

PHASE II ARCHAEOLOGICAL TESTING PROGRAM

Woodcrest Retail Project

GPA240066, PPT240018

Assessor Parcel Numbers:

273-130-014, -019, 273-141-003, -004, -005, -006, -007

Unincorporated Riverside County, California

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BCR Consulting LLC Project No. APP2501

National Archaeological Data Base Information:

Project No. APP2501
Site Tested: APP2501-P-1
Keywords: Prehistoric Bedrock Milling Feature
USGS Quadrangle: 7.5-minute *Riverside East* (1980), California
Section 26 of Township 3 South, Range 5 West, San Bernardino Base and Meridian



BCRCONSULTING LLC

January 7, 2026

MANAGEMENT SUMMARY

BCR Consulting LLC (BCR Consulting) is under contract to Applied Planning, Inc. to conduct Phase II archaeological test excavations of an archaeological site at the proposed Woodcrest Retail Project (the project), located in the Woodcrest neighborhood of unincorporated Riverside County, California. The archaeological site, a bedrock feature with two prehistoric milling slicks, was identified in July 2025 during a Phase I survey of the project site for the cultural resources assessment of the *NWC Van Buren & Washington Project* (the assessment; see Brunzell 2025). The archaeological site was temporarily designated site number APP2501-P-1. The methods for this archaeological test excavation are based on the results and recommendations from the previous assessment. The current study was completed pursuant to the California Environmental Quality Act (CEQA), and according to *County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work*.

The Phase I assessment recommended systematic test excavation, analysis of any artifacts discovered, and preparation of a Phase II technical report to present evaluation results to determine California Register of Historic of Historical Resources (California Register) eligibility for the prehistoric site designated APP2501-P-1. Since California Register eligibility Criteria 1, 2, and 3 were addressed during the assessment phase, current eligibility evaluations focus on Criterion 4. The testing program included site relocation, careful inspection for surface artifacts, and excavation of eight shovel test pits (STP). This work was performed to determine the presence and significance of buried cultural resources. All field activities were monitored by representatives of the Pechanga Band of Luiseño Indians (Pechanga) under the direction of Robert Ringlero, Head of Pechanga Cultural Resources, and by representatives of the Soboba Band of Luiseño Indians (Soboba) under the direction of Tribal Historic Preservation Officer Joseph Ontiveros.

The surface examination and excavation yielded no additional evidence of cultural activity. As a result, the site within the project site (designated APP2501-P-1) has not yielded and is not likely to yield information important to history or prehistory of the local area (California Register Criterion 4), California, or the nation and as such does not appear to be eligible for California Register listing. Therefore, BCR Consulting recommends that the archaeological site tested during the current study not be considered a “unique archaeological resource” or “historical resource” under CEQA.

While the testing program has indicated that the soils tested do not contain significant buried deposits, this study has only tested a percentage of the site’s subsurface area. The prehistoric archaeological site recorded during this study indicates that the project site remains sensitive for buried cultural resources. As a result, BCR Consulting recommends the following mitigation measures to help reduce potential impacts below a significant level, based on Conditions of Approval developed by the County.

Mitigation Measures

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.

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 (defined below) 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 project archaeologist (defined below) 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, 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.

Cultural Resource. 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. Tribal Cultural Resources are also considered cultural resources.

Project Archaeologist. If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) 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.

Environmental Constraints Sheet. 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 to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.

Project Archaeologist/Archaeological Monitor. 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.

Feature Relocation. Site(s) APP2501-P-1 cannot be avoided through project redesign. Prior to grading permit issuance, the Project Supervisor, Project Archaeologist, and a representative from the consulting Tribe(s) shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, any visible artifacts shall be recovered and recorded, photo documentation of each feature in situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in the Phase IV Monitoring Report.

Controlled Grading. The bedrock milling features at cultural site APP2501-P-1 will be impacted during construction activities and the soils surrounding them will be disturbed. To address controlled grading in this area, a plan will be developed and included in the CRMP by the Project Archaeologist. The controlled grading plan shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV monitoring report.

Temporary Fencing. Temporary fencing shall be required for the protection of cultural site APP2501 until relocation of the feature and controlled grading of the site have occurred. 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. The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor. The fencing can be removed after the feature has been relocated and controlled grading is complete.

