Appendix C

Cultural Resources Inventory Letter Report

DUDEK
27271 LAS RAMBLAS, SUITE 340
MISSION VIEJO, CALIFORNIA 92691
T 949.450.2525

November 12, 2024 14951.03

Catherine Cerri
General Manager
Lake Arrowhead Community Services District
P.O. Box 700
Lake Arrowhead, California 92352

Subject: Cultural Resources Inventory Letter Report for the Two-Mile Groundwater Wells Project, Lake Arrowhead, California

Dear Catherine Cerri:

This letter presents the results of Dudek's cultural resources inventory efforts conducted for the Lake Arrowhead Community Services District's (LACSD's) Two-Mile Groundwater Wells Project (Project or proposed Project), located in the unincorporated community of Lake Arrowhead, San Bernardino County, California. The Project is located within Section 21 of Township 2 North and Range 3 West of the Harrison Mountain, California U.S. Geological Survey (USGS) 7.5 Minute Series Quadrangle (Figure 1, Project Location). The proposed Project involves the construction of two potable water supply wells and an associated waterline, holding tank, and water treatment facility located on 2.56 acres of land to be purchased by LACSD along State Route 173 (SR-173) and within Assessor's Parcel Number (APN) 0335-141-06-0000 (Figure 2, Project Site Plan).

LACSD is the Lead Agency responsible for compliance with the California Environmental Quality Act (CEQA). In accordance with CEQA and local regulations, Dudek performed a Phase I cultural resources inventory that included a records search, an archival information review, correspondence with the Native American Heritage Commission, and a cultural resources pedestrian survey of the Area of Potential Impacts (API) for cultural resources (Project API or API), (Figure 3, Area of Potential Impacts for Cultural Resources).

Dudek conducted a California Historical Resources Information System (CHRIS) records search of the Project API and surrounding one-mile radius at the South Central Coastal Information Center (SCCIC). The records search identified 33 previously recorded cultural resources located within one mile of the Project API, one (1) of which is adjacent to, but ultimately outside of the API (P-36-012767). P-36-012767 is characterized as a historic-era archaeological resource that consists of three foundations and associated driveways, retaining walls, and a historic-era refuse scatter. Additionally, Dudek requested a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, and results were positive for Native American cultural resources within one mile of the Project API, though the NAHC did not provide details on what the resource(s) are or where they are located. Subsequent outreach letters were sent to Native American tribes and individuals identified by the NAHC requesting information on tribal resources in the area. Two responses from Native American Tribal representatives have been received to date.

Dudek cultural resources specialists conducted an intensive-level pedestrian survey of the Project API on May 22, 2024. No cultural resources were identified within the Project API during the survey, though the majority of the ground surface was obscured by roadway development, hardscape, dense vegetation and leaf litter. The Pedestrian

survey supplemented with archival research also revealed that the vast majority of the Project API has been disturbed in the past by roadway development, grading activities, and ground disturbances associated with the construction and demolition of several structures related to the former Camp Kadiman that was once operated within APN 0335-141-06-0000 during the mid-20th Century.

Although the records search and pedestrian survey did not identify any cultural resources within the Project API, there is a potential for the inadvertent discovery of subsurface archaeological resources during Project implementation.

Dudek recommends the following management strategies in order to help ensure that the Project will not result in impacts to cultural resources:

- Approved construction limits shall be clearly delineated and marked prior to the start of construction activities using staking, flagging or other acceptable methods and maintained throughout the construction period.
- In the event that archaeological resources or human remains are encountered during the exposure of subsurface soils within the Project API in the absence of an archaeological monitor, ground-disturbing work should be immediately halted, and a qualified archaeologist and Lead Agency contact notified. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during construction activities are provided in Section 5 of this report.

1 Project Location and Description

The Project is located on 2.56 acres within APN 0335-141-06-0000 and along SR-173 in the unincorporated community of Lake Arrowhead in San Bernardino County, California. The Project falls within Section 21 of Township 2 North and Range 3 West of the Harrison Mountain, California USGS 7.5 Minute Series Quadrangle (Figure 1). Regionally, the Project is located within the San Bernardino National Forest and surrounded by the communities and cities of Blue Jay, Big Bear Lake, Skyforest, Twin Peaks, Rimforest, and other mountainous communities of the County.

To augment available groundwater supplies for LACSD's service area, LACSD proposes to develop two potable water supply wells (Wellhead #1 and Wellhead #2) for a capacity of 30 gallons per minute of water per well. LACSD would drill, construct, develop, and test these two potable groundwater water supply wells and construct an associated waterline, holding tank, and water treatment facility building. The proposed on-site waterline would generally follow the alignment of the existing on-site gravel-paved access road and connect to an existing off-site waterline in SR-173 just north of the Project. The proposed Project features, as well as an existing off-site groundwater well, are illustrated in Figure 2, Project Site Plan. Prior to drilling of the wells, LACSD would abandon approximately 600-feet of sewer line in the vicinity of the proposed well locations. This existing sewer line is generally located beneath the existing on-site roadway, which is also the proposed alignment of the on-site waterline, as depicted in Figure 2.

2 Area of Potential Impacts for Cultural Resources

The API for cultural resources is the study area delineated to assess potential impacts from the construction and operation of the Project on both archaeological and historic-era built environment resources that are 45 years of

age or older (those built in or prior to 1978).[1] Because of the geographically constrained nature of the proposed Project activities, the API encompasses the extent of the proposed Project boundary together with the area of direct physical effects for all off-site improvements as delineated in Figure 3, Area of Potential Impacts for Cultural Resources. The API provides the maximum area where proposed Project components may result in impacts to archaeological and historic-era built environment resources. The following text provides and review of the Project components and an examination of the historic-era structures located within the Project API.

The proposed Project components fall into three categories: not visible underground components; components that will not sustain impacts due to the construction of the Project; and historic-era resources that may be impacted due to Project construction or implementation and therefore require recordation and evaluation.

The existing gas line, existing water line, and SR-173 are the only historic-era built environment structures over 45 years old within the Project API. The existing gas line and existing water line are considered not visible underground components. Due to inaccessibility of these underground resources, they were not able to be surveyed. SR-173, while visible, will not sustain impacts due to the construction of this Project. Changes proposed to these structures as part of the Project are in line with routine maintenance activities commonly associated with underground engineering structures and roads. These types of routine maintenance activities do not constitute a potential substantial adverse change to CEQA historical resources and therefore no further consideration of these resources is required under CEQA. No historic era-built environment resources requiring inventory or evaluation under CEQA are in the API for this Project.

3 Regulatory Framework

The Project is subject to compliance with CEQA and local regulatory conditions. No federal nexus is presently anticipated.

3.1 CEQA and the California Register of Historic Resources

CEQA requires that all private and public activities not specifically exempted be evaluated for the potential to impact the environment, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, or place, which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (Division I, Public Resources Code, Section 5021.1(b)).

Lead agencies have a responsibility to evaluate historical resources against the California Register of Historic Resources (CRHR, or California Register) criteria prior to making a finding as to a proposed project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse

[1] While the 50-year threshold is generally used for listing resources in the National Register of Historic Places (NRHP) and the California Register of Historical resources (CRHR), the California Office of Historic Preservation's (OHP) Instructions for Recording Historical Resources recommends recording "any physical evidence of human activities over 45 years . . . for the purposes of inclusion in the OHP's filing system." It also allows for the "documentation of resources less than 45 years . . . if those resources have been formally evaluated, regardless of the outcome of the evaluation." Further, the guidance notes that the 45-year threshold recognizes that there is commonly a 5-year lag between resource identification and the date that planning decisions are made, and thus it explicitly encourages the collection of data about resources that may become eligible for the NRHP or CRHR within that planning period. More restrictive criteria must be met before the resources included in OHP's filing system are listed, found eligible for listing, or otherwise determined to be important in connection with federal, state, and local legal statuses and registration programs (OHP 1995: 2).

change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition is a fairly obvious significant impact, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project which demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.

The California Register is used in the consideration of historic resources relative to significance for purposes of CEQA. The California Register includes resources listed in, or formally determined eligible for the National Register of Historic Places (NRHP) and some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the California Register, and they are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.), consisting of the following:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; 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.

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

State law 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 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

3.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required 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.

3.4 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.

3.5 Assembly Bill 52

California AB 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:

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.

3.6 Guidelines for Determining Significance

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change:

> Substantial adverse change in the significance of an historical resource means 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.

The significance of an historical resource is materially impaired when a project:

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

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

> When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
>
> 1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and

2. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code section 21083.2.) A "unique archaeological resource" is defined as:

> [A]n 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.

(California Public Resources Code section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of "unique archaeological resources." For example, "[i]f it can be demonstrated that a project will cause damage to a unique archaeological 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 archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites." (Pub. Resources Code section 21083.2(b)(1)-(4).)

Public Resources Code section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological 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."

The rules for mitigating impacts to archaeological resources to qualify as "historic resources" are slightly different. According to CEQA Guidelines section 15126.4(b), "[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation 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 archaeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archaeological 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.

Thus, although section 21083.2 of the Public Resources Code, in addressing "unique archaeological sites," provides for specific mitigation options "in no order of preference," CEQA Guidelines section 15126.4(b), in addressing "historical resources of an archaeological nature," provides that "[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites."

Under CEQA, "[w]hen data recovery through excavation is the only feasible mitigation," the lead agency may cause to be prepared and adopt a "data recovery plan," prior to any excavation being undertaken. The data recovery plan must make "provision for adequately recovering the scientifically consequential information from and about the historic resource." (CEQA Guidelines section 15126.4(b)(3)(C).) The data recovery plan also "must be deposited with the California Historical Resources Regional Information Center." (*Ibid*.) Further, "[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 archaeological 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)).

3.7 Lake Arrowhead Community Plan 2007

The Conservation chapter of the Lake Arrowhead Community Plan (adopted in 2007) describes the community's goals and policies to protect the plan area's natural and historic resources (Lake Arrowhead 2007: 53-55). The planning goals and polices are described below.

The Lake Arrowhead Community Goal #5, in the goals and policies section (5.2), consists of one goal and three policies to assist in the preservation and protection of the Community's significant historical sites and structures.

Goal 5: Preserve the significant historical sites and structures which contribute to the unique character of the Lake Arrowhead Plan are.

> Policy 5.1.: Identify and inventory local historic sites and structures and seek input from the local historical society and local committees.

Policy 5.2: Establish funding mechanisms for historic preservation through State and Federal grant programs, private trusts, local tours and publications which explain the history of these facilities.

Policy 5.3: Criteria for historical structures within the Plan areas shall include the retention/replacement of architectural elements that exemplify the respective historical period.

The Community's goal is to protect identified historic resources within the Planning Area (Lake Arrowhead 2007: 55).

4 Results

4.1 Records Search

Dudek archaeologist Roshanne Bakhtiary conducted a records search of the California Historical Resources Information System (CHRIS) on January 30, 2024 at the South Central Coastal Information Center (SCCIC) located on the campus of the California State University, Fullerton. The records search encompassed the entire proposed Project API and a one-mile search radius. The purpose of the records search is to identify any previously recorded cultural resources that may be located in or adjacent to the Project API and to identify previous studies in the Project vicinity. In addition to a review of previously prepared site records and reports, the records search also included a review of historical maps of the Project API, ethnographies, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility.

4.1.1 Previous Cultural Resources Studies

The SCCIC records search indicates that 69 previous cultural resource studies have been conducted within one mile of the Project API between 1973 and 2015. Of these, five studies overlap the Project API and are all characterized as intensive-level pedestrian surveys (Table 1). See Appendix A for the complete SCCIC records search results and associated documentation, and below Table 1 for a summary of the reports relevant to the currently proposed Project.

Table 1. Cultural Resources Studies Overlapping Project API

Report Number	Authors	Date	Title
Overlapping Project API			
SB-04993	Mirro, Michael	2005	Cultural Resources Survey of Highway 173 Between Post Mile Markers 10.86 and 23.04 for the Natural Resources Conservation Service.
SB-04994	Mirro, Michael	2005	Cultural Resources Survey of Approximately 154 Acres in The La Crest Estates Project Area for The Natural Resources Conservation Service
SB-05015	Mirro, Michael	2006	Cultural Resources Survey of Highway 173 Between Post Mile Markers 6.6 and 23.04 for the Natural Resources Conservation Service.

