Appendix C: Cultural Resources Assessment

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Subject: Draft Cultural Resources Inventory for the Seaflower Battery Energy Storage System Project, City of Menifee, Riverside County, California

Dear Piljun Ko, Ole Barre, and Chance Staley:

This letter documents the cultural resources inventory conducted by Dudek for the Seaflower Battery Energy Storage System (BESS) Project (Project), located in the City of Menifee, Riverside County, California (Figure 1, Project Location). The City of Menifee (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). Dudek performed a cultural resources inventory for the entire Project area, which consists of approximately 4 acres of privately owned land encompassing Assessor's Parcel Numbers (APNs) 331-250-021 and 331-250-002 in the City of Menifee, in Riverside County, California (Figure 2, Project Area).

The Project includes development of a new 100 megawatt (MW) 4-hour outdoor utility scale energy storage system including electrical facilities, telecommunication facilities, and a generation interconnection transmission (gen-tie) line. An overhead or underground gen-tie line would be constructed to transfer power between the Project site and the existing Southern California Edison (SCE) Valley Substation, located approximately 0.4 miles to the north. If installed overhead, an appropriate number of 115 kilovolt (kV) transmission structures including insulator/hardware assemblies, and appropriate number of conductor spans between the last structure and the dead-end substation structure at the SCE Valley Substation would be installed. The final alignment, pole heights, number of structures, structure types, conductor spans, and location of the gen-tie line will be finalized with detailed engineering design.

Dudek requested a records search from the SCIC for the Project area and a 1 mile radius on September 3, 2024. The SCIC staff conducted the records search for the Project area and 1 mile radius on January 9, 2025. The SCIC results indicate there are 23 previously recorded cultural resources located within the 1 mile of the Project, none of which intersect the Project area. The SCIC also indicate that 38 previous cultural resources studies have been recorded within the 1 mile of the Project area; four of the previous studies intersect the Project area. Additionally, the SCIC records search revealed that half of the Project area (50%) has been previously studied.

Dudek requested a Sacred Lands File from the Native American Heritage Commission (NAHC) on September 11, 2024. A response letter was received via email from the NAHC on October 1, 2024 stating that the results were negative. Dudek mailed tribal outreach letters on October 1, 2024. To date, six responses have been received.

Dudek conducted an intensive level cultural resources pedestrian survey on August 30, 2024, and did not identify any cultural or historic-age buildings located within the Project area; however, one historic-age resource, the San Jacinto Valley Railway (CA-RIV-008196), is located approximately 9 meters south of the Project area. The San Jacinto Valley Railway is a built environment resource and will be addressed in a separate built environment report for the Project (Donovan-Boyd 2024).

Dudek's cultural resources inventory of the Project indicates that there is a low to moderate potential for encountering intact subsurface archaeological deposits within the Project area during Project implementation. A review of historic topographic maps and historic aerial photographs reveal that the Project area has been subject to disturbances associated with the development of the existing Southern California Edison (SCE) Valley Substation since at least 2012. However, the depth of disturbance is not apparent from the aerial photographs and it is not possible to determine if grading removed all soils and sediments that have the potential to contain cultural resources. A review of the geomorphological context reveals there are alluvial soils present throughout the Project area. Reoccurring alluvial action and flooding serve to support the presence of cultural deposits in the area. Dudek recommends that a qualified archaeologist and Native American monitor be present during all initial ground disturbing activities to assess the extent of previous disturbances and the potential for buried archaeological resources. Monitoring can be reduced or terminated should no discoveries be made or if documentation is provided that demonstrates that ground-disturbing activities will be occurring in sediments with no potential for cultural resources.

Project Location and Description

Seaflower Energy LLC (Seaflower) is considering the development of the Project. The Project area falls within Section 14 of Township 5 South, Range 3 West of the Romoland, California U.S. Geological Service (USGS) 7.5-minute series topographic quadrangle map (Figure 1). The Project area covers approximately 4 acres of privately owned land in the City of Menifee, in Riverside County, California. Specifically, the Project parcels are located east of Junipero Road, approximately 0.65 miles south of Highway 74, west of Menifee Road, and north of Case Road, encompassing APNs 331-250-021 and 331-250-002 (Figure 2).

The Project area is currently a laydown yard and has been previously disturbed by the existing SCE Valley Substation. The Project is anticipated to interconnect with the existing SCE Valley Substation via a generation interconnection line that will travel east from the Project area, north along the eastern boundary of the Project area, across McLaughlin Road and interconnect with the SCE Valley Substation.

Regulatory Framework

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

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California"

(California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria (California Public Resources Code Section 5024.1[c]):

- Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Associated with the lives of persons important in our past.
- 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.
- Has yielded, or may be likely to yield, information important in prehistory or history.

Resources less than 50 years old are not considered for listing in the CRHR, but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

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 NAHC 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.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and 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 act also provides a process for the identification and repatriation of these items to the appropriate tribes.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological and historic resources:

1. California Public Resources Code Section 21083.2(g): Defines "unique archaeological resource."
2. California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a): Define historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource;" it also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1[q]), it is a "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; 14 CCR 15064.5[a]).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA 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" (14 CCR 15064.5[b][1]; California Public Resources Code Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

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

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.

Assembly Bill 52

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

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.

City of Menifee General Plan

The Open Space and Conservation Element of the City of Menifee's General Plan, adopted in 2008, details the city's plan for the preservation, maintenance, and enhancement of the city's paleontological and cultural resources. The specific goals and policies relating to the city's archaeological, historical, and cultural resources are detailed below (City of Menifee 2008):

Goal OSC-5. Archaeological, historical, and cultural resources are protected and integrated into the City's built environment.

Policy OSC-5.1. Preserve and protect archaeological and historic resources and cultural sites, places, districts, structures, landforms, objects and native burial sites, traditional cultural landscapes and other features, consistent with state law and any laws, regulations or policies which may be adopted by the city to implement this goal and associated policies.

Policy OSC-5.2. Work with local schools, organizations, appropriate Native American tribes with ancestral territories located within the city and other agencies to educate the public about the rich archaeological, historic, and cultural resources found in the city.

