DOCKETED	
Docket Number:	25-OPT-02
Project Title:	Prairie Song Reliability Project
TN #:	264406
Document Title:	App 3-3A Archaeological Resources Management Report
Description:	N/A
Filer:	Erin Phillips
Organization:	Dudek
Submitter Role:	Applicant Consultant
Submission Date:	6/20/2025 12:53:04 PM
Docketed Date:	6/20/2025

Appendix 3.3A

Archaeological Resources Management Report

PUBLIC

Archaeological Resources Management Report

Prairie Song Reliability Project, Los Angeles County, California

JUNE 2025

Prepared for:

PRAIRIE SONG RELIABILITY PROJECT LLC
Project Applicant

Prepared by:

DUDEK

27271 Las Ramblas Suite 340
Mission Viejo, California 92691
Contact: Roshanne Bakhtiary, MA, and Adam Giacinto, MA, RPA

Printed on 30% post-consumer recycled material.

National Archaeological Database (NADB) Information

Authors:	Roshanne Bakhtiary, MA, Jessica Colston, BA, and Brenda Rogers, BA
Firm:	Dudek
Project Proponent:	Prairie Song Reliability Project LLC
Report Date:	April 2025
Report Title:	Archaeological Resources Management Report for the Prairie Song Reliability Project, Los Angeles County, California
Type of Study:	Archaeological Resources Inventory and Evaluation
Resources:	P-19-101014; ABS-PK-S-01; ABS-PK-S-02; ABS-PK-S-03; ABS-JC-S-01; ABS-JC-S-02; ABS-JC-S-03; ABS-JC-S-04; ABS-JC-S-05; ABS-BR-S-01; ABS-RB-S-01
USGS Quads:	Acton, California and Pacifico, California 1:24,000; T 5N, R 12W, Sections 27, 28, 33, and 34
Acreage:	138.7 acres
Keywords:	Acton, California USGS 7.5-Minute Quadrangle; Pacifico, California USGS 7.5-Minute Quadrangle; Acton, California; Intensive-Level Pedestrian Survey; P-19-101014; ABS-PK-S-01; ABS-PK-S-02; ABS-PK-S-03; ABS-JC-S-01; ABS-JC-S-02; ABS-JC-S-03; ABS-JC-S-04; ABS-JC-S-05; ABS-BR-S-01; ABS-RB-S-01

INTENTIONALLY LEFT BLANK

Table of Contents

SECTION **PAGE NO.**

TABLES

FIGURES

EXHIBITS

APPENDICES

INTENTIONALLY LEFT BLANK

Acronyms and Abbreviations

Acronym or Abbreviation	Definition
Amsl	above mean sea level
APN	Assessor's Parcel Number
API	Area of Potential Impacts
BESS	battery energy storage system
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
County	County of Los Angeles
CRHR	California Register of Historical Resources
DPR site forms	California Department of Parks and Recreation 523 (Series 1/95) forms
E/W	east/west
gen-tie	generation interconnection
kV	kilovolt
MLD	Most Likely Descendant
N/S	north/south
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
PRC	Public Resources Code
project	Prairie Song Reliability Project
project API	area of potential impacts for Archaeological Resources
SCCIC	Southern Central Coastal Information Center
SCE	Southern California Edison
SLF	Sacred Lands File
TCR	tribal cultural resource
Yuhaaviatam	Yuhaaviatam of San Manuel Nation

INTENTIONALLY LEFT BLANK

Management Summary

Dudek conducted an archaeological resources inventory and evaluation in support of the Prairie Song Reliability Project (project), located on approximately 107 acres of unincorporated land in Los Angeles County, California (Figure 1, Project Location). Prairie Song Reliability Project LLC proposes to construct and operate an up to 1,150-megawatt battery energy storage system facility that will include operation and maintenance buildings, a project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison owned and operated Vincent Substation (Figure 2, Project Site Design). The project is located south of State Route 14, approximately 3 miles northeast of the unincorporated community of Acton and is within the U.S. Geological Survey 7.5-minute *Acton, California* and *Pacifico Mountain, California* Quadrangles, Township 5 North, Range 12 West, Sections 27, 28, 33 and 34. The project site is comprised of Assessor's Parcel Numbers 3056-017-007, 3056-017-020, 3056-017-021, 3056-019-013, 3056-019-026, 3056-019-037, and 3056-019-040. This study included a records search, an archival information and literature review, correspondence with the Native American Heritage Commission, informal tribal outreach, an intensive-level archaeological resources pedestrian survey of the project area of potential impacts (API), and the evaluation of one previously recorded and 10 newly identified historic-era archaeological resources under all applicable historical significance criteria.

This archaeological resources investigation was conducted in compliance with the California Environmental Quality Act (CEQA) and local regulations. The California Energy Commission is the lead agency responsible for compliance with CEQA. The project's API for Archaeological Resources (project API or API) is approximately 139 acres. This includes the proposed battery energy storage system facility footprint and both generation interconnection route corridor options with a 50-foot buffer (Figure 3, API for Archaeological Resources). For the purposes of providing management recommendations, the vertical API, as represented by the average depth of ground disturbance, is assumed to be 10 feet below the existing ground surface. The maximum ground disturbance depth is assumed to be 25 to 55 feet below the existing ground disturbance for the gen-tie line structure foundations.

Dudek conducted a California Historical Resources Information System records search of the project API and surrounding 1-mile radius at the South Central Coastal Information Center. The records search identified three previously recorded cultural resources that intersect with the API: P-19-002893 (abandoned Southern Pacific Railway segment), P-19-101014 (can isolate), and P-19-192581 (Antelope-Mesa 220 kV Transmission Line). P-19-002893 and P-19-101014 are addressed in this study, while P-19-192581 are addressed in the *Built Environment Inventory and Evaluation Report* prepared by Dudek for the project in 2025 (Ahmanson et al. 2025).

A Native American Heritage Commission Sacred Lands File search was also conducted for the project in 2023 and 2025, and results were negative for Native American cultural resources within 1 mile of the project API. The Native American Heritage Commission additionally provided a list Native American individuals and/or tribal organizations that should be contacted for more information on potential tribal sensitivities regarding the currently proposed project. Dudek sent letters via USPS certified mailing on January 15 and 20, 2025 to all California Native American Tribal representatives included on the Native American Heritage Commission contact lists. Results of these efforts are provided in Section 6. A review of historic topographic maps and aerial photographs indicate the project API has remained largely undeveloped throughout the twentieth and twenty-first centuries. Additionally, review of historic topographic maps and aerial photographs indicate the project API has remained largely undeveloped throughout the twentieth and twenty-first centuries.

Several Dudek archaeologists conducted intensive-level archaeological resources pedestrian surveys of the project API in 2023, 2024, and 2025. During these survey efforts, crews revisited one previously recorded archaeological resource (P-19-101014) and recorded an additional 10 newly identified archaeological resources within the project API. P-19-002893 was identified as being outside of the project API and thus was not subject to evaluation efforts as part of the current study. 10 of the identified archaeological resources are characterized as surficial historic-era refuse scatters, while ABS-JC-S-04 is characterized as a shallow depression containing historic-era refuse. The majority of these resources likely represent single dumping episodes as indicated by their localized concentration of mostly contemporaneous domestic refuse and food waste items.

P-19-101014, ABS-PK-S-01, ABS-PK-S-02, ABS-PK-S-03, ABS-JC-S-01, ABS-JC-S-02, ABS-JC-S-03, ABS-JC-S-04, ABS-JC-S-05, ABS-BR-S-01, and ABS-RB-S-01 were evaluated as part of the current study. Dudek recommends that all 11 archaeological resources are not eligible for listing on the California Register of Historic Resources and do not meet the criteria to be considered significant or unique archaeological resources under CEQA

Based on the quantity of archaeological resources identified within a 1-mile radius of the project API, the geoarchaeological suitability of the API for supporting the presence of buried archaeological resources, and in consideration of the lack of past disturbances within the majority of the project API, there is a moderate potential for the inadvertent discovery of unanticipated archaeological resources during initial project-related ground disturbance. Dudek recommends part-time archaeological monitoring during initial ground disturbing activities for the project. A Cultural Resources Management and Inadvertent Discovery Plan (CRMIDP) should be developed prior to initiation of construction. The requirement for Native American monitoring should be determined by the lead agency, as informed through the process of consultation. See the Summary and Management Considerations section of this report for details on recommended mitigation measures.

1 Report Structure and Key Personnel

This report is divided into nine sections. Following this section, Section 2 discloses the project location, description, and area of potential impacts delineation. Section 3 provides a summary of the regulatory setting, Section 4 reviews the natural environment and cultural context, and Section 5 provides the research design for the study's significance evaluations. Section 6 provides the methods used to complete the current inventory and evaluation. The records search, archival research, survey results, and all Native American Heritage Commission (NAHC) and tribal correspondence to date are discussed in Section 7. Section 8 provides the significance evaluation findings for all 11 archaeological resources identified as intersecting with the project area of potential impacts (API), and Section 9 summarizes the archaeological resources work completed for the project to date and provides recommendations for further treatment of archaeological resources in accordance with CEQA and local regulations. Finally, Section 10 includes a list of all materials referenced in this report. Several appendices are attached to this report. Appendix A provides resumes of key personnel; Appendix B includes confidential records search results; Appendix C contains a cultural resources overview map; Appendix D documents all NAHC and Tribal correspondence to date; and Appendix E includes all California Department of Parks and Recreation 523 (Series 1/95) forms (DPR site forms) prepared in support of this study.

Brenda Rogers, BA, and personnel at the South Central Coastal Information Center (SCCIC) conducted the California Historical Resources Information System records searches in support of this project. Jessica Colston, BA; Phillip Sharp-Garcia, BA; Shane McDonnell, BA; Brenda Rogers, BA; and Roshanne Bakhtiary, MA, conducted the intensive-level archaeological resources pedestrian surveys in support of this project. Roshanne Bakhtiary, MA; Jessica Colston, BA; and Brenda Rogers, BA, drafted the present report. Adam Giacinto acted as principal investigator, reviewed management recommendations, and finalized the technical report. All archaeologists were overseen by the principal investigator, who exceeds the Secretary of the Interior's Professional Qualification Standards for archaeology and all have extensive experience working within local, state, and federal regulatory contexts.

INTENTIONALLY LEFT BLANK

2 Introduction

2.1 Project Location and Description

Dudek's archaeological resources inventory and evaluation in support of the Prairie Song Reliability Project (project) was conducted in compliance with the California Environmental Quality Act (CEQA). Prairie Song Reliability Project LLC, a subsidiary of Coval Infrastructure DevCo LLC, is filing an Application for Opt-In Certification under the California Energy Commission's (CEC) licensing process. The CEC is the lead agency responsible for compliance with CEQA.

