (Rudolph et al. 2013) which covers the entire APE, and an EIR prepared for Palo

Verde Mesa Solar Project (SCH No.2012081026) (County 2017) that was approved by the County in August 2017. Based on the previous studies, the entire APE has been studied. The studies not listed in Table 1 are included in Confidential Appendix B. Please refer to the POWER cultural resources inventory report (Rudolph et al. 2013) for a detailed summary of the records search results encompassing the Project APE (Appendix A).

Table 1. Previous Cultural Resources Studies Intersecting the Project APE and BLM Project Components

Report Number	Year	Title	Author
RI-00220	1977	Interim Report Field Work and Data Analysis: Cultural Resource Survey of the Proposed Southern California Edison Palo Verde-Devers 500 Kv Transmission Line	Richard A. Cowan and Kurt Wallof
RI-00221	1982	Cultural Resource Inventory and National Register Assessment of the Southern California Edison Palo Verde to Devers Transmission Line Corridor (California Portion)	Richard L. Carrico, Dennis K. Quillen, and Dennis Gallegos
RI-00222	1977	Final Report: Cultural Resource Survey of the Proposed Southern California Edison Palo Verde-Devers 500 Kv Power Transmission Line	Kurt Wallof and Richard A. Cowan
RI-01249	1978	California Desert Program: Archaeological Sample Unit Records for the Big Maria Planning Unit	Bureau Of Land Management
RI-01814	1984	Results of Inventory and National Register Assessment of Archaeological Materials on Several Terraces in the Colorado Desert	Judyth Reed
RI-01842	1984	Archaeological Inventory of CA-060- MP3-13	Judyth Reed
RI-02210	1986	Preliminary Cultural Resources Survey Report for the Us Telecom Fiber Optic Cable Project, From San Timoteo Canyon to Socorro, Texas: The California Segment	J. Underwood, J. Cleland, C.M. Wood, and R. Apple
RI-03029	1990	Cultural Resources Assessment Southern California Gas Company Proposed Line 5000, Riverside County, California	Beth Padon and J. Crownover
RI-03401	1991	Archaeological Reconnaissance Report: Saunders Exchange (North of Blythe Airport)	Mike Mitchell
RI-04061	1998	Cultural Resources Inventory of 1,542 Acres of Palo Verde Mesa and Palo Verde Valley Catellus/Bureau of Land Management Land Exchange Area	Meg McDonald and Jerry Schaefer
RI-06707	2006	Cultural Resources Surveys of Alternative Routes within California for the Proposed Devers-Palo Verde 2 Transmission Project	Dennis P. McDougall, Joan George, and Susan K. Goldberg
RI-07753	1998	A Cultural Resources Inventory and Evaluation for the Parker-Blythe 161 Kv Transmission Line No. 2 Riverside & San Bernardino Counties, California	Jerry Schaefer, Drew Palette, and Jim Eighme
RI-07790	2003	A Class II Cultural Resources Assessment for the Desert-Southwest Transmission Line<, Colorado Desert, Riverside and Imperial Counties, California	Jerry Schaefer

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Report Number	Year	Title	Author
RI-08373	2009	Final Cultural Resources Inventory of the Proposed DPV2 Colorado River Switchyard Project, Riverside County California	William T. Eckhardt and Stacie Wilson
RI-08410	2004	Draft Cultural Resources Inventory of the Proposed Devers to Palo Verde II 500 kV Transmission Line, Riverside County, California	William T. Eckhardt, Kristen E. Walker, and Richard L. Carrico
RI-08545	2010	Final Phase I Cultural Resource Assessment for the Proposed Blythe Airport Solar Project, Blythe, Riverside County, California	Patricia T. Mitchell
RI-08730	2011	Class III Resources Survey for the Colorado River Substation Alternatives Analysis, Unincorporated Riverside County, CA	Erin Enright and Michael Mirro
RI-08978	2013	Cultural Resources Inventory of Late Engineering Construction Components, Southern California Edison (SCE) Devers-Palo Verde 2 (DPV2) Project, Riverside County, California	Matthew M. DeCarlo
RI-08981	2013	Summary Class III Cultural Resource Inventory, Proposed Southern California Edison Devers-Palo Verde 2 500kV Transmission Line Project, Riverside County, California	Matthew M. DeCarlo, Scott C. Justus, and William T. Eckhardt
RI-09003	2013	Blythe Mesa Solar Project, Archaeological Resource and Built Environment Survey, Transmission Line Alternatives Supplemental Report, Riverside County, California	Gini Austerman, Johanna Marty, and Jim Rudolph
RI-09049	2011	Addendum II Cultural Resources Class III Report for the Proposed Blythe Solar Power Project, Riverside County, California, Confidential	Matthew Tennyson
RI-09050	2011	Final, Cultural Resources Class III Report for the Proposed McCoy Solar Energy Project, Riverside County, California, Confidential	Stacey C. Jordan, Matthew Tennyson, Tiffany Contreras, John Dietler, and Alan Garfinkle Gold
RI-09051	2010	Cultural Resources Class III Survey Draft Report for the Proposed Blythe Solar Power Project, Riverside County, California, Confidential	Angela H. Keller, Christopher J. Doolittle, M. K. Meiser, Linda Kry, and James Cleland
RI-09051	2009	Historic Architecture Field Survey Report for the Proposed Blythe Solar Power Project, Riverside County, California, Confidential	M.K. Meise