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 County Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

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 have been handled through the following methods.

Historic Resources- all historic archaeological materials recovered during the archaeological investigations 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 reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s) shall be fully executed. 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.

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 Monitoring Plan. The report will also include the Tribal Monitoring notes as a confidential appendix. Once approved by the County Archaeologist, the Project Archaeologist shall provide a copy to the consulting tribes and the South Coastal Information Center (SCIC).

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INTRODUCTION AND SETTING

BCR Consulting LLC (BCR Consulting) is under contract to Applied Planning, Inc. to conduct archaeological test excavations of an archaeological site at the proposed Woodcrest Retail Project (the project), located in the Woodcrest neighborhood in unincorporated Riverside County, California. The test excavations have been completed pursuant to the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Chapter 2.6, Section 21083.2, and California Code of Regulations (CCR) Title 14, Chapter 3, Article 5, Section 15064.5, and per *County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work*. The project site is located in Section 26, Township 3 South, Range 5 West (SBBM), and is depicted on the USGS *Riverside East, California* (1980) 7.5-Minute Topographic Quadrangle (Figure 1).

Project Description

The project proposes a commercial development. Project plans are provided in Appendix A. Most of the project site is vacant, although three of the parcels currently contain commercial properties, including:

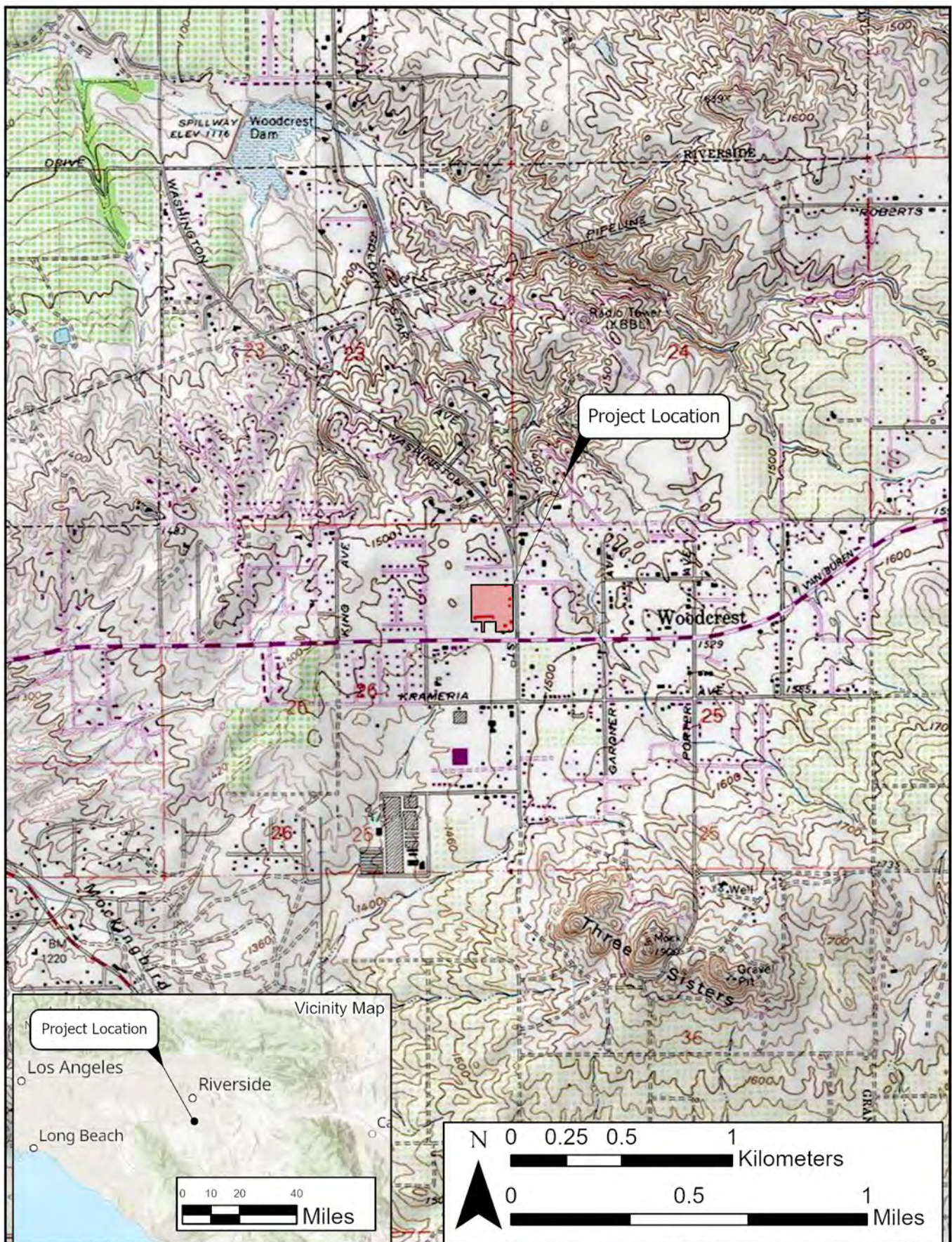
- APN 273-141-004, occupied by a 7-Eleven, bike store, smoke shop, nail shop, and taco shop,
- APN 273-141-005, occupied by a Farmer Boys fast food restaurant, and
- APN 273-141-007, occupied by a bank.