Prairie Song Reliability Project LLC is proposing to construct, operate, and eventually repower or decommission the up to 1,150-megawatt project located on up to approximately 107 acres of unincorporated land in Los Angeles County (County), California. The project is located south of State Route 14 and approximately 3 miles northeast of the unincorporated community of Acton. The project is within the U.S. Geological Survey 7.5-minute *Acton, California* and *Pacifico Mountain, California* Quadrangles, Township 5 North, Range 12 West, Sections 27, 28, 33 and 34. The project site is comprised of Assessor's Parcel Numbers (APNs) 3056-017-007, 3056-017-020, 3056-017-021, 3056-019-013, 3056-019-026, 3056-019-037, and 3056-019-040, and will occur on an area of land sandwiched between two existing transportation corridors, State Route 14 to the north and Southern Pacific Railroad lines and Carson Mesa Road to the south, that are approximately 1,200 feet apart (Figure 1, Project Location).

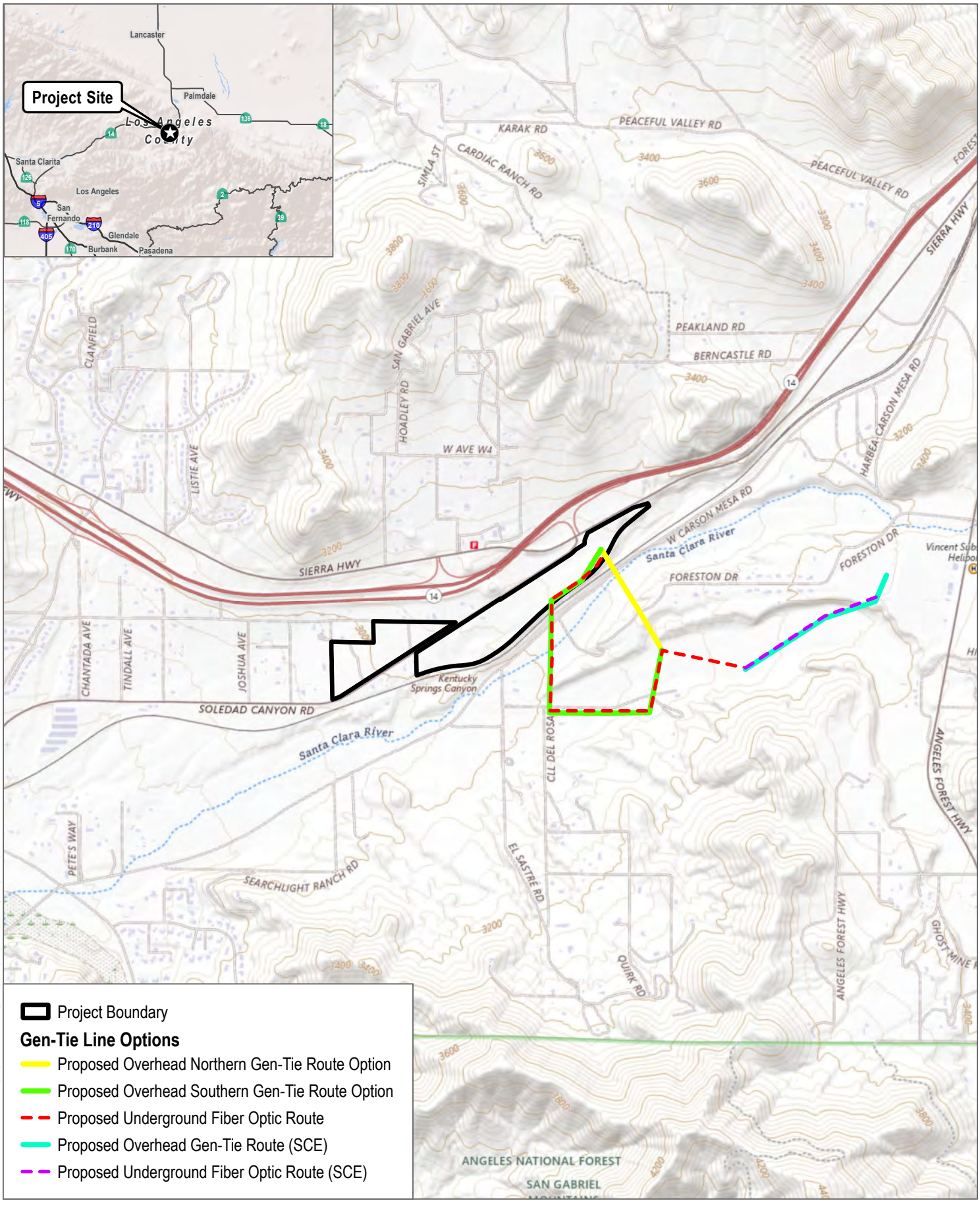
The primary components of the project include a battery energy storage system (BESS) facility, operation and maintenance buildings, a project substation, a 500-kilovolt (kV) overhead generation interconnection (gen-tie) transmission line, and interconnection facilities within the existing Southern California Edison (SCE) owned and operated Vincent Substation (Figure 2, Project Site Design).

The project will utilize one of two potential gen-tie routes. Either route will extend south and east from the project substation, crossing Southern Pacific Railroad tracks and West Carson Mesa Road, and then proceed northeast to the Point of Interconnection at the Vincent Substation. The Northern Gen-Tie Route is approximately 1.1 miles long and will be sited on APNs 3056-015-008, 3056-015-023, 3056-017-026, 3056-017-904, and 3056-017-905, 3056-005-816, 3056-005-817, 3056-005-818, 3056-015-801, and 3056-015-802. The Southern Gen-Tie Route is approximately 1.8 miles long and will be sited on APNs 3056-015-008, 3056-015-023, 3056-017-016, 3056-017-022, 3056-017-026, 3056-017-027, 3056-017-028, 3056-027-007, 3056-027-031, 3056-005-816, 3056-005-817, 3056-005-818, 3056-015-801, and 3056-015-802. Both gen-tie route options are defined by 150-foot-wide linear corridors, reflective of the anticipated impact area for project-related construction and operation. The project's interconnection facilities will located within the SCE Vincent Substation.

2.2 Area of Potential Impacts for Archaeological Resources

The project's API for archaeological resources (project API), as represented by the area that may be subject to physical impacts, is approximately 139 acres. This includes the proposed BESS facility footprint as well as any access roads, laydown yards, and both gen-tie route corridor options with a 50-foot buffer (Figure 3, API for Archaeological Resources). To note, the API does not include a 200-foot buffer around the BESS facility footprint, as it is surrounded by private property and beyond the established limits that could be affected by proposed project-

related construction or operation. For the purposes of providing management recommendations, the vertical API, as represented by the average depth of ground disturbance for the project, is assumed to be 10 feet below the existing ground surface, while the maximum depth of ground disturbance is assumed to be 25 to 55 feet below the existing ground disturbance for the gen-tie line structure foundations.



SOURCE: USGS 7.5' Series

DUDEK

0 1,000 2,000 Feet

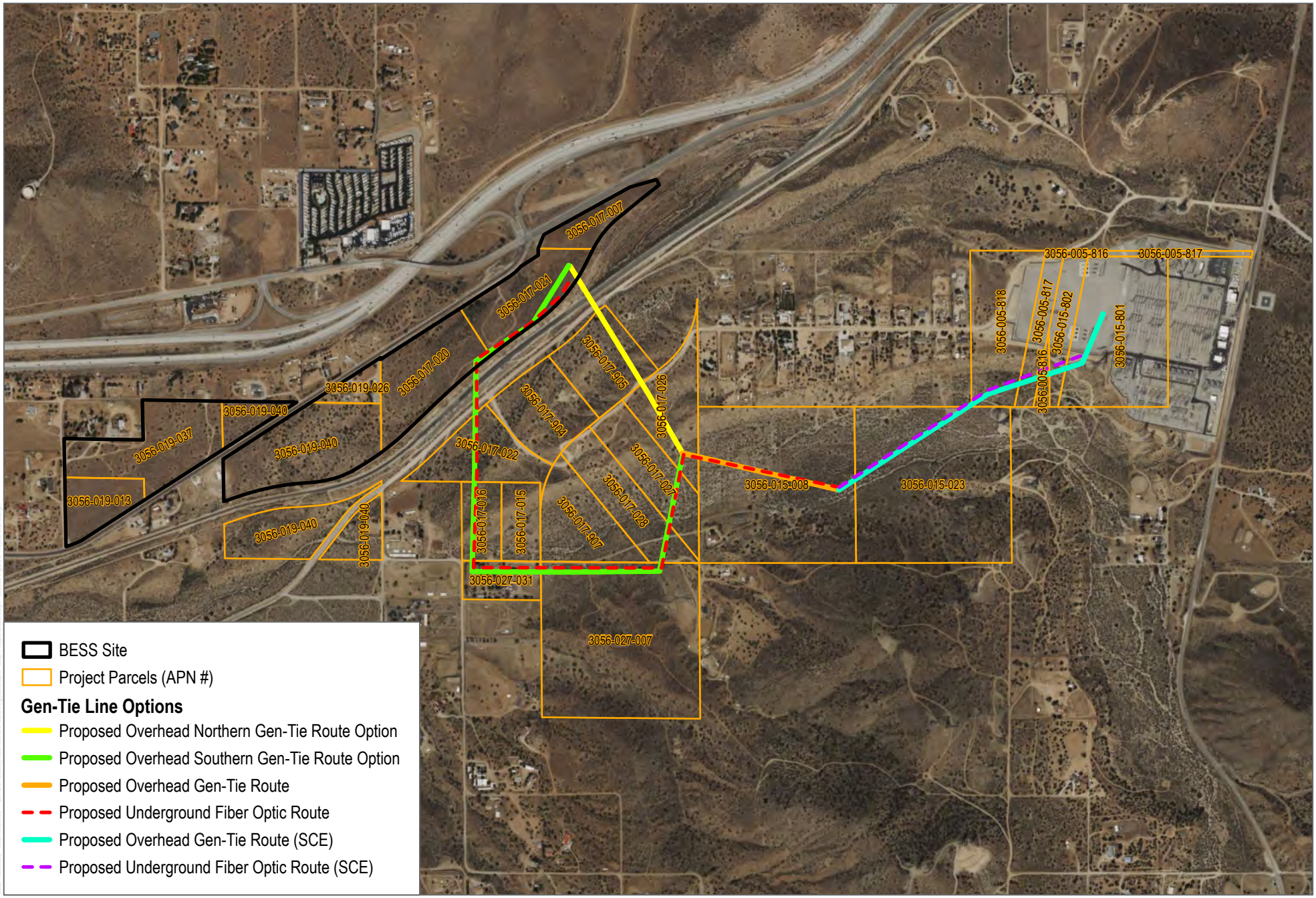
0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps

DUDEK

0 150 300 Meters

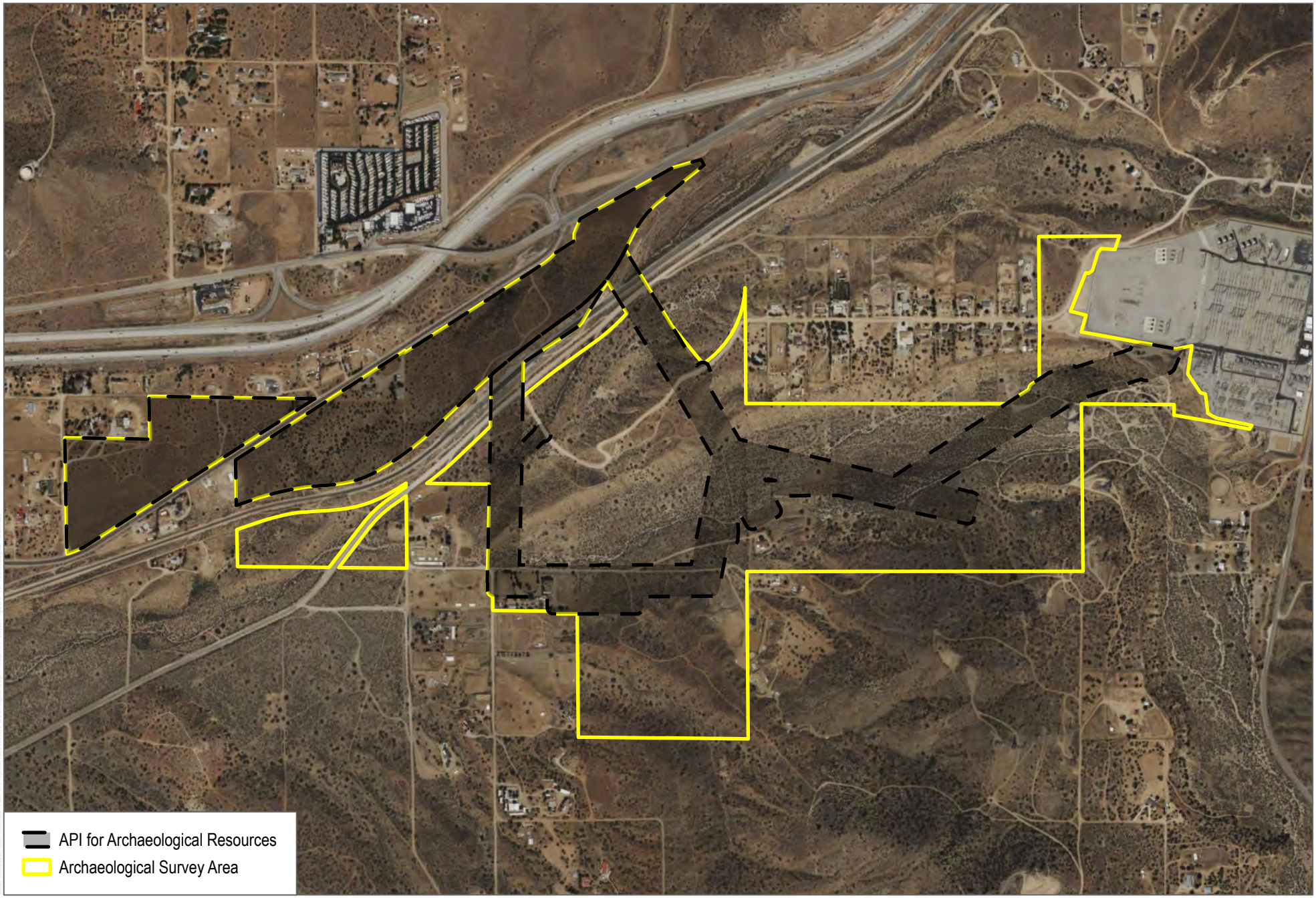
0 500 1,000 Feet

FIGURE 2

Project Site Design

Prairie Song Reliability Project

INTENTIONALLY LEFT BLANK



SOURCE: Bing Maps

DUDEK

0 500 1,000 Feet

FIGURE 3

API for Archaeological Resources

Prairie Song Reliability Project

INTENTIONALLY LEFT BLANK

3 Regulatory Setting

The following section, outlined in Table 1, provides a summary of the applicable laws, ordinances, regulations, and standards relating to the proper management of cultural resources.

Table 1. Laws, Ordinances, Regulations, and Standards Applicable to Cultural Resources

Jurisdiction	LORS	Applicability	Report Reference	Project Conformity
Federal	Section 106, National Historic Preservation Act	Applies if the project would require federal funding or permitting.	Not applicable	The project will not include any federal funding or permitting.
State	California Register of Historical Resources	Program used by state and local agencies to identify, evaluate, register, and protect California's historical resources.	Not applicable	The current study did not identify any cultural resources that meet the eligibility criteria for listing on the California Register of Historical Resources.
State	California Environmental Quality Act	Requires state and local government agencies to inform decisionmakers and the public about the potential environmental effects of a project and to prevent significant, avoidable environmental impacts to extents feasible.	Throughout this Report	Certification of the project by the CEC will be required to comply with CEQA as required by the CEC's Opt-In Application process.
State	Assembly Bill 52	Requires lead agencies to consult with Tribal Governments to address Tribal Cultural Resources that may be impacted by a project.	Not applicable	CEC will be required to complete Government-to-Government consultation pursuant to AB 52 as part of the Opt-In Application process.
State	California Health and Safety Code Section 7050.5	Work shall be halted in the event of human remains discovery.	Section 9.1	Mitigation Measure CUL-3 requires compliance with the California Health and Safety Code Section 7050.5.
State	Public Resources Code Section 5097.98	Most Likely Descendant designation following the discovery of human remains determined by the County Coroner to be Native American in origin.	Section 9.1	Mitigation Measure CUL-3 requires compliance with Public Resources Code Section 5097.98.
Local	Los Angeles County General Plan	Protects historic, cultural, and paleontological resources in	Throughout this Report	The project would conform with the Los Angeles County General Plan goal and policies, as required by the

Table 1. Laws, Ordinances, Regulations, and Standards Applicable to Cultural Resources

Jurisdiction	LORS	Applicability	Report Reference	Project Conformity
		unincorporated areas of Los Angeles County.		CEC's Opt-In Application process.
Local	Los Angeles County Historic Preservation Ordinance	Establishes criteria and procedures for the nomination, designation, and review of work on historic landmarks and property located within historic districts in unincorporated areas of Los Angeles County.	Not applicable	The current study did not identify and cultural resources that meet the Los Angeles County Historic Preservation Ordinance criteria.

Note: LORS = laws, ordinances, regulations, and standards; CEC = California Energy Commission; CEQA = California Environmental Quality Act; AB = Assembly Bill.

3.1 Federal Level Regulations

No federal nexus has been identified that would require the proposed project to comply with federal laws, ordinances, regulations, and standards related to cultural resources.

3.2 State Level Regulations

California Register of Historical Resources

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" (Public Resources Code [PRC] 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" (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated as follows: According to California PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity" and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 California Code of Regulations [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 in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and Tribal Cultural Resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "Tribal Cultural Resources."
- PRC 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 cemetery.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples 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 help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, 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" (PRC Section 21084.1; 14-CCR 15064.5[b]).

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]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

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

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC Section 21083.2[g]):

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency.

Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

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, the 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]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California 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.

Guidelines for Determining Significance

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

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

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

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

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

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

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

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

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (PRC Section 21083.2). A "unique archaeological resource" is defined as (PRC Section 21083.2(g)):

> [A]n archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
> 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

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

As stated above, CEQA contains rules for mitigation of "unique archeological resources." For example (PRC Section 21083.2(b)(1)-(4)), "[i]f it can be demonstrated that a project will cause damage to a unique archeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:"

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

PRC Section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be

required for a unique archeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

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

A. Preservation in place is the preferred manner of mitigating impacts to archeological sites. Preservation in place maintains the relationship between artifacts and the archeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site [; and]
    4. Deeding the site into a permanent conservation easement.

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

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

However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center" (CEQA Guidelines Section 15126.4(b)(3)(D)).

3.3 Local Level Regulations

Los Angeles County 2035 General Plan

Chapter 9, the Conservation and Natural Resources Element of the Los Angeles County 2035 General Plan, Section VIII. Historic, Cultural, and Paleontological Resources, provides the following goals and policies potentially relevant to the project (County of Los Angeles 2015a):

Goal C/NR 14. Protected historic, cultural, and paleontological resources.

Topic: Historic, Cultural, and Paleontological Resource Protection

Policy C/NR 14.1. Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Policy C/NR 14.2. Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.3. Support the preservation and rehabilitation of historic buildings.

Policy C/NR 14.4. Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).

Policy C/NR 14.5. Promote public awareness of historic, cultural, and paleontological resources.

Policy C/NR 14.6. Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Los Angeles County Preservation Ordinance

On September 1, 2015, the Board of Supervisors recognized the importance of preserving the County's distinctive architectural and cultural history by adopting the Historic Preservation Ordinance that (County of Los Angeles 2015b):

- Specifies criteria and procedures for the designation of landmarks and historic districts.
- Specifies criteria and procedures for reviewing proposed work on designated landmarks or on property within historic districts.
- Establishes penalties for unauthorized work, including demolition, on landmarks or historic district contributors.
- Requires maintenance of landmarks and historic district contributors to prevent deterioration.
- Prohibits work, including demolition, on property nominated but not yet designated as a landmark or historic district.
- Encourages adaptive reuse of landmarks and historic district contributors by providing relief from parking requirements.

- Provides for the enhancement of historic districts by the establishment of development guidelines and standards, and by allowing streetscape improvements that are compatible with the areas historic character.

4 Context and Setting

4.1 Environmental Setting

The project is located in northern Los Angeles County within the foothills of the Sierra Pelona Mountains and at the edge of the Antelope Valley of the western Mojave Desert. The nearest municipality to the project is the City of Palmdale, which is located approximately 4 miles to the northeast. Land uses in the immediate vicinity of the project include undeveloped and rural lands, multiple high-voltage transmission lines and an electrical substation, paved and rural roads, State Route 14, and railroad lines. The majority of the project API is currently either undeveloped or rural residential. The API ranges in elevation from approximately 3,000 feet to 3,200 feet above mean sea level (amsl) and is generally hilly in nature, with greater elevations along the eastern portion of the API. The region surrounding the project receives approximately 8.7 inches of precipitation annually. Average temperatures range from approximately 38°F to 97°F (WRCC 2025). Additionally, several seasonal drainages are located within and adjacent to project, with the Santa Clara River located directly to the north.