Table 1. Cultural Resources Studies Overlapping Project API

Report Number	Authors	Date	Title
SB-05531	Mirro, Michael	2006	Cultural Resources Survey of 401 Parcels Encompassing 175.2 Acres Within the Urban Large Parcel LA 207 Project Area for the Natural Resources Conservation Service
SB-07105	Losekoot, Frank	2011	A Confidential Archaeological Letter for the Arrowhead Heli Fuel Modification Project for the County of San Bernardino, Hazardous Tree Removal Operations, San Bernardino County, California

SB-04993

Cultural Resources Survey of Highway 173 Between Post Mile Markers 10.86 and 23.04 for the Natural Resources Conservation Service (Mirro 2005a) documents the results of an archaeological investigation consisting of a records search and a pedestrian survey. The study area overlaps with approximately 5 percent of the currently proposed Project API. The pedestrian survey included the relocation of four previously recorded cultural resources and the recordation of three newly identified cultural resources. No cultural resources were identified within or adjacent to the currently proposed Project API as a result of this study (Mirro 2005a).

SB-04994

Cultural Resources Survey of Approximately 154 Acres in The La Crest Estates Project Area for The Natural Resources Conservation Service (Mirro 2005b) documents the results of an archaeological investigation consisting of a records search and a pedestrian survey. The study area overlaps with the entire currently proposed Project API. The pedestrian survey recorded one newly identified cultural resource, P-36-012767, adjacent to the Project API. P-36-012767 is a historic-era archaeological resource associated with Camp Kadiman. P-36-012767 includes three foundations and associated driveways, retaining walls, and an historic-era refuse scatter. This resource was not evaluated in the field at the time of survey; however, it was recommended that a qualified archaeologist be present during ground disturbance within the vicinity of the resource (Mirro 2005b).

SB-05015

Cultural Resources Survey of Highway 173 Between Post Mile Markers 6.6 and 23.04 for the Natural Resources Conservation Service (Miro 2006a), documents the results of an archaeological investigation consisting of a records search and a pedestrian survey. The study area overlaps with approximately 5 percent of the currently proposed Project API. No cultural resources were identified within or adjacent to the currently proposed Project API as a result of this study (Mirro 2006a).

SB-05531

Cultural Resources Survey of 401 Parcels Encompassing 175.2 Acres Within the Urban Large Parcel LA 207 Project Area for the Natural Resources Conservation Service (Mirro 2006b), documents the results of an archaeological investigation consisting of a records search and a pedestrian survey. The study area overlaps with approximately 25 percent of the currently proposed Project API. The pedestrian survey involved the relocation of two previously

recorded cultural resources, P-36-012765 and P-36-01599, located within one mile of the Project API. No cultural resources were identified within or adjacent to the currently proposed Project API as a result of this study (Mirro 2006b).

SB-07105

A Confidential Archaeological Letter for the Arrowhead Heli Fuel Modification Project for the County of San Bernardino, Hazardous Tree Removal Operations, San Bernardino County, California (Losekoot 2011), documents the results of an archaeological investigation consisting of a records search and a pedestrian survey. The study area overlaps with approximately 20 percent of the currently proposed Project API. Previously recorded resource P-36-012767, which is located adjacent to the currently proposed Project API, was relocated during this survey effort and flagged as an Equipment Exclusion Zone (Losekoot 2011).

4.1.2 Previously Recorded Cultural Resources

The SCCIC records search did not identify any cultural resources within the Project API, though it did identify 33 previously recorded cultural resources within a one-mile radius of the Project API (Table 2). Of these resources, one (P-36-012767) is located adjacent to the proposed location of Wellhead #2 (highlighted in Table 2, below). P-36-012767 is characterized as an historic-era archaeological resource associated with the former Camp Kadiman. See Appendix A for the complete SCCIC records search results, documentation, and California Department of Parks and Recreation (DPR) cultural resources site records, and below Table 2 for a discussion on P-36-012767.

Table 2. Previously Recorded Cultural Resources within One Mile of Project API

Designation	Resource Description	Recorded By	CRHR/NRHP Eligibility
Outside Project API			
P-36-000928	Prehistoric: Groundstone, lithic debitage, a projectile point fragment, and bedrock mortars	1969 (Reeder and White); 2006 (Sheets and Kile)	Not evaluated
P-36-003868	Historic-era: Segments of Daley Canyon Road, Daley Canon Access Road, Daley Toll Road, and a commemorative stone monument for Daley Toll Road and 19th Century homesteading	1974 (Dr G. Smith and T. Suss); 1979 (R. Reynolds); 1979 (R. Reynolds); 1990 (J. Arbuckle); 2008 (Julie Scrivner); 2011 (J. Trampier)	Listed on CRHR
P-36-007049	Historic-era: Segments of Rim of the World Drive	1991 (M.K. Lerch & Associates); 1997 (Maxwell); 2001 (McCarthy); 2002 (USFS); 2005 (M. Tuma); 2010 (Denniston); 2011 (J. Trampier); 2012 (Josh Smallwood)	3S: appears eligible as an individual property through survey evaluation
P-36-009896	Historic-era: Segments of Old Lake Arrowhead Toll Road	2000 (Douglas Milburn); 2001 (McKenna et al.); 2011 (Patrick Stanton); 2011 (J. Trampier); 2017 (Dicken Everson)	Not evaluated

Table 2. Previously Recorded Cultural Resources within One Mile of Project API

Designation	Resource Description	Recorded By	CRHR/NRHP Eligibility
Outside Project API			
P-36-012760	Historic-era: Remains of a ski lift	2004 (B. Sheets)	Not evaluated
P-36-012761	Historic-era: Remains of a concrete slab and building debris	2005 (B. Sheets)	Not evaluated
P-36-012762	Historic-era: Remains of boulder and mortar foundations of two cabins and associated debris	2005 (B. Sheets and K. McLean)	Not evaluated
P-36-012763	Historic-era: remains of a cobble/boulder and mortar incinerator, observation platform, a concrete footing, and stairs/retaining walls	2005 (B. Sheets and K. McLean)	Not evaluated
P-36-012764	Historic-era: Water collection structure	2005 (B. Sheets)	Not evaluated
P-36-012765	Historic-era: Horizontal well and water tank	2005 (B. Sheets)	Not evaluated
P-36-012767	Historic-era: Remnants of three foundations, associated driveways, retaining walls, and debris	2005 (B. Sheets and K. Mclean)	Not evaluated
P-36-012769	Prehistoric: Isolate, granite mano	2006 (B. Sheets)	Not evaluated
P-36-012770	Historic-era: Commemorative shrine including altar, statues, and perimeter walls	2006 (B. Sheets)	Not evaluated
P-36-012771	Historic-era: retaining walls	2006 (B. Sheets and M. Kile)	Not evaluated
P-36-012778	Historic-era: Roadside monuments	2004 (B. Sheets, B. Gothar, and T. Everette)	Not evaluated
P-36-012779	Historic-era: Single-island gas station structure	2004 (B. Sheets)	Not evaluated
P-36-012780	Historic-era: Residential cabin	2004 (B. Sheets)	Not evaluated
P-36-012781	Historic-era: Residential cabin	2004 (B. Sheets)	Not evaluated
P-36-013496	Historic-era: Horizontal well	2006 (Linder)	Not evaluated
P-36-013498	Historic-era: Remnants of a concrete foundation, cinder block room built into hillside, and a two-chambered concrete box	2007 (Lichtenstein and Everette)	Not evaluated
P-36-013499	Historic-era: concrete foundation and collapsed wood frame	2007 (Lichtenstein)	Not evaluated

Table 2. Previously Recorded Cultural Resources within One Mile of Project API

Designation	Resource Description	Recorded By	CRHR/NRHP Eligibility
Outside Project API			
P-36-013503	Historic-era: Remains of a wood frame residential structure and associated retaining walls and staircases	2007 (Lichtenstein)	Not evaluated
P-36-013507	Historic-era: Two cisterns	2007 (B. Sheets)	Not evaluated
P-36-013508	Historic-era: concrete block and mortar structure	2007 (B. Sheets)	Not evaluated
P-36-013509	Historic-era: cistern, horizontal well, and pump house	2007 (B. Sheets)	Not evaluated
P-36-013585	Historic-era: Cabin foundation	2007 (B. Sheets and J. Coats)	Not evaluated
P-36-014411	Historic-era: Three water tanks	2008 (Lichtenstein)	Not evaluated
P-36-015499	Historic-era: Hotel, The Saddleback Inn Arrowhead	1986 (Robert Hoover); 2006 (B. Sheets and S. James)	Not evaluated
P-36-015500	Historic-era: Resort, Arrowhead Villas, "The Cottage"	1989 (Allan Griesemer); 1993 (Cheryl Weaver)	Not evaluated
P-36-023982	Historic-era: Roadway, Lower Crest Road	2011 (J. Trampier)	Not evaluated
P-36-023983	Historic-era: Roadway, Arrowhead Viall Road	2011 (J. Trampier)	Not evaluated
P-36-024629	Historic-era: Roadway, Kuffel Road	2011 (J. Trampier)	Not evaluated
P-36-060191	Prehistoric: Isolate, metate	(Laegent)	Not evaluated

P-36-012767

P-36-012767 is an historic-era archaeological resource recorded in 2005 by B. Sheets and K. Mclean. This resource is located adjacent to the Project API and near the proposed location of Wellhead #2. P-36-012767 is described as the remains of a portion of the former Camp Kadiman, a religious camp that operated within APN 0335-141-06-0000 over the mid-20th Century. P-36-012767 consists of the remnants of three foundations identified as Features 1, 2, and 3, and their associated driveways, retaining walls, and historic-era debris. Feature 1 is the remnants of a slab foundation for a house, Feature 2 is the foundation for a garage or workshop, and Feature 3 is a slab foundation for a garage or workshop and has the date "8-14-50" stamped onto it. The historic-era debris consists of wire nails, lumber, ceramic electrical insulators, an electrical fuse box, an electrical wall outlet box, sheet metal, and a galvanized iron pipe. P-36-012767 has not been evaluated for inclusion in the NRHP or CRHR (Sheets and Mclean 2005).

4.2 Archival Research

In addition to the SCCIC records search, Dudek conducted an online review of historic aerial photographs and historic topographic maps to better understand the development of the Project API and surrounding vicinities over time. Historic aerial photographs (historic aerials) of the Project API are available from 1938 to 2020 (NETR 2024). The first available historic aerial from 1938 shows SR-173 within the northern portion of the API, while the remainder of the API appears covered in tree canopy. Overall, dense vegetation and tree canopy obstruct the identification of any significant changes to the API through the years. Due to this, the historic aerials reveal little information regarding the level of ground disturbance, the historic land use, and the development of the API and immediate surroundings over time.

Historic topographic maps (historic topos) of the Project API are available for the years of 1899 to 1996 (USGS 2024). The first available historic topo from 1899 shows the API within an undeveloped mountainous area of San Bernardino County. There is little change in the historic depiction of the API as evidenced by the historic topos until 1953. By 1953, SR-173 appears within the northern portion of the API, as do two structures shown directly adjacent to the central and southern portions of the API. By 1967, the gravel-paved access road within the API appears, as do an additional six structures towards the southern extent of the API, adjacent to the currently proposed Wellhead #2. There is little change in the depiction of the API as evidenced by the historic topos from 1967 to the last available from 1996 (USGS 2024).

As evidenced by this archival review, it appears that the Project API has been subject to past disturbances associated with the development of two roadways over the first half of the 20th Century. Several structures that appear adjacent to the Project API starting in 1953 are likely associated with the former Camp Kadiman, which operated within APN 0335-141-06-0000 over the mid-20th Century. Overall, there is one structure historic in age (SR-173) located within the API as indicated by this archival review. Due to dense vegetation and tree cover, there is no evidence to indicate the current condition of the historic-era structures identified as adjacent to the Project API.

