

A PHASE I CULTURAL RESOURCES STUDY FOR THE ROY ROGERS DRIVE PROJECT

**CITY OF VICTORVILLE,
SAN BERNARDINO COUNTY, CALIFORNIA**

**PSUB25-00017
APNs 3106-201-20, -21, and -22**

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June 9, 2025



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Archaeological Report Summary Information

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Report Title: A Phase I Cultural Resources Study for the Roy Rogers Drive Project, City of Victorville, San Bernardino County, California

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Assessor's Parcel Number: 3106-201-20, -21, and -22

USGS Quadrangle: Section 17, Township 5 North, Range 4 West of the U.S. Geological Survey (USGS) (7.5-minute) *Victorville, California* Quadrangle

Study Area: 3.42 acres

Key Words: Archaeological survey program; City of Victorville; 3.42 acres; *Victorville, California* USGS topographic quadrangle; negative; no further archaeological study recommended.

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1.0 MANAGEMENT SUMMARY/ABSTRACT

The following report describes the results of the cultural resources survey conducted by BFSA Environmental Services, a Perennial Company (BFSa), for the Roy Rogers Drive Project. The survey included 3.42 acres (Assessor's Parcel Numbers [APN] 3106-201-20, -21 and -22) north of and abutting Roy Rogers Drive between Civic Drive and Amargosa Road in the city of Victorville, western San Bernardino County, California. The subject property is situated within Section 17, Township 5 North, Range 4 West of the United States Geological Survey (USGS) (7.5-minute) *Victorville, California* topographic quadrangle. As designed, the project proposes to develop a Tractor Supply Company store, associated parking, and infrastructure.

1.1 Purpose of Investigation

BFSa conducted this assessment to locate and record any cultural resources identified within the project in compliance with the California Environmental Quality Act (CEQA) and following City of Victorville environmental requirements for the project. The purpose of this investigation was to complete background research regarding the cultural resource sensitivity of the project, survey the project acreage, identify any archaeological resources on the property, and test and evaluate any cultural resources that may be impacted by the proposed development. The site plan shows the configuration of the proposed development (see Figure 2.0–3).

1.2 Major Findings

A review of historic USGS data and aerial photographs found that no structures have ever been located on the subject property. BFSa conducted a records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (CSU Fullerton). The records search identified seven previously conducted studies and one previously recorded historic resource within one-quarter mile of the subject property. Two of the studies included the project boundaries and were negative for the presence of resources. Further, the records search indicated that the subject property does not contain any previously recorded resources. In addition to the institutional records search, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within the project, the results have not been received yet. The survey did not result in the identification of any historic or prehistoric cultural resources on the property.

1.3 Recommendation Summary

Based upon the findings presented in this report, no further archaeological studies are necessary as part of the CEQA review process. Further, mitigation monitoring is not recommended as part of project approval considering impacts from previous grading and negative survey results. As such, there is little to no potential to encounter any cultural sites during development of this property. However, in the event that any historic or prehistoric cultural

resources are inadvertently discovered during the future development of the property, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be consulted to determine if further mitigation measures are warranted. Should human remains be discovered, treatment of those remains shall follow California Public Resources Code (PRC) 5097.9. Any human remains that are determined to be Native American shall be reported to the San Bernardino County Sheriff's Department Coroner Division and subsequently to the NAHC. A copy of this report will be filed with the SCCIC at CSU Fullerton. All notes, photographs, and other materials related to this project will be curated at the archaeological laboratory of BFSa in Poway, California.

2.0 INTRODUCTION

BFSA was retained by the project applicant to conduct a cultural resources study of the proposed Roy Rogers Drive Project in the city of Victorville, San Bernardino County, California. The archaeological survey was conducted to comply with CEQA and City of Victorville guidelines with regard to development-generated impacts to cultural resources. The project is located in an area of low to moderate cultural resource sensitivity, as suggested by known site density and predictive modeling. Sensitivity for cultural resources in a given area is usually indicated by known settlement patterns, which in the western San Bernardino County area, are focused around environments with accessible food and water.

The 3.24-acre project (APNs 3106-201-20, -21 and -22) is located north of and abutting Roy Rogers Drive between Civic Drive and Amargosa Road in the city of Victorville, western San Bernardino County, California (Figure 2.0–1). Specifically, the subject property is situated within Section 17, Township 5 North, Range 4 West of the USGS (7.5-minute) *Victorville, California* topographic quadrangle (Figure 2.0–2). As designed, the project proposes to develop a Tractor Supply Company store, associated parking, and infrastructure (Figure 2.0–3).

Principal Investigator Tracy A. Stropes, M.A., RPA directed the pedestrian survey with assistance from BFSA field archaeologist Parker Sheriff. The survey was conducted in 10- to 15-meter interval transects. The survey conditions were generally good. James Shrieve prepared the technical report, Emily Soong created the report graphics, and Payton Swanson conducted technical editing and report production. Qualifications of key personnel are provided in Appendix A.

2.1 Previous Work

BFSA conducted an archaeological records search at the SCCIC at CSU Fullerton for one-quarter mile around the current project. The results identified seven previously conducted studies and one previously recorded historic resource within one-quarter mile. Two of the previous studies (White et al. 2001 and Sanka and Aislin-Kay 2008) investigated the subject property as part of larger survey projects and did not identify cultural resources within the project.

