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Matt Shell – Acquisitions Associate Pacific Industrial
6272 E. Pacific Coast Highway, Ste E Long Beach, California 90803
Via email: matts@pac-industrial.com

Subject: Cultural Resources Assessment for the Pacific Palmdale Project, City of Palmdale, Los Angeles County, California

Dear Mr. Shell:

This letter documents the cultural resources inventory conducted by Dudek for the Pacific Palmdale Project (Project), located in City of Palmdale, Los Angeles County, California. The Project consists of Assessor Parcel Numbers (APNs) 3006-027-001, 3006-027-002, 3006-027-003, 3006-027-004, and 3006-027-005. The Project proponent is Pacific Industrial (Proponent). The City of Palmdale (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). In support of the environmental review process, Dudek performed a Phase I cultural resources inventory for the entire 66.79-acre Project site (Figure 1).

CEQA refers to sequential stages of cultural resources investigation, including Inventory, Evaluation, and Mitigation. Phase I (Inventory), Phase II (evaluation), and Phase III (Mitigation) are vernacular terms used in the cultural resources industry. For the purposes of this report, Phase I is defined as an inventory and includes archival research for archaeological resources and Tribal Cultural Resources, pedestrian surveys, and other inventory methods.

The Project site consists of vacant, undeveloped land with two dirt roads that transect the site south-central and eastern positions of the site. The ground surface cover on the project site generally consists of exposed soil with sparsely located Joshua trees, bushes, native grass, and weed growth. Based on the existing condition of the Project site as a vacant and undeveloped property and the negative survey and records search results, archaeological monitoring is not recommended for the proposed Project. The Project is unlikely to impact undiscovered cultural resources. However, in the unlikely event that cultural resources are encountered during exposure of subsurface soils, ground-disturbing work should be immediately halted in the area and a qualified archaeologist should be retained to evaluate the resources.

The Project is subject to compliance with Assembly Bill (AB) 52 (California Public Resources Code section 21074), which requires consideration of impacts to “tribal cultural resources” as part of the CEQA process and requires the CEQA lead agency to notify any groups (who have requested notification) of the Project who are traditionally or culturally affiliated with the geographic area of the Project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City. As of this report date, consultation has not produced additional information or input from tribes regarding tribal cultural resources and recommended mitigation.

Project Location

The Project site is in the City of Palmdale, within northern Los Angeles County, California. The Project site is in Sections 14 and 15 of Township 6 North, Range 12 West on the Ritter Ridge and Palmdale U.S. Geological Survey

U.S. Geological Survey 7.5-minute quadrangle map (Figures 1 and 2). The Project site is located on the north side of Rancho Vista Boulevard and west side of Sierra Highway, including APNs: 3006-027-001, 3006-027-002, 3006-027-003, 3006-027-004, and 3006-027-005. The Project consists of five contiguous parcels, occupying approximately 66.79 acres of undeveloped vacant land. Note that that parcel 3006-027-005 includes a 0.27-acre undeveloped property on the eastern side of Sierra Highway and the Union Pacific Railroad line. As this property is not part of the Project site, it was not surveyed, although it is included in the records search buffer area. The “project area” as used in this report refers to the five contiguous parcels (excluding the 0.27-acre remainder of APN 3006-027-005), as shown in Figure 2.

Project Description

The Project area will be developed with one (1) approximately 1,000,000 square foot industrial building to be located in the central area of the Project area. The building will be constructed with dock-high doors along the north and south building walls. The balance of the site is designed to include driveways, parking areas, landscaping, and other supporting features.

Regulatory Setting

State

The California Register of Historical Resources (Public Resources Code section 5020 et seq.)

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 California Register of Historical Resources (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)). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria:

1. Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. 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.

According to California Public Resources Code section 5024.1(c), resources less than 50 years old are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, section 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 on the NRHP are automatically listed on 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. The State Historic Preservation Officer maintains the CRHR.

California Environmental Quality Act Statutes and Guidelines

As described further below, the following CEQA statutes and CEQA Guidelines are relevant to the analysis of archaeological and historic 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): Defines 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 a historical resource.
3. California Public Resources Code section 5097.98 and CEQA Guidelines section 15064.5(e): These statutes set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: These statutes and regulations provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; identifies preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

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)). A “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.” 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)). However, the lead agency can determine 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. (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

Under CEQA, significant cultural impact results from a “substantial adverse change in the significance of a 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, CEQA Guidelines section 15064.5(b)(2) states the significance of an 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.