Table 1. Previous Cultural Resources Studies Intersecting the Project APE and BLM Project Components

Report Number	Year	Title	Author
RI-09233	2010	Addendum 1 Cultural Resources Class III Report Fort The Proposed Blythe Solar Power Project Riverside County, California	Benjamin Vargas
RI-09435	2013	Blythe Mesa Solar Project, Archaeological Resource and Built Environment Survey	Gini Austerman, Johanna Marty, and Jim Rudolph
RI-09625	2010	Cultural Resources Class III Survey Draft Report For the Proposed Blythe Solar Power Project Riverside County, California	Angela H. Keller
RI-09664	2012	Supplemental Transmission Line Survey. Results McCoy Solar Energy Project, Riverside County, California	Stacy C. Jordan and Trina Meiser
RI-10090	2009	Historic Architecture Field Survey Report For the Proposed Blythe Solar Power Project Riverside County, California	M.K. Meiser and Rebecca Apple
RI-10172	2014	Research Design and Work Plan for Class III Cultural Resources Inventory, Desert Quartzite Solar Project, Palo Verde Mesa, Riverside County, California Bureau of Land Management	Scott H. Kremkau, Patrick B. Stanton, Dean Duryea, Mark Q. Sutton, and Michael K. Lerch
RI-10461	2015	Archaeological Investigations and Monitoring for the Construction of the Devers-Palo Verde No. 2 Transmission Line Project, Riverside County, California	William T. Eckhardt, Matthew M. DeCarlo, Doug Mengers, Sherri Andrews, Don Laylander, and Tony Quach
RI-10477	2010	Addendum 1 Cultural Resources Class 3 Report for the Proposed Blythe Solar Power Project Riverside County, California	Benjamin Vargas
RI-10641	2003	Cultural Resource Inventory of 374 Transmission Line Structure for the Western Area Power Administration on the Parker-Blythe #1 161-kV Transmission Line Structure Replacement Project	Patrick Maxon and Robert Herrmann
N/A	2013	Palo Verde Mesa Solar Project Cultural Resource Survey Final Report, Riverside County, California. Prepared for Renewable Resources Group, Los Angeles, California.	Rudolph, J., G. Austerman, and J. Marty
N/A	2017	Final Environmental Impact Report for the Palo Verde Mesa Solar Project SCH No. 2012081026.	Riverside County
N/A	2017	Cultural Resources Monitoring Report for the McCoy Solar Energy Project, Riverside County, California. Prepared for the Bureau of Land Management and County of Riverside	Adam Giacinto, Brad Comeau, Angela Pham, and Micah Hale

Table 1. Previous Cultural Resources Studies Intersecting the Project APE and BLM Project Components

Report Number	Year	Title	Author
N/A	2020	Final Cultural Resources Report for the Blythe Solar Power Project (09-AFC-6C), Riverside County, California (Unit 1). Prepared for the Bureau of Land Management California Energy Commission	AECOM
N/A	2019	Final Cultural Resources Monitoring Report for Unit 2 of the Blythe Solar Power Project, Riverside County, California. Prepared for the Bureau of Land Management California Energy Commission	Adam Giacinto, Angela Pham, and Micah Hale
N/A	2022	Final Cultural Resources Monitoring Report for Units 3 and 4 of the Blythe Solar Power Project, Riverside County, California. Prepared for the Bureau of Land Management California Energy Commission	Adam Giacinto, Ross Owen, William Burns, Jessica Colston, and Micah Hale
N/A	In Draft	Cultural Resources Monitoring Report for the Arlington Solar Energy Center, Riverside County, California. In draft for Bureau of Land Management	Adam Giacinto, Ross Owen, and Keshia Montifolca
N/A	In Draft	Archaeological Resources Survey Results for the Geotechnical Investigations for the Grace Solar Energy Project, Riverside County, California. In draft for Bureau of Land Management	Keshia Montifolca and Adam Giacinto

The record search identified a total of 851 previously recorded cultural resources within 1-mile of the Project APE (privately owned lands) and transmission line boundaries (BLM lands). Of the 851 previously recorded resources, a total of 26 cultural resources are located within the APE located on privately owned lands (Table 2). All resources within the APE (areas on privately owned lands representing the solar generation site) have been evaluated with County review and concurrence. Cultural resources are also located within the APE located on BLM lands, and information related to cultural resources on BLM lands will be addressed in a future report. The results of the records search and all DPR forms are attached as part of Confidential Appendix B.

Table 2. Previously Recorded Cultural Resources within the Project APE

Primary No.	Trinomial	Age	Description	CRHR Eligibility Status
P-33-002846	CA-RIV-2846	Prehistoric	Large Lithic Quarry	Eligible
P-33-019388	-	Prehistoric	Isolate: Flake	Not Eligible
P-33-019613	-	Historic	Isolate: Cans	Not Eligible
P-33-020929	-	Prehistoric	Isolate: Flake and tested Cobble	Not Eligible
P-33-020930	-	Prehistoric	Isolate: Flake	Not Eligible
P-33-020931	-	Prehistoric	Isolate: Ceramic Sherd (Grayware)	Not Eligible
P-33-020932	-	Historic	Isolate: .50-Caliber Casing	Not Eligible
P-33-020933	-	Prehistoric	Isolate: Flake	Not Eligible