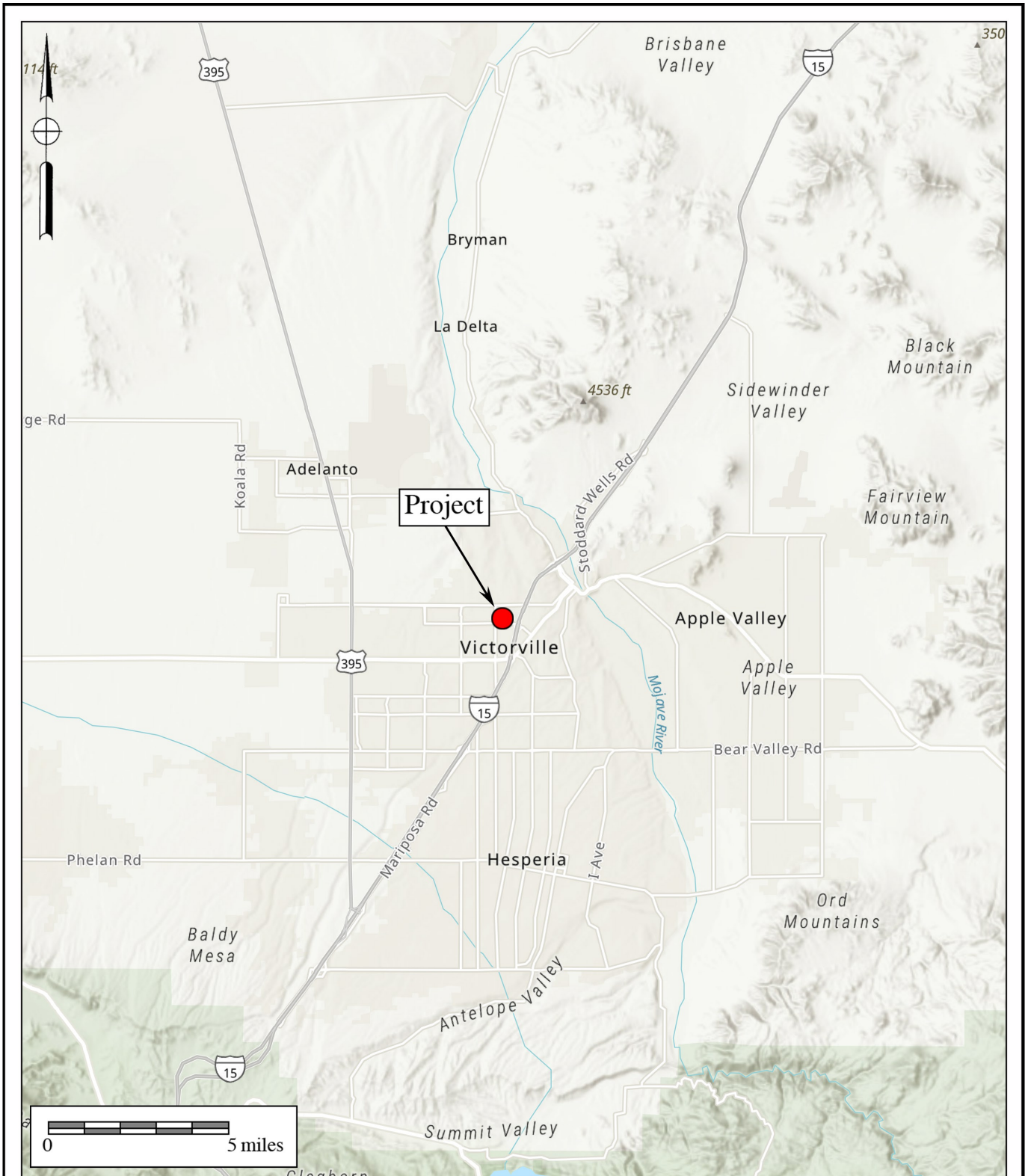


Figure 2.0–1
General Location Map
The Roy Rogers Drive Project
Esri World Topographic Map

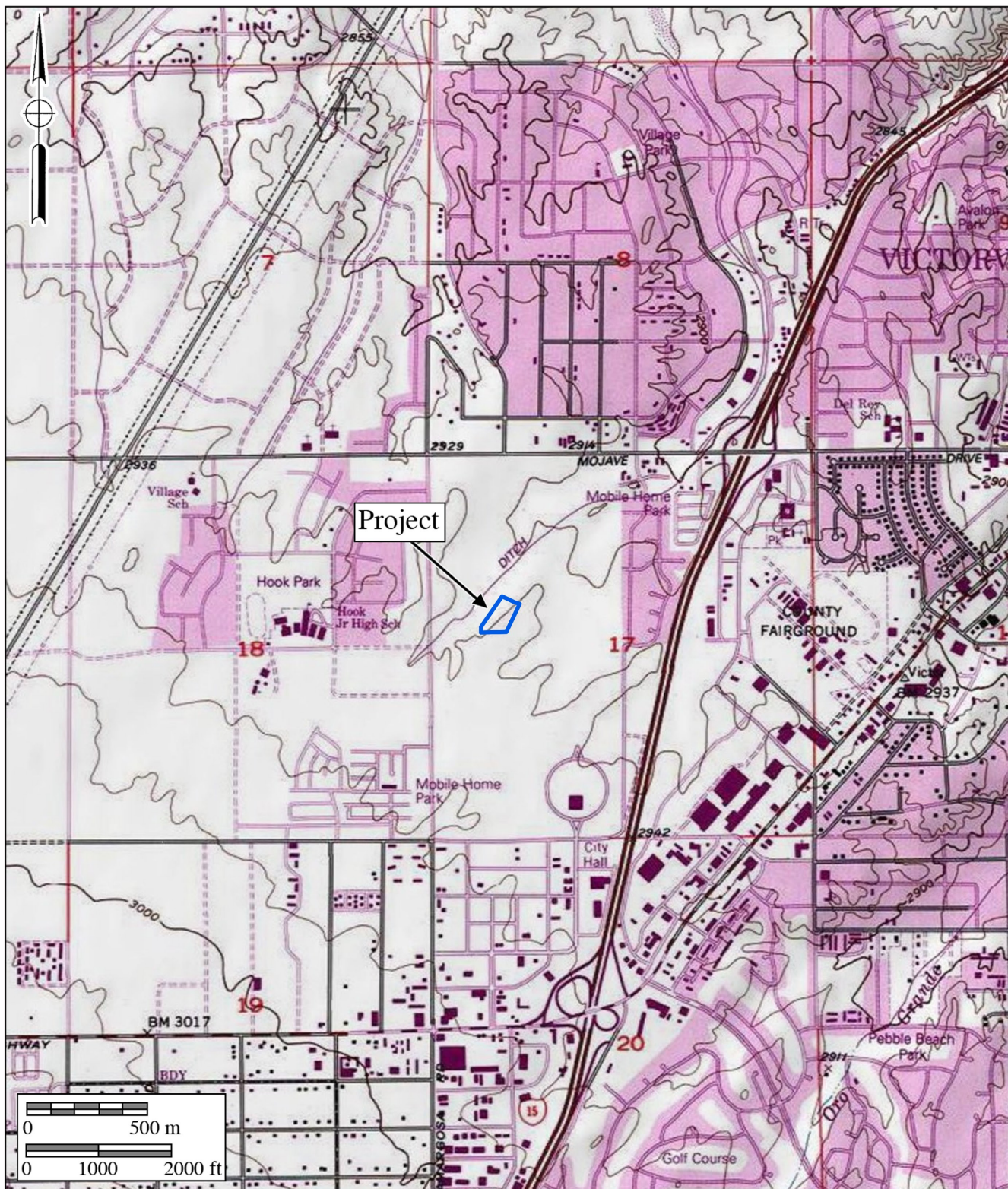


Figure 2.0–2
Project Location Map

The Roy Rogers Drive Project

USGS *Victorville* and *Hesperia* Quadrangles (7.5-minute series)



Site Data Summary

Building Summary:

Tractor Supply:

Indoor: ~23,957 SF

Outdoor: ~20,000 SF

Existing Zoning: Commercial (C-2)

Jurisdiction: City of Victorville

Area Summary:

Tractor Supply: 3.42 AC (148,812 SF)

Parcel ID: 310620120, 310620121,

310620122, 310620129

Vehicular Parking Summary:

Ratio: 1 space per 200

Minimum Required Retail 1: 120

Provided: 120

Stall Size: 10' x 20'

Setback:

Front: 10'

Side: 0'

Rear: 0'

Buffers:

Front: 10'

Side: 0'

Rear: 10'