The project API sits within an ecotone characterized by a blend of desert scrub and mixed chaparral native plant communities. Common plant species within desert scrub environments include creosote (*Larrea tridentata*), white bursage (*Ambrosia dumosa*), juniper (*Juniperus* spp.), and golden cholla (*Cylindropuntia echinocarpa*), while species typical of mixed chaparral include chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos* spp.), coyote brush (*Baccharis pilularis*), California buckwheat (*Eriogonum fasciculatum*), scrub oak (*Quercus berberidifolia*) and yucca (*Yucca* spp. or *Hesperoyucca* sp.). Additionally, a wide array of fauna is known to exist within the foothills of the western Mojave Desert. Medium-sized mammals such as coyote (*Canis latrans*) and fox (*Urocyon cinereoargenteus*) are common. Smaller animals include blacktailed jackrabbit (*Lepus californicus*), cottontail rabbit (*Sylvilagus audubonii*), ground squirrel (*Spermophilus* sp.), and kangaroo rat (*Dipodomys* sp.), as there are many birds and migratory waterfowl present at lower elevations across cross the Antelope Valley (Earle et al. 1997; Pritchard-Parker et al. 1999; Rhode and Lancaster 1996).

4.2 Prehistoric Setting

Earle et al. (1997) and Loechl et al. (2002) have divided the prehistoric cultural chronology for the Mojave Desert into seven cultural/temporal periods: Fluted Point Period, Lake Mojave Period, Pinto Period, Gypsum Period, Saratoga Springs Period, Post-Saratoga Springs/Late Period, and Contact/Ethnographic Period; the last includes the Euro-American historic record as well. Following Loechl et al. (2002) and Horne and McDougall (2005), Giambastiani et al. (2008) synthesized these periods with inferred paleoclimatic events over the past 12,000 years in the Mojave Desert. However, their scenario conflicts with the “standard” culture synthesis currently in use within the region, and there are minor aspects of that scheme that appear somewhat outdated in light of recent data from Edwards Airforce Base (Basgall and Overly 2004; Giambastiani and Basgall 2000; Rhode and Lancaster 1996), Fort Irwin (Basgall and Hall 1992; Byrd et al. 1994), and Twentynine Palms (Basgall and Giambastiani 2000; Basgall et al. 2002; Basgall and Jurich 2006; Hall 2000).

While it is likely that long-term trends in prehistoric subsistence/settlement adaptations, and the timing of major changes in them, were largely similar across the Mojave Desert region, the many attempts to summarize them during the last 30 years of archaeological research have often produced differing results. In particular, the character of Late Pleistocene/early Holocene adaptations is still unclear and strongly debated, due in part to the persistence

of long-standing notions of Paleoindian lifeways but due also to the continued scarcity of archaeological data from ancient sites in good, dateable contexts. The following summary of early prehistoric culture history, therefore, contains some assertions that are largely inferred and many that are highly debatable. Other important, more detailed syntheses can be found elsewhere (Basgall 1993, 2000; Giambastiani and Basgall 2000; Grayson 1993; Warren 1984; Warren and Crabtree 1986), and the interested reader is referred to those sources to become more familiar with the number of different and often better substantiated opinions about the nature of ancient human adaptations in the Mojave Desert.

4.2.1 Fluted Point Period (12,000–10,000 BP)

Typically, sites of this age have been identified based on the presence of fluted-base projectile points similar to the well-known Clovis forms typically associated with ancient cultures of the Great Plains. Termed "Western Clovis" (Tuohy 1974; Willig and Aikens 1988), "Black Rock Concave Base" (Clewlow 1968) or "Great Basin Concave-Base" (Pendleton 1979), many types of Clovis-like points have been found in various locations throughout the western Great Basin and in California. Lithic assemblages containing fluted points often contain crescents, gravers, scrapers, choppers, and "perforators" (Davis 1978). Fluted point sites occur in a variety of environments, indicating that inhabitants were likely generalized foragers rather than specialized big game hunters (Earle et al. 1997; Moratto 1984).

4.2.2 Lake Mojave Period (10,000–7000 BP)

In the western Great Basin, various stemmed projectile point forms have been fairly well dated to the early Holocene, roughly between 10,000 and 7500 BP. Generally subsumed under the broader appellation "Great Basin Stemmed," these artifacts are elongate, lanceolate forms often with subtle, sloping shoulders, although many different regional styles exist. In the western Mojave Desert, typical stemmed points are Lake Mojave (unshouldered) and Silver Lake (slightly shouldered) forms, both of which are parts of lithic assemblages similar to those of the Fluted Point period.

Because of their tendency to occur along the shorelines of extinct lakes, stemmed point assemblages were once considered to represent a unique, lacustrine-based subsistence adaptation. The term "Western Pluvial Lakes Tradition,", originally coined by Bedwell (1973), was applied to stemmed point sites found in ancient lakeshore contexts across the Great Basin. Lithic assemblages of the Western Pluvial Lakes Tradition were found to be fairly comparable to Clovis materials, and in many cases points of both kinds occur together in the same sites (cf., Basgall and Hall 1991; Davis and Panlaqui 1978; Willig 1988, 1990). Flaked stone "crescents" (Amsden 1937; Tadlock 1966; Wardle 1913) were found primarily in such lakeshore assemblages, leading many archaeologists to draw associations between crescents and lacustrine environments. Support for the Western Pluvial Lakes Tradition has faded in recent years, however, as more and more stemmed point sites have been discovered in locations away from extinct bodies of water, and the landform bias in early survey programs becomes increasingly clear. Bias in the differential preservation of ancient land surfaces along fossil washes and in the center of dry lake basins has also been recognized (Basgall and Hall 1991; Waters 1988, 1991).

4.2.3 Pinto Period (7000–4000 BP)

Archaeological assemblages dating to this period are typified by Pinto points, which are projectiles bearing weak shoulders and indented or split-stem bases. Associated flaked stone assemblages include leaf-shaped bifaces,

formal unifaces, flake tools, and consistent quantities of core-cobble implements (Basgall 1993, 2000; Campbell and Campbell 1935; Hunt 1960; Rogers 1939). Lithic selection evidently favored fine-grained igneous stones, such as basalt and rhyolite, for points and bifaces (Glennan 1970, 1971; Norwood 1987). Milling stones are a major part of Pinto period assemblages, reflecting the importance of seed processing. The timing of the Pinto period coincides with Antevs' (1953) "Altithermal," an extended interval when climate was supposedly very hot and dry. Archaeologists once believed a scarcity of Pinto sites in the Mojave Desert signaled a near-total abandonment of the region due to the oppressive climate, but recent studies suggest that the middle Holocene in the Antelope Valley was punctuated by wetter episodes (Grayson 1993; Mehringer 1986) and that the effects of the Altithermal were variable in different parts of the desert. The Pinto Period is synonymous with the "Archaic" period throughout North America. During this time, Pinto Period artifacts tend to occur in aggregates at fewer locations having the appearance of being sedentary encampments. However, the relatively limited diversity of artifacts at these sites indicates they were serially occupied, perhaps during a particular season by the same families, leading to stockpiles of ground and battered stones. This seems to fit with the occurrence of Pinto Period projectile points at small, task specific sites indicating a greater reliance on logistical forays around a more stable encampment.

4.2.4 Gypsum Period (4000–1500 BP)

Diagnostic artifacts at Gypsum period sites include Gypsum contracting-stem projectile points, Elko eared and corner-notched points, and Humboldt basal-notched points. Lithic assemblages are typified by bifaces, scrapers, and a variety of other flake-based tools, but also contain mortars and pestles as evidence of expanded plant processing (including mesquite, pine nuts, yucca, and agave). Large villages or village complexes appear during Gypsum times, reflecting a transition from seasonal transhumance to year-round sedentary occupation within the Antelope Valley (Sutton 1988, 1996). The presence of marine shell artifacts at Gypsum period sites indicates economic ties between the Antelope Valley and the California coast (Warren 1984). Gardner (2007) analyzed data from a slew of sites in the western Mojave to assess the socioeconomic impact of the Medieval Climatic Anomaly and in so doing, suggested a revision in the terminus of the Gypsum period to about 2000 BP. Gardner (2007:241) based this revision on the early appearance of the bow and arrow within the Rose Spring Complex in conjunction with an increase in effective moisture at 2000 BP.

4.2.5 Saratoga Springs Period (1500–800 BP)

By at least 1500 BP (or 2000 BP using Gardner's [2007] chronological scheme), the aboriginal people of the Mojave Desert had replaced the atl atl (or spear-thrower) with the bow and arrow (Yohe 1992, 1998). This change brought about a shift toward the use of smaller projectile points, including various corner-notched and side-notched Saratoga Springs types and the corner-notched Rose Spring and Eastgate types. Anasazi ceramics also appear in the southern Mojave around 1200–1100 BP, coinciding with the westward spread of the Virgin Anasazi into southern Nevada. Influence from the cultures of the Colorado River eventually grew stronger than those from the east, allowing for an influx of buffware ceramics and other goods that persisted until the historic present. The intensification of plant use initiated during the Gypsum period continued in the Saratoga Springs period, as diet breadth was expanded to include a wide range of plant foods that required high cost/high return procurement and processing strategies. This is indicated by a general increase in milling equipment from Gypsum times through the Saratoga Springs period (see Gardner 2007:225–228).

4.2.6 Post-Saratoga Springs or Late Period (800–300 BP)

In the Antelope Valley, social and economic adaptations during this final prehistoric interval were largely an extension of patterns that developed during the Saratoga Springs period. Trade along the Mojave River continued to provide the people of eastern Antelope Valley with a variety of exotic goods and materials, although it appears that relationships with groups in coastal California eventually grew stronger than those with groups inhabiting the arid interior. Projectile points also shifted in form, with unnotched Cottonwood triangular and Desert side-notched points being even smaller than their predecessors. Mortars and pestles also appear in significant quantities, probably an indication of increased emphasis on high-cost/high-yield processing.

4.3 Ethnohistoric Setting (300 BP–Present)

This last interval is defined as the period of contact between native desert people and Euro-American explorers and settlers. Kroeber (1925) argued that as many as six different native groups were living in the western Mojave at the time of Euro-American contact, including the Chemehuevi, Serrano, Kawaiisu, Kitanemuk, Alliklik (Tataviam), and Vanyume, although it is likely that only the latter four groups used lands within Antelope Valley on a regular basis. Blackburn and Bean (1978) later reinterpreted the political geography in the western Mojave Desert, dividing western Antelope Valley between the Tataviam (to the south) and the Kitanemuk (to the north). Sutton (1980:220) followed Blackburn and Bean, claiming that the late prehistoric population in the majority of Antelope Valley was "ancestral to the ethnographic Kitanemuk." He later hypothesized that the floor of the valley might have been abandoned a few decades prior to Spanish contact in 1772 (Sutton 1988; Warren 1984). Earle et al. (1997:8), however, feels this idea is probably "overdrawn," citing the diaries of Pedro Fages (1775 and Father Garcés (1776, as cited in Earle et al. 1997) that remarked on seeing and visiting native villages in what is now western Antelope Valley. The site of Apavuchiveat, probably located at Buckhorn Springs, is likely affiliated with the Desert (Vanyume) Serrano. Another site at Willow Springs, west of Rosamond Dry Lake, was identified by contemporary Kitanemuk Serrano as an additional village location (Earle et al. 1997).