4.3 Review of Geotechnical Evaluation

A geotechnical evaluation in support of the proposed Project was conducted by Hilltop Geotechnical, Inc. in 2024. Subsurface exploration consisted of the excavation and logging of five (5) exploratory hand auger borings throughout the Project API to a maximum depth of 12.5 feet below ground surface. Three boring samples were taken adjacent to the location of Wellhead #1 and associated Project components (B-3, B-4, and B-5), and the other two were taken adjacent to Wellhead #2 (B-1 and B-2) (Hilltop Geotechnical, Inc. 2024).

Overall, materials encountered during subsurface explorations consisted artificial fill, colluvium, and Cretaceous monzogranite bedrock materials of the City Creek formation. Artificial fill was encountered in four (4) of the five (5) borings to a depth of approximately 6 feet below ground surface. Artificial fill generally consisted of brown, slightly moist, fine to medium grained silty sand. Colluvium was also encountered in four (4) of five (5) borings and reached a depth of approximately 12.5 feet below ground surface. Colluvium generally consisted of brown, moist, medium to fine grained silty sand with trace amounts of gravel. Monzogranite bedrock of the City Creek formation was encountered underlying colluvium in one (1) of the borings. The bedrock was generally weathered near the contact with colluvial soils and became hard with depth (Hilltop Geotechnical, Inc. 2024). Overall, the Project API is

underlain by artificial fill, colluvium and bedrock at varying levels of depth. In general, deposits of this nature have a low potential to contain intact subsurface cultural deposits.

4.4 NAHC SLF Search and Tribal Correspondence

Dudek requested an NAHC search of the SLF for the Project API and one-mile radius on February 15, 2024. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on February 20, 2024, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within one mile of the API, and not necessarily directly within the API. The NAHC additionally provided a list of nine Native American individuals and/or tribal organizations that should be contacted for more information on potential tribal sensitivities regarding the currently proposed Project.

Tribal outreach letters were mailed on March 1, 2024, to all California Native American Tribal representatives included on the NAHC contact list. These letters attempted to solicit additional information relating to Native American cultural resources that may be impacted by the Project. Native American Tribal representatives were requested to define a general area where known resources intersect the Project API. To date, Dudek has received two responses to this information request. These responses are paraphrased below:

> Xitlaly Madrigal of the Agua Caliente Band of Cahuilla Indians (Agua Caliente) responded on March 3, 2024. Ms. Madrigal's response indicated that, after a records check of the Tribal Historic Preservation Office's cultural registry, the Project API is not located within the boundaries Agua Caliente consider their Traditional Use Area. Ms. Madrigal also stated that Agua Caliente defer consultation efforts to other Tribes in this area and that her letter serves as Agua Caliente's conclusion of consultation on the Project.
>
> Eunice Ambriz of the Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) responded on March 11, 2024. Mr. Ambriz's response indicated that the Project API is considered moderately culturally sensitive by the Yuhaaviatam of San Manuel Nation (Yuhaaviatam), and that Yuhaaviatam wish to engage with LACSD in government-to-government consultation pursuant to AB 52.

Any additional responses to these outreach letters will be forwarded to LACSD and included in subsequent drafts of this report. See Appendix B for complete documentation of NAHC correspondence, SLF search results, and Tribal outreach efforts to date. In compliance with AB 52, LACSD, as Lead Agency, is responsible for conducting government-to-government consultation with Tribal entities.

4.5 Pedestrian Survey

Dudek cultural resources specialists Katie Ahmanson and Roshanne Bakhtiary conducted an intensive-level cultural resources pedestrian survey of the Project API on May 22, 2024. Standard procedures and techniques consistent with the Secretary of the Interior Standards for Archaeology and Historic Preservation were employed during the pedestrian survey. When possible, 10-meter interval survey transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g.,

metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. This effort also entailed surveying the Project API for historic-era built environment resources. All fieldwork was documented using field notes and an Apple iPad equipped with ESRI Field Maps. Location-specific photographs were taken using an eighth-generation Apple iPad equipped with an eight (8) mega-pixel (MP) 1080p resolution camera and georeferenced PDF maps of the Project API. All field notes, photographs, and records related to the current study are on file at Dudek's Mission Viejo, California office.

The Project API is largely disturbed, consisting predominantly of SR-173, a gravel-paved access road where the waterline is proposed (Figure 4), and two recently graded pads where Wellhead #1 and associated components (Figure 5), and Wellhead #2 are proposed (Figure 6). Portions of the Project API adjacent to the gravel-paved access road and within the recently graded pads were subject to systematic transects (40%). A reconnaissance-level pedestrian survey was conducted for the remainder of the Project API (60%) and included all portions of the proposed waterline alignment through the gravel-paved access road and within SR-173.

Ground visibility throughout the Project API was poor (0-25%) and largely obscured by hardscape (gravel paving and asphalt), dense vegetation, and leaf litter. Vegetation throughout the Project API included wild grape (*Vitis sp.*), cypress (*Cupressus sp.*), miner's lettuce (*Claytonia perfoliata*), and dogwood (*Cornus sp.*). Observed soils consisted of brown silts and clays. Fragmentary pieces of concrete and cement, brick, and asphalt in secondary contexts were observed throughout the Project API, and particularly within the location of the graded pad for Wellhead #1 and associated Project components.

Previously recorded historic-era archaeological resource P-36-012767 was successfully relocated during the pedestrian survey. Disturbances noted in 2024 include mass grading directly adjacent to the resource, upslope and downslope erosion of the resource, and the partial burial of its many features first recorded in 2005. The pedestrian survey confirmed that no historic-era features or debris associated with P-36-012767 are located within the currently proposed Project API.

5 Summary and Management Considerations

Dudek's cultural resources inventory of the Project indicates that, while low, there is a potential for the inadvertent discovery of unanticipated cultural resources during Project implementation. Dudek conducted a records search of the Project API and surrounding one-mile radius at the SCCIC. The records search identified 33 previously recorded cultural resources located within one mile of the proposed Project API, one of which is adjacent to, but ultimately outside of the API (P-36-012767). P-36-012767 is characterized as an historic-era archaeological resource associated with the former Camp Kadiman that once operated within APN 0335-141-06-0000. As currently designed, the proposed Project will avoid impacts to P-26-012767. An NAHC SLF search was also requested for the proposed Project, and results were positive for Native American cultural resources within one mile of the Project API.

Dudek cultural resources specialists conducted an intensive-level pedestrian survey of the Project API on May 22, 2024. No cultural resources were identified within the Project API during the survey, though the majority of the ground surface was obscured by roadway development, hardscape, dense vegetation and leaf litter. The Pedestrian survey supplemented with archival research also revealed that the vast majority of the API has been disturbed in the past by roadway development, grading activities, and disturbances associated with the construction and

demolition of several structures associated the former Camp Kadiman. Geotechnical investigations in support of the Project also revealed that the Project API is underlain by artificial fill and colluvial soils. These soils represent secondary contexts, which are generally not suited to support the presence of intact archaeological deposits.

Overall, the results of this inventory effort revealed that no cultural resources over the age of 45 were identified in the Project API that required consideration under CEQA as potential historical resources and/or rose to the level of requiring a full impacts assessment under CEQA. The finding for historical resources for the proposed Project under CEQA is no impact.

Though the Project will not have any impacts on known cultural resources, there is a potential for the inadvertent discovery of subsurface archaeological resources during Project implementation. Dudek recommends additional cultural resources management strategies be implemented in order to ensure that the Project will not result in impacts to unanticipated archaeological resources and human remains. These management strategies are summarized in detail below.

Unanticipated Discovery of Archaeological Resources

Approved construction limits shall be clearly delineated and marked prior to the start of construction activities using staking, flagging or other acceptable methods and maintained throughout the construction period. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 50 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. Construction activities may continue in other areas, or use existing paths of travel, but should be redirected a safe distance from the find. Avoidance and/or preservation in place should be considered the preferred management approach wherever possible. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation with LACSD and consulting parties, if applicable. Ground disturbance can continue only after the resources has been properly mitigated with approval by LACSD.

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 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 the person or persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with LACSD, of the human remains.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me at 760.557.0998 or rbakhtiary@dudek.com.

Respectfully submitted,

Katie Ahmanson

Katie Ahmanson, MHC
Architectural Historian

Roshanne Bakhtiary, MA
Archaeologist

Att.: *Figure 1. Project Location Map*
Figure 2. Project Site Plan
Figure 3. Area of Potential Impacts for Cultural Resources
Figure 4. Overview of proposed waterline alignment. View facing south.
Figure 5. Overview of proposed Wellhead #1 and associated Project components. View facing southeast
Figure 6. Overview of proposed Wellhead #2. View facing northeast.
National Archaeological Database Information
Confidential Appendix A, SCCIC Records Search Results
Appendix B, NAHC Correspondence and Tribal Outreach
cc: *Nicole Frank, MSHP, Dudek; Kathryn Haley, MA, Dudek; Daria Sarraf, MA, Dudek*

6 References

Hilltop Geotechnical, Inc. 2024. Report of Preliminary Geotechnical/Geologic Study, Proposed Two Well Head Houses, an Above-Ground Treatment Building with a Water Tank and Appurtenances. Prepared for the Lake Arrowhead Community Services District, Lake Arrowhead, California, by Hilltop Geotechnical, Inc., San Bernardino, California.

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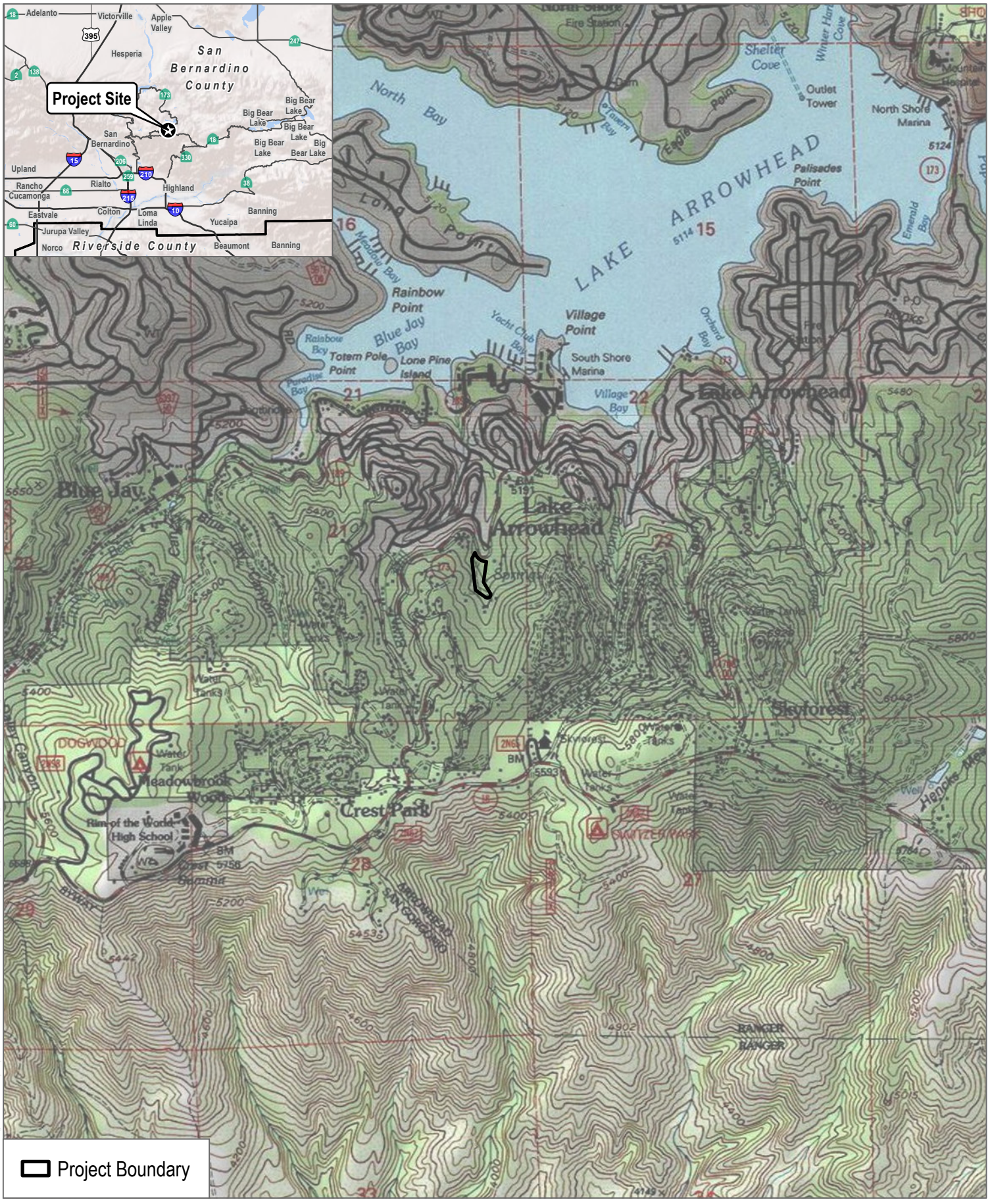
Mirro, Michael. 2006a. Cultural Resources Survey of Highway 173 Between Post Mile Markers 6.6 and 23.04 for the Natural Resources Conservation Service. Report on File at the SCCIC, Fullerton, California.