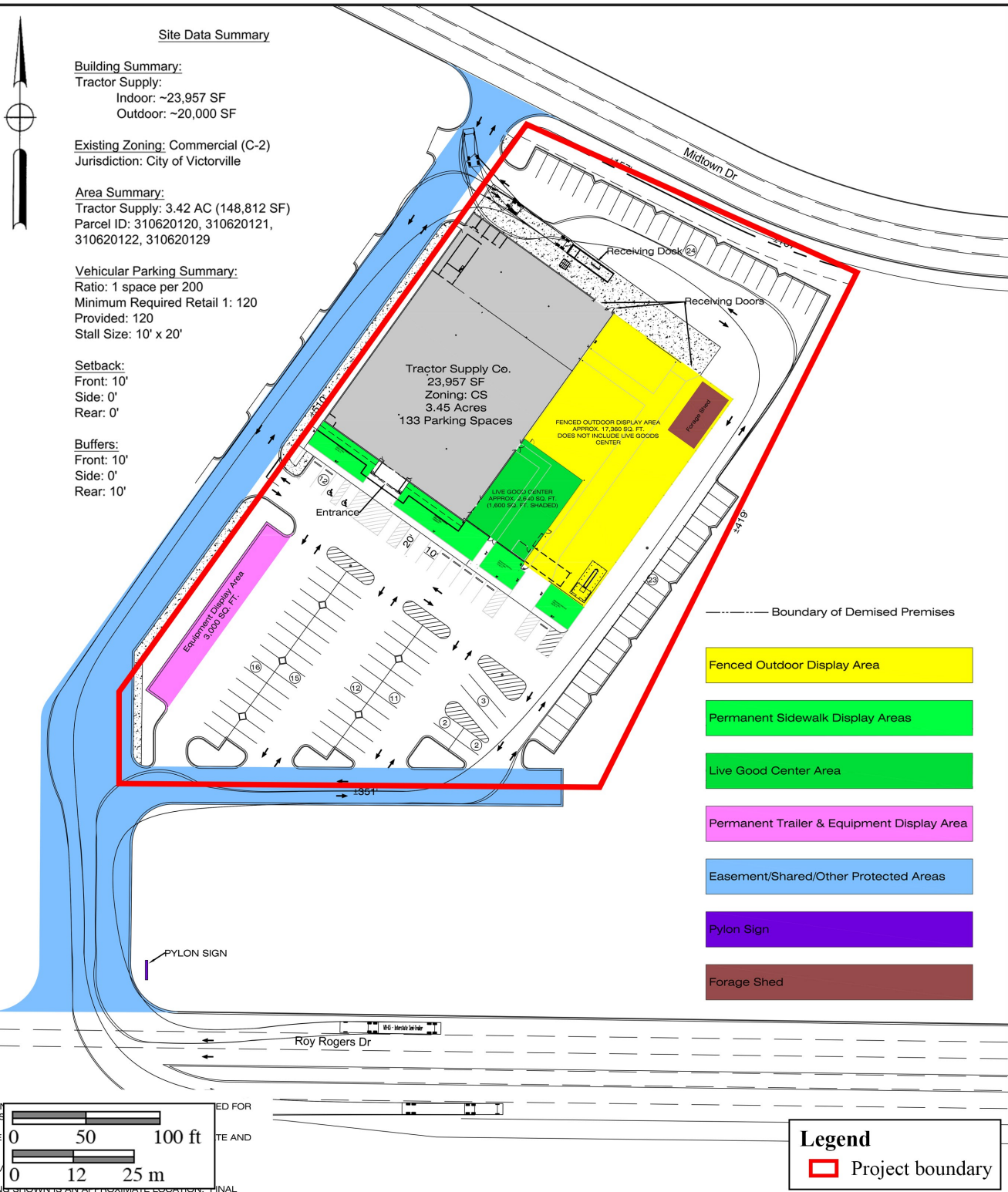


Figure 2.0-3

Site Plan

The Roy Rogers Drive Project

2.2 Project Setting

The subject property is located east of the Peninsular Ranges Geologic Province of southern California. The range, which lies in a northwest-to-southeast trend through the county, extends some 1,000 miles from the Raymond-Malibu Fault Zone in western Los Angeles County to the southern tip of Baja California. The subject property is located in the Mojave Desert, north of the San Gabriel Mountain range and the San Bernardino National Forest, and south of the Ord Mountain range. The property is generally flat with elevations ranging from approximately 2,940 to 2,950 feet above mean sea level. Currently, the vegetation on the property consists of creosote bushes, rubber rabbitbrush, and Joshua trees.

The project is located over the Victorville Basin. The 40-kilometer-wide structural depression is filled with sediments up to 1,300 meters thick and is a succession of deposits ranging in age from middle Miocene through late Pleistocene. To the south, the Victorville Basin is bordered by the San Gabriel and San Bernardino mountains and to the north, local are peaks and ridges of pre-Cenozoic basement rocks in the areas of Quartzite Mountain and the southeastern Shadow Mountains. These deposits record the erosional and depositional cycles of the region during episodes of crustal slip along the San Andreas Fault, along with the coeval uplift and transrotation of the San Bernardino and San Gabriel mountains. A major feature of the area is the evolution of the northward-flowing ancestral Mojave River. Between the Cajon Pass and Victorville, and at the project, the main geomorphic attribute of the surface is the Victorville Fan, a broad piedmont or bajada. The fan was active between roughly one-half million years to about middle to late Pleistocene times (Cox et al. 2003). Geologically, the project primarily overlies middle Holocene young alluvial fan deposits (Morton and Miller 2006). The specific soil type on the subject property is characterized as Cajon Sand, zero to two percent slopes (NRCS 2019).

2.3 Cultural Setting

The subject property straddles the traditional territory of multiple Native American groups including the Serrano and the Vanyume. Although there may be considered a range of cultural variations among these groups, they all have language derived from a base Uto-Aztecan language stock. In the same instance, although they may have held differing worldviews and maintained variations in their social structures, how they exploited the natural resources of their territories remained similar.

Although the Mojave Desert is an area believed to have had limited prehistoric subsistence resources, it has historically supported a long and occasionally dense population. Evidence of villages and camps, burials, quarries, rock features, and bedrock mortars has been documented at archaeological sites across the desert, some of which contain evidence of a lengthy prehistoric time span. Although early archaeological remains are not frequently found, when they are, they are generally located along the margins of former pluvial lakes or in areas of dune deflation. In contrast, artifacts on the desert floor may be sparse, widely scattered, and mixed with the desert pavements. For the region, archaeologists have reached a broad consensus regarding the general

cultural chronology. The identified sequence includes the Paleo Indian Period, the Pinto Period, the Gypsum Period, the Saratoga Springs Period, and the Ethnohistoric Period.

2.3.1 Paleo Indian Period (12,000 to 7,000 Years Before the Present [YBP])

The earliest documented evidence of human occupation in the Mojave Desert comes from the Paleo Indian Period, a cultural expression referred to as the Western Pluvial Lakes Tradition (WPLT). The WPLT occurred in the western Great Basin and covered an area that stretched from the now arid lands of southern California to Oregon. A cultural adaptation to pluvial conditions (e.g., lakes, marshes, and grasslands) flourished for thousands of years after approximately 9000 B.C. but disappeared in response to the warming and drying trends of the Altithermal Climatic Period (Moratto 1984). One of the most well-known expressions of the WPLT is the Lake Mojave Complex, which is thought to have covered a vast area including parts of the southwestern Great Basin and the Mojave Desert, maybe reaching as far south as the San Diego area. Artifacts indicative of the Lake Mojave Complex include foliated points and knives, Lake Mojave points, Silver Lake points, and flaked-stone crescents. Similar artifacts have been subsequently recorded along the shoreline of many other pluvial lakes in the Mojave Desert.