Personnel

David Brunzell, M.A., RPA acted as the Principal Investigator for the current study and provided project oversight. BCR Consulting Project Manager Nick Shepetuk, M.A., RPA acted as project manager. BCR Consulting Staff archaeologists Eduardo Gutierrez, B.S. and Doug Kazmier B.A., PGC conducted archaeological excavation. Mr. Gutierrez and Mr. Kazmier also conducted a surface survey of the proposed excavation locations. Mr. Brunzell and Mr. Shepetuk compiled the technical report with contributions from BCR Consulting Project Manager Joseph Orozco, M.A., RPA, and Mr. Kazmier. All field activities were monitored by a representative of the Pechanga Band of Luiseño Indians (Pechanga) under the direction of Robert Ringlero of the Pechanga Cultural Resources Department, and by representatives of the Soboba Band of Luiseño Indians (Soboba) under the direction of Soboba Tribal Historic Preservation Officer Joseph Ontiveros.

Summary of Previous Work

Prior to the current study, BCR Consulting completed a Phase I cultural resource assessment of the project site in July 2025 (Brunzell 2025). This assessment resulted in the recording of one previously unrecorded resource located within the project site using Department of Park and Recreation (DPR) 523 forms. The resource consisted of one granite outcrop containing two milling slick features, temporarily designated APP2501-P-1. The Phase 1 assessment recommended systematic test excavation, analysis of any artifacts discovered, and preparation of a Phase II technical report to present evaluation results necessary to determine California Register eligibility. Since California Register eligibility Criteria 1, 2, and 3 were addressed during the assessment phase, current eligibility evaluations focus on Criterion 4.



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Project Location Site
NWV Van Buren & Washington Project

Reference: ESRI; USGS Quad: Riverside East, California (1980)

Figure 1

**Applied
Planning, Inc.**

Topography

The project site occupies relatively flat topography, with two moderate-sized granitic outcrops present in the central and western portions of the site. Elevation within the project site ranges from 1490 to 1504 feet Above Mean Sea Level (AMSL). An intermittent drainage crosses the southeastern portion of the project site from north to south. Most of the project site is vacant, although three of the parcels currently contain commercial properties, the eastern third of the project area was in use as a residential property until the residence was demolished in 2018. The project site has been subject to severe disturbances related to discing, former residential development and demolition, and commercial developments.