Mirro, Michael. 2006b. Cultural Resources Survey of 401 Parcels Encompassing 175.2 Acres Within the Urban Large Parcel LA 207 Project Area for the Natural Resources Conservation Service. Report on File at the SCCIC, Fullerton, California.

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USGS (United States Geological Survey). 2024. Historic Topographic Maps for Lake Arrowhead, California. Accessed August 2024. https://livingatlas.arcgis.com/topoexplorer/



SOURCE: USGS 7.5 Minute Series

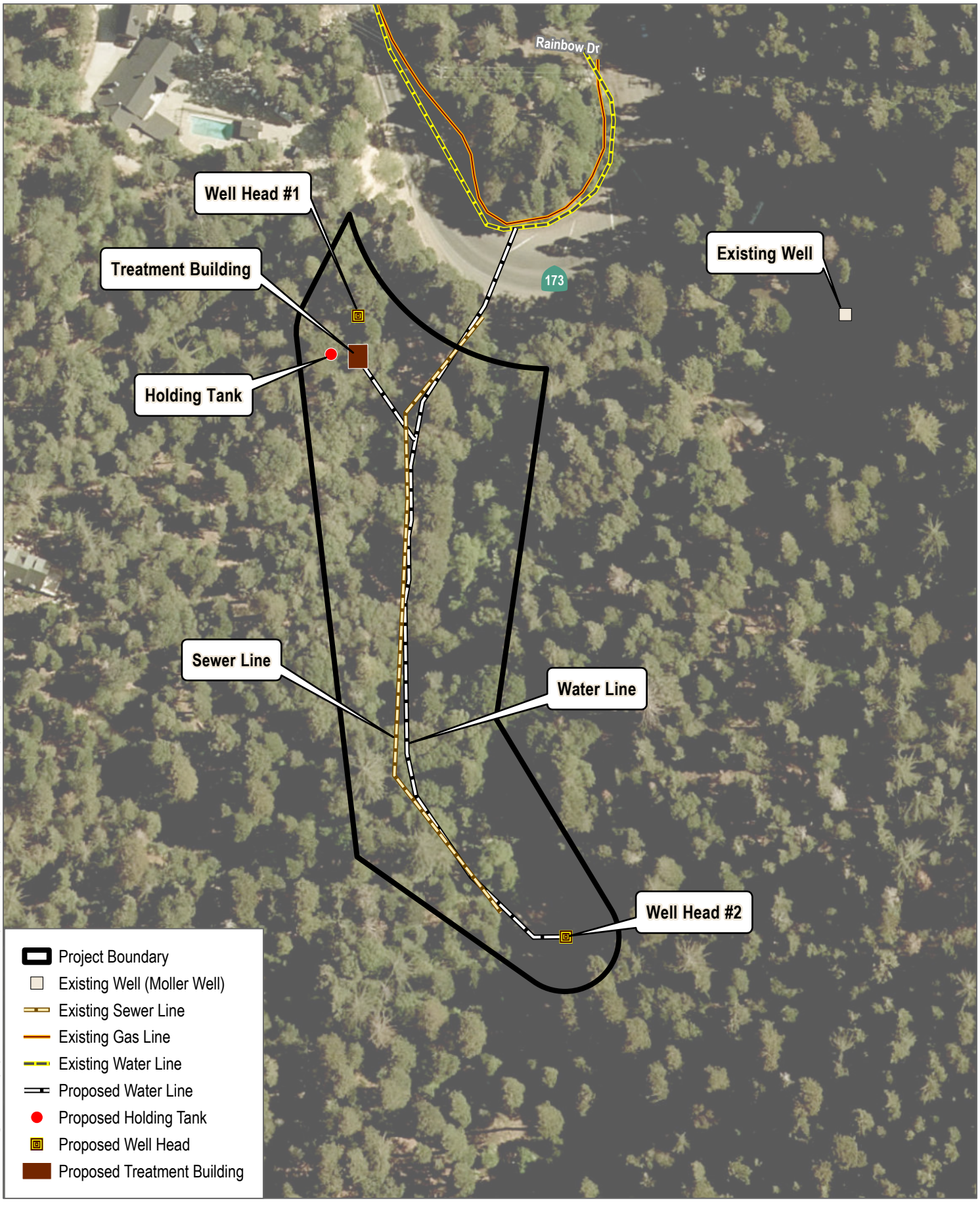
FIGURE 1

Project Location

Cultural Resources Inventory and Evaluation Report Two-Mile Wells Project, Lake Arrowhead, California

DUDEK

0 1,000 2,000 Feet



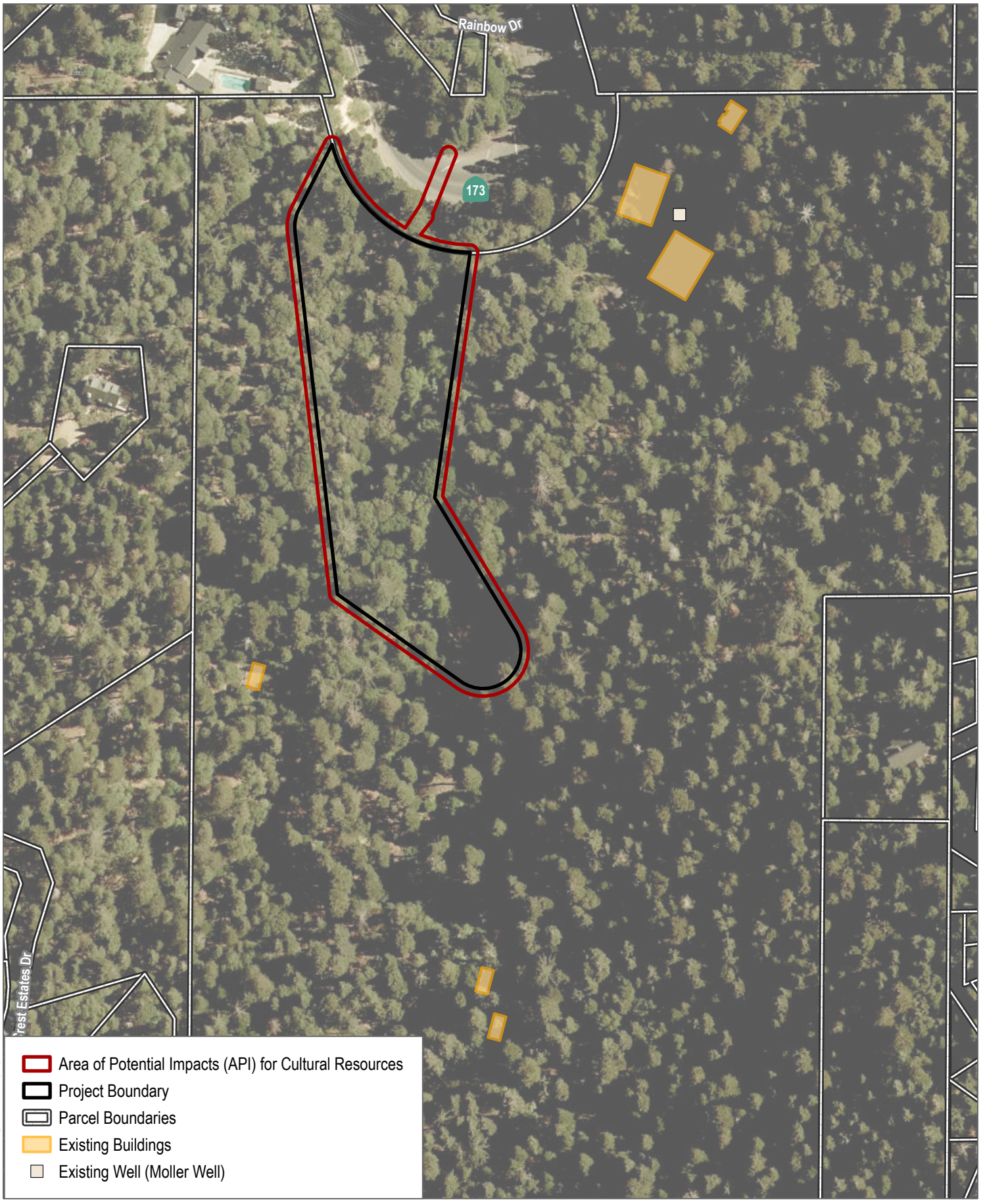
SOURCE: Esri World Imagery; LASCD 2024

FIGURE 2

Project Site Plan

DUDEK

0 55 110 Feet



SOURCE: Esri World Imagery 2023; San Bernardino County 2024

Harrison Mountain Quadrangle - Township 2N Range 3W Section 21, 22

DUDEK

0 80 160 Feet

FIGURE 3

Area of Potential Impacts for Cultural Resources

Cultural Resources Inventory and Evaluation Report Two-Mile Wells Project, Lake Arrowhead, California



Figure 4. Overview of proposed waterline alignment. View facing south.



Figure 5. Overview of proposed Wellhead #1 and associated Project components. View facing southeast.



Figure 6. Overview of proposed Wellhead #2. View facing northeast.

National Archaeological Database (NADB) Information

Authors:	Katie Ahmanson, MHC; Roshanne Bakhtiary, MA; Nicole Frank, MSHP; Kathryn Haley, MA
Firm:	Dudek
Project Proponent:	Lake Arrowhead Community Services District
Report Date:	November 2024
Report Title:	Cultural Resources Inventory Letter Report for the Two-Mile Wells Project, Lake Arrowhead, California
Type of Study:	Cultural Resources Inventory
Resources:	None
USGS Quads:	Harrison Mountain, California Quadrangle, Township 2 North, Range 3 West, Section 21
Acreage:	2.56-acre
Permit Numbers:	N/A
Keywords:	Inventory, Negative, Lake Arrowhead, State Route 173

Confidential Appendix A

SCCIC Records Search Results

Appendix B

NAHC Correspondence and Tribal Outreach

Roshanne Bakhtiary

From: Roshanne Bakhtiary
Sent: Thursday, February 15, 2024 9:37 AM
To: NAHC@NAHC
Subject: NAHC SLF Search Request - LACSD Two-Mile DUDEK PN 14951.03
Attachments: NAHC SLF Request _ DUDEK PN 14951.03.pdf

Dear NAHC,

Please find attached to this email the NAHC Sacred Lands File Search request with project location map for the LACSD Two-Mile Wells Project (Dudek #14951.03) located in unincorporated San Bernardino County, California. Dudek is requesting an NAHC Sacred Lands File Search for any sacred sites, tribal cultural resources, and other places of Native American community value that may fall within a one-mile radius of the proposed project location.

Please let me know if you have any questions regarding this project. You can email the results to me at: rbakhtiary@dudek.com.