2.3.2 Pinto Period (7,000 to 4,000 YBP)

The Pinto Period dates to the end of the Pleistocene, when the severe and dramatic environmental change from pluvial to arid conditions began. Pinto Period sites are mostly found near ephemeral lakes and now dry streams and springs, suggesting a wetter climate than the present. Projectile points associated with the Pinto Period are characterized as larger atlatl dart points, as opposed to arrowhead points, which were introduced later. This period has been described as a highly mobile desert economy, with an emphasis upon hunting that was supplemented by the use of processed seeds (Moratto 1984). Pinto Period artifacts have been interpreted as indications of temporary or seasonal occupations by small groups of people.

2.3.3 Gypsum Period (4,000 to 1,500 YBP)

The presence of Humboldt Concave Base, Gypsum Cave, Elko Eared, or Elko corner-notched points are believed to be indicative of the Gypsum Period (radiocarbon dated from 4,000 to 1,500 years ago). The Gypsum Period reflects a more intensive desert occupation. Indications of trade with coastal populations are evidenced by the shell beads in the archaeological record. An increase in milling stones and manos has been found in association with this period, which indicates an increased use of hard seeds (Moratto 1984). Several scholars associate this period with the division of the Uto-Aztecan language, approximately 3,000 to 2,500 years ago. The major language groups that emerged from this division are Numic, spoken by the Kawaiisu and Piute; Takic, spoken by the Kitanemuk, Serrano, Gabrieliño, and other southern California Shoshonean speakers; Hopic, spoken in the southwest; and Tubatulabalic, spoken by the Tubatulabal in the southern Sierra Nevada Mountains. A shift in settlement patterns toward a more sedentary lifestyle

occurred during this period, characterized by the emergence of large permanent or semi-permanent village sites and associated cemeteries.

2.3.4 Saratoga Springs Period (1,500 to 800 YBP)

The Saratoga Springs Period is characterized by a transition from larger dart points to smaller arrow points. This, combined with evidence from rock art motifs, leads scholars to argue for a shift from atlatls to the use of the bow and arrow either during the end of the Gypsum Period or the beginning of the Saratoga Springs Period. This period saw an increase in trade with Arizona and other areas of the Southwest. Evidence in the archaeological record shows that Brown and Buff wares (pottery styles) characteristic of Arizona made their way to the California desert by A.D. 900. It is also believed that the Anasazi mined turquoise in the eastern California desert about this time.

2.3.5 Ethnohistoric Period (800 YPB to the Time of European Contact)

During the Ethnohistoric Period, the Vanyume and potentially the Serrano occupied the project area. The territory of the Vanyume was covered by small and relatively sparse populations primarily focused along the Mojave River, north of the Serrano and southeast of the Kawaiisu. It is believed that the southwestern extent of their territory went as far as Cajon Pass and portions of Hesperia. Bean and Smith (1978) noted it was uncertain if the Vanyume spoke a dialect of Serrano or a separate Takic-based language. However, King and Blackburn (1978) suggest that the Vanyume and other Kitanemuk speakers once occupied most of Antelope Valley. In contrast to the Serrano, the Vanyume maintained friendly social relations with the Mohave and Chemehuevi to the east and northeast (Kroeber 1976). As with the majority of California native populations, Vanyume populations were decimated circa the 1820s by placement in Spanish missions and *asistencias*. It is believed that by 1900, the Vanyume had become extinct (Bean and Smith 1978). However, given the settlement patterns reported for the Vanyume, it is more probable that the population was dispersed rather than completely wiped out.

The Serrano and Vanyume were primarily hunters and gatherers. Individual family dwellings were likely circular, domed structures. Vegetal staples varied with locality; acorns and piñon nuts were found in the foothills and mesquite, yucca roots, cacti fruits, and piñon nuts were found in or near the desert regions. Diets were supplemented with other roots, bulbs, shoots, and seeds (Heizer 1978). Deer, mountain sheep, antelopes, rabbits, and other small rodents were among the principal food packages. Various game birds, especially quail, were also hunted. The bow and arrow was used for large game, while smaller game and birds were killed with curved throwing sticks, traps, and snares. Occasionally, game was hunted communally, often during mourning ceremonies (Benedict 1924; Drucker 1937; Heizer 1978). In general, manufactured goods included baskets, some pottery, rabbit-skin blankets, awls, arrow straighteners, sinew-backed bows, arrows, fire drills, stone pipes, musical instruments (rattles, rasps, whistles, bull-roarers, and flutes), feathered costumes, mats, bags, storage pouches, and nets (Heizer 1978). Food

acquisition and processing required the manufacture of additional items such as knives, stone or bone scrapers, pottery trays and bowls, bone or horn spoons, and stirrers. Mortars, made of either stone or wood, and metates were also manufactured (Strong 1929; Drucker 1937; Benedict 1924).

2.3.6 Historic Period

Prior to the European presence in North America, Native American groups subsisted along the shores of the no longer extant lakes of the Great Basin region that covered the major portion of the present-day Mojave Desert. It was along these shores that Native Americans made their homes, produced their tools, and left an indelible mark upon the landscape. However, by the time the first Spanish explorers ventured into what is now southern California in 1769, the pluvial lakes had long since vanished, leaving the Mojave River to primarily support the Paiute and Mohave tribes.

The earliest documentation of any movement through the region is from the journal of a Spanish Franciscan priest, Francisco Garcés (Kyle 1990). Garcés was in search of a passable immigration route from what is now southern Arizona to the northern Spanish missions of what is now California. This, he thought, would allow an easier route for trade between the missions located in present-day New Mexico and present-day California. It is believed that, in 1776, Garcés passed what would later become Barstow, California.

Up until the 1850s, the majority of traffic through the region took place along the “Old Spanish Trail,” which forked northward from Mojave Road, located a few miles east of present-day Barstow (Steele 1975). These early travelers were not likely organized groups and more often than not, were raiders, mission escapees, slave traders, fur trappers, soldiers, explorers, stockmen, merchants, guides, gold prospectors, and immigrants.

By the early 1860s, many early pioneers began settling along the Mojave River, deriving their income from the road traffic that was now more common in the region. This, in turn, led to the development of way stations that held emergency supplies for travelers, with their most lucrative trade being liquor. It was around this same time that settlers also began agricultural and stock-raising ventures. Despite the early forays into gold mining that began as early as the 1850s, large-scale local developments did not begin until nearly 1881. This was likely a result of the harsh nature of the region, which forced costly freight charges and had crude mineral recovery methods, a scarcity of water, and an overall lack of local subsistence.

It was not until the discovery of silver in Calico and the construction of the Southern Pacific Railroad from Mojave to Daggett in 1882 that the region became a mining center. This gave rise to the now famous 20-mule teams. Ten teams were hitched together with two wagons and a water wagon to haul ore from Daggett to the town of Calico. It would follow that rich silver deposits gave birth to Calico Mines, Waterman Mines, and Daggett Mills (Kyle 1990). These ventures were then bolstered by the non-metallic mining industry, which still represents a significant portion of the desert’s commercial industry today.