Primary No.	Trinomial	Age	Description	CRHR Eligibility Status
P-33-020934	-	Prehistoric	Isolate: Flakes	Not Eligible
P-33-020935	-	Prehistoric	Isolate: Tested Cobble and Flake	Not Eligible
P-33-020936	-	Prehistoric	Isolate: Flake	Not Eligible
P-33-020937	-	Prehistoric	Isolate: Core and Scraper	Not Eligible
P-33-020938	-	Prehistoric	Isolate: Core and Biface Scraper Tool	Not Eligible
P-33-020939	-	Prehistoric	Isolate: Flake	Not Eligible
P-33-020940	-	Prehistoric	Isolate: Flake	Not Eligible
P-33-020941	-	Prehistoric	Isolate: Scraper Tool	Not Eligible
P-33-020942	CA-RIV-10833	Historic	Trash Scatter	Not Eligible
P-33-020943	CA-RIV-10855	Historic	Trash Scatter	Not Eligible
P-33-020945	CA-RIV-10857	Multicomponent	Trash Scatter/ Prehistoric Lithic and Ceramic Scatter	Not Eligible
P-33-020946	CA-RIV-10858	Multicomponent	Trash Scatter/ Prehistoric Lithic and Ceramic Scatter	Eligible
P-33-020947	CA-RIV-10859	Multicomponent	Trash Scatter/ Prehistoric Lithic and Ceramic Scatter	Not Eligible
P-33-020948	CA-RIV-10860	Prehistoric	Ceramic and Lithic Scatter	Eligible
P-33-020949	CA-RIV-10861	Prehistoric	Ceramic Scatter	Eligible
P-33-020950	CA-RIV-10862	Prehistoric	Ceramic Scatter	Not Eligible
P-33-020951	CA-RIV-10863	Prehistoric	Lithic Scatter	Not Eligible
P-33-014083	-	Historic	Parker-Headgate Rock-Blythe 161 kV Transmission Line	Not Eligible

3.2 Field Survey Results

The pedestrian survey attempted to revisit 21 archaeological resources consisting of 10 sites and 15 isolates located within the private lands APE. A total of 10 archaeological sites were revisited during the supplemental survey. Eleven out of the 15 isolates were revisited during the supplemental survey. Cultural resource locations can be seen on a Cultural Resources Overview Map in Confidential Appendix C. Ground visibility during the supplemental survey was excellent (90-100%); an example of field conditions is shown on Figure 3. Disturbances consist of primarily off-road activity (Figure 4), bioturbation, and previous agricultural disking.

Cultural resource P-33-014083 is a previously recorded transmission line located within a small corner of the APE and is considered a built environment resource. The transmission line was constructed in the 1940s and is still in use today. POWER recommended P-33-014083 not eligible for listing on the NRHP or the CRHR (Rudolph et al 2013). The built environment resource was not revisited during the survey. Information related to cultural resources on BLM lands will be addressed in a future report.

3.2.1 Archaeological Sites

P-33-002846

An extension of this resource has been documented as intersecting the APE. This prehistoric site was originally recorded in 1984 by the BLM as a very large quarry activity site covering over 430 acres and part of a very large complex of sites on similar terraces in the area (Reed 1984a, 1984 b). The BLM noted that unauthorized rock collecting activity destroyed much of the integrity and recommended the site not eligible for listing in the NRHP and the State Historic Preservation Officer (SHPO) agreed with the recommendation (Reed 1984a, 1984b). The site was revisited by the BLM in 1988, and three sleeping circles were noted. Testing also occurred within sample areas of the site. The test units indicated a lack of subsurface deposits, and the BLM recommended that the site lacked sufficient integrity to meet the criteria for NRHP listing (Mitchell 1988). USDA- Natural Resources Conservation Services revisited the site in 2000 and 2001 and noted that a dirt road bisects the area, and rocks were collected (Spencer et al. 2000). AECOM revisited the site in 2009 and 2010 and recommended the site eligible for listing in the NRHP due to the density of artifacts and the potential for containing temporally diagnostic features. The BLM concurred with AECOM's recommendation and determined the site eligible for listing in the NRHP in a Memorandum of Agreement for the McCoy Solar, LLC, right-of-way grant (BLM, McCoy Solar, LLC, SHPO, ACHPR, 2012). Resources determined eligible for listing in the NRHP are automatically eligible for listing in the CRHR. As such, site P-33-002846 is eligible for listing in the CRHR and is considered a historical resource under CEQA. and noted disturbances in the site including vehicle tracks and rock collection. POWER conducted a survey in 2012 which extended the southern site boundary by 350 m x 120 m for a total of 8.3 acres to include five small pebble terraces including tested cobbles or core fragments with flakes (Rudolph et al. 2013). These artifact areas were labeled as Segregated Reduction Loci (SRL), and the southern extension of the site included 32 SRL features, four flaked stone tools, nine tested cobbles, 27 cores, and 390 flakes. The site was noted to be in poor condition from vehicular and agricultural activities and consistent with previous site findings of the site having been recommended not eligible for listing in the NRHP (Reed 1984; Mitchell 1988). POWER recommended the updated southern section of the site located within the current Project APE as not eligible for inclusion in the CRHR (Rudolph et al. 2013). Multiple evaluations and assessments of P-33-002846 have been conducted resulting in various recommendations of the resource. While POWER recommended the updated southern section of the site located within the current Project APE as not eligible to the CRHR, the expanded component located within the Project APE is likely non-contributing to the overall site's eligibility to the NRHP.