Thank you,

Roshanne Bakhtiary
Archaeologist
DUDEK

O: 9493738307 **C:** 7605570998
dudek.com



Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Lake Arrowhead CSD Two-Mile Wells Project

County: San Bernardino

USGS Quadrangle Name: Lake Arrowhead and Harrison Mountain

Township: 2N **Range:** 3W **Section(s):** 15, 16, 17, 20, 21, 22, 27, 28, and 29

Company/Firm/Agency: Dudek

Street Address: 605 3rd Street

City: Encinitas, CA **Zip:** 92024

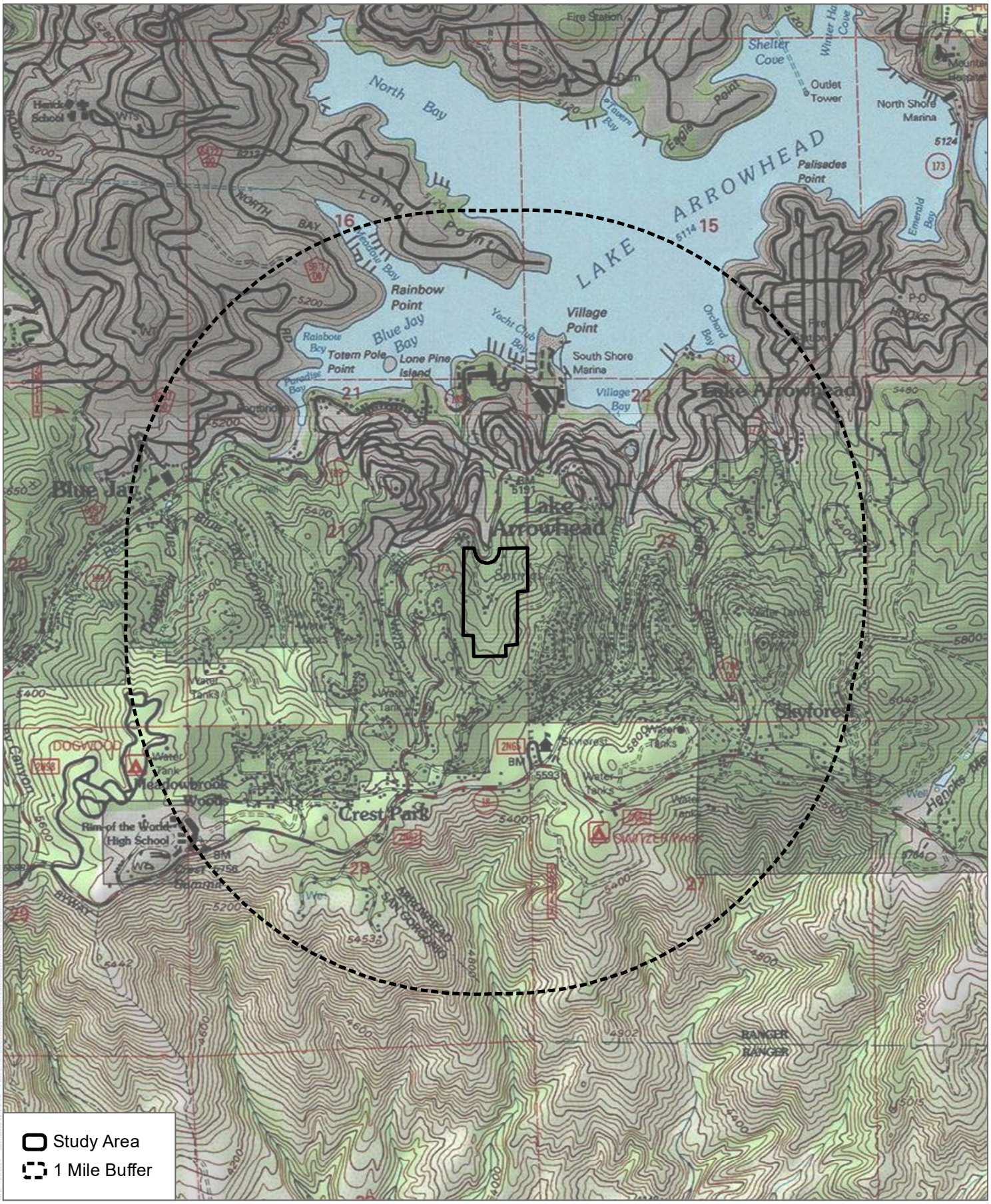
Phone: (760) 557-0998

Fax:

Email: rbakhtiary@dudek.com

Project Description:

The project involves the development of two potable water supply wells and an associated water treatment facility on an approximately 31-acre property.



SOURCE: USGS 7.5-Minute Series Lake Arrowhead & Harrison Mtn Quadrangles
Township 2N; Range 3W; Sections 15, 16, 17, 20, 21, 22, 27, 28, 29

DUDEK

0 1,000 2,000 Feet
0 285 570 Meters
1:24,000

Records Search

Lake Arrowhead CSD Two-Mile Wells Project

Roshanne Bakhtiary

From: Donahue, Murphy@NAHC <Murphy.Donahue@nahc.ca.gov>
Sent: Tuesday, February 20, 2024 2:56 PM
To: Roshanne Bakhtiary
Cc: alexandra.mccleary@sanmanuel-nsn.gov
Subject: Lake Arrowhead CSD Two-Mile Wells Project
Attachments: SLF Yes Lake Arrowhead CSD Two-Mile Wells Project 2.20.24.pdf; Lake Arrowhead CSD Two-Mile Wells Project 2.20.24.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon,

Attached is the response to the project referenced above. If you have any additional questions, please feel free to contact our office email at nahc@nahc.ca.gov.

In our ongoing effort to enhance your user experience and increase functionality, we have transitioned from distributing data in PDF Format to Excel Format. This change allows you to take full advantage of features such as searching, filtering, and mail-merging, making it easier for you to handle and utilize the data provided. If you encounter any technical difficulties, or if you have any questions regarding this new format, please do not hesitate to reach out to me directly.

Thank you,

Murphy Donahue (she/her)
Native American Heritage Commission
Cultural Resources Analyst
Phone# (916) 282-3195
1550 Harbor Blvd., Ste 100
West Sacramento, CA 95691
STATE OF CALIFORNIA
NATIVE AMERICAN
HERITAGE COMMISSION

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

February 20, 2024

Roshanne Bakhtiary
Dudek

Via Email to: rbakhtiary@dudek.com

Re: Lake Arrowhead CSD Two-Mile Wells Project, San Bernardino County

Dear Ms. Bakhtiary:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the San Manuel Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Murphy.Donahue@NAHC.ca.gov

Sincerely,

Murphy Donahue

Murphy Donahue
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Bernardino County
2/20/2024

County	Tribe Name	F/N	Contact Person	Contact Address	Phone	Fax	Email Address	Cultural Affiliation	Counties
San Bernardino	Agua Caliente Band of Cahuilla Indians	F	Lacy Padilla, THPO Operations Manager	5401 Dinah Shore Drive Palm Springs, CA, 92264	(760) 333-5222	(760) 699-6919	ACBCI-THPO@aguacaliente.net	Cahuilla	Imperial, Riverside, San Bernardino, San Diego
	Morongo Band of Mission Indians	F	Ann Brierty, THPO	12700 Pumarra Road Banning, CA, 92220	(951) 755-5259	(951) 572-6004	abrierty@morongo-nsn.gov	Cahuilla Serrano	Imperial, Los Angeles, Riverside, San Bernardino, San Diego
	Morongo Band of Mission Indians	F	Robert Martin, Chairperson	12700 Pumarra Road Banning, CA, 92220	(951) 755-5110	(951) 755-5177	abrierty@morongo-nsn.gov	Cahuilla Serrano	Imperial, Los Angeles, Riverside, San Bernardino, San Diego
	Quechan Tribe of the Fort Yuma Reservation	F	Manfred Scott, Acting Chairman - Kw'ts'an Cultural Committee	P.O. Box 1899 Yuma, AZ, 85366	(928) 210-8739		culturalcommittee@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego

County	Tribe Name	F/N	Contact Person	Contact Address	Phone	Fax	Email Address	Cultural Affiliation	Counties
	Quechan Tribe of the Fort Yuma Reservation	F	Jordan Joaquin, President, Quechan Tribal Council	P.O.Box 1899 Yuma, AZ, 85366	(760) 919-3600		executivesecretary@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego
	Quechan Tribe of the Fort Yuma Reservation	F	Jill McCormick, Historic Preservation Officer	P.O. Box 1899 Yuma, AZ, 85366	(928) 261-0254		historicpreservation@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego
	San Manuel Band of Mission Indians	F	Alexandra McCleary, Senior Manager of Cultural Resources Management	26569 Community Center Drive Highland, CA, 92346	(909) 633-0054		alexandra.mccleary@sanmanuel-nsn.gov	Serrano	Kern, Los Angeles, Riverside, San Bernardino
	Serrano Nation of Mission Indians	N	Mark Cochrane, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(909) 578-2598		serranonation1@gmail.com	Serrano	Los Angeles, Riverside, San Bernardino
	Serrano Nation of Mission Indians	N	Wayne Walker, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(253) 370-0167		serranonation1@gmail.com	Serrano	Los Angeles, Riverside, San Bernardino

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Lake Arrowhead CSD Two-Mile Wells Project, San Bernardino County.

DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Mr. Robert Martin, Chairperson
Morongo Band of Mission Indians
12700 Pumarra Road
Banning, CA 92220

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Mr. Martin,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

As part of the cultural resources study prepared for the proposed Project, Dudek contacted the Native American Heritage Commission (NAHC) to request a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on February 20, 2024, stating that the SLF search positively identified the presence of Native American cultural resources within 1-mile of the Project area.

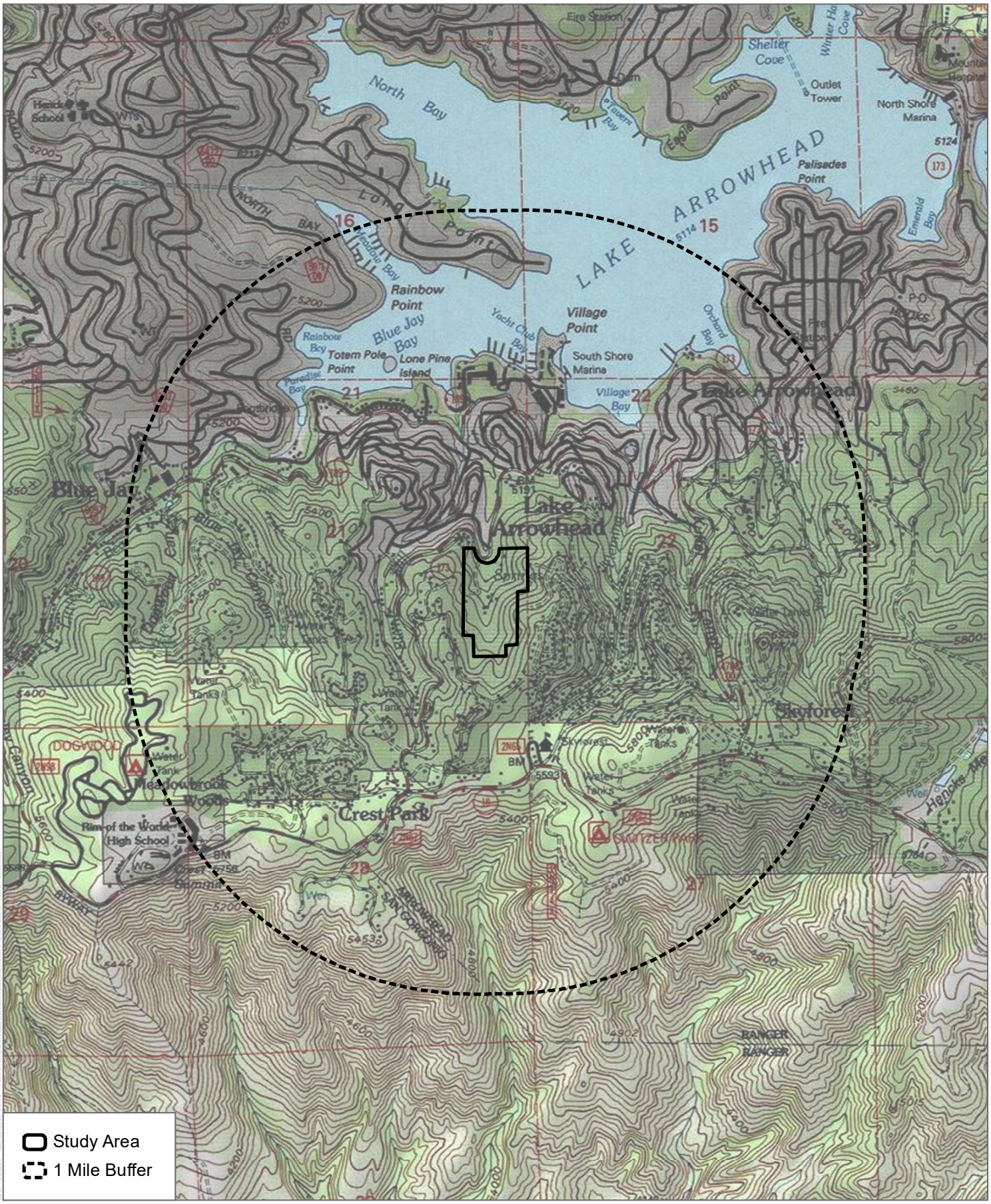
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If you have any knowledge of cultural resources that may exist within or near the proposed Project, or concerns pertaining to such information, please contact me by phone or email.