In 1853, Congress authorized exploration and surveys to determine the most economical route for a rail line from the Mississippi River to the Pacific Ocean (Kyle 1990). Southern Pacific Railroad constructed the desert section of the rail line. The route was completed from Mojave to Needles in 1882 to 1883. Ore was hauled on the Calico Railroad from Calico to the Oro Grande Milling Company, which was across the river from Daggett, circa 1888. It was at this same time that the Santa Fe Railroad arrived in the region. In 1886, the California Southern Railroad (a subsidiary of the Atchison, Topeka, and Santa Fe Railway Company) completed the line from National City in San Diego County through the Cajon Pass, joining the transcontinental line.

That same year, the plan for the town of Victor was prepared. Named for California Southern Railroad construction superintendent Jacob Nash Victor, the town was established after the construction of the original railroad station located approximately one mile northwest of the narrows of the Mojave River. The plan for the town of Victor included a grid-patterned original subdivision map of approximately 200 acres that would encompass properties between A and G streets and First to Eleventh streets. In 1901, the name of the town was changed from Victor to Victorville, due to confusion by the United States Post Office with Victor, Colorado (City of Victorville 2015).

Due to the presence of rich soils and an abundance of water from the Mojave River, the town of Victor began to develop agriculturally soon after it was established in the 1880s. This focus was short-lived, however, as in the 1890s, limestone and granite were discovered in Victor Valley. This discovery led to the town shifting its attentions toward the cement manufacturing industry, with the Southwestern Portland Cement Company beginning operations in the town in 1916 (City of Victorville 2015).

Utilizing the existing National Old Trails Highway system, U.S. Route 66 was designated. Although the National Old Trails Highway originally cut through the town of Hesperia, the route was realigned in 1924 to pass through Victorville. The intersection of Seventh and D streets in downtown Victorville became a major transportation corridor after the designation (City of Victorville 2015).

As Victorville grew, the United States government became interested in utilizing the lands surrounding the town. The United States Army Corps of Engineers began construction of the Victorville Army Flight Training School in 1941, completing construction in 1942. A total of 10,000 men were stationed at the school when it opened. Following World War II, however, the airfield saw less use until the facility was reactivated in 1950 due to training needs associated with the Korean War. Upon reopening, the facility was renamed George Air Force Base after Brigadier General Harold H. George, who was killed in a ground accident on a United States base in Australia in 1942. The base was closed in 1992 and has been converted for civilian use as the Southern California Logistics Airport (City of Victorville 2015).

The town of Victorville was incorporated as a general law city in 1962 with its city limits encompassing approximately 10 square miles. In 2007, the city comprised approximately 74 square miles (City of Victorville 2015).

2.4 Research Goals

The primary goal of the research design is to attempt to understand the way in which humans have used the land and resources within the project through time, as well as to aid in the determination of resource significance. For the current project, the study area under investigation is the western portion of San Bernardino County. The scope of work for the archaeological program conducted for the project included the survey of 3.42 acres. Given the area involved and the narrow focus of the cultural resources study, the research design for this project was necessarily limited and general in nature. Since the main objective of the investigation was to identify the presence of and potential impacts to cultural resources, the goal is not necessarily to answer wide-reaching theories regarding the development of early southern California, but to investigate the role and importance of the identified resources. Although survey-level investigations are limited in terms of the amount of information available, several specific research questions were developed that could be used to guide the initial investigations of any observed cultural resources. The following research questions take into account the size and location of the project.

Research Questions:

- Can located cultural resources be situated with a specific time period, population, or individual?
- Do the types of located cultural resources allow a site activity/function to be determined from a preliminary investigation? What are the site activities? What is the site function? What resources were exploited?
- How do the located sites compare to others reported from different surveys conducted in the area?
- How do the located sites fit existing models of settlement and subsistence for valley environments of the region?

Data Needs

At the survey level, the principal research objective is a generalized investigation of changing settlement patterns in both the prehistoric and historic periods within the study area. The overall goal is to understand settlement and resource procurement patterns of the project occupants. Therefore, adequate information on site function, context, and chronology from an archaeological perspective is essential for the investigation. The fieldwork and archival research were undertaken with these primary research goals in mind:

- 1) To identify cultural resources occurring within the project;
- 2) To determine, if possible, site type and function, context of the deposit, and chronological placement of each cultural resource identified;
- 3) To place each cultural resource identified within a regional perspective; and

- 4) To provide recommendations for the treatment of each of the cultural resources identified.

3.0 METHODOLOGY

The archaeological program for the Roy Rogers Drive Project consisted of an institutional records search, an intensive pedestrian survey of the entire 3.24-acre project, and preparation of a technical study. This archaeological study conformed to professional standards in support of City of Victorville requirements for the project. Statutory requirements of CEQA and subsequent legislation (Section 15064.5) were followed in evaluating the significance of cultural resources. Specific definitions for archaeological resource type(s) used in this report are those established by the State Historic Preservation Office (SHPO 1995).

3.1 Archaeological Records Search

BFSA conducted an archaeological records search for the project and surrounding area within a one-quarter mile radius at the SCCIC at CSU Fullerton. Land patent records, held by the Bureau of Land Management (BLM) and accessible through the BLM General Land Office (GLO) website, were also reviewed for pertinent project information. In addition, the BFSA research library was consulted for any relevant historical information.

3.2 Field Methodology

In accordance with CEQA review criteria and the policies of the City of Victorville, an intensive pedestrian survey of the project was conducted that employed a series of parallel survey transects spaced at 10- to 15-meter intervals to locate archaeological sites within the project. The archaeological survey of the project was conducted on June 2, 2025. The entire project was covered by the survey process and photographs were taken to document property conditions during the survey (see Section 4.2). Ground visibility throughout the property was considered excellent.

3.3 Report Preparation and Recordation

This report contains information regarding previous studies, statutory requirements for the project, a brief description of the setting, research methods employed, and the overall results of the survey. The report includes all appropriate illustrations and tabular information needed to make a complete and comprehensive presentation of these activities, including the methodologies employed and the personnel involved. A copy of this report will be placed at the SCCIC at CSU Fullerton. Any newly recorded sites or sites requiring updated information will be recorded on the appropriate Department of Parks and Recreation site forms, which will be filed with the SCCIC.

3.4 Native American Consultation

BFSA also requested a SLF search from the NAHC to search for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within the vicinity of the project. This request is not part of any Assembly Bill (AB) 52 Native American

consultation. The results of the SLF are discussed in Section 4.1. All correspondence can be found in Appendix C.

3.5 Applicable Regulations

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of the city of Victorville in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA provide the guidance for making such a determination. Below are the CEQA criteria that a resource must meet in order to be determined important.