Policy OSC-5.3. Preserve sacred sites identified in consultation with the appropriate Native American tribes whose ancestral territories are within the city, such as Native American burial locations, by avoiding activities that would negatively impact the sites, while maintaining the confidentiality of the location and nature of the sacred site.

Policy OSC-5.4. Establish clear and responsible policies and best practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural resources, following applicable CEQA and NEPA procedures and in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.5. Develop clear policies regarding the preservation and avoidance of cultural resources located within the city, in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.6. Develop strong government-to-government relationships and consultation protocols with the appropriate Native American tribes with ancestral territories within the city in order to ensure better identification, protection and preservation of cultural resources, while also developing appropriate educational programs, with tribal participation, for Menifee residents.

Records Search

Dudek requested a search of the California Historical Resources Information System (CHRIS) from the South Coastal Information Center (SCIC) for the Project area on September 3, 2024. These searches included review of mapped prehistoric, historical, and built-environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Project site, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. Results from the records search are provided in Confidential Attachment A, SCIC Records Search Results.

Previously Recorded Cultural Resources

The SCIC staff conducted the records search of the Project area and 1 mile radius on January 9, 2025. The SCIC records search results did not identify any previously recorded cultural resources within the Project area. The records search did identify 23 previously recorded cultural resources located within 1 mile of the Project area (Table 1). The resources located within 1 mile of the Project area consist of 10 prehistoric resources, including 3

bedrock milling sites, 2 isolates, 1 bedrock milling feature and lithic scatter, 1 bedrock milling feature and midden deposit, 1 midden deposit and lithic scatter, 1 rock art, and 1 lithic scatter; 10 historic-age resources, including 4 roadways, 2 historic properties, 1 ancillary farming feature, 1 building foundation and refuse, 1 cattle staging area, the San Jacinto Valley Railway (CA-RIV-008196), and 3 multicomponent consisting of bedrock milling features with historic-age refuse. No historic addresses are located within the Project area; however one historic-age resource, the San Jacinto Valley Railway (CA-RIV-008196), is located approximately 9 meters south of the Project area, is considered a built environment resource. This resource is detailed below and will be addressed in a separate built environment report for the Project (Donovan-Boyd 2024). The records search results, including a table of the previously recorded resources, and all the Department of Parks and Recreation (DPR) forms are included in Confidential Attachment A.

Table 1. Previously Recorded Resources within 1 Mile of the Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility	CHRS Status Code
Outside Project area					
P-33-009724	-	Historic	Ancillary farming features	Not extant	6Z
P-33-009725	CA-RIV-007883	Historic	Building foundations and an historic-age refuse scatter	Ineligible	6Z
P-33-009726	-	Historic	Cattle staging area	Ineligible	6Z
P-33-011466	CA-RIV-006844/H	Multicomponent	Bedrock milling features and an historic-age refuse scatter	Recommended eligible under Criterion 4	3S
P-33-011467	CA-RIV-006845	Prehistoric	Bedrock milling features	Ineligible	6Z
P-33-011468	CA-RIV-006846/H	Multicomponent	Bedrock milling features and an historic-age refuse scatter	Recommended eligible under Criterion 4	3CS
P-33-011469	CA-RIV-006847	Prehistoric	Bedrock milling features	Ineligible	6Z
P-33-011471	CA-RIV-006849/H	Multicomponent	Bedrock milling features and an historic-age refuse scatter	Recommended eligible Criterion 4	3CS
P-33-011472	CA-RIV-006850	Prehistoric	Bedrock milling features	Ineligible	6Z
P-33-012535	CA-RIV-007129	Prehistoric	Bedrock milling features and a sparse lithic scatter	Unevaluated	7R
P-33-012536	CA-RIV-007130	Prehistoric	Midden deposit and lithic scatter	Unevaluated	7R
P-33-015381	-	Historic	Historic property	Ineligible	6Z

Table 1. Previously Recorded Resources within 1 Mile of the Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility	CHRS Status Code
P-33-015382	-	Historic	Historic property	Ineligible	6Z
P-33-015743	CA-RIV-008198	Historic	San Jacinto Valley Railway	Recommended eligible under Criterion 1	3CS
P-33-020447	CA-RIV-010348	Historic	Roadway	Unevaluated	7R
P-33-020504	CA-RIV-010405	Historic	Roadway	Ineligible	
P-33-020505	CA-RIV-010406	Historic	Roadway	Unevaluated	7R
P-33-020640	CA-RIV-010543	Historic	Roadway	Unevaluated	7R
P-33-024087	-	Prehistoric	Isolate	Ineligible	6Z
P-33-024902	CA-RIV-012345	Prehistoric	Sparce lithic scatter	Unevaluated	7R
P-33-028165	-	Prehistoric	Rock art	Unevaluated	7R
P-33-029126	CA-RIV-013019	Prehistoric	Bedrock milling features and ephemeral midden deposit	*	3CS
P-33-029762	CA-RIV-003429	Prehistoric	Isolate	Ineligible	6Z

CA-RIV-008196/P-33-015743

The portion of San Jacinto Valley Railway was first recorded in 2005 by P. Easter and P. Beedle of Applied EarthWorks Inc. The resource is located approximately 9 meters south of the current Project area. The original recordation included a large segment of the main line of the railway, although only a small portion of the main line between Winchester, California, and Hemet, California, was surveyed for this field effort. Additional segments of the railway and its associated features were recorded in site form updates in 2005, 2006, 2007, 2008, 2010, 2011, 2012, 2015, and 2016. In 2010, Justus and Giacinto recorded an additional 234-yard segment off the main line that abuts the currently proposed gen-tie placement. The main line portion of the San Jacinto Valley Railway that intersects the Project area was recommended as eligible for listing on the CRHR under Criterion 1 by Applied EarthWorks Inc. in 2005, although there is no evidence to indicate that this portion of the railway was subject to survey efforts at the time of recordation and eligibility recommendation (P-33-015743).