Dudek revisited site P-33-002846 within the Project APE during the recent survey and noted the site condition was consistent with previous recordation. The site was observed to be in poor condition as grading or brush clearing was evident as small rock push piles were noted within the site. The site boundary was confined to the mesa area and did not appear to extend south into the alluvial areas. Dudek did not visit any features located outside of the Project APE.

P-33-020942

This historic site was recorded by POWER in 2012 as a large scatter of structural debris and a few domestic artifacts measuring 180 m x 175 m, scattered across several acres in an agricultural field and is likely a secondary deposit or dump site (Rudolph et al. 2013). The site was noted to be located north of a Blythe Army Air Base (BAAB) utility building and the agricultural field was recently disked (Rudolph et al. 2013). In addition, several concentrations of

debris consisting of large chunks of concrete rubble, clay sewer pipe fragments, brick, and additional construction/building fragments were observed to be in piles, likely the result of multiple dumping episodes (Rudolph et al. 2013). Domestic artifacts included two sanitary cans, ten can fragments, five cobalt glass fragments, two bottles, and over 50 bottle fragments. The site was noted to be in poor condition from the recent disking and from the pushing of debris into piles. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020942 and noted the site condition was consistent with previous recordation, with the addition of one secondary cryptocrystalline silicate (CCS) flake within the site boundary. P-33-020942 has been revised to be noted as a multicomponent site. The site was observed to be in poor condition as the loci were observed to be more dispersed than originally recorded but were still recognizable. Disturbances also included evidence of off-road activity, vegetation, and bioturbation throughout the site.

P-33-020943

This historic site was recorded by POWER in 2012 as a small historic can and glass scatter measuring 15 m x 30 m, located in an agricultural field that had been recently disked (Rudolph et al. 2013). The cans consisted primarily of sanitary cans, and four were strung on a loop of bailing wire. This method cans strung together were used by sheepherders to move their flocks; the cans were often filled with rocks to make noise and were referred to as a "Shepherd's Bell" (Rudolph et al. 2013). The site was noted to be in poor condition from the recent disking and seasonal flooding, and that it was possible some of the artifacts represent a secondary deposit as refuse dumping was common in the area. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020943 during the survey and noted the site condition was consistent with previous recordation. No additional cultural material was observed. The site was observed to be in poor condition and disturbances also included vegetation and bioturbation throughout the site.

P-33-020945

This multicomponent site was recorded by POWER in 2012 as historic trash scatter and prehistoric lithic and ceramic scatter measuring 60 m x 88 m, located in a recently disked agricultural field. The site is contained in two concentrations; Locus A which consists of primarily historic components, and Locus B consisting of prehistoric lithics and ceramics (Rudolph et al. 2013). Locus A measures 40 m x 40 m and contains both prehistoric and historic artifacts consisting of nine grayware sherds, 12 flakes, a tested cobble, and a core along with historic domestic refuse consisting of two whiteware fragments, a crockery rim fragment, a mother of pearl button, bone fragments exhibiting cut marks, three terra cotta brick fragments, and glass fragments. Locus B measures 20 m x 20 m and contains 14 grayware sherds, six flakes, and two tested cobbles. The historic artifacts consist of domestic debris and the prehistoric artifacts may represent lithic core reduction activity (Rudolph et al. 2013). The site was noted to be in poor condition as the area was subjected to agricultural and possibly military training activities from the past 70 years and was recently disked. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020945 during the survey and noted the site condition was consistent with previous recordation. No additional cultural material was observed. The site was observed to be in poor condition, a majority of the site was covered in vegetation, and bioturbation was also noted.

P-33-020946

This multicomponent site was recorded by POWER in 2012 as a concentration of fire affected rock (FAR), ceramic sherds, and flakes, and the historic component consists of glass fragments, cans, and metal debris, measuring 70 m x 60 m, located in a recently disked agricultural field (Rudolph et al. 2013). The prehistoric artifacts are concentrated within the center of the site; the concentration of FAR consisting of over 20 cobbles measures 5 m x 10 m, and the historic material are located along the site periphery. The concentration of FAR with the ceramic and lithic artifacts suggests the site may represent a short-term camp (Rudolph et al. 2013). Since the site is located in an agricultural field located close to 9th Avenue, the historic artifacts are likely the result of residential or industrial refuse dumping. The site was noted to be in poor condition from the agricultural disking, however, since the artifacts indicate the site represents lithic core reduction and there is a potential for subsurface deposit of artifacts, and the presence of FAR concentration may indicate a subsurface feature exists, POWER recommended the site eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020946 during the survey to be more dispersed than originally recorded as the ceramic scatter were concentrated on the southern and western edges of central FAR feature. No additional cultural material was observed. The site was observed to be in poor condition, a majority of the site was covered in vegetation, and bioturbation was also noted.