4.4 Historic Setting (Post-AD 1542)

The following summary provides an overall background to the historic Euro-American occupancy of lands in Antelope Valley and in the vicinity of project API.

4.4.1 Early Explorers

Unlike the coastal areas of California, the Mojave Desert was not intensively explored by the Spanish in early historic times, remaining beyond the limit of Hispanic settlement during the period of Mexican rule. The first visit to the region by the Spanish was made in 1772 by Pedro Fages, who was searching for deserters from the Spanish army (Fages 1775). In 1776, Father Francisco Hermenegildo Garcés traveled the course of the Mojave River across the desert and the mountains westward through the Tejon Pass. This was the first documented use of what was eventually called the Old Spanish Trail, an important transportation route between Southern California and the eastern United States. Other explorers made more regular visits to the Mojave Desert beginning in the mid-1820s. Early explorers included trappers Jedediah Smith and Joseph Walker. Kit Carson, a trapper on Jedediah Smith's 1828 expedition, later served as guide for John C. Frémont's exploratory expedition in 1844 that reached the Antelope Valley by way of the Old Spanish Trail.

4.4.2 The Coming of the Railroad

A number of federally funded geographic surveys to explore and map proposed routes for a transcontinental railroad were implemented in the Antelope Valley in the 1850s. These included surveys by Captain L. Sitgreaves in 1851, Lieutenant Amiel Whipple in 1853–1854, and Edward Fitzgerald Beale in 1857. In advance of issuing railroad grants, most of the Mojave Desert was surveyed by the Government Land Office between 1855 and 1857.

The arrival of the railroad was the catalyst that opened up the Antelope Valley to agricultural settlement and mining. The Southern Pacific Railroad completed its line from San Francisco to Los Angeles via the Antelope Valley in 1876. Train stations located along this route later became the nuclei of local settlement. In 1884, the Atchison, Topeka and Santa Fe Railway completed its line between Chicago and Needles. This line linked up with the Southern Pacific line at the community of Mojave. In 1885, the California Southern Railroad linked San Diego to Barstow. The completion of the railroad lines and associated infrastructure opened up the Mojave Desert to settlers from the east and from coastal areas of Southern California.

Railroads were granted odd-numbered sections within 20 miles on either side of the railroad right-of-way, and sale of these grant lands in the 1880s had a major impact on settlement of the region, resulting in a corridor of settlement parallel to the railroad (Earle 2004:283). The establishment of railroads linking the Midwest to Los Angeles in 1884 led to a Southern California land boom that included a dramatic increase in settlement in the Antelope Valley (Dumke 1944:17–58). The towns of Lancaster and Palmenthal (Palmdale), both located on railroad grant land, were founded in 1884 and 1886, respectively (Earle 2004:284). The communities of Mojave, Rosamond, Lancaster, Tehachapi, Alpine Springs, Acton, and Ravenna originated as railroad stations, as did Gamba, Bissell, Fluhr, Yucca, Solon, Rich, Amargo, and Kramer (Earle 2004).

Aggressive publicity campaigns by railroad real estate agents sought to attract settlers to railroad grant lands from states east of the Mississippi and from northern Europe during the 1880s and 1890s. Several communities based on a “colony” model were established in the Valley, which led to “a fascinating mix of early planned community development, emigrant town-of-origin marketing, social and religious communitarianism, and the reworking of traditional agricultural practices” (Earle 1998:64–65). Between 1883 and 1895, at least 10 colonies were founded in the Antelope Valley, many along the southern edge of the valley, and it has been estimated that between 12,000 acres and 15,000 acres were taken up by individual colonists.

4.4.3 Homesteading

Under the federal Homestead Act (1862), settlers could acquire up to 160 acres of public land for a nominal filing charge under certain conditions. Prospective settlers were required to establish residency on the claim for a period of 5 years, build a house, and either cultivate crops on at least 20 acres or graze cattle on the land. By 1912, the residency requirement was reduced to 3 years, and settlers were allowed up to 5 months per year of absence from the land. Homestead patents required proof that the patentee had constructed a house measuring at least 10 × 10 feet with at least one (1) door and one (1) window, and that residency was maintained for at least 7 months per year over 3 consecutive years (Robinson 1979:168). The Desert Land Act (1875) was subsequently passed to encourage settling of desert areas for which the Homestead Act was poorly suited. Desert lands were defined as lands exclusive of timberlands and mineral lands that would not produce a crop without irrigation. Under this act, entry could be made on up to 640 acres, on the condition that an irrigation system was established within 2 years of entry. If it could be demonstrated that sufficient water flow for irrigation had been established, the patentee

could receive title on payment of the minimum government price. In 1891, the number of acres available under this act was reduced to 360, and the time allowed for reclamation was extended to 4 years. Under an 1891 amendment, 3 dollars per acre had to be expended on irrigation, and one-eighth of the land had to be reclaimed within the allotted time before a patent could be issued (Robinson 1979:170).

Public land, obtained either through homesteading or through a desert land entry, was considerably cheaper than the purchase of railroad land, and many settlers in the Antelope Valley opted to patent land from the public domain. Homesteaders in the Antelope Valley prior to 1900 were attracted to the artesian belt in the vicinity of Lancaster, where subsurface water collected. Many of the artesian wells drilled by homesteaders in the artesian belt did not produce sufficient water flow for irrigation, and the soil was not productive due to high alkalinity. Somewhat more successful was dryland farming of grains, principally barley and winter wheat, in the western part of the valley. Particularly wet winters during the years 1883 to 1892 that resulted in large crop yields persuaded many new settlers to the Antelope Valley that dry farming could be successful (Earle 2004:286).

Drought conditions between 1896 and 1903 brought the burgeoning agricultural development of the Antelope Valley to an end. The severe drought caused many of the homesteads and private land holdings to be abandoned. Many of the colonies also collapsed, and colonists moved away. The population of the valley fell from a total of 1,500–1,600 in the 1890s to 930 in 1900 at the height of the drought (Earle 2004:287).

Following a number of wet years, agricultural development resumed, led by the return of cattle grazing. In addition, abandoned homesteads were returned to the public domain and were again available for homesteading. Technological innovations, including improved drilling methods and the availability of petroleum-distillate pumps, increased the profitability of well-and-pump irrigation. Smaller farms, no larger than 40 acres and devoted to the cultivation of alfalfa, were touted as the future of agricultural development in the valley (Earle 2004:287). In addition, the construction of the Los Angeles Aqueduct was a boon to the region, providing much-needed employment.

During the 1910s, the Antelope Valley experienced a second boom in homesteading due to a series of Homestead Act reforms. Of the 2,113 homestead patents issued in the Los Angeles portion of the Antelope Valley, 75% were issued after 1910 (Earle 2004:289). As noted above, the length of the residency requirement was shortened from 5 years to 3 years, speeding up the patenting process, and homesteaders could now leave their homesteads for up to 5 months of the year, thus allowing them to find outside employment. The Enlarged Homestead Act (1909) allowed for larger homesteads of up to 320 acres for dryland farming. The homesteading boom continued in the Antelope Valley through the 1920s and into the Depression years. Desert land entries were common in the Antelope Valley, as they did not have a residency requirement and were often seen as a stepping-stone to establishing a homestead claim. Up to 320 acres could be obtained under the Desert Land Act, but the entryman was required to irrigate 80 acres, or 25%, of the entry claim. Fraud was widespread with desert land entries, and they were frequently used to claim land on which a Homestead Entry was later submitted (Spinney et al. 2004:81). Irrigation also required an infusion of capital to which many homesteaders did not have access. Many desert land entrymen spent large portions of the year working elsewhere to earn the cash necessary to prove up their claim. Productivity varied from homestead to homestead, depending on soil alkalinity and availability of subsurface water. In spite of the many difficulties inherent in homesteading in this desert environment, many homesteaders succeeded in obtaining title to their land, although a significant proportion failed to do so. In the 1910s, 58% of homestead entries in the Antelope Valley area failed (Earle et al. 1998:175).

The completion of a paved road between the Antelope Valley and Los Angeles in 1921 provided a ready market for produce from the Antelope Valley in the rapidly growing metropolis. The proximity of Antelope Valley to Los Angeles fueled agricultural production through the 1920s. Poultry farming, dairy operations, and fruit production were combined with the cultivation of alfalfa in a more diverse agricultural economy (Earle 2004:291). With an increase in the availability of motor transport, the desert became a recreational area for city dwellers. Motor transport also allowed homesteaders to find employment to supplement their farming income. The Depression years saw a decline in farm production as the price of fruit, alfalfa, and chickens fell by one-half to two-thirds of their original price. During this period, bootlegging became a significant source of income in the valley. Despite the economic decline, the Antelope Valley attracted refugees from urban areas who squatted on vacant land. Homestead entries increased rapidly in the Depression years. The era of homesteading came to a close in 1935, when federal land was withdrawn from further public entry as a result in a shift in the government's focus from settlement of public land to preservation and conservation. While new entries were not permitted, those who had made entry prior to 1935 were allowed to complete the process. Agricultural production began its recovery by 1936 and experienced rapid expansion in the 1940s.

4.4.4 Mining

Mining has long played an important role in the economy of Antelope Valley since the discovery of copper, rich deposits of silver, and gold south of Kramer in 1884. A second mining boom occurred in 1894 after the discovery of gold at Tropico Hill near Rosamond. Shortly thereafter, gold was also discovered at Soledad Mountain, Standard Mountain, and Rand Mountain. The last big gold rush occurred in the area in 1926, when the Herkelrath brothers discovered gold near Kramer Hills. This led to a rush in mining claims in the region. Districts were established at Kramer, Kramer Hills, Rosamond, Randsburg, Oro Grande, and El Paso. Gold mining practically ceased during World War II by order of the War Production Board. In the early 1940s, there were 1,500 mining claims within the boundaries of Muroc Army Air Field, but most of these were revoked when the U.S. Geological Survey ruled that they contained an insufficient quantity of minerals for extraction.

The mining of mud and clay for the extraction of bentonite, used in the refinement of petroleum products, was carried out in the Buckhorn, Rogers, and Rosamond dry lakebeds. In 1913, borate was discovered in the Kramer area. The town of Amargo (later renamed Boron) developed around the Pacific Coast Borax Company mine. The accidental discovery of oil north of Muroc in 1921 led to increased oil drilling in the Antelope Valley; however, oil drilling was largely abandoned in the valley by 1925. In general, mining operations provided an important alternative employment to homesteaders in Antelope Valley by allowing people to supplement their farming income during lean years. Without this source of employment, the rate of homestead abandonment would have been considerably higher during the 1920s and 1930s.