Previous Cultural Resources Studies

The SCIC records search indicate 38 cultural resources studies have been performed within 1 mile of the Project area. Of the 38 studies, 4 intersect the Project area and include 2 cultural resources inventories and 2 historical and archaeological inventory reports (Table 2). The SCIC records search results reveal that half of the Project area (50%) has been previously studied. The records search results, including a table of the previous cultural resources studies, are included in Confidential Attachment A.

Table 2. Previously Conducted Studies within 1 Mile of the Project Area

Report ID	Year	Author	Title
Intersects Project Area			
RI-01660	1983	Daniel F. McCarthy	Archaeological Assessment of the Proposed Homeland-Green Acres Pollution Project No. C-06-2886, Eastern Municipal Water District, Riverside County, California
RI-06018	2003	Bai Tang, Michael Hogan, Mariam Dahdul, and Daniel Ballester	Historical/Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, In and Near the Communities of Romoland and Homeland, Riverside County, California
RI-06888	2006	Michael K. Lerch and Marlesa A. Gray	Cultural Resources Assessment of the Valley-Ivyglen Transmission Line Project, Riverside County, California
RI-09002	2014	Bai "Tom" Tang	Letter Report: Update to Historical/ Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, Cities of Menifee and Perris; Unincorporated Homeland and Romoland Areas, Riverside County, California, CRM TECH Contract No. 1104/2771
Outside of Project Area			
RI-00898	1980	Bureau of Land Management	Cultural Resource Inspection of Ferd Tank
RI-01237	1980	Robert J. Wlodarski and John M. Foster	Cultural Resource Overview for The Devers Substation to Serrano Substation Transmission Route Alternatives Corridor Right-of-Way
RI-01660	1983	Daniel F. McCarthy	Archaeological Assessment of the Proposed Homeland-Green Acres Pollution Project No. C-06-2886, Eastern Municipal Water District, Riverside County, California
RI-02341	1988	Christopher E. Drover	A Cultural Resource Inventory: Menifee Ranch Specific Plan Project near Romoland, California
RI-02342	1989	DROVER, CHRISTOPHER	A CULTURAL RESOURCE REVIEW: AN ADDENDUM TO THE MENIFEE RANCH SPECIFIC PLAN, NEAR HEMET, CALIFORNIA
RI-02475	1989	Christopher E. Drover	A Cultural Resource Inventory of the Menifee North Project, Near Hemet, California
RI-02476	1990	Christopher E. Drover, PhD	A Cultural Resource Inventory: An Addendum to the Menifee North Project near Hemet, California.
RI-04518	2000	Brian F. Smith and Johanna L. Buysee	An Archaeological/Historical Study For The Menifee Ranch Project, Perris Valley, County Of Riverside--Specific Plan Number 301, Amendment #1
RI-05627	2003	DROVER, CHRISTOPHER E.	A CULTURAL RESOURCERS INVENTORY: AN ARCHAEOLOGICAL ASSESSMENT OF ROMOLAND 64 PROJECT, ROMOLAND, RIVERSIDE COUNTY, CA

Table 2. Previously Conducted Studies within 1 Mile of the Project Area

Report ID	Year	Author	Title
RI-06018	2003	Bai Tang, Michael Hogan, Mariam Dahdul, and Daniel Ballester	Historical/Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, In and Near the Communities of Romoland and Homeland, Riverside County, California
RI-06794	2006	Fulton, Phil	Cultural Resources Assessment, Romoland Phase I, In the Community of Romoland, Riverside County, California
RI-06795	2006	Marken, Mitch W., Marcy H. Rockman, Kyle H. Garcia, and J.D. Stewart	Phase I Cultural and Paleontological Assessment of the Motte Menifee North Project, County of Riverside, California
RI-06888	2006	Lerch, Michael K. and Gray, Marlesa A.	Cultural Resources Assessment of the Valley-Ivyglen Transmission Line Project, Riverside County, California
RI-06913	2006	Stacy C. Jordan and Joshua D. Patterson	Archaeological Survey Report for the Souther California Edison Campany Re-Locate U/G Facilities, Service Center Relocation, OH Feed to Office Trailer & Rule 15 Line Exit Riverside County, California.
RI-07509	2007	Hogan, Michael and Bai "Tom" Tang	Archaeological Mitigation Report Site 33-011466 (CA-RIV-6844/H) Tract No. 29777, near the Community of Romoland, Riverside County, California
RI-07528	2008	Theodore G. Cooley	Archaeological Survey Report for Southern California Edison Company Livermore 12 kV DSP Project, Riverside County, California (WO#6577-5345, AI#6-5350)
RI-07622	2008	Hogan, M. and Tang, T.	PHASE I ARCHAEOLOGICAL ASSESSMENT: GREEN HERITAGE, LLC MENIFEE VALLEY AREA, RIVERSIDE COUNTY, CALIFORNIA
RI-07628	2002	Smith, Brian F. and Johnna L. Buysse	An Archaeological/Historical Study for Tract No. 29835 Menifee West GPA Project, Perris Valley, County of Riverside
RI-07876	2006	Pierson, Larry J.	Results of the Mitigation Monitoring and Reporting Program for the Heritage Lake Phase II Project, Perris Valley, County of Riverside. Specific Plan Number 301, Amendment #1.
RI-07966	2008	Sara Clowery-Moreno and Brian F. Smith	A Phase I Archaeological Assessment for the Retaining Walls Project, Riverside County, California APNs 331-210-019, -020, and -021; CUP 03560
RI-08182	2009	James J. Schmidt and June A. Schmidt	Archaeological Survey Report, Southern California Edison, Intelsat POP-22401 Juniper Flats Road, Nuevo, Riverside County. Intelsat TAP to Splice #1 on Valley-Bunker Fiber Optic Cable (10062). IO #304865