P-33-020947

This multicomponent site was recorded by POWER in 2012 as the remains of a demolished pumphouse, railroad ties, construction-related debris, domestic refuse, and a small concentration of prehistoric lithic material measuring 27 m x 66 m, along a dirt road between agricultural fields (Rudolph et al. 2013). The remnants of the pump house consist of five rectangular concrete footings, and the domestic refuse include glass fragments, and domestic material and refuse. The construction-related debris include red brick fragments, sheet rock, roofing tile, nails, and more than 100 redwood tie remnants. The prehistoric artifacts consist of 10 flakes, cores, and tested cobbles, located in the southern section of the site. The site was noted to be in poor condition due to the structural decay of the pump house, the refuse appears to be the result of numerous dumping episodes, and because the site contains modern refuse such as plastic bottles and PVC pipe. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020947 during the survey and noted the site condition was consistent with previous recordation. The site was observed to be in poor condition. No additional cultural material was observed. Disturbances included evidence of off-road activity, utility poles, vegetation, and bioturbation throughout the site.

P-33-020948

This prehistoric site was recorded by POWER in 2012 as a prehistoric lithic and ceramic scatter measuring 12 m x 40 m located in an agricultural field that was recently disked and located near a pebble terrace at the base of the

McCoy Mountains (Rudolph et al. 2013). A total of 23 ceramic body sherds and one rim sherd were observed. The temper consists of coarse sand, and it is possible that all sherds represent one vessel. The lithic material includes one primary flake, one secondary flake, two tertiary flakes, and one exhausted core. The site was noted to be in poor condition as the area has been utilized as an agricultural field. Due to the potential for an intact subsurface deposit, POWER recommended the site eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020948 during the survey and noted the site condition was consistent with previous recordation. No additional cultural material was observed. A majority of the site was covered in vegetation, and bioturbation was noted throughout the site.

P-33-020949

This prehistoric site was recorded by POWER in 2012 as a prehistoric ceramic scatter measuring 30 m x 20 m, located in an agricultural field that was recently disked and located closer to pebble terraces and McCoy Wash (Rudolph et al. 2013). Two types of redware sherds were identified; three sherds have a smooth interior surface with a coarse-textured exterior surface with a fine sand with quartz inclusions temper and 20 sherds consisted of a coarse-tempered redware with coarse sandy temper. The lithic material includes one primary flake, one secondary flake, two tertiary flakes, and one exhausted core. The site was noted to be in poor condition as the area has been utilized as an agricultural field and possibly for military training activities for the past 70 years. Due to the potential for an intact subsurface deposit, POWER recommended the site eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020949 during the survey and noted the site condition was consistent with previous recordation. No additional cultural material was observed. The site was observed to be in poor condition. Vegetation and bioturbation were noted throughout the site.

P-33-020950

This prehistoric site was recorded by POWER in 2012 as a prehistoric ceramic scatter measuring 5 m x 5 m, located in McCoy Wash and within the tracks of a rough two-track road (Rudolph et al. 2013). A total of 12 buff-colored body sherds were observed with a smooth burnished exterior surface with a fine-grained sandy temper. The site was noted to be in poor condition with impacts from erosion and off-road vehicles, and since the site integrity has been disturbed from alluvial and vehicle activity. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020950 during the survey and noted the site condition was consistent with previous recordation, with the addition of two buff-colored body ceramic sherds, updating the total number of sherds to 14. The site was observed to be in poor condition as evidence of off-roading were observed throughout the site.

P-33-020951

This prehistoric resource was recorded by POWER in 2012 as a prehistoric lithic scatter measuring 25 m x 10 m, located on a slope overlooking McCoy Wash (Rudolph et al. 2013). The scatter consists of 22 flakes, two core fragments, and a tested cobble. The site may represent a lithic reduction site associated with a travel corridor

between quarries. It was noted that there is a loss of integrity and little potential for subsurface deposit of artifacts from the degree of surface disturbance from alluvial, previous long-term agricultural activity, and vehicular activity. POWER recommended the site not eligible for inclusion in the CRHR (Rudolph et al. 2013).

Dudek revisited P-33-020951 during the survey and noted the site condition was consistent with previous recordation. The site was observed to be in poor condition with evidence of off-roading observed throughout the site, and it was noted that sediments were quite sandy.

3.2.2 Isolates

P-33-019388

This prehistoric isolate consists of one white CCS unifacial flake tool recorded by AECOM in 2010 (Vargas 2010). Dudek revisited the mapped location of P-33-019388 and could not locate the isolate.

P-33-019613

This historic period isolate consists of two cans recorded by AECOM in 2009 (Keller 2010). Dudek revisited P-33-019613 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020929

This prehistoric isolate consists of one brown chert secondary flake and one lime green chert tested cobble, recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020929 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020930

This prehistoric isolate consists of one white chert primary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020930 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020931

This prehistoric isolate consists of one grayware pottery fragment recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020931 during the survey and noted the fragment to be smaller when compared with the fragment size recorded in 2012. No additional artifacts or features were observed.

P-33-020932

This historic period isolate consists of one 0.50 caliber casing recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited the mapped location of P-33-020932 and could not locate the isolate.

P-33-020933

This prehistoric isolate consists of one chert primary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020933 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020934

This prehistoric isolate consists of one quartzite secondary flake and one chert secondary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020934 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020935

This prehistoric isolate consists of one tan quartzite tested cobble and one primary quartzite flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020935 during the survey and only observed the tested cobble and could not relocate the quartzite primary flake. No additional artifacts or features were observed. No additional artifacts or features were observed.

P-33-020936

This prehistoric isolate consists of one large chert secondary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020936 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020937

This prehistoric isolate consists of one white core and one brown chert bifacial scraper recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020937 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020938

This prehistoric isolate consists of one chert core and one chert bifacial scraper recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020938 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

P-33-020939

This prehistoric isolate consists of one chert secondary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited the mapped location of P-33-020939 and could not locate the isolate.