INTENTIONALLY LEFT BLANK

5 Research Design

The objective of the evaluation portion of this project was to obtain information from archaeological sites that could be used to evaluate the resource's significance under CEQA. Current research is typically structured in a way that links anthropologically oriented research issues to the archaeological record. The following discussion embraces this strategy and identifies potential questions and appropriate archaeological evidence within a series of broad research themes. General issues pertinent to the assessment of the sites include determination of the extent and integrity of cultural deposits, age and probable affiliation, site function, and subsistence strategies.

5.1 Integrity

Delineation of the horizontal distribution and vertical depth of the site is necessary for an assessment of research potential. Of particular importance is the integrity of the deposits: whether or not features or surfaces are preserved and whether the potential exists for identifying, through analysis, horizontal and vertical spatial patterning in the evidence for past behavior.

Formation processes such as alluvial deposition, erosion, bioturbation, and modern disturbance can considerably affect the integrity and original character of archaeological sites. Here, attempts are made to identify and interpret the processes that formed the site, with particular attention given to the character of post- depositional processes and the extent to which they have affected the integrity of the archaeological deposits.

The recordation and analysis of surface artifacts at several sites were used to address the following issues:

- Does the horizontal and vertical extent of the archaeological record within the sites represent continuous or discrete occupations?
- Is it possible to discern depositional versus post-depositional processes that have contributed to the present condition of the archaeological record at any of the sites? In other words, what are the factors, both natural and anthropogenic, that have altered the position and condition of artifacts from the prehistoric and historic occupations of the sites?
- What kinds of features are potentially preserved at the sites (e.g., structures, hearths, earth ovens)? Are there features that are highly disrupted by postdepositional processes but that are still recognizable? Can these features be associated with particular functions?
- By examining spatial patterns in the horizontal distribution of artifacts, is it possible to discern areas that were associated with specific functions? Do patterns in the vertical distribution of artifacts tell us anything about changes in the function, materials exploited, or human activities at the sites through time?
- Is there evidence of overlapping dump episodes, such as multiple points of concentration or concentration of artifacts of a certain age?

5.2 Chronological Placement

Chronological issues are essential to any archaeological investigation, so several basic questions concerning the temporal data potential of evaluated sites pertain to the current study, including:

- Can the chronological placement of project sites be determined?
- What kinds of chronometric data can project sites provide? Of those obtained during survey, how well do they correlate in terms of the age estimates they provide (e.g., cans vs. bottles).
- Are there data indicating the presence of multiple occupation episodes at project sites?
- Do diagnostic artifacts appear to fit with temporal patterns recognized in the surrounding region? Are there any unique diagnostic items present?
- Can chronometric data from project sites help to refine dating schemes in the local region?

Potential chronometric evidence of the historic sites located within the project APE is primarily obtainable from artifacts with maker's marks, specific can or bottle manufacture styles, or coins. However, it is common for dates of manufacture for a particular artifact to be much broader than those for another artifact class, making a determination for age of consumption for any given class difficult, if not impossible. For this reason, the date of refuse disposal is more pertinent for refuse deposits that are not located at homesites; and this is usually determined by the early manufacture date on the youngest artifact for each dump event. Hale et al. (2010) document a widespread pattern of dumping items of mixed manufacture and consumption age as the result of homesite cleanup and off-site dumping. If refuse deposits are located at a homesite, assessing the age of consumption for historic artifacts is an approximation based on overlapping manufacture dates, taking into account the earliest and latest possible dates. Assemblages that cannot be securely placed chronologically would be less likely to possess a significant research potential. Of course, archival research can provide direct information on the date of construction and occupancy for historic homesites and lands used for agricultural, ranching, or mining.

5.3 Settlement and Site Function

Interpretation of the study sites depends upon an assessment of their places within the larger settlement-subsistence system of their occupants. Sites belonging to functional types that are relatively ubiquitous within the region would be less likely to be considered significant than unusual site types. Sites with evidence of multiple functions may possess richer information content than relatively simple sites; on the other hand, single-function sites may have a greater research potential than multiple-function sites if the residues from the various activities at the latter cannot be effectively differentiated.

Considering historic archaeological sites, the kinds of artifacts present, the activities they represent, and their overall proportions can give some indication of where refuse originated, and why it was abandoned at its place of discard. The main questions for historical archaeological sites are:

- What is the nature of refuse at historic sites? Are proportions of consumptive, household, industrial, and other artifacts substantial enough to derive context of origin(s)?
- Are any maker's marks on historic artifacts indicative of specific places of manufacture? Do they provide any information about where particular goods might have been purchased or otherwise obtained?

These kinds of questions are relevant for understanding the nature of historical occupation, including at homesites, agricultural facilities (i.e., field worker residential areas), and urban neighborhoods. Archival research helps bolster field data by documenting past historical landowners, lease holders, or residents, and by documenting historical changes in the local landscape. While it is virtually impossible to tie historic refuse deposits in some cases to specific homesites or businesses, it is possible to identify potential sources of refuse and make informed assumptions about its origin.

5.4 Subsistence

The issues related to subsistence orientation are interwoven with the previously discussed settlement organization, and this section complements the issues discussed previously.

The primary question to address at historic sites is:

- Are artifacts present that provide information on the kinds of foods consumed (i.e., food cans, glass bottles, etc.)?

The data necessary to address this issue is generally limited to the kinds of food containers and food processing items found at historical archaeological sites.

INTENTIONALLY LEFT BLANK

6 Methods

This section describes the techniques employed to identify and evaluate archaeological resources within the project API. All methods exceed the Secretary of the Interior's Standards and Guidelines for archaeology, as do all project personnel for their respective roles.

6.1 Inventory

The inventory portion of this archaeological resources investigation consisted of a SCCIC records search of the project API and surrounding 1-mile radius; archival research; correspondence with the NAHC; informal tribal outreach; and an intensive-level pedestrian survey of the project API.

A California Historic Resources Information System records search encompassing the current project API and a 0.5-mile radius was performed by staff at the SCCIC, located on the campus of the California State University, Fullerton, in Fullerton, California on January 26 and 27, 2023. An update to this original records search to incorporate changes to the project footprint and to encompass a 1-mile radius was completed by Dudek archaeologist Brenda Rogers at the SCCIC on November 6, 2024. The purpose of the records search is to identify any previously recorded cultural resources that may be located in or adjacent to the project API and to identify previous studies in the project vicinity. In addition to a review of previously prepared DPR site forms and reports, the records search also included a review of historical maps of the project API, ethnographies, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility. Records search results are provided in Section 7.

Archival research consisted of reviewing historic topographic maps (Smith and Huang 2024), historic aerial photographs (Smith and Huang 2024), and U.S. Department of Agriculture soil survey maps (USDA 2025). No local archaeological societies or museums were identified or contacted during archival research efforts in support of the current study. Archival research results are provided in Section 7.

Dudek requested a NAHC search of the Sacred Lands File (SLF) for the project API and a 0.5-mile radius on January 13, 2023, and for the project API and a 1-mile radius on December 30, 2024. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on January 27, 2023, and January 16, 2025, respectively, stating that the SLF search was completed with negative results. Along with the results of the SLF search, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. Informal tribal outreach letters were mailed on January 15 and 20, 2025 to all California Native American Tribal representatives included on the NAHC contact lists. Results of these efforts are provided in Section 7.

Dudek archaeologists Jessica Colston, Phillip Sharp-Garcia, and Shane McDonnell conducted an intensive-level archaeological resources pedestrian survey of a large portion of the project API on February 1 and 2, 2023. Dudek archaeologists Jessica Colston and Brenda Rogers re-surveyed many portions of the project API and conducted an intensive-level archaeological resources pedestrian survey of additional, newly incorporated portions of the project API from November 18 to 20, 2024. Jessica Colston and Roshanne Bakhtiary conducted an intensive-level archaeological resources pedestrian survey of the SCE-owned portions of the project API on February 25, 2025. In

total, the Archaeological Survey Area encompassed approximately 321 acres as delineated in Figure 3 (Archaeological Survey Area). Each pedestrian survey employed standard archaeological procedures and techniques consistent with the Secretary of the Interior's Standards and Guidelines for archaeology. When possible, 15-meter interval survey transects were conducted, oriented in north–south cardinal directions. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. Evidence for buried archaeological deposits was opportunistically sought through inspection of natural or artificial erosion/excavation exposures and the spoils from rodent burrows. Areas of the project that contained a greater than 30% slope were not surveyed due to safety concerns and their general lack of suitability for containing archaeological resources. Results of the pedestrian survey are provided in Section 7.

A Global Navigation Satellite System receiver with sub-meter accuracy along with an 11th Generation Apple iPad equipped with georeferenced PDF maps of the project API were used to verify the accuracy of the survey coverage and facilitate in-field recording.

A minimum density of three or more artifacts in a 25-meter (82-foot) squared area constituted an archaeological site, as with the presence of any feature (i.e., concrete foundation). Any separation of 50 meters (164 feet) squared or more between artifacts was considered justification for delineation of a site boundary. A temporary site number was assigned to all newly identified archaeological resources that met the definition of an archaeological site. Isolated finds consisting of fewer than three artifacts within a 25-meter squared area were recorded separately from sites, including the use of a different numbering scheme. Any previously recorded archaeological sites located within the project API were field checked and documented as appropriate. Additionally, a metal detector was used to perform cardinally oriented transects radiating out from the central portion of each site to determine the potential for buried deposits.

Location-specific photographs were taken using an 11th Generation Apple iPad equipped with 8 mega-pixel resolution. All field notes, photographs, and records related to the current study are on file at Dudek's Mission Viejo, California office. All resources were recorded in their entirety on DPR site forms, using the Instructions for Recording Historical Resources (OHP 1995).

6.2 Significance Evaluations

11 archaeological resources were identified within the project API during inventory efforts that required formal evaluation for listing on the CRHR and for significance under CEQA and local regulations. 10 of the archaeological resources are characterized as surficial historic-era refuse scatters, while ABS-JC-S-04 is characterized as a shallow depression containing historic-era refuse. The majority of these resources likely represent single dumping episodes as indicated by their localized concentration of mostly contemporaneous domestic refuse and food waste items. Through the use of remote sensing (metal detection), it has been determined that these resources are unlikely to contain associated subsurface archaeological deposits. Therefore, significance evaluations for all resources were conducted using data obtained from the recordation of artifacts identified on the ground surface. See Table 2 for a list of all archaeological resources subject to significance evaluations as part of the current study. Results of these efforts are provided in Section 8.