Table 2. Previously Conducted Studies within 1 Mile of the Project Area

Report ID	Year	Author	Title
RI-08374	2009	William T. Eckhardt, Stacie Wilson, Carol Serr, and Karolina Chmiel	Final--Cultural Resources Inventory of the Proposed SCE Devers to Valley Substation Project, Riverside County, California: Volume I
RI-08472	2007	Christopher J. Dolittle and Susan Hogan-Conrad	Archaeological Survey Report for Southern California Edison's San Jaquinto Service Center Extension Project, Riverside County, California
RI-08648	2011	Wayne H. Bonner and Sarah A. Williams	Cultural Resource Record Search and Site Visit Results for T-Mobile USA Candidate IE2491-A
RI-08980	2010	Scott C. Justus, Matthew M. DeCarlo, and William T. Eckhardt	Final: Cultural Resources Inventory Of The Proposed DPV2 Construction Yards Riverside County California
RI-09002	2014	Bai "Tom" Tang	Letter Report: Update to Historical/ Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, Cities of Menifee and Perris; Unincorporated Homeland and Romoland Areas, Riverside County, California, CRM TECH Contract No. 1104/2771
RI-09059	2013	Jean A. Keller	A Phase I Cultural Resources Assessment of Specific Plan Amendment 2010-090, APN 329-090-069,070, 071,072, 329-100-025,026,027,030,031,032
RI-09276	2015	Bai Tang and Michael Hogan	Phase I Cultural Resources Assessment: The Village at Menifee, City of Menifee, Riverside County, California
RI-09437	2015	Joan George and Vanessa Mirro	Cultural Resources Monitoring Report for the TTLC Talavera, LLC Project, Tentative Tract No. 29777, City of Menifee, Riverside County, California
RI-09891	2016	Bai Tang	Letter Report: Archaeological Monitoring Program-Romoland Master Drainage Plan Line A, Stage 6, And Briggs Basin In And Near The City Of Menifee
RI-10461	2015	William T. Eckhardt, Matthew M. DeCarlo, Doug Mengers, Sherri Andrews, Don Laylander, and Tony Quach	Archaeological Investigations and Monitoring for the Construction of the Devers-Palo Verde No. 2 Transmission Line Project, Riverside County, California
RI-10654	2015	Phil Fulton	Cultural Resource Assessment Class 1 Inventory Verison Wireless Services Red Apple Facility
RI-10771	2018	Brian F. Smith	Results of Archaeological Monitoring for the Talavera Project (Tract No. 29777), City of Menifee, California (Negative Archaeological Monitoring Report)
RI-10888	2023	David Brunzell	Phase 1 Cultural Resources Assessment Motte Business Center Project City of Menifee, Riverside County, California

Table 2. Previously Conducted Studies within 1 Mile of the Project Area

Report ID	Year	Author	Title
RI-10912	2023	David Brunzell	Phase I Cultural Resources Assessment for the TTM 38346 Project, City of Menifee, Riverside County, California
RI-10981	2020	Brain F Smith	Results of Archaelogical Monitoring at the McCall Mesa (TM 31098) Project, City of Menifee, California (Negative Archaeological Monitoring Report)
RI-10989	2020	Kim Scott and John Gust	Cultural and Paleontological Resources Impact Mitigation Program for the Romoland Line A-3 Stage 2 and 3 Project, Romoland, Riverside Countu Flood Control District California
RI-11352	2021	Tracy A. Stropes and Brian F. Smith	Cultural Resources Study for the Countryside 106 project, City of Menifee, Riverside County, APNs 329-100-003 and -010

RI-01660

In 1953, Daniel F. McCarthy performed an Archaeological Assessment of the Proposed Homeland-Green Acres Pollution Project No. C-06-2886, Eastern Municipal Water District, Riverside County, California. The purpose of the project was to provide the U.S. Environmental Protection Agency-State Clean Water Grant with the identification and protection or archaeological and historical resources located within the project. The study identified five archaeological resources. These resources are not located within the Seaflower BESS Project area.

RI-06018

In 2003, Tang et al. performed an Historical/Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, In and Near the Communities of Romoland and Homeland, Riverside County, California The purpose of the project was to provide the Riverside County Flood Control and Water Conservation District with the necessary information and analysis to determine if the project would cause substantial adverse changes to any historical and archaeological resources within the project. The study identified one archaeological site and one isolate. These resources are not located within the Seaflower BESS Project area.

RI-06888

In 2006, Michael K. Lerch and Marlesa A. Gray performed a Cultural Resources Assessment of the Valley-Ivyglen Transmission Line Project, Riverside County, California. The purpose of the project was to provide the California Public Utilities Commission (CPUC) with the necessary information and analysis to determine if the project would cause substantial adverse changes to any historical and archaeological resources within the project. The study identified 92 cultural resources, including 43 archaeological sites and 49 built environment resources. These resources are not located within the Seaflower BESS Project area.

RI-09002

In 2014, Bai Tang performed a cultural resources investigation for the Update to Historical/ Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, Cities of Menifee and Perris; Unincorporated Homeland and Romoland Areas, Riverside County, California, CRM TECH Contract No. 1104/2771 The purpose of the project was to provide the Riverside County Flood Control and Water Conservation District with the necessary information and analysis to determine if the project would cause substantial adverse changes to any historical and archaeological resources within the project. The study identified three historic sites, P-33-015743 (San Jacinto Valley Railway), P-33-020504 (Palomar Road), and P-33-020644 (Briggs Road). These resources are not located within the Seaflower BESS Project area, however, the San Jacinto Valley Railway is located 9 meters south of the Seaflower Project area. The study concluded that none of the sites are historical resources as defined by CEQA.