Pursuant to these sections, CEQA first evaluates whether a Project site contains any “historical resources,” then assesses whether that Project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

When a Project significantly affects a unique archeological resource, CEQA imposes special mitigation requirements. Specifically, “[i]f it can be demonstrated that a Project will cause damage to a unique archeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. “Planning construction to avoid archeological sites.”
2. “Deeding archeological sites into permanent conservation easements.”
3. “Capping or covering archeological sites with a layer of soil before building on the sites.”
4. “Planning parks, greenspace, or other open space to incorporate archeological sites.”

Public Resources Code section 21083.2(b)(1)-(4).

If these “preservation in place” options are not feasible, mitigation may be accomplished through data recovery. (Pub.Res. Code § 21083.2(d); CEQA Guidelines § 15126.4(b)(3)(C).) Public Resources Code section 21083.2(d) states that “[e]xcavation as mitigation shall be restricted to those parts of the unique archeological resource that would be damaged or destroyed by the Project. Excavation as mitigation shall not be required for a unique archeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.”

These same requirements are set forth in slightly greater detail in CEQA Guidelines section 15126.4(b)(3), as follows:

- (A) Preservation in place is the preferred manner of mitigating impacts to archeological sites. Preservation in place maintains the relationship between artifacts and the archeological context. Preservation in place may also avoid conflict with religious or cultural values of groups associated with the site.
- (B) Preservation in place may be accomplished by, but is not limited to, the following:
 - 1. Planning construction to avoid archeological sites;
 - 2. Incorporation of sites within parks, greenspace, or other open space;
 - 3. Covering the archeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
 - 4. Deeding the site into a permanent conservation easement.
- (C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.
- (D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or Association of Environmental Professionals 2024 CEQA Guidelines 232 historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

Note that, when conducting data recovery, “[i]f an artifact must be removed during Project excavation or testing, curation may be an appropriate mitigation.” (Ibid.) However, “[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center” (CEQA Guidelines section 15126.4(b)(3)(D)).

Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

The Native American Historic Resources Protection Act (Public Resources Code section 5097, et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance,

vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a Project; and establishes the NRHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to one year in jail to deface or destroy a Native American historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes. California Health and Safety

Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

California Health and Safety Code Section 7050.5

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Assembly Bill 52

California Assembly Bill 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to “tribal cultural resources” (TCR). Public Resources Code section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either (Public Resources Code section 21074(a)):

1. listed or eligible for listing in the CRHR or a local register of historical resources, or
2. determined by a lead agency to be a TCR.

AB 52 amended CEQA to require public agencies to consider the effects of their actions on TCRs. CEQA also requires that public agencies avoid damaging effects to any TCR, when feasible. If the lead agency determines that a project may cause a substantial adverse change in a TCR, and measures are not otherwise identified in the consultation process, state law provides mitigation measures that may be considered to avoid or minimize the significant adverse impacts. These include:

- Avoidance and preservation in place, including incorporation of the resource into open spaces, parks, or green spaces;
- Treating the resource with appropriate dignity, including protecting the cultural character and integrity of the resource, protecting the traditional use of the resource, and protecting the confidentiality of the resource;
- Establishing conservation easements or other interests in real property with culturally appropriate management criteria for purposes of preserving or utilizing the resource in place; or
- Otherwise protecting the resource.

City of Palmdale 2045 General Plan

The City of Palmdale 2045 General Plan (City of Palmdale 2024a) has goals and policies to guide the development of Palmdale with respect to its historic and cultural resources.

Goal CON-8: Protect historical and culturally significant resources, which contribute to the community's sense of history.

- Policy CON-8.1 Historic landmark identification. Identify and recognize historic landmarks from Palmdale's past.
- Policy CON-8.2 Cultural and historic buildings. Identify and preserve unique cultural and historic buildings and features in order to enhance community character.
- Policy CON-8.3 Identified landmarks. Maintain, rehabilitate, and appropriately reuse identified landmarks where feasible.
- Policy CON-8.4 Preservation in new development. Require that new development preserve significant historic, paleontological, or archaeological resources.
- Policy CON-8.5 Tribal consultation. Conduct Native American consultation consistent with the applicable regulations when new development is proposed in potentially culturally sensitive areas.
- Policy CON-8.6 Discovery coordination with Tribal groups. When human remains suspected to be of

Native American origin are discovered, coordinate with the Native American Heritage Commission and any local Native American groups to determine the most appropriate course of action.