Table 2. Archaeological Resources Subject to Significance Evaluation

Resource ID	Resource Description	Buried Potential	Level of Effort for Evaluation
P-19-101014	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-PK-S-01	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-PK-S-02	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-PK-S-03	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-JC-S-01	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-JC-S-02	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-JC-S-03	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-JC-S-04	Shallow depression containing historic refuse	Unlikely	Surface recordation
ABS-JC-S-05	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-BR-S-01	Historic-era refuse scatter	Unlikely	Surface recordation
ABS-RB-S-01	Historic-era refuse scatter	Unlikely	Surface recordation

INTENTIONALLY LEFT BLANK

7 Results

This section presents the results of the SCCIC records search, archival research, correspondence with the NAHC, informal tribal outreach, and intensive-level pedestrian survey of the project API in support of the currently proposed project.

7.1 Records Search

7.1.1 Previously Conducted Cultural Resources Studies

The SCCIC records search identified 50 previous cultural resources studies that have been conducted within a 1-mile radius of the project API. Of these studies, 22 intersect with the project API (Table 3). These include 12 cultural resources inventories, six (6) archaeological resources inventories, one (1) archaeological and paleontological resources inventory, one (1) records search report, one (1) archaeological resources monitoring report, and one (1) evaluation report. Relevant reports are discussed in further detail below Table 3. Approximately 30% of the project API has been subject to past cultural resources investigations. See Appendix B for the complete SCCIC records search results and associated documentation.

Table 3. Previous Cultural Resource Studies that Intersect the Project API

Report ID	Year	Author	Title
Intersects Project API			
LA-00680	1979	Barker, James P.	An Archaeological Sampling of the Proposed Allen-warner Valley Energy System, Western Transmission Line Corridors, Mojave Desert, Los Angeles and San Bernardino Counties, California and Clark County, Nevada
LA-00962	1980	Robinson, R. W.	Cultural Resources Investigation Re: Parcel Map No. 12240
LA-01585	1986	Weil, Edward B.	City of Los Angeles Department of Water and Power Vincent Substation Loop-in Project Cultural Resource Records Check and Field Survey Results
LA-03017	1994	Gibson, Robert O.	Results of Archaeological Records Check for the Mojave Alternatives of the Pacific Pipeline Project Los Angeles County, California
LA-03705	1969	Coleman, R.G., J. Jones, and T.F. King	An Archaeological Reconnaissance of Southern California Edison Company's Vincent Transmission, From Bakersfield to Glendale, California
LA-04008	1996	Unknown	Cultural Resources Investigation Pacific Pipeline Emidio Route
LA-07940	2005	Schmidt, June A.	DWO 6036-4800, AI #5-4834: 2005 Deteriorated Pole Replacement Project Pick B-1 and C-2; Bootlegger A-3, B-3, C-2, and C-3; Leona A-1; Titan C-3; Calli Valli D-1; Acrobat A-2; Target B-1; and Dennis 12 kV Distribution Lines, Los Angeles County

Table 3. Previous Cultural Resource Studies that Intersect the Project API

Report ID	Year	Author	Title
Intersects Project API			
LA-08179	2006	Ahmet, Koral, Roger Mason and Sara Bholat	Cultural Resources Survey Report for Antelope Transmission Project: Segments 2 & 3, Los Angeles and Kern Counties
LA-09705	2007	Anonymous	Cultural Resources Inventory of the Southern California Edison Company Tehachapi Renewable Transmission Project, Kern, Los Angeles and San Bernardino Counties, California. ARR #05-01-01046
LA-09755	2009	Gust, Sherri, Veronica Harper, and Amy Glover	Supplemental Archaeological and Paleontological Resources Assessment, Sagebrush 220 kV Transmission Line Modification (Segment 2, Tehachapi Renewable Transmission Project), Los Angeles County, California
LA-10175	2009	Unknown	Confidential Cultural Resources Specialist Report for the Tehachapi Transmission Project
LA-10470	2010	Schmidt, James	Archaeological Monitoring Report - Southern California Edison Station Fire Emergency Transmission Line Road Maintenance Project, Angeles National Forest, Los Angeles County, California ARR #05-01-1154
LA-11869	2010	Holm, Lisa	Cultural Resources Survey for the M76-T5 Access Roads, Segment 5 Tehachapi Renewable Transmission Project, Los Angeles County, California
LA-11873	2010	Holm, Lisa	TRTP Cultural Resources Survey Report with Negative Findings, Segment 5 Removal of Conductor between Existing Antelope-Mesa 220 kV towers M76-T4 and M76-T5, Los Angeles County, California
LA-11987	2010	Schneider, Tsim	TRTP Negative Archaeological Survey Report, Tehachapi Renewable Transmission Project, Cultural Resources Survey Report with Negative Findings, Segment 9 Vincent Substation Expansion and Foreston Drive Realignment, Los Angeles County, California
LA-12527	2010	Panich, Lee, Stephanie Cimino, and John Holson	Supplemental Archaeological Survey Report #1, Tehachapi Renewable Transmission Project Segment 5, Los Angeles County, California
LA-12528	2010	Schneider, Tsim and John Holson	Supplemental Archaeological Survey Report #2, Tehachapi Renewable Transmission Project Segment 5, Los Angeles County, California
LA-12548	2010	Greenberg, Marc, Tsim Schneider, and John Holson	Supplemental Archaeological Survey Report Tehachapi Renewable Transmission Project Segment 6, Los Angeles County, California
LA-12807	2014	Tennesen, Kristin	Cultural Resources Survey for the Vincent Station Siding Extension and Second Platform Project, Acton, California, Los Angeles County
LA-12833	2013	Jackson, Thomas	Evaluation of National Register of Historic Places and California Register of Historical Resources Eligibility of Archaeological Site CA-LAN-2546, Southern California

Table 3. Previous Cultural Resource Studies that Intersect the Project API

Report ID	Year	Author	Title
Intersects Project API			
			Edison Company Tehachapi Renewable Transmission Project, Segment 6 Los Angeles County, California
LA-12838	2014	Greenberg, Marc	Segment 11C Supplemental Survey in Support of a Variance Request for Additional Pullouts and Spur Roads, Tehachapi Renewable Transmission Project, Los Angeles County, California
LA-12840	2014	Greenberg, Marc	Segment 11C Supplemental Survey for TEWS for Construct 03 Access Road, Tehachapi Renewable Transmission Project, Los Angeles County, California

Notes: TRTP = Tehachapi Renewable Transmission Project.

LA-12548

A supplemental archaeological survey report was prepared for the Tehachapi Renewable Transmission Project Segment 6 in 2011 by Pacific Legacy, Inc. This report was a supplement to an initial archaeological inventory for the Tehachapi Renewable Transmission Project and included a records search, literature review, pedestrian survey, and the documentation of previously identified archaeological resources and newly discovered archaeological resources that intersected with the Segment 6 project area. Overall, the pedestrian survey identified eight (8) previously recorded archaeological resources and another nine (9) newly discovered archaeological resources within the Segment 6 project area, one (1) of which was P-10-101014. Though P-19-101014 was originally recorded as part of this study, no further investigations were completed, including evaluating P-19-101014's eligibility for listing on the CRHR/NRHP. Overall, the Segment 6 study area overlaps with less than 5% of the currently proposed project API. Management recommendations for the project included the evaluation of all resources identified within the Segment 6 project area if avoidance was not feasible, as well as the implementation of inadvertent discovery protocols for archaeological resources and huma remains during project construction (Greenberg et al. 2011).

7.1.2 Previously Recorded Cultural Resources

The SCCIC records search identified three (3) previously recorded cultural resources within the project API: P-19-002893 (abandoned Southern Pacific Railway segment), P-19-101014 (can isolate), and P-19-192581 (Antelope-Mesa 220 kV Transmission Line). An additional 28 previously recorded cultural resources were identified within a 1-mile radius of the project API (Table 4). These include 13 historic-era refuse scatters, four (4) prehistoric isolates, two (2) lithic and groundstone scatters, two (2) historic-era isolates, two (2) built environment structures, one (1) prehistoric hearth feature, one (1) prehistoric bedrock milling feature, one (1) collapsed wooden structure with an associated refuse scatter, the Angeles National Forest, and the Angeles Forest Highway.

P-19-002893 and P-19-101014 are described in further detail below Table 4. P-19-192581 and all other built environment resources recorded and evaluated as part of this project are addressed in the *Built Environment Inventory and Evaluation Report* prepared by Dudek in 2025 (Ahmanson et al. 2025). See Appendix B for the complete SCCIC records search results and associated documentation, and Appendix C for a Cultural Resources

Overview Map that depicts all previously recorded and newly identified (as part of Dudek's inventory and evaluation efforts) cultural resources within a 1-mile radius of the proposed project.

Table 4. Previously Recorded Cultural Resources within 1 Mile of Project API

Primary Number	Trinomial	Age	Type	Description	Eligibility for CRHR/NRHP
Intersects Project API					
P-19-002893	CA-LAN-002893H	Historic	Site	Abandoned segment of the Southern Pacific Railroad	Recommended ineligible for NRHP
P-19-101014	—	Historic	Isolate	Can isolate	Categorically Ineligible for CRHR/NRHP
P-19-192581	—	Historic	Engineering structure	Antelope-Mesa 220 kV Transmission Line	Recommended ineligible for CRHR/NRHP
Outside of Project API					
P-19-002414	CA-LAN-002414	Prehistoric	Site	Lithic and groundstone scatter	Not evaluated
P-19-002415	CA-LAN-002415	Prehistoric	Site	Lithic and groundstone scatter	Not evaluated
P-19-002459*	CA-LAN-002459H	Historic	Site	San Gabriel Dam Construction Camp Bldg. FC143	Unknown
P-19-002546	CA-LAN-002546	Prehistoric	Site	Hearth feature	Recommended ineligible for CRHR/NRHP
P-19-002561	CA-LAN-002561H	Historic	Site	Refuse scatter	Unknown
P-19-002907	CA-LAN-002907H	Historic	Site	Refuse scatter	Unknown
P-19-002908	CA-LAN-002908H	Historic	Site	Refuse scatter	Unknown
P-19-003116	CA-LAN-003116H	Historic	Site	Borrow pits with associated refuse scatter	Unknown
P-19-003124	CA-LAN-003124	Prehistoric	Isolate	Lithic isolate	Categorically Ineligible for CRHR/NRHP
P-19-003308	CA-LAN-003308H	Historic	Site	Refuse scatter	Determined ineligible for NRHP
P-19-003458	CA-LAN-003458H	Historic	Site	Refuse scatter	Unknown
P-19-003536	CA-LAN-003536H	Historic	Site	Refuse scatter	Unknown
P-19-003729	CA-LAN-003729H	Historic	Site	Refuse scatter	Recommended ineligible for CRHR/NRHP
P-19-003730	CA-LAN-003730H	Historic	Site	Refuse scatter	Unknown