Vegetation

Coastal sage scrub plant community dominates the local vegetation, and is mixed with some marginal riparian habitat along the southwestern periphery. Signature plant species within the Coastal Sage Scrub Habitat includes black sage (*Salvia mellifera*), California brittlebush (*Encelia californica*), California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), deerweed (*Lotus scoparius*), golden yarrow (*Eriophyllum confertiflorum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), poison oak (*Toxicodendron diversilobum*), purple sage (*Salvia leucophylla*), sticky monkeyflower (*Mimulus aurantiacus*), sugar bush (*Rhus ovata*), toyon (*Heteromeles arbutifolia*), white sage (*Salvia apiana*), coastal century plant (*Agave shawii*), coastal cholla (*Opuntia prolifera*), Laguna Beach liveforever (*Dudleya stolonifera*), many-stemmed liveforever (*Dudleya multicaulis*), our Lord's candle (*Yucca whipplei*), prickly pear cactus (*Opuntia* sp.) (Williams et al. 2008:118-119). Signature animal species within Coastal Sage Scrub habitat include the kangaroo rat (*Dipodomys* sp.), California horned lizard (*Phrynosoma coronatum frontale*), orange throated whiptail (*Cnemidophorus hyperthrus*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), brown-headed cowbird (*Molothrus ater*), California gnatcatcher (*Polioptila californica californica*), California quail (*Callipepla californica*), and San Diego cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) (Williams et al. 2008:118-120). The marginal riparian habitat exhibits dense stands of arroyo willow (*Salix lasiolepis*; *ibid.*).

For details on prehistoric (particularly Luiseño) local use of plant and animal species, see Lightfoot and Parrish (2009); Bean and Shipek (1978:552); Oxendine (1983:19-29). Sparkman (1908) and Bean and Saubel (1972) have listed the harvesting and processing methods and seasons for edible plants that grow in the above described communities and others.

Geology

The project is situated in California's Peninsular Range geologic province that encompasses western Riverside County. Crystalline rocks in the area include gabbro and granodiorite of the southern California batholith. These resistant rocks weather to form dark or light colored, boulder covered conical buttes and hills. They are granitic and have intruded and metamorphosed to locally form gneissic and schistose rocks (Rogers 1965). The crystalline rocks in the area are covered by older Pleistocene alluvium (Kennedy 1977) that, in turn, is covered by a thin horizon of Holocene soils and recent stream sediments in channels (Rogers 1965). Pedogenic carbonate (caliche or hardpan) is a depositional product

associated with the Holocene soils and invades the Pleistocene sediments. The southern tip of the Northern Peninsular Range has a number of igneous rocks utilized by Native Americans for food (particularly seed) processing. These include granodiorites, quartz monzonites, and breccias, which are found locally. Metamorphosed sedimentary rocks, such as metamorphosed quartzite, are also found near the project location. Olivine basalt and andesite containing phenocrysts have also been locally utilized for the prehistoric manufacture of chipped stone tools (ibid.).

PREHISTORIC CONTEXT SUMMARY

Two primary regional syntheses are commonly utilized in the archaeological literature for southern California. Wallace defined the first of these syntheses in 1955, comprising four successive cultural horizons: Early Man, Milling Stone, Intermediate, and Late Prehistoric. In 1986 Warren devised a new synthesis containing five culturally-defined periods, which represented the region's first attempt at an ecologically based and comprehensive approach. These include the Lake Mojave, Pinto, Gypsum, Saratoga Springs, and Protohistoric Periods. Environmental shifts defined their parameters, and Warren viewed changes in settlement patterns and subsistence focus as cultural adaptations to these shifts. The most obvious indications of the changing environment are derived from paleo-ecological data which revealed the following trends: warming during the late Pleistocene, drying of desert lakes and subsequent (and brief) return to pluvial conditions during the Holocene and middle Holocene, and a general warming and drying trend (with occasional reversals) that continue into the modern era (Warren 1986).

The project site is situated within the traditional boundaries of the Luiseño and Cahuilla (Bean and Shipek 1978; Kroeber 1925).

Luiseño. Typically, the native culture groups in southern California are named after nearby Spanish missions, and such is the case for this Takic-speaking population. For instance, the term "Luiseño" is applied to the natives inhabiting the region within the "ecclesiastical jurisdiction of Mission San Luis Rey...[and who shared] an ancestral relationship which is evident in their cosmogony, and oral tradition, common language, and reciprocal relationship in ceremonies" (Oxendine 1983:8). The first written accounts of the Luiseño are attributed to the mission fathers. Sparkman (1908), Oxendine (1983) and others produced later documentation. Prior to Spanish occupation of California, the territory of the Luiseño extended along the coast from Agua Hedionda Creek to the south, Aliso Creek to the northwest, and the Elsinore Valley and Palomar Mountain to the east. These territorial boundaries were somewhat fluid and changed through time. They encompassed an extremely diverse environment that included coastal beaches, lagoons and marshes, inland river valleys and foothills, and mountain groves of oaks and evergreens (Bean and Shipek 1978:551).