Archival Research

In addition to the SCIC records search, Dudek conducted an online review of historic aerial photographs (historic aerials) of the Project area and general vicinity, to help determine possible development and land use of the Project area over time. Historic aerials of the Project area were available from 1967 to 2022 (NETR 2024). The 1967 historic aerial shows the immediate Project area as undeveloped and fallow, and Matthews Road (Case Road), Rouse Road, Menifee Road, and the Atchison, Topeka, and Santa Fe Railway as developed within the general vicinity of the Project area. Additionally, one residential property is located southeast of Rouse Road and Menifee Road. The 1978 historic aerial shows two additional residential properties to the southeast of the Project area, along Menifee Road and no substantial changes are observed within the Project area. The 1985 aerial does not show any substantial changes to the Project area; however, there is construction activity for the existing SCE Valley Substation immediately north and east of the Project area. The 1996 aerial photograph reveals there is an increase of commercial development and dirt access roads to the east and west of the Project area. The 2002 aerial photograph does not show any substantial changes to the Project area or within the general vicinity of the Project area. The 2005 aerial photograph reveals grading activity to the north and east of the Project area, and on the 2009 aerial photograph, these graded areas appear as paved foundations for the expansion of the existing SCE Valley Substation. Additionally, industrial development is observed to the southwest of the Project area and residential development to the southeast of the Project area. The 2012 aerial photograph shows the Project area as graded. Between the 2014 and 2016 aerial photographs, there are no substantial changes to the Project area or within the general vicinity of the Project area. The 2018 aerial photograph reveals a gravel foundation within the central and eastern sections of the Project area. The 2020 aerial photograph does not show any substantial changes to the Project area or within the general vicinity of the Project area. The 2022 aerial photograph shows the Project area as developed with imported gravel and being used as a laydown yard.

Historic topographic (topo) maps of the Project area were reviewed (earliest map available is 1943). The historic topo map from 1943 shows Matthews Road (Case Road), Menifee Road, and the Atchison, Topeka, and Santa Fe Railway. Additionally, a blue line feature is observed to the north of the Project area

Overall, the review of historic topographic maps and historic aerials indicate the Project area as being used as a laydown yard for the SCE Valley Substation since 2018. This review also indicated there are no historic-age buildings located within the Project area.

Review of Geomorphological Context

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024), two soil types are mapped in the Project area, including Exeter Sandy loam, 0% to 2% slopes, located within the east and southeast portions of the Project area and the Exeter Sandy loam, 2% to 8% slopes, located within the west and northwest portions of the Project area. The Exeter Sandy loam soil series generally occurs in settings with alluvial fans deriving from granite and are typically in elevations of 20 to 700 feet. Reoccurring alluvial action and flooding serve to support the presence of cultural deposits in the area. With alluvial soils present throughout the Project area, there is a low to moderate potential for subsurface cultural resources.

Native American Heritage Commission Sacred Lands File Search Results

Dudek contacted the NAHC on September 11, 2024, and requested a review of their Sacred Lands File (SLF) for the Project area (Attachment B, NAHC Sacred Lands File Results). The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC databases. The NAHC emailed a response letter on October 1, 2024 stating the results were negative. The NAHC response letter advised Dudek to contact Native American representatives who may have information about cultural resources within the Project area. Additionally, the NAHC provided a list of traditionally culturally affiliated Native American tribal representatives who may have additional information related to cultural resources within the Project area as part of this search (Attachment B).

Dudek mailed outreach letters on October 1, 2024, to all Native American group representatives included on the NAHC contact list. These letters attempted to solicit additional information relating to resources that may be impacted by the Project. To date, six responses have been received. The Morongo Band of Mission Indians responded on October 4, 2024 and requested tribal monitoring during the cultural resource surveys and construction phases of the Project. Additionally, the Morongo Band of Mission Indians will request government-to-government consultation under Assembly Bill (AB 52) with the lead agency. The Augustine Band of Cahuilla Indians responded on October 4, 2024 and request to notify the California Native American Heritage Commission if cultural resources are discovered during development. The Cahuilla Band of Mission Indians responded on October 8, 2024 and indicated there are more than 10 prehistoric or historic sites within the one-mile of the Project area and suggest a monitor to be included in the mitigation measures for the Project. The Rincon Band of Luiseño Indians responded on October 21, 2024 and recommended working with other Tribes as they may have pertinent information to provide. The Ft. Yuma Quechan Indian Tribe responded on October 24, 2024 and do not wish to comment on the Project and would like to defer to more local tribes. The Agua Caliente Band of Cahuilla Indians responded on October 25, 2024 and would like to defer to Soboba. Any additional responses received will be included in the final draft of the report (Attachment B).

The lead agency responsible for compliance with CEQA will be required to conduct consultation with Native American tribes and individuals in accordance with Assembly Bill (AB 52).

Survey Results

Dudek archaeologist Javier Hernandez conducted an intensive level pedestrian survey of the Project area on August 30, 2024. All survey work was conducted employing standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards. Where possible for the Project area, 15-meter interval survey transects were conducted. The ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials.

The entire Project area has been disturbed, as evidenced by the presence of the existing SCE Valley Substation, parking lot, and laydown yard. Approximately 90% of the Project area is developed, while the remaining 10% of the Project area consists of an open dirt access road around the perimeter of the Project area. Ground visibility in the Project area was poor (0%–25%) and obscured by the SCE Valley Substation, imported gravel, and light vegetation. In open areas not developed, the ground visibility was excellent (90%–100%). Additionally, concrete rubble and modern debris (food/beverage trash) are located along the perimeter of the Project area. Soil consists of loosely compacted light brown silty loam with 15% angular/subangular gravels. Vegetation included sparse desert scrub and dead low-lying grasses. No cultural resources or historic-age buildings were identified within the Project area.

Recommendations

Dudek's cultural resources inventory of the Project indicates that there is a low to moderate potential for encountering intact subsurface archaeological deposits within the Project area during Project implementation. Based on available EIC records search results from the adjacent property, which covers the entire Project area, there are no previously recorded cultural resources located within the Project area. Dudek conducted a pedestrian survey of the Project area, and no cultural resources or historic-age buildings were identified within the Project area; however, one historic-age resource, the San Jacinto Valley Railway (CA-RIV-008196), is located approximately 9 meters south of the Project area. The San Jacinto Valley Railway is a built environment resource and will be addressed in a separate built environment report for the Project (Donovan-Boyd 2024).

A review of the geomorphological context reveals there are alluvial soils present throughout the Project area. Reoccurring alluvial action and flooding serve to support the presence of cultural deposits in the area. Additionally, a review of historic topographic maps and historic aerial photographs reveal that the Project area has been subject to disturbances associated with the development of the existing SCE Valley Substation since at least 2012. However, the depth of disturbance is not apparent from aerial photographs, and it is not possible to determine if grading removed all soils and sediments that have the potential to contain cultural resources. Dudek recommends that a qualified archaeologist and Native American monitor be present during all initial ground disturbing activities to assess the extent of previous disturbances and the potential for buried archaeological resources. Monitoring can be reduced or terminated should no discoveries be made or if documentation is provided that demonstrates that ground-disturbing activities will be occurring in sediments with no potential for cultural resources.