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



SOURCE: USGS 7.5-Minute Series Lake Arrowhead & Harrison Mtn Quadrangles
Township 2N; Range 3W; Sections 15, 16, 17, 20, 21, 22, 27, 28, 29

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Records Search

Lake Arrowhead CSD Two-Mile Wells Project

DUDEK
MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Ms. Ann Brierty, THPO
Morongo Band of Mission Indians
12700 Pumarra Road
Banning, CA 92220

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Ms. Brierty,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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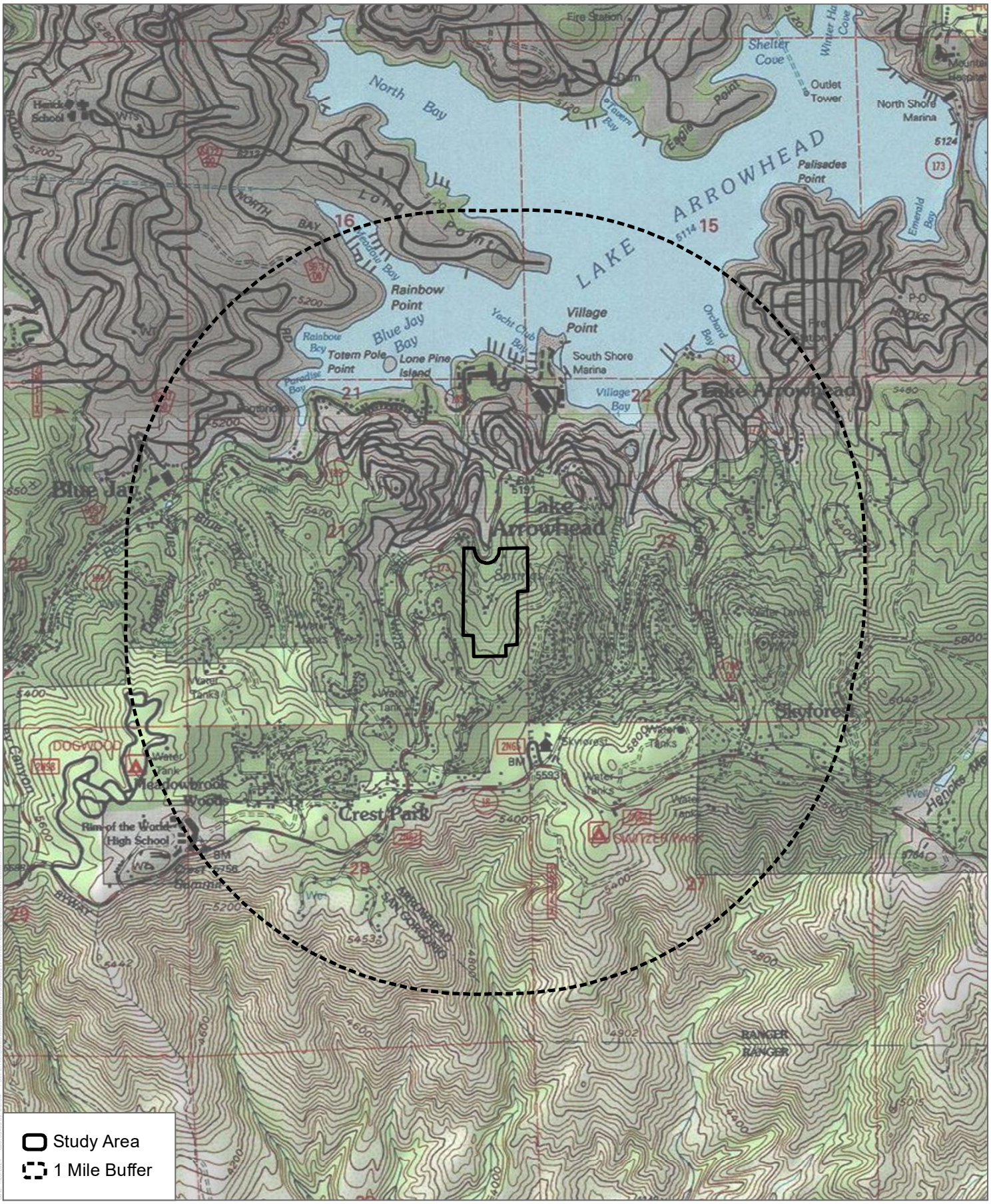
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Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Alexandra McCleary, Cultural Lands Manager
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Ms. McCleary,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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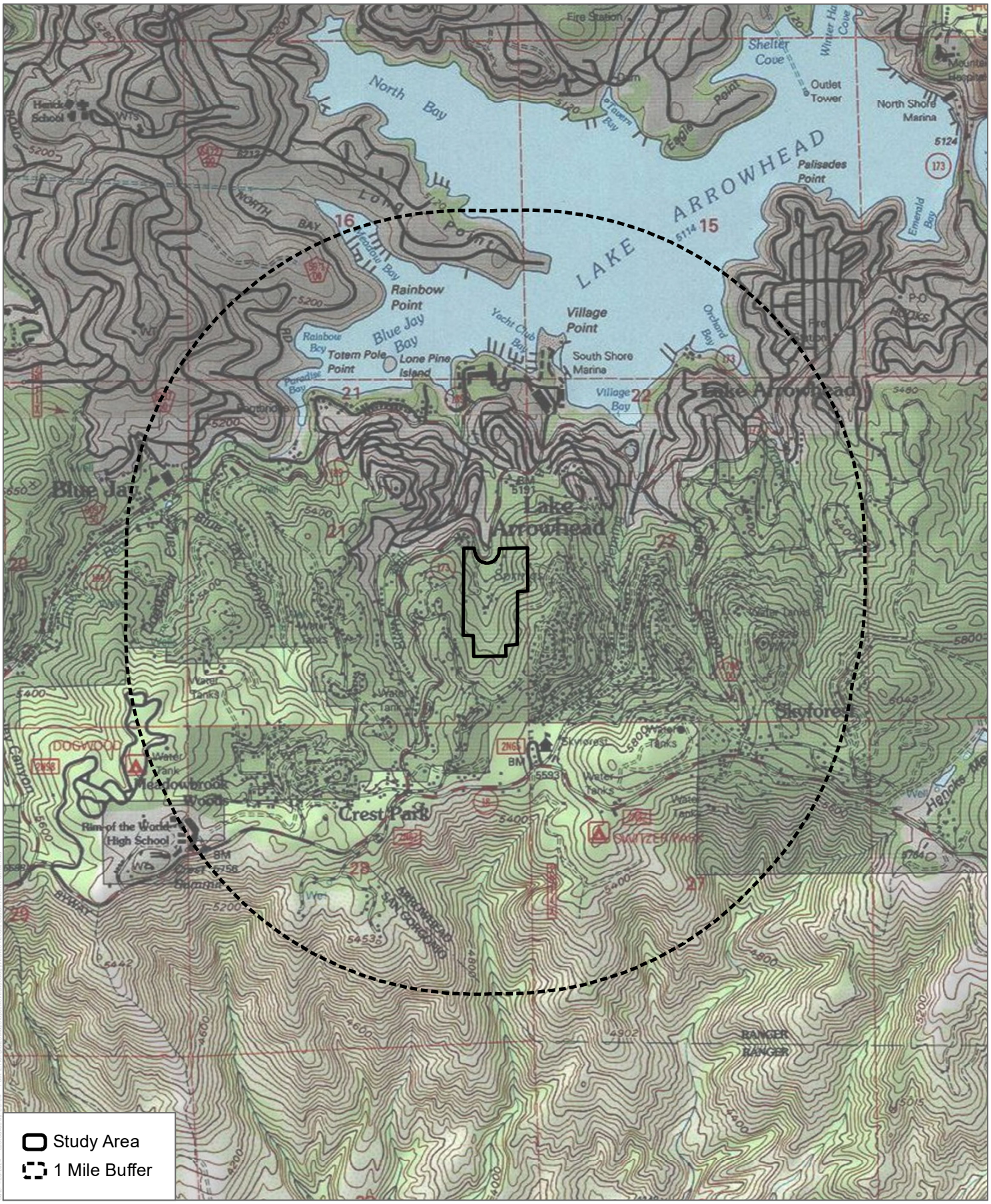
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If you have any knowledge of cultural resources that may exist within or near the proposed Project, or concerns pertaining to such information, please contact me by phone or email.

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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Township 2N; Range 3W; Sections 15, 16, 17, 20, 21, 22, 27, 28, 29

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Lake Arrowhead CSD Two-Mile Wells Project

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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Lacy Padilla, THPO Operations Manager
Agua Caliente Band of Cahuilla Indians
5401 Dinah Shore Drive
Palm Springs, CA 92264

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Ms. Padilla,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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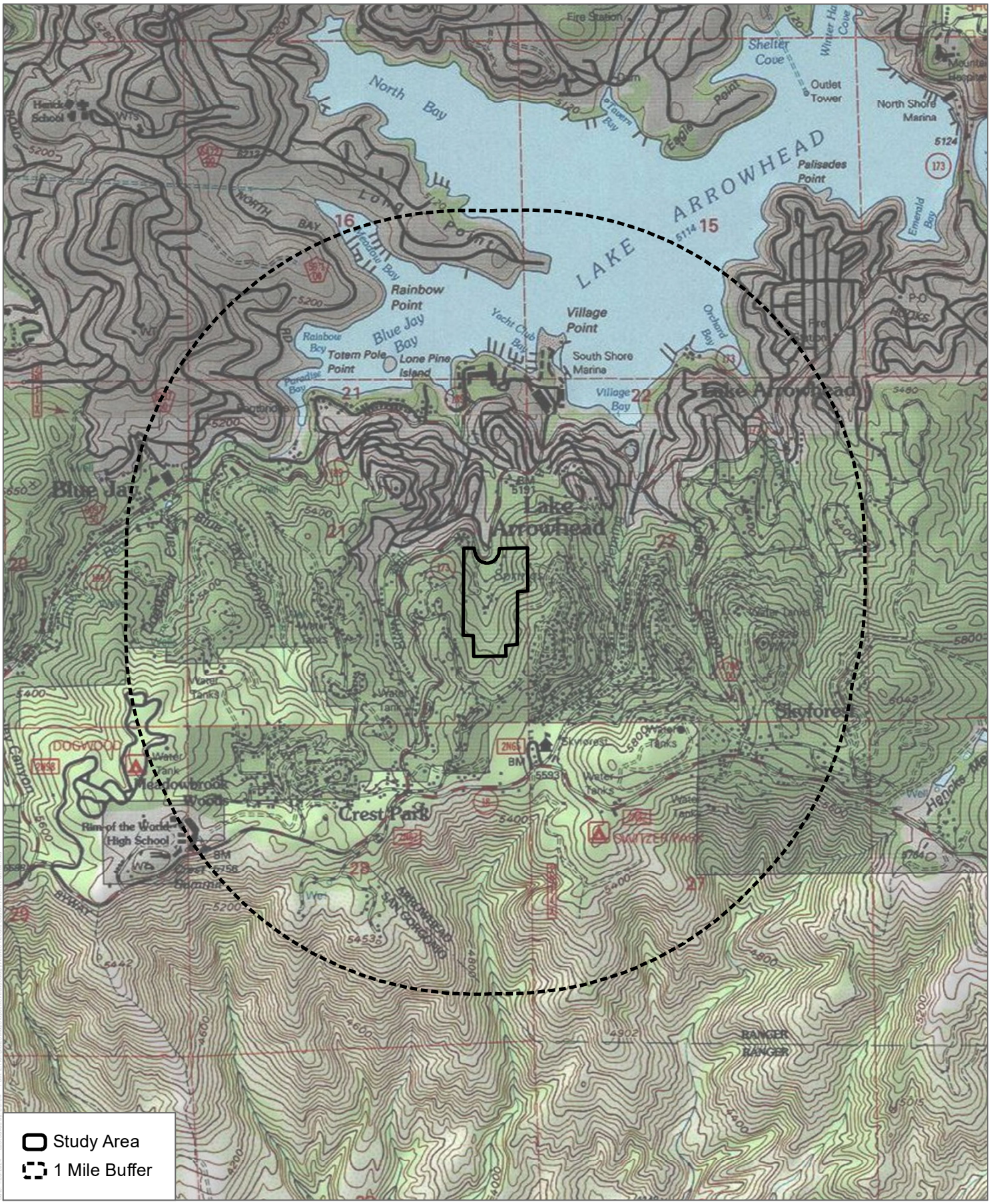
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If you have any knowledge of cultural resources that may exist within or near the proposed Project, or concerns pertaining to such information, please contact me by phone or email.