3.5.1 California Environmental Quality Act

According to CEQA (§15064.5a), the term “historical resource” includes the following:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (CRHR) (PRC SS5024.1, Title 14 CCR [California Code of Regulations]. Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. 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 (PRC SS5024.1, Title 14, Section 4852) including the following:
 - a) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - b) Is associated with the lives of persons important in our past;
 - c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

- d) Has yielded, or may be likely to yield, information important in prehistory or history.
- 4) The fact that a resource is not listed in, or determined eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), or identified in an historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

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

- 1) 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.
- 2) The significance of an historical resource is materially impaired when a project:
 - a) 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
 - b) 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 PRC or its identification in an historical resources survey, meeting the requirements of Section 5024.1(g) of the PRC, 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,
 - c) 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:

- 1) 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).

- 2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.
- 3) 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 PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC 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.
- 4) If an archaeological resource is neither a unique archaeological nor 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, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

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

- (d) 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 NAHC as provided in PRC 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 NAHC. 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).
 - 2) The requirement of CEQA and the Coastal Act.

4.0 RESULTS

4.1 Records Search Results

BFSA conducted an archaeological records search for the project and the surrounding area within a one-quarter mile radius at the SCCIC at CSU Fullerton (Appendix B). The search results identified one previously recorded historic resource (P-36-014486; historic trash dump) within the search radius; it is not located within the project boundaries. The records search also identified seven previous studies within one-quarter mile of the subject property, two of which included the current project parcel (White et al. 2001 and Sanka and Aislin-Kay 2008). The White et al. (2001) and Sanka and Aislin-Kay (2008) studies were archaeological surveys that investigated the subject property as part of larger survey projects and identified no cultural resources within the project.

BFSA also reviewed The National Register of Historic Places (NRHP) index, the Office of Historic Preservation (OHP) California Point of Historical Interest index, BLM GLO records, historic USGS topographic maps, and historic aerial photographs (1952 to 2023) to help facilitate a better understanding of the historic use of the property. The review of the NRHP index, the OHP index, and BLM GLO records did not indicate the presence of archaeological resources within the project. Historic USGS data and aerial photographs further indicate that no structures have ever been located within the subject property. In addition, aerial photographs indicate that the perimeters of the property were impacted by the development of Roy Rogers Drive to the south between 1985 and 1994, Midtown Drive to the north between 1994 and 2005, and Desert Sun Plaza to the west in 2006.

BFSA also requested a SLF search from the NAHC. This request is not part of any AB 52 Native American consultation. The SLF search determines the presence of any sacred or religious sites within the search radius. The results have not been received yet. All correspondence is provided in Appendix C.

4.2 Results of the Field Survey

BFSA field archaeologist Parker Sheriff conducted the archaeological survey of property on June 2, 2025. The survey included a careful inspection of all exposed ground surfaces, including any rodent burrows and disturbed areas. The archaeological survey of the project was an intensive reconnaissance consisting of a series of parallel survey transects spaced at approximately 10- to 15-meter intervals. The entire property was accessible with excellent ground surface visibility. Vegetation consisted of desert sage scrub communities including creosote bushes, rubber rabbitbrush, and Joshua trees (Plate 4.2–1). Modern refuse was noted throughout the property, but the survey did not result in the identification of any historic or prehistoric cultural resources within the project.



Plate 4.2–1: Overview of the project from the northwest project boundary, facing southeast.

5.0 RECOMMENDATIONS

The cultural resources survey for the Roy Rogers Drive Project did not identify any archaeological resources on the property. Given that no archaeological sites, features, or artifacts were identified during the survey, no potential impacts to cultural resources are anticipated with the approval of the proposed development.

Based upon the findings of this study, no further archaeological studies are necessary as part of the CEQA review process. Further, mitigation monitoring is not recommended as part of project approval considering impacts from previous grading and negative survey results. As such, there is little to no potential to encounter any cultural sites during development of this property. However, in the event that any historic or prehistoric cultural resources are inadvertently discovered during the future development of the property, all construction work in the immediate vicinity of the discovery shall stop, and a qualified archaeologist shall be consulted to determine if further mitigation measures are warranted. Should human remains be discovered, treatment of these remains shall follow California PRC 5097.9. Any human remains that are determined to be Native American shall be reported to the San Bernardino County Sheriff's Department Coroner Division and subsequently to the NAHC.

6.0 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.



Tracy A Stropes, M.A., RPA
Principal Archaeologist

June 9, 2025

Date

7.0 REFERENCES

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APPENDIX A

Qualifications of Key Personnel

Tracy A. Stropes, MA, RPA

Vice President of Cultural Resources/ Principal Archaeologist

BFSA Environmental Services, a Perennial Company

14010 Poway Road • Suite A •

Phone: (858) 484-0915 • Fax: (858) 679-9896 • Email: tstropes@bfsa.perennialenv.com



Education

Master of Arts, Anthropology, San Diego State University, California 2007

Bachelor of Science, Anthropology, University of California, Riverside 2000

Professional Memberships

Register of Professional Archaeologists

Society for California Archaeology

Archaeological Institute of America

Association of Oregon Archaeologists

Experience

Vice President of Cultural Resources/Principal Archaeologist
BFSA Environmental Services, a Perennial Company
Poway, California

March 2009–Present

Tracy A. Stropes has over 33 years of experience in cultural resource management, with experience in project management, report authorship, lithic analysis, laboratory management, Native American consultation, and technical report editing for numerous projects throughout the western United States. Mr. Stropes has conducted cultural resource surveys, archaeological site testing and evaluations for National Register eligibility and CEQA compliance, mitigation of resources through data recovery for archaeological sites, budget and report preparation, and direction of crews of all sizes for projects ranging in duration from a single-day site visit to multiple years. Mr. Stropes is a Registered Professional Archaeologist (RPA) and is on the list of archaeological consultants qualified to conduct archaeological investigations in the city and county of San Diego, county of Riverside, State of Oregon, State of Arizona, and on Arizona and California BLM lands. He has served as project archaeologist for hundreds of projects and composed data recovery and preservation programs for sites throughout the western United States for both CEQA- and NEPA-level compliance.

Archaeological Principal Investigator
TRC Solutions

June 2008–February 2009
Irvine, California

Cultural resource segment of Natural Sciences and Permitting Division; management of archaeological investigations for private companies and local, state, and federal agencies, personnel management, field and laboratory supervision, lithic analysis, Native American consultation and reporting, NRHP and CEQA site evaluations, and authoring/coauthoring cultural resource management reports.

**Principal Investigator and Project Archaeologist
Archaeological Resource Analysts**

**June 2006–May 2008
Oceanside, California**

As a sub consultant, served as Principal Investigator and Project Archaeologist for several projects for SRS Inc., including field direction, project and personnel management, lab analysis, and authorship of company reports.

**Project Archaeologist
Gallegos & Associates**

**September 1996–June 2006
Carlsbad, California**

Project management, laboratory management, lithic analysis, field direction, Native American consultation, report authorship/technical editing, and composition of several data recovery/preservation programs for both CEQA and NEPA level compliance.

**Project Archaeologist
Macko Inc.**

**September 1993–September 1996
Santa Ana, California**

Project management, laboratory management, lithic analysis, field supervision, and report authorship/technical editing.