P-33-020940

This prehistoric isolate consists of one chert primary flake recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited the mapped location of P-33-020940 and could not locate the isolate.

P-33-020941

This prehistoric isolate consists of one chert scraper recorded by POWER in 2012 (Rudolph et al. 2013). Dudek revisited P-33-020941 during the survey and noted the condition of the isolate to be consistent with previous recordation. No additional artifacts or features were observed.

4 Summary and Management Considerations

This letter memorandum serves as an adequacy check to the *Palo Verde Mesa Solar Project Cultural Resource Survey Final Report, Riverside County, California* prepared by POWER (Rudolph et al. 2013).

A total of 10 archaeological resources and 11 isolates were revisited during the supplemental survey. Of the 10 resources identified during the survey and located within this Project's APE, four resources, P-33-002846, P-33-020946, P-33-020948, and P-33-020949, are recommended eligible for listing on the CRHR. The remaining previously recorded resources have been recommended not eligible for listing on the CRHR by POWER (Rudolph et al. 2013) and Dudek concurs with these previous findings.

A previously recorded built environment resource is located within a small corner of the APE: P-33-014083. This resource is a historic period transmission line that is still in use today. This resource has been previously evaluated and recommended to be not eligible for inclusion to the CRHR and is not considered a significant historical resource for the purposes of CEQA.

Since the site conditions were consistent with previous recordation, Dudek concurs with the previous eligibility findings recommended by POWER (Rudolph et al. 2013). Due to the known presence of cultural resources within the APE, there is potential for subsurface cultural resources, therefore, it is recommended that a qualified archaeological monitor and Native American monitor are present during Project-related earth moving activities. The following mitigation measures are recommended for the Project:

Planning-CUL. 1

Human Remains

If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

Pursuant to State Health and Safety Code Section 7050.5, if human remains are encountered, no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code Section 5097.98 (b), remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage

Commission shall be contacted by the Coroner within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "Most Likely Descendant". The Most Likely Descendant shall then make recommendations and engage in consultation with the property owner concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. There will be no photography of human remains or associated resources.

Planning-CUL. 2

Unanticipated Resources

The developer/permit holder or any successor in interest shall comply with the following for the life of this permit.

If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the applicant shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist**, the Native American tribal representative (or other appropriate ethnic/cultural group representative), and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

060 – Planning-CUL. 1 ECS Sheet Resource Reburial Area

Prior to issuance of grading permits: the developer/ applicant shall provide evidence to the Riverside County Planning Department that an Environmental Constraints Sheet has been

included in the Grading Plans. This sheet shall indicate an area that will be used, if needed, for reburial of any artifacts that have been identified during grading and cannot be avoided. This area will be protected and not disturbed in the future. This is confidential information and the exact nature of this area will not be called out on the grading plans.

060 – Planning-CUL. 2 Native American Monitor

Prior to the issuance of grading permits, the developer/permit applicant shall enter into agreement(s) with the consulting tribe(s) for the appropriate number of Native American Monitor(s).

In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. In addition, an adequate number of Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of soils in each portion of the project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

Activities will be documented in Tribal Monitoring Notes which will be required to be submitted to the County Archaeologist prior to grading final inspection.

The developer/permit applicant shall submit a fully executed copy of the agreement(s) to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition.

This agreement shall not modify any condition of approval or mitigation measure.

060 – Planning-CUL. 3 Project Archaeologist

Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring Program (CRMP). A Cultural Resource Monitoring Plan shall be developed in consultation with the monitoring tribe(s) that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a digitally-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.

The Professional Archaeologist may submit a detailed letter to the County of Riverside during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.

060 – Planning-CUL. 4 Temporary Fencing

Temporary fencing shall be required for the protection of cultural site(s) P-33-002846, P-33-020946, P-33-020948, and P-33-020949 during grading activities. Prior to commencement of grading or brushing, the project archaeologist shall confirm the site boundaries and determine an adequate buffer for protection of the site(s). The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor. The fencing can be removed only after grading operations have been completed.

070 – Planning-CUL. 1 Artifact Disposition

Prior to Grading Permit Final Inspection

In the event cultural resources are identified during ground disturbing activities, the landowner(s) shall relinquish ownership of all cultural resources, (with the exception of sacred items, burial goods, and Human Remains) and Provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through the following methods.

Historic Resources- all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

Pre-contact resources-A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s). This shall include measures and provisions to protect the reburial area from any future impacts. Reburial shall not occur until all cataloguing, analysis and special studies have been completed on the cultural resources. Details of contents and location of the reburial shall be included in the Phase IV Report.

The details of any disposition of artifacts shall be documented in the Phase IV report.

070 – Planning-CUL. 2 Deed Restriction

At the conclusion of all construction activities, the Project proponent and landowner shall record a deed restriction on the avoidance areas, P-33-002846, P-33-020946, P-33-020948, and P-33-020949, (and the reburial location, if used) with the County to restrict development of these areas in the future. Deed restrictions shall not disclose the nature of the avoidance areas. A copy of the deed restriction(s) shall be submitted to the County planning staff as proof of compliance prior to the issuance of certificates of occupancy for the Project.