- Policy CON-8.7 Cooperation with preservation entities. Cooperate with private and public entities whose goals are to protect and preserve historic landmarks and important cultural resources.
- Policy CON-8.8 Recognition of local historic resources. Promote respect and recognition of unique historical resources within the community by identifying significant cultural resources with landmark designation plaques, directional signage, self-guided tours, school curriculum, programs, and events.
- Policy CON-8.9 Maintain cultural assets. Discourage historic landmark properties from being altered in such a manner as to significantly reduce their cultural value to the community.

Goal CON-9: Promote community design that reflects Palmdale's history and preserves Palmdale's cultural resources.

- Policy CON-9.1 Design elements. Promote use of design elements, which reflect the various periods of history and settlement in Palmdale.
- Policy CON-9.2 Locally relevant community design. Community design should reflect the community's roots, rather than simulating historic periods or events, which did not occur in the Antelope Valley.
- Policy CON-9.3 Locally appropriate landscape design. Preserve the natural heritage of the region through landscape design by ensuring the local stock of native trees and vegetation is replenished and protected.

The City's General Plan Update EIR included mitigation measures addressing cultural resources and are as follows (City of Palmdale 2024b):

MM-CUL-1: Historical Resources

A historical resources evaluation shall be prepared for all discretionary projects carried out under the Plan involving a property which includes buildings, structures, objects, sites, landscape/site plans, or other features that are 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify any potential historical resources within the proposed development site. All structures 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP, CRHR, or as a Landmark in Palmdale, the historical resources evaluation described above shall not be required. If historical resources are identified within the Project area of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character defining features and construction activities. Efforts shall be made to the greatest extent possible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR § 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction

activities shall be provided to the City for review and concurrence. As applicable, the report shall demonstrate how the project complies with the Standards and be submitted to the City for review and approval prior to the issuance of any permits. If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS)-Like report. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and be submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

MM-CUL-2 Phase I Archaeological Resources Study

For any project carried out under the General Plan Update, the City and/or project applicant shall investigate the potential to disturb archaeological resources. If the project will involve any ground disturbance (unless the project site is within soils that can be reliably demonstrated as being non-native or artificial fill) a Phase I cultural resources study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (PQS) for archaeology (National Park Service 1983). If a project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. The Phase I cultural resources study shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the South Central Coastal Information Center no more than two years old and a Sacred Lands File search with the NAHC. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources. The report shall be submitted to the City of Palmdale for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase I technical report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities.

MM-CUL-3 Extended Phase 1 Testing

For any projects proposed within 100 feet of a known archaeological site and/or in areas identified as sensitive by a Phase I study [Mitigation Measure CUL-2], the project applicant shall retain a qualified archaeologist to conduct an Extended Phase I (XPI) study to determine the presence/absence and extent of archaeological resources on the project site. XPI testing should comprise a series of shovel test pits and/or hand augured units and/or mechanical trenching to establish the boundaries of archaeological site(s) on the project site. If the boundaries of the archaeological site are already well understood from previous archaeological work, an XPI will not be required. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s). All archaeological excavation shall be conducted by a qualified archaeologist(s) under the direction of a principal investigator meeting the SOI's PQS for archaeology (National Park Service 1983). If an XPI report is prepared, it shall be submitted to the City of Palmdale for review and approval prior to the issuance of any grading or construction permits. Recommendations contained therein shall be implemented for all ground disturbance activities.

MM-CUL-4 Archaeological Site Avoidance

Any identified archaeological sites (determined after implementing mitigation measures CUL-2 and/or CUL-3) shall be avoided by project-related construction activities, where feasible. A barrier (temporary fencing) and flagging shall be placed between the work location and any resources within 60 feet of a work location to minimize the potential for inadvertent impacts.