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Ms. Jill McCormick, Historic Preservation Officer
Quechan Tribe of the Fort Yuma Reservation
P.O. Box 1899
Yuma, AZ 85366

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Ms. McCormick,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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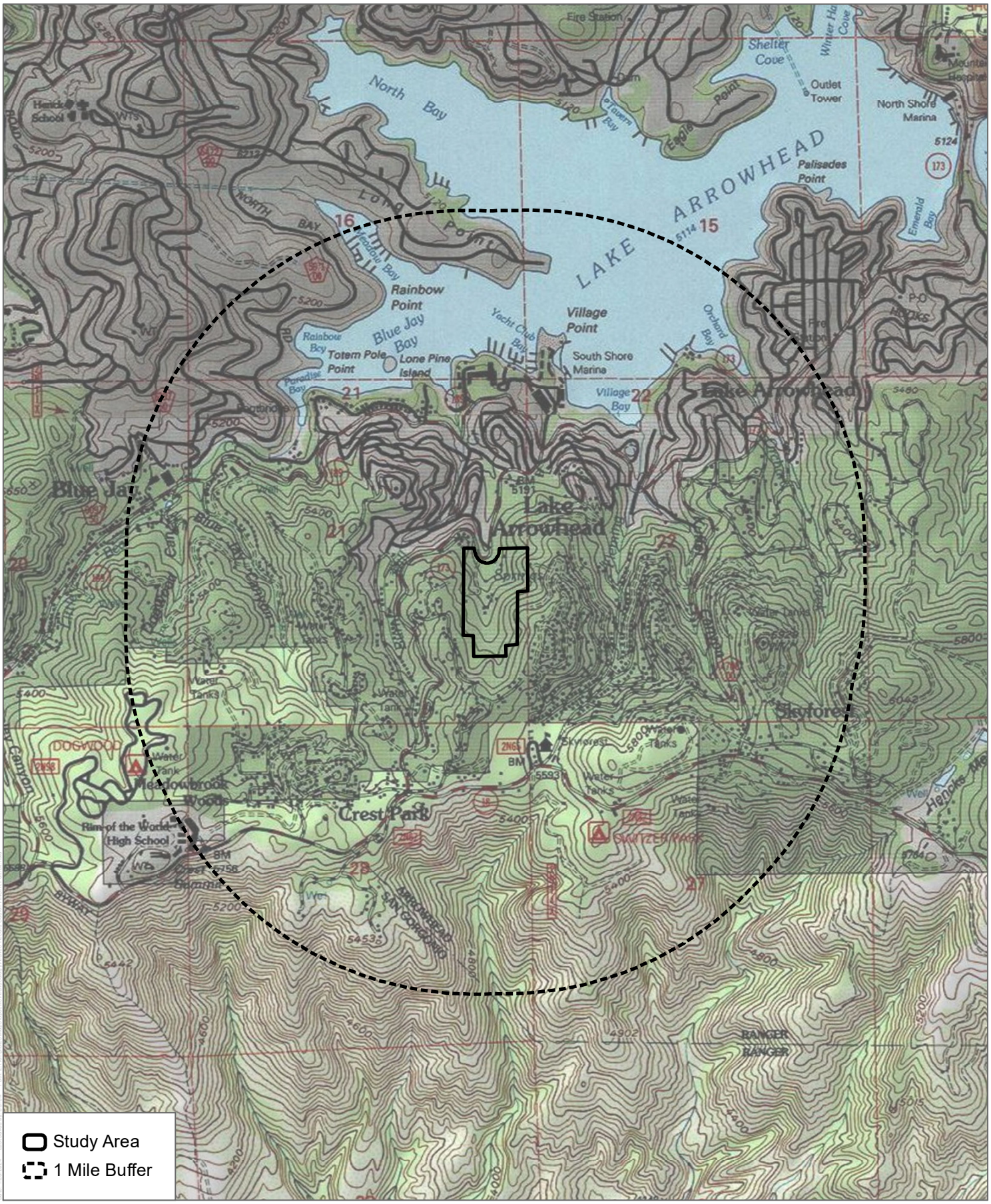
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Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Jordan Joaquin, President, Quechan Tribal Council
Quechan Tribe of the Fort Yuma Reservation
P.O. Box 1899
Yuma, AZ 85366

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Mr. Joaquin,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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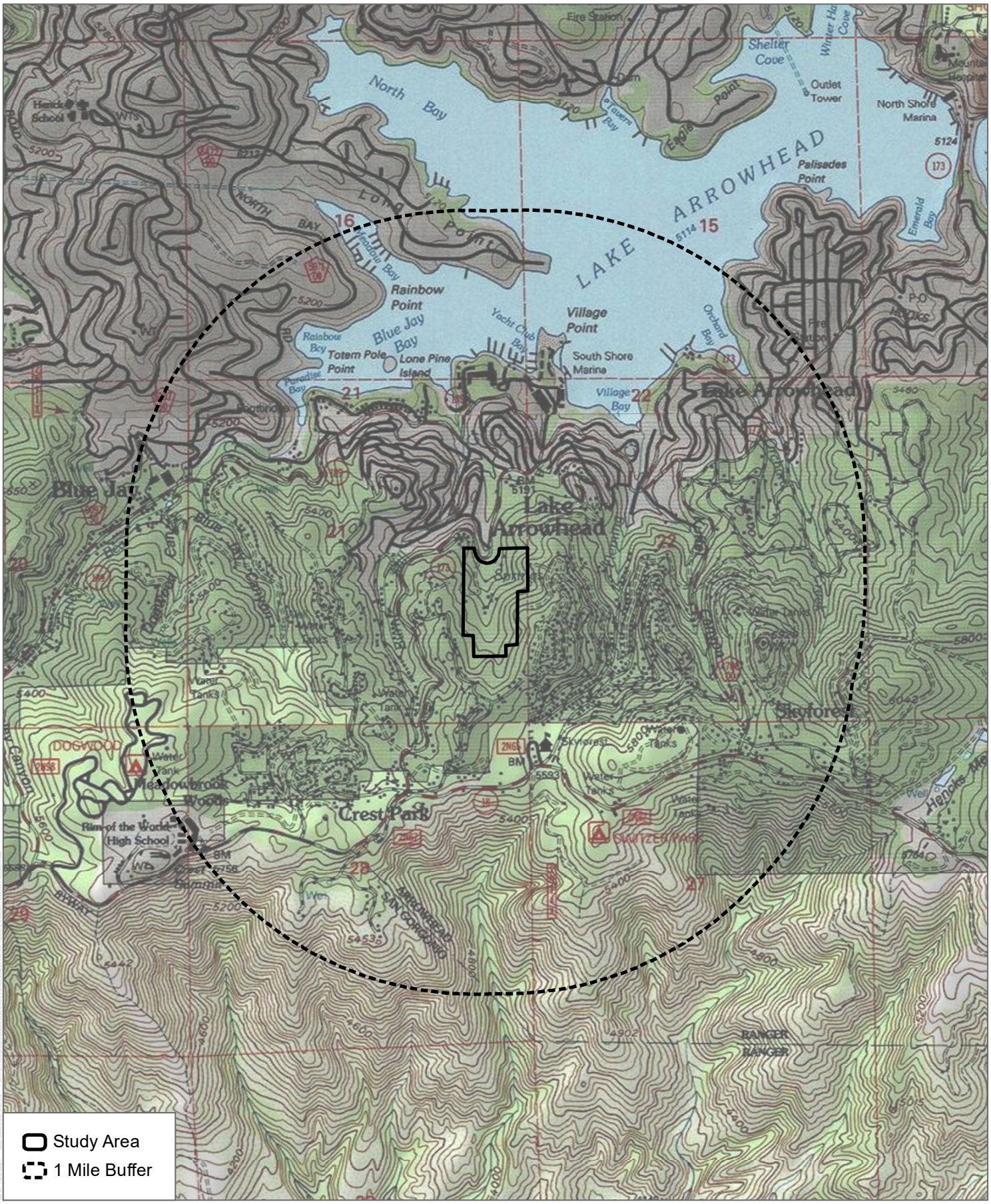
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Archaeologist
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Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Mr. Manfred Scott, Acting Chairman
Quechan Tribe of the Fort Yuma Reservation
P.O. Box 1899
Yuma, AZ 85366

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Mr. Scott,

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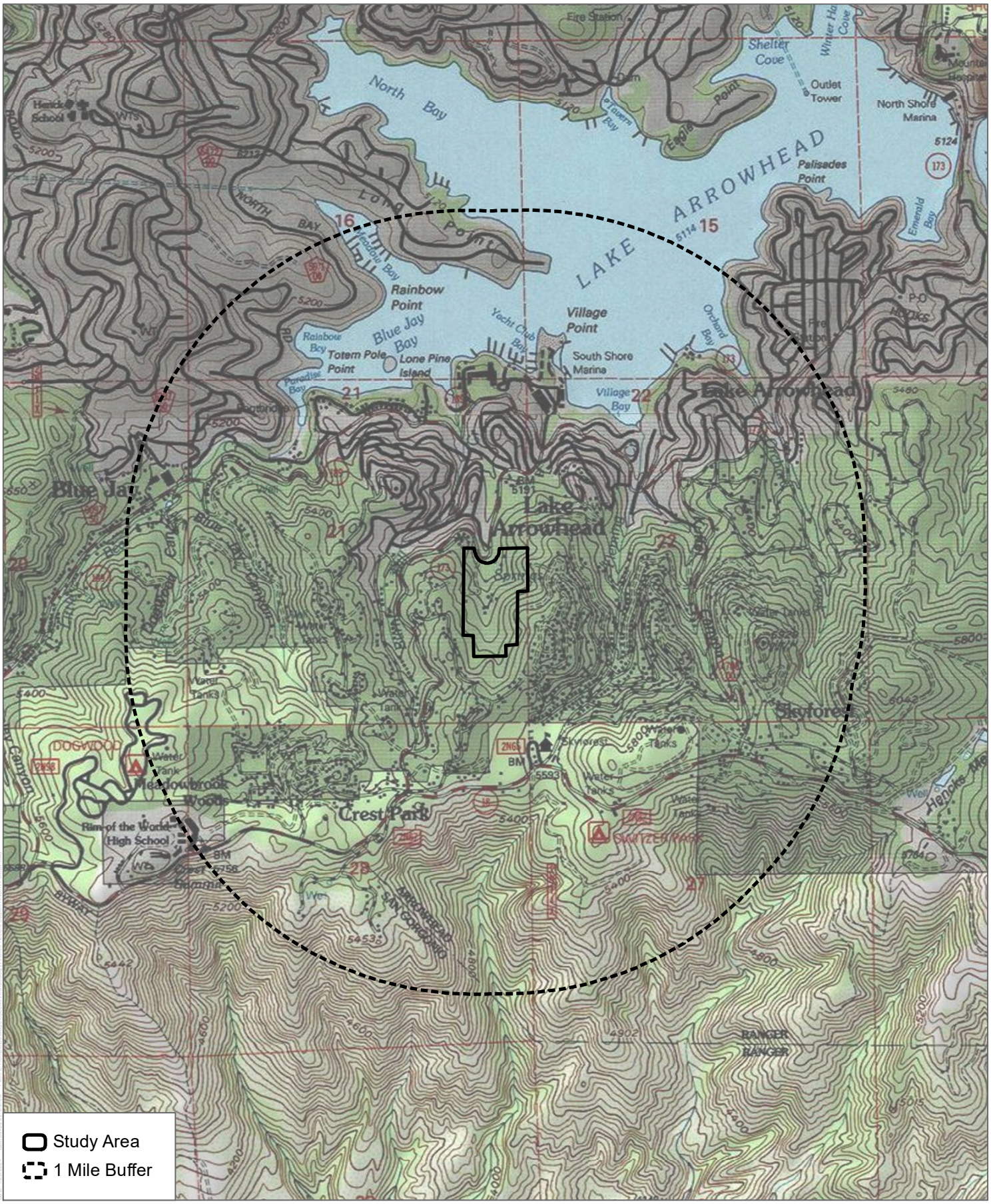
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Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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Lake Arrowhead CSD Two-Mile Wells Project