**Archaeological Field Technician
Chambers Group Inc.**

**January 1993–September 1993
Irvine, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

**Archaeological Field Technician
John Minch and Associates**

**May 1992–September 1992
San Juan Capistrano, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

Selected Reports/Papers

Principal Author

- 2023 A Section 106 (NHPA) Historic Resource Study for the Oak Creek Canyon Project, City of Wildomar, Riverside County, California. Prepared for Ambient Pacific OCC, LLC.
- 2023 A Section 106 (NHPA) Historic Resource Study for The Questhaven 76 Project, San Diego County, California (APNs 223-070-007, 223-070-008, and 223-080-046). Prepared for ColRich.
- 2023 A Phase I Cultural Resources Survey for the Bermuda Dunes Self Storage Project, PAR220053, Riverside County, California. Prepared for FAMA Dairy.
- 2023 A Cultural Resources Study for 4846 Pacifica Drive, City of San Diego. Prepared for Colliers International.
- 2023 A Section 106 (NHPA) Historical Resources Study for the Maison's Sierra Project, City of Lancaster, California (Tract No. 27099). Prepared for Ravello Holdings, Inc.

- 2023 Cultural Resource Survey and Evaluation Program for the Omni Hotel Driving Range/Parking Lot Project, City of Carlsbad, California. Prepared for TRT Holdings, Inc.
- 2022 A Class III Historic Resources Study for the Anna Avenue Project for Section 106 Compliance, City of San Diego, California. Prepared for John Smith Earthworks, Inc.
- 2022 A Section 106 (NHPA) Historic Resource Study for the Grand Avenue Project, Riverside County, California (APN 379-060-005). Prepared for TriPointe Homes
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- 2022 A Section 106 (NHPA) Historical Resources Study for the Alpine Rancho Palo Verde Project, San Diego County, California (SPL-219-00698-CJA). Prepared for Schindler Real Estate Services, Inc.
- 2022 A Section 106 (NHPA) Historic Resource Study for the Cumming Ranch Project, San Diego County, California (APNs 282-010-08, -30, -34, and -43; 283-011-06; 283-021-01 and -02; 283-022-02; 283-041-25 and -26; and 283-051-01). Prepared for 805 Properties.
- 2021 A Section 106 (NHPA) Historic Resources Study for the Gatchell Road Project, San Diego County, California (Project No. 100203). Prepared for the National Park Service.
- 2021 A Section 106 (NHPA) Historic Resources Study for Site CA-SDI-11,934/H, San Diego County, California (APN 532-520-15). Prepared for the National Park Service.
- 2021 A Section 106 (NHPA) Historical Resources Study for the Renaissance Ranch Project, Riverside County, California (SPL-2004-01431-JPL). Prepared for Richland Developers, Inc.
- 2021 A Phase I Cultural Resource Survey for the Coppel Remodel & Addition Project, La Jolla, California. Prepared for Marengo Morton Architects, Inc.
- 2021 A Section 106 (NHPA) Historic Resources Study for CAB-20-1, San Diego County, California (APN 532-520-15). Prepared for the National Park Service.
- 2021 Cultural Resources Study for 7951 Paseo Del Ocaso, La Jolla, California. Prepared for Aidlin Darling Design.
- 2021 Cultural Resources Study for the Secret Hills Ranch Project, San Diego County, California (PDS2020-LDGRMJ-30253, APN 520-060-18)
- 2021 Cultural Resources Study for the UCLA Cedar Suites and Willow Creek Staff Housing Project, Lake Arrowhead, San Bernardino County, California. Prepared for T&B Planning, Inc.
- 2021 A Section 106 (NHPA) Historic Resources Study for CA-SDI-13,884, San Diego County, California (APN 532-520-13). Prepared for the National Park Service.
- 2021 A Cultural Resources Study for the UCLA Glamping Facility Project, Lake Arrowhead, San Bernardino County, California. Prepared for UCLA Capital Programs.
- 2021 Archaeological Test Results for 2596 Chalcedony Street, San Diego, California. Prepared for Colliers International.

- 2021 Cultural Resources Study for the 12247 Elliott Avenue Project, Los Angeles County, California. Prepared for EPD Solutions.
- 2021 A Section 106 (NHPA) Historic Resources Study for the Roquet Ranch Project, City of Colton, San Bernardino County, California (Tentative Tract Map No. 19983; APNs 116-701-101, -102, 116-702-101, -105, -121, -122, -123, and 116-703-118). Prepared for Sunmeadows, LLC.
- 2020 A Section 106 (NHPA) Historical Resources Study for the Ocean Breeze Ranch Project, Bonsall, San Diego County, California (SPL-2020-00176). Prepared for Ocean Breeze Ranch, LLC.
- 2020 Cultural Resource Monitoring Report for the Encinitas Beach Hotel Project, Encinitas, California. Prepared for JMI Realty, LLC
- 2020 A Section 106 (NHPA) Historic Resources Study for the Pacifica Estates Project, Fallbrook, San Diego County, California. Prepared for Jose Islas.
- 2020 A Section 106 (NHPA) Historic Resources Study for the Hidden Valley Ranch Project, SPL-2004-01124, City of Poway, California. Prepared for Barbara Malone.
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- 2020 A Phase I and II Cultural Resources Assessment for the Hansen Lot Split Project, TPM 37655, Riverside County, California. Prepared for Forest Hansen.
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- 2019 Cultural Resources Survey for the Highlands at Warner Springs and Off-Site Fire Access Road Project, Warner Springs, San Diego County, California. Prepared for Warner Springs Estates, LLC.
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- 2019 Mitigation Monitoring and Reporting Program for the Harmony Grove Village, San Diego County, California. Prepared for Lennar – San Diego Division.
- 2019 Cultural Resource Monitoring Report for the Price-Cohen Residence Project, 2045 Lowry Place, La Jolla, California 92037. Prepared for Lena Price and Thomas Cohen.
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- 2019 Cultural Resources Study for the Ocean Breeze Ranch Project, Bonsall, San Diego County, California. Prepared for Ocean Breeze Ranch, LLC.
- 2019 Mitigation Monitoring and Reporting Program for the Arthofer Residence Project, 1890 Viking Way, La Jolla, California. Prepared for Frank and Sharon Arthofer.
- 2019 A Phase I and II Cultural Resources Assessment for the Greentree Ranch Project, Riverside County, California. Prepared for T&B Planning, Inc.
- 2018 A Section 106 (NHPA) Historic Resources Study for the Escondido Country Club Project, SPL-2018-00135-CJA, City of Escondido, California. Prepared for New Urban West, Inc.
- 2018 A Phase I Cultural Resources Study for the North County Plaza Project, Carlsbad, California. Prepared for Planning Systems, Inc.
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- 2017 A Class III Archaeological Study for the Tract 28859 Project for Section 106 Compliance. Prepared for Menifee 28859, LLC.
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- 2014 Cultural Resource Monitoring Report for the Sewer Group 723 Project, San Diego, California. Prepared for Ortiz Corporation.
- 2013 A Phase I Cultural Resource Study for the Rogers Tierra Bonita Project, Poway, California. Prepared for John D. Fitch & Associates.
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- 2013 Phase I Archaeological Assessment for the Bixby Highgrove Project (TTM 36437), Riverside County, California. Prepared for T&B Planning, Inc.
- 2013 A Class III Cultural Resources Study for the Ramona Ranch Affordable Housing Project for Section 106 Compliance, San Diego County, California. Prepared for AMCAL Multi-Housing, Inc.
- 2013 Phase I Archaeological Assessment for the Yates Road Project (TTM 36437), Riverside County, California. Prepared for CV Communities, LLC.
- 2013 A Cultural Resources Survey and Evaluation Program for the Warner Ranch Project, San Diego County, California. Prepared for HP Warner Ranch, LP.
- 2013 A Phase I Cultural Resource Assessment for TPM 36585, Riverside County, California. Prepared for GF Real Estate Services.
- 2013 A Class III Cultural Resources Study for TR 31597 and TR 32627, Riverside County, California. Prepared for Standard Pacific Homes.
- 2013 Phase I Cultural Resources Survey for the Sunny Cal Project, City of Beaumont, County of Riverside. Prepared for CV Communities, LLC.