MM-CUL-5 Phase II Site Evaluation

If the results of any Phase I and/or XPI (mitigation measures CUL-2 and/or CUL-3) indicate the presence of archaeological resources that cannot be avoided by the project (Mitigation Measure CUL-4) and that have not been adequately evaluated for the NRHP or CRHR listing at the project site, the qualified archaeologist shall conduct a Phase II investigation to determine if intact deposits remain and if they may be eligible for the CRHR or qualify as unique archaeological resources. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s). A Phase II evaluation shall include any necessary archival research to identify significant historical associations and mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit. The sample excavation will characterize the nature of the sites, define the artifact and feature contents, determine horizontal and vertical boundaries, and retrieve representative samples of artifacts and other remains. If the archeologist and, if applicable, a Native American monitor (see Mitigation Measure TCR2) or other interested tribal representative determine it is appropriate, cultural materials collected from the site shall be processed and analyzed in a laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)." The report shall be submitted to the City of Palmdale for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase II report shall be implemented for all ground disturbance activities.

MM-CUL-6 Phase III Data Recovery

Should the results of the Phase II site evaluation (Mitigation Measure CUL-5) yield resources that meet CRHR significance standards and if the resource cannot be avoided by project construction in accordance with CUL-4, the project applicant shall ensure that all feasible recommendations for mitigation of archaeological impacts are incorporated into the final design and approved by the City of Palmdale prior to construction. Any necessary Phase III data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI PQS for archaeology according to a research design reviewed and approved by the City of Palmdale prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof. If the archaeological resource(s) of concern are Native American in origin, the qualified archaeologist shall confer with local California Native American tribe(s). If applicable, a Native American monitor shall be present. As applicable, the final Phase III Data Recovery reports shall be submitted to the City of Palmdale prior to issuance of any grading or construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

MM-CUL-7 Cultural Resources Monitoring

If recommended by Phase I, XPI, Phase II, or Phase III studies [mitigation measures CUL-2, CUL-3, CUL-5, and/or CUL-6], the project applicant shall retain a qualified archaeologist to monitor project-related, ground-disturbing activities. If archaeological resources are encountered during ground-disturbing activities, mitigation measures CUL-4 through CUL-6 shall be implemented, as appropriate.

MM-CUL-8 Unanticipated Discovery of Archaeological Resources

If archaeological resources are encountered during ground-disturbing activities, work within 60 feet shall be halted and the project archaeologist meeting the SOI's Professional Qualification Standards for archaeology (National Park

Service 1983) shall immediately evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work may be warranted, such as data recovery excavation, to mitigate any significant impacts to historical resources. Any reports required to document and/or evaluate unanticipated discoveries shall be submitted to the City of Palmdale for review and approval. Recommendations contained therein shall be implemented throughout the remainder of ground disturbance activities.

City of Palmdale Municipal Code: Chapter 17.96 HAZARDOUS MATERIALS FACILITIES

All applications for land use decisions shall be filed with the Director accompanied by the appropriate fees as established by City Council resolution. (Ord. 1603 § 4 (Exh. I), 2023).

Per PMC 17.96.060 every application for a facility pursuant to this Title shall be made in writing to the Director on the forms provided by the Planning Division and must be in sufficient detail to facilitate thorough review. All applications shall be accompanied by the appropriate filing fees as established by City Council resolution. An application shall include, but is not limited to, the following information:

(V) Identification of any cultural resources located on the proposed facility site, including archaeological, paleontological, and historical resources, and proposed mitigation measures to ensure no significant impact on cultural resources occurs.

Background Research

SCCIC Records Search

On July 11, 2024, Dudek conducted a search of the California Historic Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton. This search included mapped prehistoric and historic archaeological resources and historic built-environment resources; Department of Parks and Recreation site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the proposed Project area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. The records search results are also provided in Confidential Appendix A.

Previously Conducted Cultural Resource Studies

The SCCIC records indicate that 47 previous cultural resources technical investigations have been conducted within 1-mile of the Project area between 1985 and 2015. Of these, six previous studies overlap the Project area, four cultural resource inventories; they include an extended phase 1 and testing report, and a historical resource evaluation. These studies are briefly listed in Table 1. Approximately 10% of the Project area has had previous technical studies conducted by others. These previous studies covered the eastern edge of the Project Site. Studies not listed in Table 1 are included in Confidential Appendix A.