Unanticipated Archaeological Resources

All construction crew should be alerted to the potential to the potential to encounter archaeological material. In the event that cultural resources (sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find under CEQA (14 CCR 15064.5[f]; PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Unanticipated 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 notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the remains are determined to be Native American, the Coroner shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the MLD from the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then make a recommendation, in consultation with the property owner, regarding the treatment and disposition of the human remains.

Should you have any questions relating to this report and its findings please contact Makayla Murillo at 760.846.5874 or mmurillo@dudek.com

Sincerely,

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Sincerely,

Angela Pham, MA, RPA
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Office: 760.479.4855
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Att.: *Figure 1, Project Location*
Figure 2, Project Area
Confidential A, SCIC Records Search Results
Confidential B, EIC Records Search Results
Appendix C, NAHC Sacred Lands File Results
cc: *Keith Carwana, Dudek*

References Cited

City of Menifee. 2008. City of Menifee General Plan. Accessed September 2023. https://www.cityofmenifee.us/221/General-Plan.

Donovan-Boyd et al. 2024. *Built Environment Resources Report for the Seaflower Energy Storage Energy Storage Project, City of Menifee, Riverside County, California.*

NETR (Nationwide Environmental Title Research). 2024. Historic Aerials: Online Viewer. Accessed September 2024. https://www.historicaerials.com/viewer.

USDA (U.S. Department of Agriculture). 2024. Web Soil Survey. USDA, Natural Resources Conservation Service, Soil Survey Staff. Accessed September 2024. http://websoilsurvey.nrcs.usda.gov.

Confidential Attachment A

SCIC Records Search Results

Attachment B

NAHC Sacred Lands File Search Results

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August 14, 2024 11438.96

Piljun Ko
Samsung C&T Renewables, LLC
17785 Center Court Drive, Suite 200
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Subject: Cultural Resources - Built Environment Constraints Analysis for the Seaflower Energy Storage Project, City of Menifee, Riverside County, California

Dear Piljun Ko,

This letter summarizes the built environment constraints analysis for the Seaflower Energy Storage Project (Project), located in the City of Menifee, Riverside County, California. The City of Menifee (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). Efforts include a preliminary review of the potential impacts on resources that may qualify as historical resources under CEQA in consideration of the Project Description as of July 2024. Efforts included a review of information housed at the Eastern Information Center (EIC) for the Project site and surrounding one-mile radius, a desktop review of historic topographic and historic aerial photographs to identify potential historic-age resources within or immediately adjacent (defined as one parcel outside of the Project site) to the Project site, and a review of potential impacts to built environment resources that may result from Project construction or implementation. The discussion below includes a summary of these efforts.

Project Location and Description

Samsung C&T Renewables, LLC (Samsung) is considering the development of the Seaflower Energy Storage Project (Project). The Project area falls within Section 14 of Township 5 South, Range 3 West of the Romoland, California U.S. Geological Service (USGS) 7.5-minute series topographic quadrangle map (Figure 1). The Project area covers 16.1 acres of privately owned land in the City of Menifee in Riverside County, California. Specifically, the Project parcels are located east of Palomar Road, approximately 0.65 miles south of Highway 74, west of Menifee Road, and north of Rouse Road that encompasses Assessor Parcel Numbers (APNs) 331-240-010, 331-240-009, 331-240-006 (Figure 2).

The Project area is currently vacant and has been previously disturbed by agricultural activities. The Project is anticipated to interconnect with the existing Southern California Edison (SCE) Valley Substation via a generation interconnection line that will travel north along Palomar Road, east along McLaughlin Road, cross the existing railroad tracks, and interconnect with the SCE Valley Substation.

Regulatory Framework

State Level Regulations

California Environmental Quality Act

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

Lead agencies have a responsibility to evaluate historical resources against the California Register of Historical Resources (CRHR) 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 change to a historical resource. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are obvious significant impacts, 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 that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource's significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, 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 CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise. The CRHR significance criteria are modeled after the criteria used to evaluate properties for their eligibility for listing in the NRHP.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets one of the criteria for listing on the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852), which consist 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.

Local Regulations

City of Menifee General Plan

The Open Space and Conservation Element of the City of Menifee's General Plan, adopted in 2008, details the City's plan for the preservation, maintenance, and enhancement of the city's paleontological and cultural resources. The specific goals and policies relating to the city's archaeological, historical, and cultural resources are detailed below (City of Menifee 2008):

Goal OSC-5. Archaeological, historical, and cultural resources are protected and integrated into the City's built environment.

Policy OSC-5.1. Preserve and protect archaeological and historic resources and cultural sites, places, districts, structures, landforms, objects and native burial sites, traditional cultural landscapes and other features, consistent with state law and any laws, regulations or policies which may be adopted by the city to implement this goal and associated policies.

Policy OSC-5.2. Work with local schools, organizations, appropriate Native American tribes with ancestral territories located within the city and other agencies to educate the public about the rich archaeological, historic, and cultural resources found in the city.

Policy OSC-5.3. Preserve sacred sites identified in consultation with the appropriate Native American tribes whose ancestral territories are within the city, such as Native American burial locations, by avoiding activities that would negatively impact the sites, while maintaining the confidentiality of the location and nature of the sacred site.

Policy OSC-5.4. Establish clear and responsible policies and best practices to identify, evaluate, and protect previously unknown archaeological, historic, and cultural resources, following applicable CEQA and NEPA procedures and in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.5. Develop clear policies regarding the preservation and avoidance of cultural resources located within the city, in consultation with the appropriate Native American tribes who have ancestral lands within the city.