Cahuilla. The Cahuilla belong to the Cupan group of the Takic subfamily of languages (Bean and Smith 1978). Like other Native American groups in southern California, they practiced semi-nomadic hunter-gatherer subsistence strategies and commonly exploited seasonably available plant and animal resources. Spanish missionaries were the first outsiders to encounter these groups during the late 18th century. The Cahuilla are generally divided into three groups: Desert Cahuilla, Mountain Cahuilla, and Western (or Pass)

Cahuilla (Kroeber 1925; Bean and Smith 1978). The term Western Cahuilla is preferred over Pass Cahuilla because this group is not confined to the San Geronimo Pass area. The distinctions are believed to be primarily geographic, although linguistic and cultural differences may have existed to varying degrees (Strong 1929). Cahuilla territory lies within the geographic center of Southern California and the Cocopa-Maricopa Trail, a major prehistoric trade route, ran through it. The first written accounts of the Cahuilla are attributed to mission fathers; later documentation was by Strong (1929), Bright (1998), and others. Today, the Cahuilla are represented in nine bands or nations located in Southern California.

RESEARCH GOALS

BCR Consulting formed a testing plan for shovel test pit (STP) excavations at APP2501-P-1 which is the subject of the current study. This plan is more thoroughly outlined in the Methods section below, and is included in its entirety in Appendix D. The plan details the following tasks:

- Fieldwork, including surface collection of any artifacts, hand excavation, and mapping of any surface or subsurface finds;
- Analysis of any surface or subsurface finds;
- Technical reporting;
- Native American Coordination.

These tasks have been intended to help gather information on a site boundary centered on APP2501-P-1, depth, stratigraphy, integrity, contents, spatial distribution of artifacts and faunal remains, cultural affiliation, and chronological indicators. The ultimate aim of the current research is to use the information gathered to determine whether data is present that can illuminate topics of prehistoric adaptive strategies, subsistence strategies, settlement patterns, site activities, site interaction, and chronology, thereby assisting in determining California Register eligibility.

METHODS

As a result of the cultural resources (milling features) discovered during the previous assessment, a plan consisting of Shovel Test Pit (STP) test excavations and laboratory analysis program has been implemented for the current study. The methods implemented for this plan are included below.

Fieldwork

Surface Collection and Hand Excavation. Prior to any excavation, the surface area surrounding the site was re-checked for the presence of prehistoric artifacts. The potentially significant archaeological site was subject to subsurface testing via STP excavation. A judgmental sampling strategy was employed to determine the placement of STPs. This strategy has taken into consideration proximity to known features, topography, and environmental factors. STPs were approximately 30 centimeters in diameter and were excavated at 20-centimeter intervals. Per the testing plan, if two adjacent sterile levels were identified during excavation, if bedrock was reached, or if a depth of 80 to 100 centimeters was reached then the STP was dug no further. During all STP excavations, each discrete

interval was dry screened to identify the presence/absence of cultural remains. Sediment was screened through 1/8-inch hardware mesh and any artifacts were to be placed in biodegradable bags, labeled, and collected for non-invasive analysis. Results were documented on the appropriate forms, which included (as appropriate) information on provenience, artifact inventory, sediment characteristics, and stratigraphy. A maximum of eight STPs were excavated.

If buried cultural remains were not identified by the STPs, the site would be considered to lack potential for archaeological significance. If STPs had become impassible due to bedrock or dense gravels, excavation would cease and the site would be considered not to contain subsurface artifacts in that area. If significant intact subsurface cultural remains had been identified, the site would have been considered present in the area of the positive STP, and further archaeological evaluation would have been necessary.