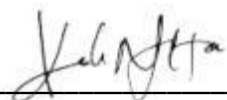
070 – Planning-CUL. 3 Phase IV Monitoring Report

Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Management Plan.

Four of the resources, P-33-002846, P-33-020946, P-33-020948, and P-33-020949, were recommended eligible to the CRHR, and POWER recommended the proposed Project would cause impacts to these historical resources under CEQA. If these resources cannot be avoided, other treatment measures can be developed with the County of Riverside (Rudolph et al. 2013). These resources are presently avoided by the Project, as approved and designed (County 2017).

If you have any questions about this investigation, please contact Keshia Montifolca, (kmontifolca@dudek.com or 619.949.3082), or Adam Giacinto (agiacinto@dudek.com or 949 373 8334).

Respectfully Submitted,



Keshia Montifolca, M.A., RPA
Archaeologist

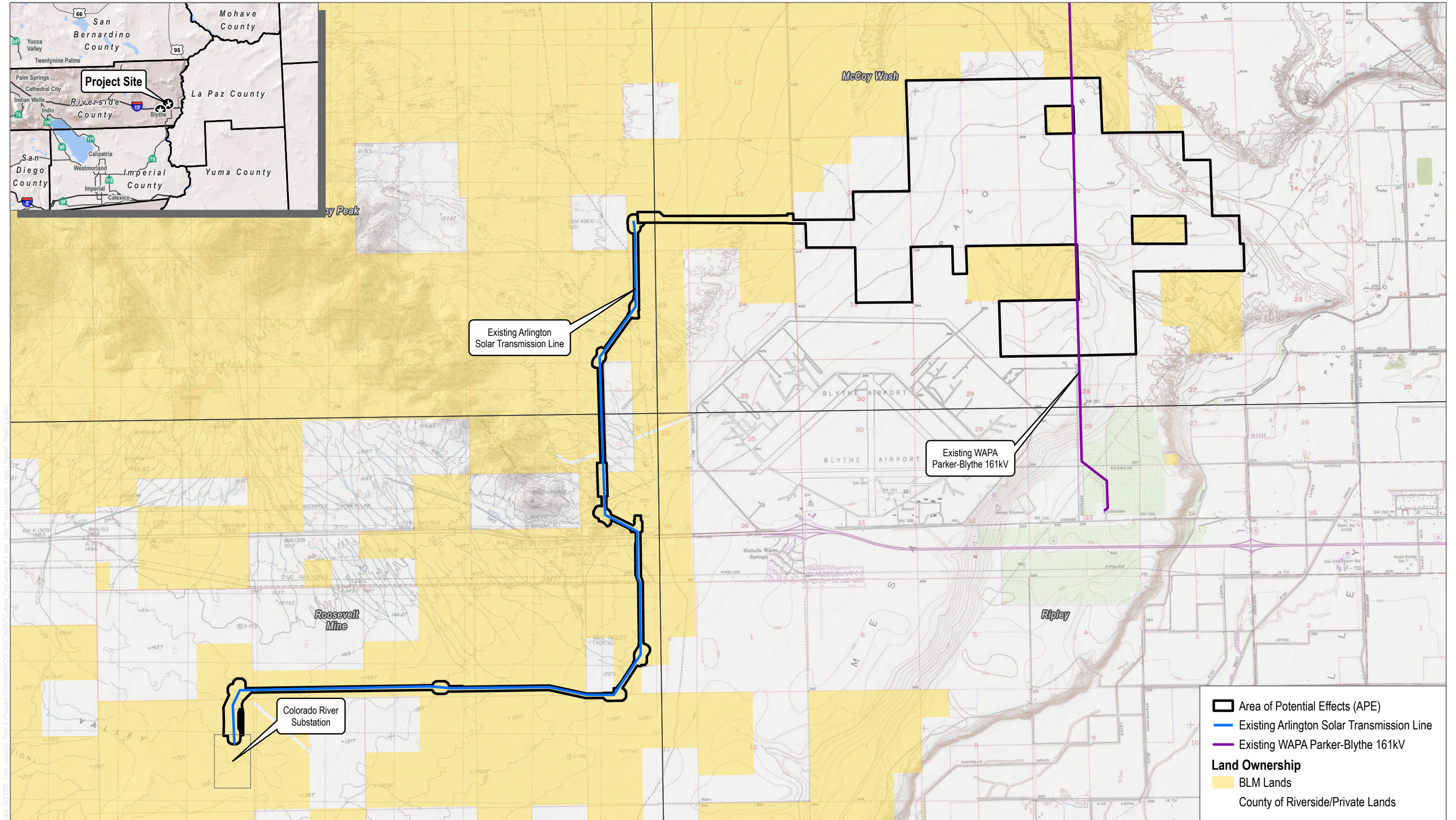
Cc; Adam Giacinto, MA, RPA; Micah Hale, PhD, RPA; Jennifer Sucha, Dudek

Att: Figure 1, Project Location
Figure 2, APE Map
Figure 3, Overview of field conditions, view facing west
Figure 4, Overview of vehicle tracks, view facing west.