Table 1. Previous Technical Studies within 1-Mile of the Proposed Project Site

Report Number	Author	Year	Report Title
LA-01924	Romani, Gwendolyn R.	1990	Cultural Resources Investigation: TTM 44592, City of Palmdale
LA-07160	Goodwin, Riordan L.	2004	Archaeological and Historic Property Survey Reports Rancho Vista Boulevard Widening Project City of Palmdale
LA-08427	Cooley, Theodore G.	2007	Archaeological Survey Report for Southern California Edison Company 66kv Antelope Bus Split Project Los Angeles County, California
LA-10813	Lajoie, Glenn and Starla Barker	2011	Expansion Area Amendment to the Redevelopment Plans for the Merged Project Area
LA-12864	Furnis, C. Lynn and Gust, Sherri	2015	Supplemental Historical Resources Evaluation Report for the High Desert Corridor, Los Angeles & San Bernardino Counties, California
LA-12874	Gust, Sherri M., Tadhg Kirwan, and Lynn Furnis	2014	Extended Phase I Testing And Phase II Evaluation Proposal, High Desert Corridor/ Sr 138 Widening Project From Sr 14 To Sr 18 Los Angeles And San Bernardino Counties, California, 07-La/Pm 48.0 To Sr 138 Ea No. 116720

Previously Recorded Cultural Resources

The SCCIC records indicate that 33 cultural resources have been recorded within 1-mile of the Project area; none of which intersect or are adjacent to the Project area. These resources include 18 historic trash scatters, six ranch/orchard remnants, three single family residences, one multifamily residence, one commercial building, one water conveyance system, one foundation, one prehistoric lithic scatter and one prehistoric isolate. All 33 resources are summarized in Table 2.

Table 2. Previously Recorded Cultural Resources within 1-Mile of the Proposed Project Area

Primary Number (P-19-)	Trinomial (CA-LAN-)	Period	NRHP/ CRHR Status	Description	In/Out of Project Site
001623	1623H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
002909	2909H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
002910	2910H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
002911	2911H	Historic	Not Evaluated	Foundations/Structure Pads; Landscaping/Orchard; Water Conveyance System	Outside
002912	2912H	Historic	Not Evaluated	Water Conveyance System; Walls/Fences	Outside
002913	2913H	Historic	Not Evaluated	Foundations/Structure Pads; Landscaping/Orchard; Walls/Fences	Outside
003185	3185H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003186	3186H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003187	3187H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003188	3188H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003189	3189H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003190	3190H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003258	3258H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003645	3645H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters; Water Conveyance System	Outside
003703	3703H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
003705	3705H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
004284	4284H	Historic	Not Evaluated	Foundations/Structure Pads; Privies/Dumps/Trash Scatters	Outside
004285	4285H	Historic	Not Evaluated	Foundations/Structure Pads	Outside
004286	4286H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
004287	4287H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
004364	4364H	Historic	Not Evaluated	Foundations/Structure Pads; Privies/Dumps/Trash Scatters	Outside
004693	4693H	Historic	Not Evaluated	Privies/Dumps/Trash Scatters	Outside
004719	4719H	Historic	Not Evaluated	Foundations/Structure Pads; Privies/Dumps/Trash Scatters	Outside

Primary Number (P-19-)	Trinomial (CA-LAN-)	Period	NRHP/ CRHR Status	Description	In/Out
004963	4963H	Historic	Recommended Not eligible	Privies/Dumps/Trash Scatters	Outside
004965	4965H	Historic	Recommended Not eligible	Privies/Dumps/Trash Scatters	Outside
100955	—	Prehistoric	Not Evaluated	Isolate: Flake	Outside
101034	—	Prehistoric	Not Evaluated	Isolate: Projectile point	Outside
101400	—	Historic	Not Evaluated	Isolate: Bottle base	Outside
187071	—	Historic	Not Evaluated	Single Family Property	Outside
187903	—	Historic	Not Evaluated	Single Family Property	Outside
190802	—	Historic	Recommended Not Eligible	1-3 Story Commercial Building; Industrial Building	Outside
190817	—	Historic	Recommended Not Eligible	Multiple Family Property	Outside
190818	—	Historic	Recommended Not Eligible	Single Family Property	Outside

Native American Coordination

On June 13, 2024, Dudek requested a search of the Sacred Lands File (SLF) from the NAHC. A response letter was received via email from the NAHC on July 2, 2024, stating that the results of the SLF search did not indicate that the Project area and surrounding area was sensitive for the presence of Native American tribal cultural resources, though they stated that negative results do not preclude the existence of Native American related resources within the Project area. The NAHC also provided a list of 10 Native American groups and individuals who may have knowledge of cultural resources within the Project area. Dudek sent letters to each of the 10 representatives on July 5, 2024. This coordination was conducted for informational purposes only and does not constitute formal government-to- government consultation. To date, only one response has been received by Dudek.