- 2013 A Class III Cultural Resources Study for The Sierra Bella Project for Section 106 Compliance, Riverside County, California. Prepared for Forestar Corona, LLC.
- 2013 A Class III Cultural Resources Study for the Moosa Creek Mitigation Bank Project. Prepared for a Creek LLC.
- 2013 Archaeological Survey of the Rohmiller Residence for a Bulletin 560 Permit Application, 2350 Calle De La Garza, La Jolla, California 92037 (APN 346-180-22). Prepared for Architect Mark D. Lyon, Inc.
- 2013 Cultural Resources Survey and Evaluation Program for the Oak Creek Project, City of Escondido, California. Prepared for New Urban West, Inc.
- 2013 Phase I Cultural Resources Survey for the Hope Harbor Project, Riverside County, California. Prepared for Medhat Rofael.
- 2013 Archaeological Survey of the Liske Residence, La Jolla, California. Prepared for ECEGC Inc.
- 2013 An Updated Phase I Cultural Resources Assessment for Tentative Tract Maps Nos. 36484 and 36485, Audie Murphy Ranch. Prepared for Brookfield Residential.
- 2013 A Phase I Cultural Resources Study For the 401 West Ash Street Project San Diego, California. Prepared for PierPoint Legacy Holdings, LLC.
- 2013 Cultural Resource Test Plan for the Ten on Columbia Project, San Diego, California. Prepared for InDev, Inc.
- 2013 Phase I Cultural Resources Survey for the Washington Avenue Project, City of Murrieta, California. Prepared for Coastal Land Solutions.
- 2012 Phase I Cultural Resources Survey for the Wildomar 23 Project, Riverside County, California. Prepared for Lennar.
- 2012 A Class III Cultural Resources Study for the USGS Creepmeter Project. Prepared for Bureau of Land Management, El Centro Office.
- 2012 Mitigation Monitoring Report for the for the Johnston Residence Project, La Jolla, California. Prepared for Heather Johnston.
- 2012 A Phase I Cultural Resource Study for the Howell Residence Project, Poway, California. Prepared for Cal Howell.
- 2012 Cultural Resource Monitoring Report for the Sewer and Water Group 799 Project. Prepared for Burtech Pipeline.
- 2012 A Phase I Cultural Resources Study For the Villa Hermosa Project San Diego, California. Prepared for David Chow.
- 2012 A Phase I Cultural Resource Study for the Payan Property Project, San Diego, California. Prepared for Landmark Engineering.
- 2012 A Phase I Cultural Resource Study for the El Camino Real Widening Project, Carlsbad, California. Prepared for Planning Systems.

- 2012 A Phase I Cultural Resource Study for the Encore Trust Project, La Jolla, California. Prepared for Metcalf Development and Consulting.
- 2012 A Phase I Cultural Resource Study for the Andres Residence Project, La Jolla, California. Prepared for Engineering Design Group.
- 2012 Phase I Cultural Resources Survey for the Diamond Springs Project, Riverside County, California. Prepared for Benjamin J. Stables III, B 3 Consulting.
- 2012 A Phase I Cultural Resource Study for the ActivCare at Mission Bay Project, San Diego, California. Prepared for ActivCare Living, Inc.
- 2012 Mitigation Monitoring Report for the Water Group 790 Project, City of San Diego, California. Prepared for Orion Construction Corporation.
- 2012 Results of the Mitigation Monitoring Program for the Mission Brewery Villas Project, City of San Diego, California. Prepared for Eilar Associates, Inc.
- 2012 Cultural Resource Monitoring Report for the Gatto Residence Project, La Jolla, California. Prepared for Marengo Morton Architects Inc.
- 2012 Cultural Resource Monitoring Report for the Sunset Cliffs Trunk Sewer Project, City of San Diego, California. Prepared for KTA Construction.
- 2012 Mitigation Monitoring Report for the Sewer Group 682M Project, City of San Diego, California. Prepared for BRH Garver.
- 2012 Cultural Resource Monitoring Report for the Pelberg Residence Project, City of San Diego, California. Prepared for Linda and Art Pelberg.
- 2012 Cultural Resource Monitoring Report for the Rose Creek Bikeway Bridge Project, City of San Diego, California. Prepared for Flatiron West, Inc.
- 2011 Mitigation Monitoring Report for the South Mission Valley Trunk Sewer Project, City of San Diego, California. Prepared for HPS Mechanical, Inc.
- 2011 A Class III Cultural Resources Study for the La Dama de Oro Project, San Bernardino County, California. Prepared for Mohave Gold Mining & Exploration, Inc.
- 2011 Mitigation Monitoring Report for the Jacobs Health Care Facility Project, City of San Diego, California. Prepared for Jacobs Health Care, LLC.
- 2011 A Phase I Cultural Resources Study For the Rowland Auto Dismantling Project, City of San Diego, California. Prepared for David Rowland.
- 2011 A Phase I Cultural Resource Study for the Dye Residence Project, La Jolla, California. Prepared for Eric Dye.
- 2011 Phase I Cultural Resources Survey for the Santa Rosa Academy Project, Riverside County, California. Prepared for Santa Rosa Academy Charter School c/o Bradley Burke Competitive Edge Development, LLC.
- 2011 Cultural Resource Data Recovery Study for SDI-4606 Locus B for Saint Gabriel's Catholic Church, Poway, California. Prepared for Saint Gabriel's Catholic Church.

- 2011 A Phase I Cultural Resource Study for the Nooren Residence Project, La Jolla, California. Prepared for Jack Nooren.
- 2011 Mitigation Monitoring Report for the Sewer and Water Group 768 Project, City of San Diego, California. Prepared for Ortiz Corporation.
- 2011 Cultural Resource Test for the 10th Avenue Parking Lot Project, City of San Diego, California. Prepared for 11th and B Investment Associates, LLC.
- 2011 A Cultural Resources Study for the Ampudia Lot Project, City of San Diego, California. Prepared for Venture Pacific Commercial Services, Inc.
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Contributing Author

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APPENDIX B

Archaeological Records Search Results

(Deleted for Public Review; Bound Separately)

APPENDIX C

NAHC Sacred Lands File Results

(Deleted for Public Review; Bound Separately)