Confidential Appendix A, POWER 2013 Cultural Resources Report
Confidential Appendix B, EIC Records Search Results
Confidential Appendix C, Cultural Resources Overview Map and Updated DPR Forms

5 References

- BLM (Bureau of Land Management). 2004. "The Foundations for Managing Cultural Resources." Section 8100 in the BLM Manual. Release no. 8-72. December 3, 2004.
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- Tennyson, Matthew 2011. Cultural Resources Evaluation Report for Phase 1B of the Proposed Blythe Solar Power Project, Riverside County, California.
- Vargas, Benjamin 2010. Addendum 1 Cultural Resources Class III Report for the Proposed Blythe Solar Power Project, Riverside County, California. Report on file with the Bureau of Land Management and California Energy Commission.



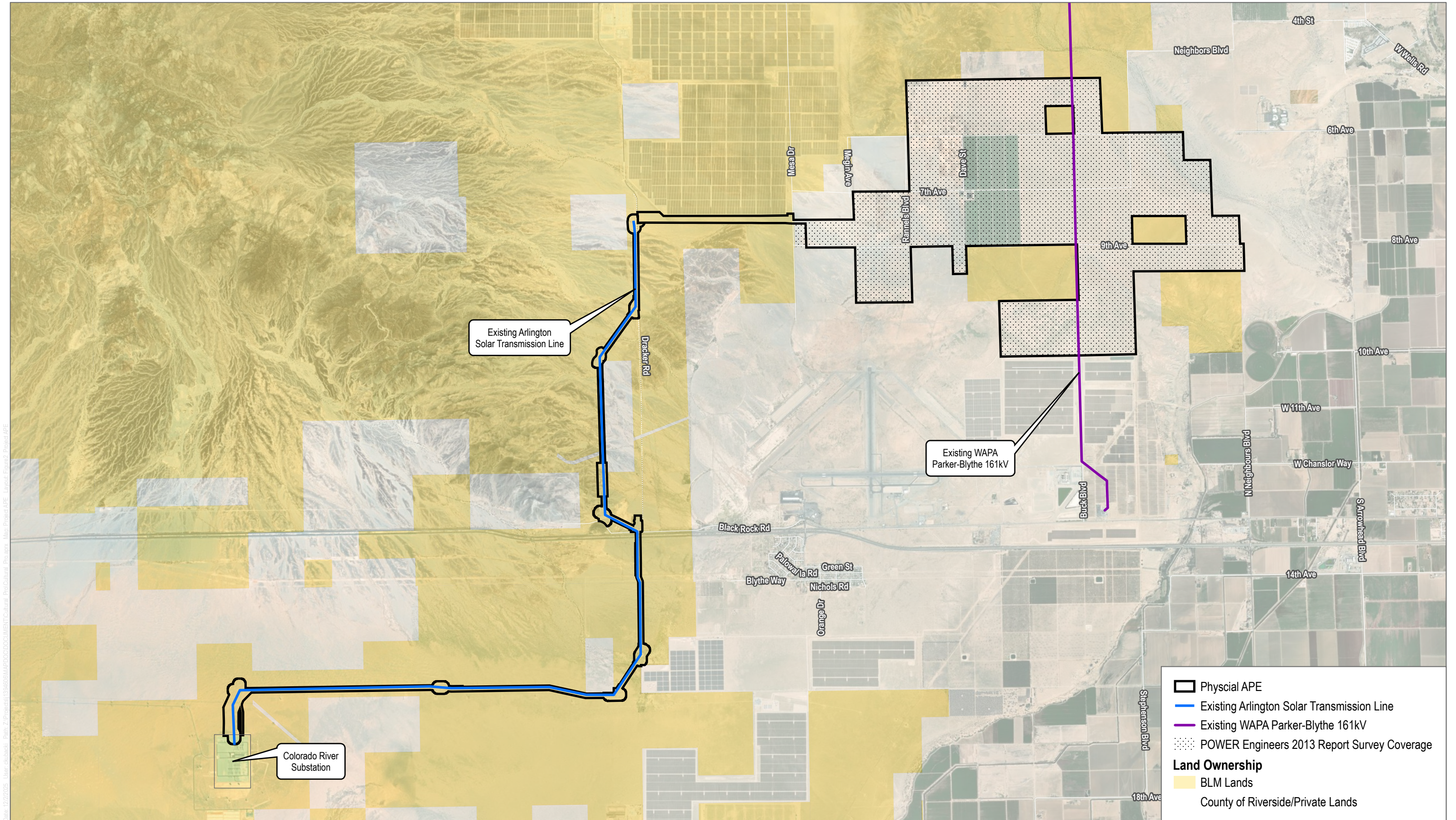
SOURCE: USGS 7.5-Minute McCoy Wash Quadrangle; T6S/R21E/Section 13-14, 24; T6S/R22E/Section 7-10, 15-23, 28-29

DUDEK



0 700 1,400 Meters
0 2,500 5,000 Feet

FIGURE 1
Project Location
Grace Solar Energy Center



SOURCE: Maxar 2023

DUDEK

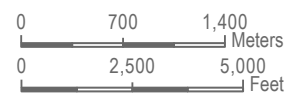


FIGURE 2

Project APE

Grace Solar Energy Center



Figure 3. Overview of field conditions, view facing west.



Figure 4. Overview of vehicle tracks, view facing west.

Appendix A

(Confidential) POWER 2013 Cultural Resources Report

Appendix B

(Confidential) EIC Records Search Results*

*Please note the results provided by the EIC are non-digitized as no shapefiles were provided and only PDFs of the DPR forms were made available

Appendix C

(Confidential) Cultural Resources Map and DPR Forms