Analysis

Subsequent to Task 1, the testing plan allowed for an estimated 10 artifacts to be analyzed on site and given to Pechanga for temporary storage. Artifacts were to be analyzed to determine associations between known land use and findings in the field. A finding of no significance would represent the conclusion of Phase II evaluation requirements. If testing and analysis indicated that the archaeological site was significant, potential preservation measures would have been identified and recommended. If on-site preservation was not feasible, data recovery would have been required in consultation with the County, the applicant/developer, Pechanga, and Soboba. Pre-contact cultural resources discovered during archaeological presence/absence testing, would have been temporarily bagged and stored for analysis before being analyzed and returned to Pechanga and Soboba to determine final disposition. Although Tribal Cultural Resources (TCRs) are not addressed in this report, it is intended to help inform decisions regarding the site's potential as a TCR.

Technical Report

This document presents the results of the test excavations at APP2501-P-1, including recommendations regarding site eligibility for California Register listing, based on *County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work*.

Native American Coordination

In consultation with the County, BCR Consulting coordinated with Pechanga and Soboba tribal representatives that expressed a wish to participate (see Brunzell 2025: Appendix C). Prior to site testing, Pechanga representative Robert Ringlero and Soboba Tribal Historic Preservation Officer Joseph Ontiveros reviewed the testing plan and results of the recent assessment. Mr. Ringlero offered a brief response by email, re-emphasizing comments and concerns offered during the Phase I assessment and requesting coordination on monitoring. Mr. Ontiveros responded with a letter outlining concerns with the testing plan. Comments were addressed in a subsequent email from BCR Consulting, and in changes to the testing plan. The testing plan, which was also reviewed by County Archaeologist Heather Thomson, is provided in Appendix D.

RESULTS

Surface Collection and Hand Excavation

The surface collection and excavations were intended to characterize the horizontal and vertical limits of APP2501-P-1. BCR Consulting archaeologists excavated eight STPs that were centered on APP2501-P-1. The findings are summarized and discussed below.

APP2501-P-1. BCR Consulting archaeologists revisited the site on November 24, 2025 to re-examine the surface for artifacts, and completed the STP excavations. No artifacts were found on the surface. Subsurface findings were also negative which precluded the need for collection, analysis, or further excavation. STPs ranged from a depth of 24-42 centimeters with a radius of 30 centimeters. Excavations were strategically placed, based in relation to the milling slicks, site topography, and in areas that exhibited low potential for modern surface disturbances. All excavations were placed in consultation with Pechanga and Soboba monitors. Since surface examination and excavations failed to yield any previously undiscovered surface or buried cultural remains, or visible signs of prehistoric cultural activity, profile sketches have not been prepared. Site soils consisted mainly of lightly to moderately compacted, slightly damp, dark-brown clay loam with decayed granite gravel inclusions that ranged in density from absent to approximately 15 percent. Other than bedrock, which was encountered at depths varying from 24 to 44 centimeters, no notable stratigraphy, soil changes, intact features, or dateable deposits were observed.

Table A. Shovel Test Pit Results

STP #	UTMs	Findings	Depth	Material	Quantity
1	11S 465942mE 3749383mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/no inclusions	N/A
2	11S 465947mE 3749381mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/10% granitic inclusions past 20 cm	N/A
3	11S 465952mE 3749386mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm Level 3: 40-60 cm	Soil was a dark brown, clay loam w/15% granitic inclusions past 20 cm	N/A
4	11S 465951mE 3749387mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/10% granitic inclusions past 20 cm	N/A
5	11S 465951mE 3749388mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/minimal inclusions. Granite bedrock hit at 26 cm.	N/A
6	11S 465939mE 3749391mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/10% granitic inclusions past 25 cm	N/A
7	11S 465939mE 3749384mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/20% granitic	N/A
8	11S 465941mE 3749386mN	Negative	Level 1: 0-20 cm Level 2: 20-40 cm	Soil was a dark brown, clay loam w/ 15% granitic inclusions past 20 cm	N/A

SIGNIFICANCE

California Register of Historical Resources

The California Register criteria are based on National Register criteria. For a property to be eligible for the California Register, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (CCR 4852 [d][2]).

The California Register also requires that a resource possess integrity. In general, properties eligible for listing in the California Register will meet the same criteria for listing in the National Register but may have a lower level of integrity.