Policy OSC-5.6. Develop strong government-to-government relationships and consultation protocols with the appropriate Native American tribes with ancestral territories within the city in order to ensure better identification, protection and preservation of cultural resources, while also developing appropriate educational programs, with tribal participation, for Menifee residents.

Eastern Information Center Records Search Results Summary

The following section summarizes the results of the EIC records search conducted by Dudek staff on June 24, 2024, for the Project area and a surrounding one-mile radius. The records search documents are on file at Dudek's

Encinitas, California office. These searches included a review of mapped prehistoric, historical, and built-environment resources; California Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Project area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. For this letter, only historical resources and reports are included; for a full records search with both historical and archaeological resources and reports, see Dudek's 2024 *Cultural Resources Inventory for the Seaflower Energy Storage Project, City of Menifee, Riverside County, California,* prepared by Angela Pham, MA, RPA, and Makayla Murillo, BA.

Previously Recorded Cultural Resources

The EIC records search did not identify any previously recorded cultural resources within the Project area. However, the records search identified 23 previously recorded cultural resources located within a one-mile radius of the Project area. Eight of these resources are built environment resources (Table 1).

Table 1. Previously Recorded Built Environment Resources within One Mile of the Project Area

Primary Number	Trinomial	Age	Description	Eligibility	CHR Status Code
Outside Project area					
P-33-009724	-	Historic	Ancillary farming features (Not extant)	Recommended not eligible	6Z
P-33-009725	CA-RIV-007883	Historic	Building foundations and a historic-era refuse scatter	Recommended not eligible	6Z
P-33-009726	-	Historic	Cattle staging area	Recommended not eligible	6Z
P-33-015381	-	Historic	Historic property	Recommended not eligible	6Z
P-33-015382	-	Historic	Historic property	Recommended not eligible	6Z
P-33-015743	CA-RIV-008196	Historic	San Jacinto Valley Railway	Recommended Eligible under CRHR Criterion 1	3CS/6Z
P-33-020505	CA-RIV-010406	Historic	Roadway	Unevaluated	7R
P-33-020640	CA-RIV-010543	Historic	Roadway	Unevaluated	7R

NOTES: CHR = California Historical Resource; 3CS = Appears eligible for the CRHR individually through survey evaluation; 6Z = Found ineligible for NRHP, CRHR or local designation through survey evaluation; 7R = Identified in a Reconnaissance Level Survey or in an Area of Potential Effect – Not evaluated.

Previous Cultural Resources Studies

The EIC records search indicates that 39 cultural resources studies were performed within a one-mile radius of the Project area; however, it appears that only 14 contain information pertaining to historical resources (Table 2). The Project area has not been subject to previous cultural resources studies.

Table 2. Previously Conducted Studies within One-Mile of Project Area

Report ID	Year	Author	Title
Outside of Project Area			
RI-06888	2006	Michael K. Lerch and Marlesa A. Gray	Cultural Resources Assessment of the Valley-Ivyglen Transmission Line Project, Riverside County, California
RI-08374	2009	William T. Eckhardt, Stacie Wilson, Carol Serr, and Karolina Chmiel	Final: Cultural Resources Inventory of the Proposed SCE Devers to Valley Substation Project, Riverside County, California: Volume I
RI-08980	2010	Scott C. Justus, Matthew M. DeCarlo, and William T. Eckhardt	Final: Cultural Resources Inventory of the Proposed DPV2 Construction Yards Riverside County, California
RI-01237	1980	Robert J. Wlodarski and John M. Foster	Cultural Resource Overview for the Devers Substation to Serrano Substation Transmission Route Alternatives Corridor Right-of-Way
RI-02341	1988	Christopher E. Drover	A Cultural Resource Inventory: Menifee Ranch Specific Plan Project near Romoland, California
RI-02342	1989	Christopher E. Drover	A Cultural Resources Review: An Addendum to the Menifee Ranch Specific Plan, Near Hemet, California
RI-02475	1989	Christopher E. Drover	A Cultural Resource Inventory of the Menifee North Project, Near Hemet, California
RI-04518	2000	Brian F. Smith and Johanna L. Buysee	An Archaeological/Historical Study for The Menifee Ranch Project, Perris Valley, County of Riverside--Specific Plan Number 301, Amendment #1
RI-06018	2003	Bai Tang, Michael Hogan, Mariam Dahdul, and Daniel Ballester	Historical/Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, In and Near the Communities of Romoland and Homeland, Riverside County, California
RI-07628	2002	Brian F. Smith and Johnna L. Buysse	An Archaeological/Historical Study for Tract No. 29835 Menifee West GPA Project, Perris Valley, County of Riverside
RI-08374	2009	William T. Eckhardt, Stacie Wilson, Carol Serr, and Karolina Chmiel	Final: Cultural Resources Inventory of the Proposed SCE Devers to Valley Substation Project, Riverside County, California: Volume I
RI-08888	2012	Bai "Tom" Tang, Jay K. Sander, Daniel Ballester, and Laura H. Shaker	Historical/Archaeological Resources Survey Report: Vista and Ellis Zones Water System Improvement Project, In and near the City of Menifee, Riverside County, California
RI-09002	2014	Bai "Tom" Tang	Letter Report: Update to Historical/ Archaeological Resources Survey Report: Menifee Valley North Drainage Facilities Project, Cities of Menifee and Perris; Unincorporated Homeland and Romoland Areas,

Table 2. Previously Conducted Studies within One-Mile of Project Area

Report ID	Year	Author	Title
			Riverside County, California, CRM TECH Contract No. 1104/2771
RI-11352	2021	Tracy A. Stropes and Brian F. Smith	Cultural Resources Study for the Countryside 106 project, City of Menifee, Riverside County, APNs 329-100-003 and -010

Built Environment Review

A desktop analysis review of known and/or potential historic era-built environment resources that may sustain impacts due to project construction and implementation was conducted as part of this effort vis historic aerial photographs, topographic maps, and assessor build date data. Historic era (i.e., over the age of 45 years as of the date of this letter) built environment resources include previously recorded or evaluated resources, as well as buildings and structures have not yet been evaluated for historic significance.