Luara Chatterton, Cultural Resource Specialist for the Morongo Band of Mission Indians responded via email on August 15, 2024, indicating that the Project site was located within the ancestral territory and traditional use are of the Cahuilla and Serrano people of the Morongo Band of Mission Indians. Luara Chatterton indicated that while no cultural artifacts or features may be present on the surface, the Project site is in an area of high cultural sensitivity. According to the letter, the Morongo Band of Mission Indians look forward to participating in the AB 52 consultation process with the lead agency once it begins. Morongo Band of Mission Indians' letter included a list of documents that will be requested for meaningful consultation, including records search results, shapefiles of the Project and record search buffer, geotechnical reports, and mass grading maps. They also request tribal monitor participation in any fieldwork.

Should any additional responses be received, Dudek will forward the responses to the City. Documentation of coordination with Native American groups and individuals is provided in Confidential Appendix B.

Historic Aerial Review

Dudek consulted historic maps and aerial photographs to understand development of the Project area and surrounding properties. Topographic maps were available from 1930 to 2022. Aerial images were available from 1948 through 2020 (NETR 2024).

The first topographic map showing the Project area dates to 1930 and shows that there were no developments within the Project area and very few developments within the immediate vicinity of the Project, though the adjacent railroad is present, as well as a fragment of Rancho Vista Boulevard present in half of the southeastern border. A small retention pond is visible in the 1930 topo in the southeastern corner of the Project site through 1937 and does not appear on subsequent maps. In 1960, most developments were concentrated around the intersection of Sierra Highway, east of the Project area, with a small residential center being built south of the Project. Division Street, which borders the western side of the Project also shows up during this time. To the northeast, the Northrup Grumman and Air Force Base 42 are established. Between 1975 and 2022 there was a modest increase in development throughout the areas surrounding the Project area; however, there was no development within the Project area. No structures are located within the Project area.

Historic aerials from 1948 show the Project area and the general vicinity as undeveloped land. In 1948 there appears to be several agricultural fields within the general area. The small retention pond in the southeastern corner is visible intermittently through all years depending on vegetation but does not appear to be maintained after initial excavation. By 1953, there was an increase in development to the west of the Project area, though there were no developments within or adjacent to the Project area. By 1959 the residential development directly to the south was developed. The Antelope Valley Country Club to the west was visible by the 1959 aerial. There was also an increase in residential development further north and to the south of the Project area, but the Project area itself was undeveloped. By the early 1970s, the I-14 was constructed and there was a general, modest increase in development throughout the general area surrounding the proposed Project area. 1971 and 1974 aerials show that the Project area was undeveloped during this period, though there were several unimproved dirt trails visible running through the Project area. Between the 1987 and 1990 aerials a housing pad appears to have been graded and excavated just outside of the northwest corner of the Project, but remains unfinished to present day. The 1990s saw continued increase in residential development, particularly to the west of the I-14. By 1995, the general area had essentially reached its current extent of development. There were no significant developments to the area in the late 1990s or during the 2000s. The Project area has never been developed historically or during the modern era.

Geotechnical Summary

Frias and Mitchell (2024) of SoCalGeo prepared a geotechnical analysis for the Project site, including a visual area reconnaissance, subsurface exploration, field and laboratory testing, and geotechnical engineering analysis to provide criteria for preparing the design of the building and construction considerations for the proposed development. Their findings identified the soil types on area as alluvial soils: sands, silty sands, and sandy silts. Younger alluvium was observed in the borings to a depth of 17 ft, with older alluvium to the maximum borings of 30 ft. Historic high groundwater level for the site was greater than 50 ft below the ground surface. The Project's Geotechnical Investigation recommends remedial grading be performed within the proposed building pad area and over excavation for most of the areas to a minimum depth of 4 to 6 feet depending on construction context.