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MAIN OFFICE
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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Mr. Mark Cochrane, Co-Chairperson
Serrano Nation of Mission Indians
P.O. Box 343
Patton, CA 92369

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Mr. Cochrane,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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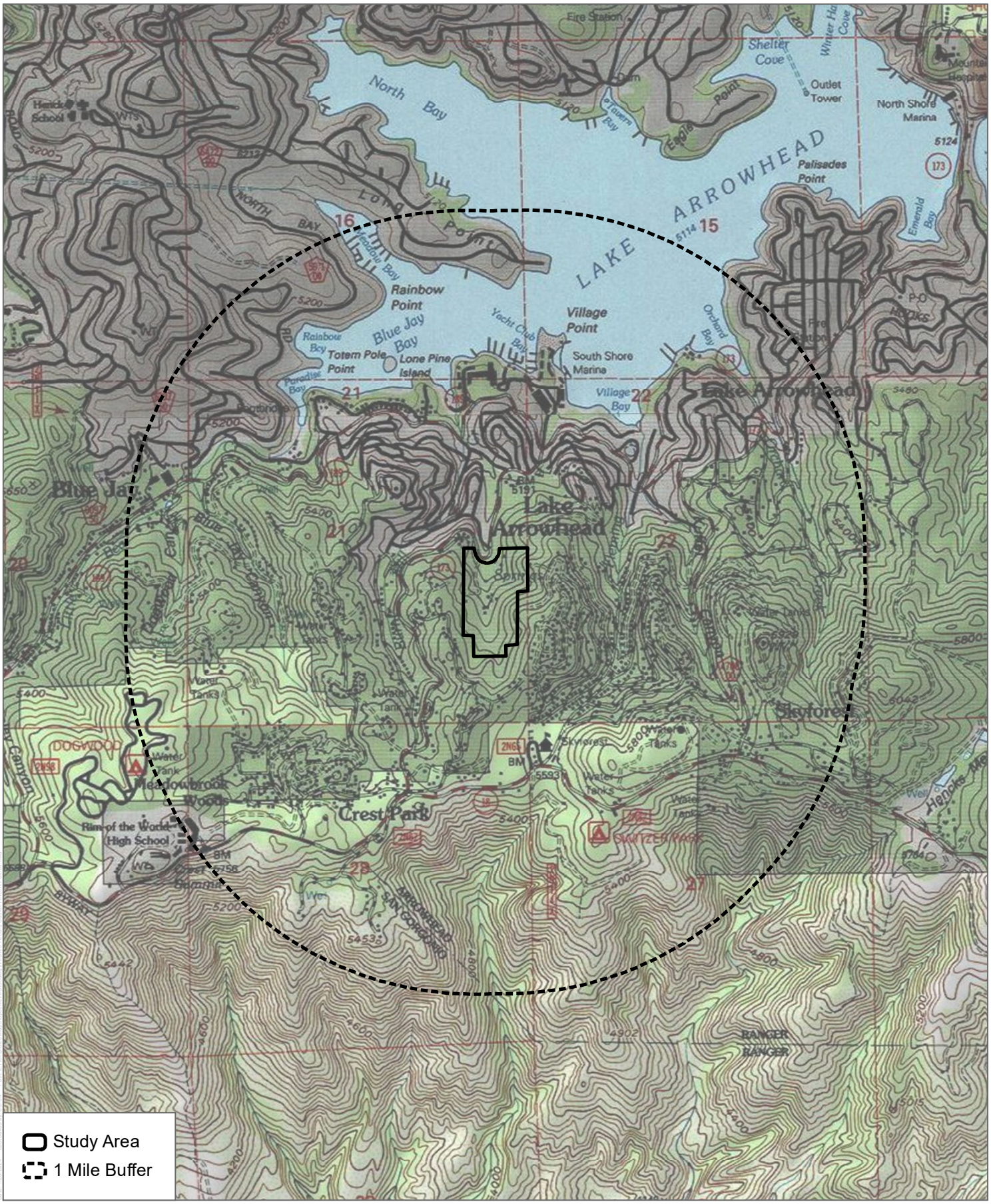
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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

March 01, 2024 14951.03

Mr. Wayne Walker, Co-Chairperson
Serrano Nation of Mission Indians
P.O. Box 343
Patton, CA 92369

Subject: Information Request for the Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Dear Mr. Walker,

The Lake Arrowhead Community Services District Two-Mile Wells Project (Project) is proposed within a 31-acre property located south of the intersection of Rainbow Drive and Highway 173, in the unincorporated community of Lake Arrowhead, San Bernardino County, California (Figure 1, Records Search Map). The Project involves the development of two potable water supply wells and an associated water treatment facility. The Project falls in Section 21 of Township 2 North and Range 3 West of the *Lake Arrowhead* and *Harrison Mountain* U.S. Geological Survey 7.5-minute Quadrangle Maps.

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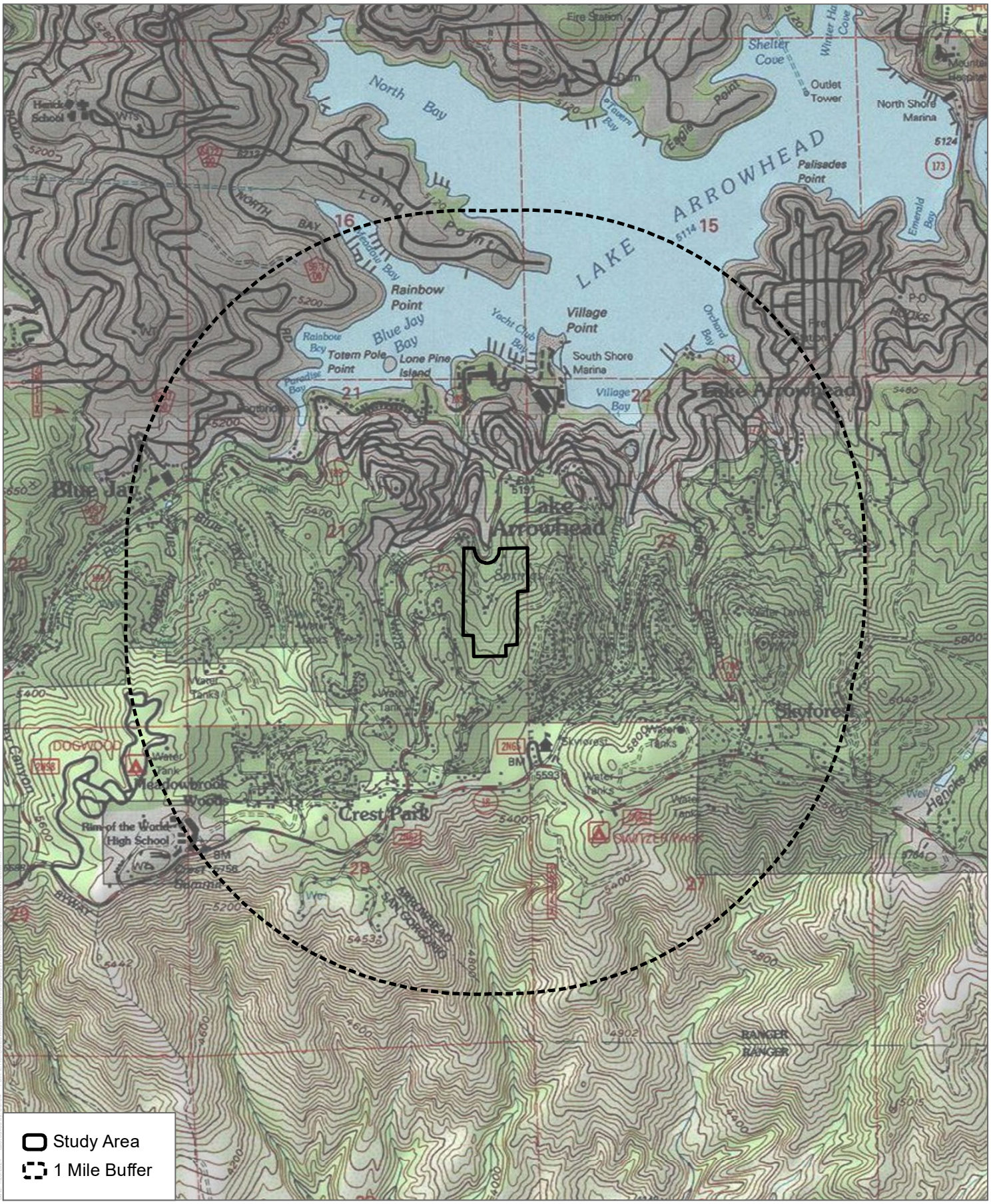
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Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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Records Search

Lake Arrowhead CSD Two-Mile Wells Project

Roshanne Bakhtiary

From: THPO Consulting <ACBCI-THPO@aguacaliente.net>
Sent: Monday, March 4, 2024 4:34 PM
To: Makayla Murillo
Subject: Lake Arrowhead Community Services District Two-Mile Wells Project, San Bernardino County, California

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings,

A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Thank you,

Xitlaly Madrigal
Cultural Resources Analyst
xmadrigal@aguacaliente.net
C: (760) 423-3485 | D: (760) 883-6829
5401 Dinah Shore Drive, Palm Springs, CA 92264

Roshanne Bakhtiary

From: Eunice Ambriz <Eunice.Ambriz@sanmanuel-nsn.gov>
Sent: Monday, March 11, 2024 11:15 AM
To: Makayla Murillo
Subject: Response to Information Request - Lake Arrowhead Two-Mile Project
Attachments: Lake Arrowhead Two-mile Project.pdf

Dear Makayla,

Thank you for contacting the San Manuel Band of Mission Indians concerning the proposed project area. San Manuel appreciates the opportunity to review the project documentation received by the Cultural Resources Management Department on March 6, 2024. Based on our current knowledge, the proposed project site is considered moderately culturally sensitive by the Tribe due to previously recorded resources.

As the area is of concern, the Tribe will wish to engage in government-to-government consultation pursuant to AB 52 with the Lead Agency for the project.

Thank you again for your correspondence, if you have any additional questions or comments please reach out to me at your earliest convenience.

Regards,
Eunice

Eunice Ambriz
Cultural Resources Technician
Eunice.Ambriz@sanmanuel-nsn.gov
O:(909) 864-8933 x 50-2033
M:(909) 649-4867
26569 Community Center Dr Highland, California 92346
SAN MANUEL
BAND OF MISSION INDIANS