The EIC records search identified one eligible resource that is located approximately 0.28 miles north/northeast of the Project site: the former San Jacinto Valley Railway (P-33-015743). The generation interconnection transmission line alignment will likely cross this previously recorded resource. The railroad was first recorded in 2005 and was recommended as eligible for the CRHR under Criterion 1 for its association with the successful economic development of valley towns such as Hemet and for becoming the primary method of transport of valley agricultural products to market. No character-defining features of the railroad were identified as part of this evaluation. Between 2005 and 2016, segments of the railroad were recorded 12 additional times. This documentation included evaluations of several segments of the railroad that are recommended as not eligible for the NRHP or the CRHR. Much of the documentation, however, consists of brief archaeological record forms or DPR 523 update forms that describe the physical condition of segments of the tracks with no evaluation of significance. Under CEQA, the railroad is considered a historical resource. In addition, the EIC search identified two historic-age roadways that were recorded but not previously evaluated. The EIC did not provide documents associated with these roads' recordation.

Dudek also reviewed historic aerials and topographic maps to date buildings and structures constructed prior to 1979 (over the age of 45) located within and directly adjacent to the Project area (defined as one parcel outside the Project area boundary). As a result of this review, no additional historic era-built environment resources were identified.

Recommendations

The CRHR-eligible San Jacinto Valley Railway and two historic period roads were previously recorded within or adjacent to the Project site and generation interconnect alignment. If the project moves forward, no further technical studies for built environment resources is recommended because no historical resources are within the Project site. However, if the City requests additional technical work pertaining to built environment resources Dudek can provide a scope and cost for such services.

If you have any questions about this report and its findings, please do not hesitate to contact me at adonovanboyd@dudek.com.

Sincerely,



Adrienne Donovan-Boyd, MSHP
Architectural Historian
Dudek
Office: 503-201-3592
Email: adonovanboyd@dudek.com

Att.: *Figure 1. Project Location Map*
Figure 2. Project Area
cc: *Keith Carwana, Erin Phillips, Dudek*



SOURCE: USGS 7.5 Minute Series

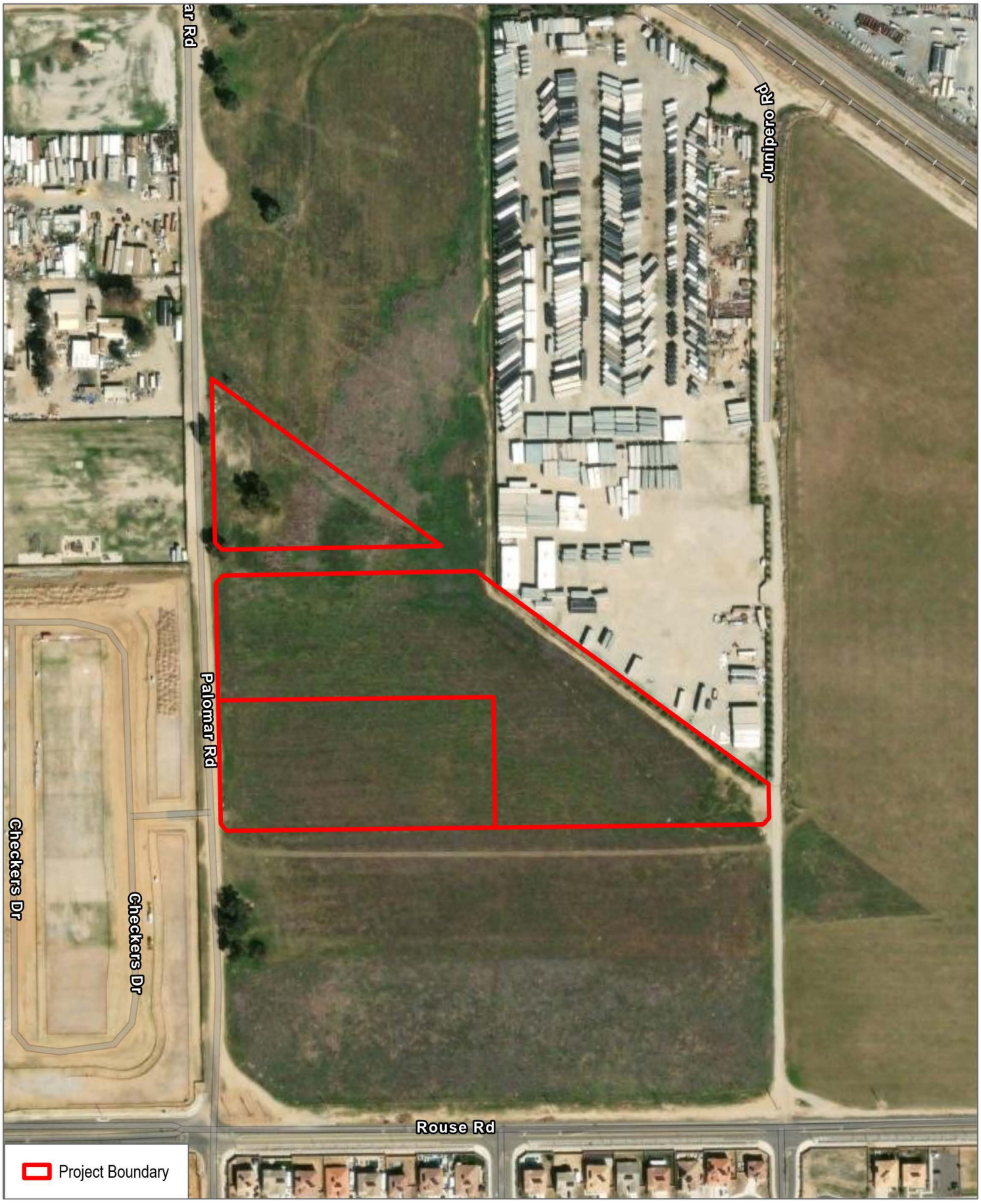
DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Seaflower Energy Storage Project



SOURCE: World Imagery 2022

DUDEK

0 145 290 Feet

FIGURE 2

Project Area

Seaflower Energy Storage Project