Cultural Resources Survey

Methods

Dudek conducted a pedestrian survey of the Project site on July 15, 2024, using standard archaeological procedures and techniques. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. All portions of the proposed Project site with exposed ground surface were inspected. Survey transects were spaced 15 meters wide and oriented northwest-southeast across accessible areas of the proposed Project area. Where transects were not feasible (such as eroding dirt banks, areas covered in dense vegetation, and stockpiled areas) transects were not utilized. Instead, a mixed approach (opportunistic survey) was utilized, and reconnaissance survey (visual inspection) was utilized. The goal of the survey was to identify and record any cultural resources within the proposed Project area. The ground surface was examined for the presence of prehistoric artifacts, historical artifacts, sediment discolorations that might indicate the presence of a cultural midden, depressions, and other features that might indicate the former presence of structures or buildings.

All fieldwork was documented using field notes and an Apple Generation 12 iPhone (iPhone) equipped with ESRI Field Maps and Avenza PDF Maps software with close-scale field maps, and aerial photographs. Location-specific photographs were taken using the iPhone's 12-megapixel camera. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office.

Results

Dudek observed a recent burn area (Exhibit 1), approximately 4.5 acres, that showed 100% visibility. This acreage was measured in the field using the ESRI Field Maps app. Outside of the burn area visibility was approximately 70%, due to the presence of dense vegetation (Exhibit 2). Vegetation consisted of Joshua trees, sagebrush, forbes and grasses. Soils observed within the Project area consisted of light brown- to medium brown-colored, sandy-silt, with inclusion of gravel and small-sized sub-angular rocks. Human disturbance to the area was minimal, limited to a single dirt road that bisects the Project area as an extension of 3rd Street East to the north. Trash was observed along each of the roads. The current topography does not appear to support any lithic material gathering, due to the sandy alluvial surface and lack of rocky outcrops or gravel fields. No waterways were observed within the Project area. No cultural resources were identified during the survey. The small retention pond observed on historic topographic maps and aerials was not relocated and appears to have dissolved into the general landscape.

Exhibit 1. Overview from western portion of proposed Project, view to northwest, showing the burn area.



Source: Dudek 2024

Exhibit 2. Overview from central portion of proposed Project, view to south.



Source: Dudek 2024

Summary and Management Considerations

Archaeological Recommendations

Dudek's Phase I cultural resources inventory of the Project indicates that there is low sensitivity for intact subsurface cultural deposits. The SCCIC records search did not identify any cultural resources within the Project area. The NAHC SLF search was also negative for the Project. Historic topographic maps and aerials indicate that the Project area was never developed, though it does appear to have been travel on foot as indicated by trails running through the Project site. An intensive pedestrian survey of the Project area did not identify any cultural resources.

In consideration of the negative results of the SCCIC records search, archival research, NAHC Sacred Lands File search, and intensive-level survey, no further cultural investigations, including archaeological monitoring, are recommended to be necessary in support of implementation of the Project. No historical resources, as defined in Section 15064.5, were identified on the Project site. AB 52 consultation between the City and consulting tribes may result in further consideration of tribal cultural resources and associated mitigation measures.

Recommendations

Unanticipated Discovery of Archaeological Resources Protocol

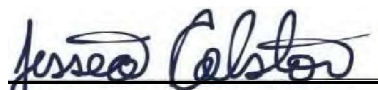
In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); California Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Please do not hesitate to contact me if you have any questions about this report. I may be reached via email at jcolston@dudek.com or phone at (760) 815-6642.

Respectfully Submitted,



Jessica Colston, BA

Archaeologist

Att: *Figures*
Confidential Appendix A: SCCIC Records Search Information
Confidential Appendix B: NAHC SLF Search and Native American Consultation Documentation
cc: *Angela Pham, Dudek*
Brian Grattidge, Dudek

References

City of Palmdale 2024a. Envision Palmdale 2045 General Plan. Accessed August 19, 2024.

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City of Palmdale 2024b. City of Palmdale 2045 General Plan Update Final Environmental Impact Report. Accessed August 19, 2024.