During the assessment phase, the site subject to the current study (APP2501-P-1) was recommended not eligible for California Register listing under Criteria 1, 2, and 3, but was considered potentially eligible for listing under Criterion 4, pending the results of the current study. Subsurface testing has resulted in negative findings. Therefore the site has not yielded, and does not exhibit potential to yield, information important to the prehistory or history of the local area, California, or the nation. As a result, APP2501-P-1 is not considered eligible for California Register listing.

RECOMMENDATIONS

BCR Consulting has conducted archaeological STP excavations at APP2501-P-1 within the project location. Testing has not yielded any data that can meet research goals, and the site has not yielded any new information related to site boundaries, depth, stratigraphy, integrity, contents, spatial distribution of artifacts and faunal remains, cultural affiliation, or chronological indicators. Therefore, the archaeological site within the project site has not yielded and is not likely to yield information important to history or prehistory of the local area, California, or the nation and as such does not appear to be eligible for California Register listing. Therefore, BCR Consulting recommends that the archaeological site tested during the current study has been sufficiently recorded and is not considered a "unique archaeological resource" or a "historical resource" under CEQA.

While the testing program has indicated that the soils tested do not contain significant buried deposits, this study has only tested a percentage of the site's subsurface area. The prehistoric archaeological site recorded during this study indicates that the project site remains sensitive for buried cultural resources. As a result, BCR Consulting recommends the following mitigation measures to help reduce potential impacts below a significant level, based on Conditions of Approval (COA) developed by the County.

Mitigation Measures

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.

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 (defined below) 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 project archaeologist (defined below) 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, 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.

Cultural Resource. 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. Tribal Cultural Resources are also considered cultural resources.

Project Archaeologist. If not already employed by the project developer, a County approved archaeologist and a Native American Monitor from the consulting tribe(s) 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.

Environmental Constraints Sheet. 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 to be used for relocation of the bedrock milling features that cannot be avoided by this project. In addition, a permanent space within this area will be predetermined and designated on a confidential map for reburial of any artifacts that will be impacted and/or discovered during grading.

Project Archaeologist/Archaeological Monitor. 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.

Feature Relocation. Site(s) APP2501-P-1 cannot be avoided through project redesign. Prior to grading permit issuance, the Project Supervisor, Project Archaeologist, and a representative from the consulting Tribe(s) shall meet onsite to determine the strategy for relocating the milling features to a permanent open space area predetermined and designated on a confidential map. Before construction activities are allowed to start and using professional archaeological methods, any visible artifacts shall be recovered and recorded, photo documentation of each feature in situ shall occur. The current Department of Parks and Recreation forms for the sites shall be updated, detailing which features were relocated, the process through which this was done, and updated maps using sub meter GIS technology to document the new location of each feature. The relocation information shall be included in the Phase IV Monitoring Report.

Controlled Grading. The bedrock milling features at cultural site APP2501-P-1 will be impacted during construction activities and the soils surrounding them will be disturbed. To address controlled grading in this area, a plan will be developed and included in the CRMP by the Project Archaeologist. The controlled grading plan shall require the systematic removal of the ground surface to allow for the identification, documentation and recovery of any subsurface cultural deposits. Results of the controlled grading program shall be included in the Phase IV monitoring report.

Temporary Fencing. Temporary fencing shall be required for the protection of cultural site APP2501 until relocation of the feature and controlled grading of the site have occurred. 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. The applicant shall direct the installation of fencing under the supervision of the project archaeologist and Native American Monitor. The fencing can be removed after the feature has been relocated and controlled grading is complete.

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 County Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

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 have been handled through the following methods.

Historic Resources- all historic archaeological materials recovered during the archaeological investigations 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 reburial agreement with the appropriate culturally affiliated Native American tribe(s) or band(s) shall be fully executed. 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.

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 Monitoring Plan. The report will also include the Tribal Monitoring notes as a confidential appendix. Once approved by the County Archaeologist, the Project Archaeologist shall provide a copy to the consulting tribes and the South Coastal Information Center (SCIC).

CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this archaeological report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date: January 7, 2026	
	David Brunzell
Authorized Signature	Printed Name
County Registration Number: 154	

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