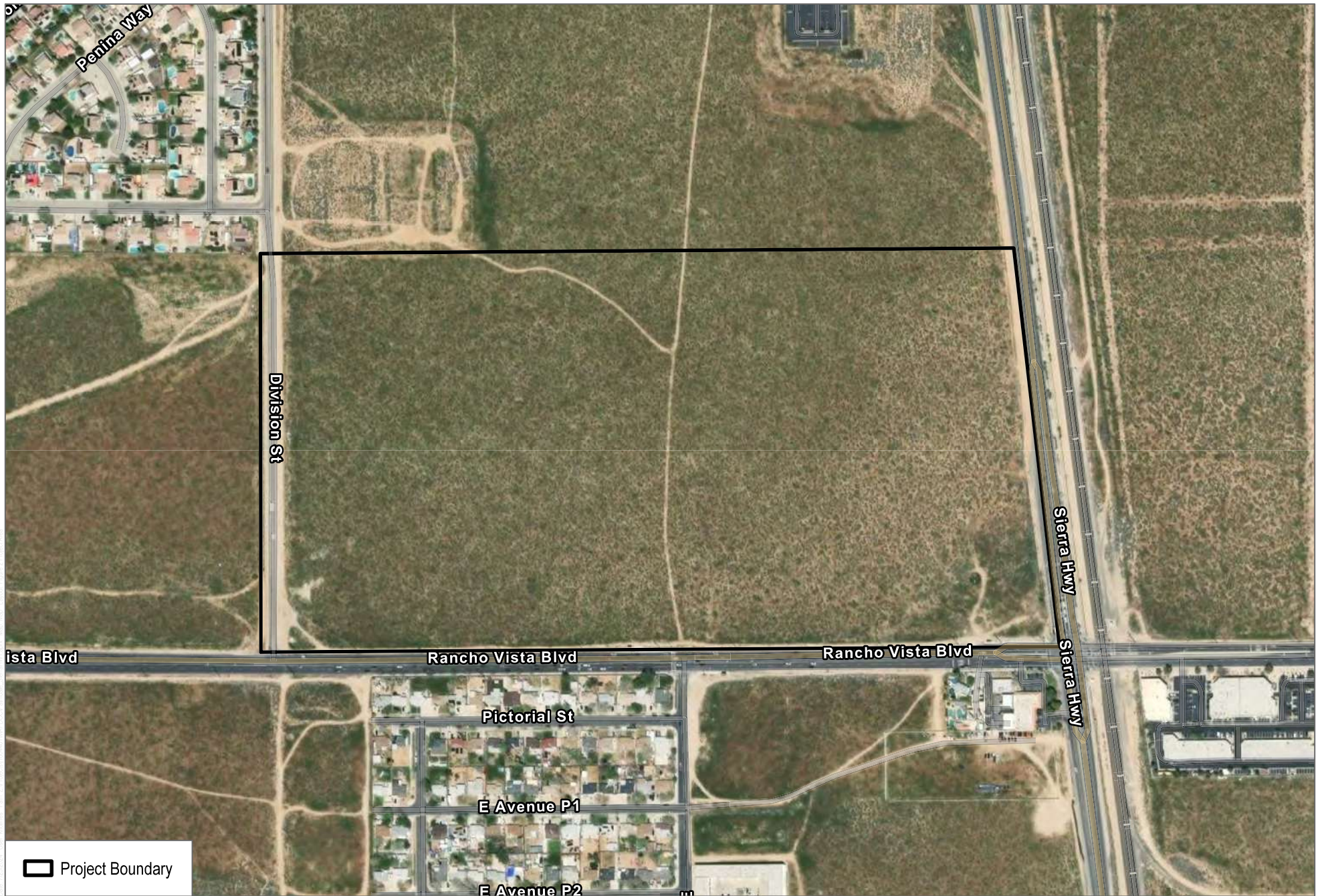
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NETR (Nationwide Environmental Title Research LLC). 2024. Historic Topographic Maps and Aerials. Accessed July 21, 2024. <https://www.historicaerials.com/viewer>.

Rancho Vista Blvd and Sierra Hwy Palmdale Project

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SOURCE: World Imagery 2022

DUDEK



0 210 420 Feet

FIGURE 2
Project Area

Rancho Vista Blvd and Sierra Hwy Palmdale Project

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Confidential Appendix A

SCCIC Record Search Results

Confidential Appendix B

NAHC SLF Search and Native American Consultation Documentation