Table 4. Previously Recorded Cultural Resources within 1 Mile of Project API

Primary Number	Trinomial	Age	Type	Description	Eligibility for CRHR/NRHP
P-19-003731	CA-LAN-003731	Prehistoric	Site	Bedrock milling feature	Unknown
P-19-003732	CA-LAN-003732H	Historic	Site	Collapsed wooden structure with associated refuse scatter	Recommended ineligible for CRHR/NRHP
P-19-003733	CA-LAN-003733H	Historic	Site	Refuse scatter	Recommended ineligible for CRHR/NRHP
P-19-003938	CA-LAN-003938H	Historic	Site	Refuse scatter	Determined ineligible for CRHR/NRHP
P-19-004335	CA-LAN-004335H	Historic	Site	Refuse scatter	Recommended ineligible for CRHR/NRHP
P-19-004470	CA-LAN-004470H	Historic	Site	Refuse scatter	Unknown
P-19-100576*	—	Historic	Isolate	Glass insulator	Categorically Ineligible for CRHR/NRHP
P-19-100758	—	Prehistoric	Isolate	Core fragment	Categorically Ineligible for CRHR/NRHP
P-19-101018	—	Historic	Isolate	Bottle fragment	Categorically Ineligible for CRHR/NRHP
P-19-101021	—	Prehistoric	Isolate	Metate fragment	Categorically Ineligible for CRHR/NRHP
P-19-101359	—	Prehistoric	Isolate	Obsidian biface fragment	Categorically Ineligible for CRHR/NRHP
P-19-186535	—	Historic	Plaque	Angeles National Forest	California Historical Landmark
P-19-186876	—	Historic	Engineering structure	SCE Eagle Rock-Pardee Transmission Line	Recommended ineligible for CRHR/NRHP
P-19-187713	—	Historic	Highway	Angeles Forest Highway	Recommended ineligible for CRHR/NRHP

* PDF not on file at SCCIC

P-19-002893

P-19-002893 is characterized as an abandoned segment of the Southern Pacific Railroad grade through Soledad Canyon. This resource was first recorded in 2000 by SWCA Environmental Consultants and recommended ineligible for listing on the NRHP. At time of recordation, P-19-002893 consisted of imported stone, several railroad ties in secondary context, two water culverts (one dated to 1937) and a cement signal stand. This resource was revisited in 2013 by HDR. HDR was able to revisit all previously identified components, however indicated that the original mapping by SWCA in 2000 appeared to be incorrect (Purcell 2000).

P-19-101014

P-19-101014 is characterized as an isolated can scatter consisting of a three-tab seam, church key opened, steel beer can, a crushed painted label oil can, and additional cans noted upslope adjacent to the SCE Vincent Substation. This resource was first recorded in 2011 by Pacific Legacy, Inc. in support of the Tehachapi Renewable Transmission Project (Greenberg and Schrader 2011). Isolates are categorically ineligible for listing on the CRHR and do not meet the criteria to be considered significant or unique archaeological resources under CEQA.

7.2 Archival Research

7.2.1 Review of Historic Topographic Maps

Table 5 provides a summary of the historic topographic map review conducted for the BESS facility. This table has been modified from the *Phase I Environmental Site Assessment: Prairie Song Reliability Project* prepared by Dudek in 2024 (Smith and Huang 2024: 19-20).

Table 5. Summary of Historic Topographic Maps

Date	BESS Facility (APNs 3056-017-007, -020, 021; 3056-019-013, -026, -037, and -040)	Adjoining and Surrounding Properties
1900	The project site is depicted as vacant, undeveloped land. An east–west-trending light-duty road and a wide wash are depicted through the center of the site.	The adjoining and surrounding areas are depicted as vacant, undeveloped land. A northeast–southwest trending railroad is depicted to the north. A few light-duty roads are depicted throughout the adjoining and surrounding area.
1934	The light-duty road and wide wash are no longer depicted on the site. A tank and a well are depicted on the site. Narrow washes are depicted in the southwest and northwest portions of the site. Unimproved roads are depicted in the northwestern and northeastern portions of the site. A structure is depicted along the eastern border of the site.	Two wells and a patrol station are depicted north of the site. East–west trending Highway 6 and Soledad Canyon are depicted north of the project site. Additional roadways and narrow washes are depicted throughout the surrounding area.
1939	The site is depicted similarly to the 1934 topographic map.	The adjoining and surrounding areas are depicted similarly to the 1934 topographic map.

Table 5. Summary of Historic Topographic Maps

Date	BESS Facility (APNs 3056-017-007, -020, 021; 3056-019-013, -026, -037, and -040)	Adjoining and Surrounding Properties
1940	The tank and the well are no longer depicted on the site. The narrow wash in the southwestern portion is no longer depicted on the site.	The two wells are no longer depicted north of the project site. Additional structures are depicted on the surrounding properties to the north.
1947	The structure along the eastern border is now depicted outside of the site boundary. The remaining site is depicted similarly to the 1940 topographic map.	A structure is depicted on the eastern-adjoining property. The remaining adjoining and surrounding areas are depicted similarly to the 1940 topographic map.
1948	The site is unmapped.	Most of the adjoining and surrounding properties are unmapped.
1959	The site is depicted similarly to the 1947 topographic map.	Kentucky Springs Canyon is depicted on the adjoining and surrounding property to the north. Additional roadways and structures are scattered throughout the surrounding area.
1974, 1978	The site is depicted similarly to the 1959 topographic map.	Highway 6 has been expanded to have several on-/off-ramps connecting to the highway and is renamed Highway 14. A substation is now depicted northeast of the project site. Two structures are depicted on the southwestern adjoining property. Additional buildings and unimproved roads have appeared in the areas surrounding the project site.
1991, 1994	The site is depicted similarly to the 1974/1978 topographic map.	The adjoining and surrounding areas are depicted similarly to the 1974/1978 topographic map.
1995	A structure is depicted in the western portion of the site. A roadway is depicted along the western border of the site.	Additional structures and roads are depicted in the areas surrounding the project site.
2012	Structures are no longer depicted on the topographic map.	Structures and power transmission lines are no longer depicted on the topographic map.
2015	The site is depicted similarly to the 2012 topographic map.	Changes to road layouts are depicted in areas surrounding the site.
2018	The site is depicted similarly to the 2015 topographic map.	The adjoining and surrounding areas are depicted similarly to the 2015 topographic map.
2022	The site is depicted similarly to the 2018 topographic map.	The adjoining and surrounding areas are depicted similarly to the 2018 topographic map.

Notes: BESS = battery energy storage system; APN = Assessor's Parcel Number.

7.2.2 Review of Historic Aerial Photographs

Table 6 summarizes the review of the historic aerials photographs that cover the BESS facility (Smith and Huang 2024: 17–18).

Table 6. Summary of Historic Aerial Photographs

Date	BESS Facility (APNs 3056-017-007, -020, 021; 3056-019-013, -026, -037, and -040)	Adjoining and Surrounding Properties
1928	The site appears largely undeveloped. An east–west-trending wide wash is observed in the northwest portion of the site. A narrow wash is observed in the southwestern corner of the site. Two roads are observed on the northern half of site. Vegetation that appears to be bushes and shrubs sparsely covers the entirety of the site.	Undeveloped land is observed on all adjoining and surrounding properties. A road and railroad are observed northwest of the site. A few narrow washes and dirt roads/trails are observed throughout the surrounding area. Vegetation that appears to be bushes and shrubs sparsely covers the adjoining and surrounding properties.
1940	The site appears similar to the 1928 aerial photograph.	The adjoining and surrounding areas appear similar to the 1928 aerial photograph.
1954	The site appears similar to the 1940 aerial photograph.	The adjoining and surrounding areas appear similar to the 1940 aerial photograph.
1968	A cleared area is observed in the western portion of the project site. A north–south-trending road is observed along a portion of the western border.	Rural residential/farming structures are observed on the western- and eastern-adjoining properties. Additional residential/farming structures are observed to the south. Additional roads appear throughout the adjoining and surrounding properties.
1974	The site appears similar to the 1968 aerial photograph.	The adjoining and surrounding areas appear similar to the 1968 aerial photograph.
1976	The site appears similar to the 1974 aerial photograph.	The adjoining and surrounding areas appear similar to the 1974 aerial photograph.
1983	A small, cleared area is observed along the eastern border of the site, associated with the eastern-adjoining structure. The site appears similar to the 1976 aerial photograph.	Additional residential/farming structures are observed adjoining the subject property to the northeast and west and also on the surrounding property to the south.
1989	A residential area is observed in the western portion of the site. A graded area associated with structures on the eastern adjoining property is observed along the eastern border.	The northeastern- and western-adjoining areas are further developed with additional structures and grading. The remaining adjoining and surrounding areas appear similar to the 1983 aerial photograph.
1994	A few additional roads are observed throughout the site.	Additional structures are observed on the western adjoining property. The remaining adjoining and surrounding areas appear similar to the 1989 aerial photograph.
2002	Additional structures are observed in the western portion of the site.	Additional development is observed on the eastern and western-adjoining properties. The remaining adjoining and surrounding areas appear similar to the 1994 aerial photograph.
2005	The site appears similar to the 2002 aerial photograph.	The adjoining and surrounding areas appear similar to the 2002 aerial photograph.
2009	Additional structures are observed in the western portion of the site. The remaining	The adjoining and surrounding areas appear similar to the 2005 aerial photograph.

Table 6. Summary of Historic Aerial Photographs

Date	BESS Facility (APNs 3056-017-007, -020, 021; 3056-019-013, -026, -037, and -040)	Adjoining and Surrounding Properties
	site appears similar to the 2005 aerial photograph.	
2012	The site appears similar to the 2009 aerial photograph.	The adjoining and surrounding areas appear similar to the 2009 aerial photograph.
2016	The site appears similar to the 2012 aerial photograph.	The adjacent and surrounding areas appear similar to the 2012 aerial photograph.
2020	The site appears similar to the 2016 aerial photograph.	The adjacent and surrounding areas appear similar to the 2016 aerial photograph.
2023	The site appears similar to the 2020 aerial photograph.	The adjacent and surrounding areas appear similar to the 2020 aerial photograph

Notes: BESS = battery energy storage system; APN = Assessor's Parcel Number.

7.2.3 Review of Geomorphological Context

According to the U.S. Department of Agriculture Natural Resources Conservation Services, several soil types are mapped within the project API. Official U.S. Department of Agriculture soil descriptions for the soil types identified within the project API are provided below (USDA 2025).

- Hanford coarse sandy loam, 2% to 9% slopes, is present within 27% of the project API. Hanford coarse sandy loams generally occur in settings with alluvial fans deriving from granite and are found in areas with elevations ranging from 2,390 feet to 4,200 feet amsl.
- Terrace escarpments are present within 24% of the project API and are characterized by their high percent of slope, which in general, are not suitable for sustaining buried archaeological deposits.
- Hanford coarse sandy loam, 0% to 2% slopes, is present within 17% of the project API. Hanford coarse sandy loams generally occur in settings with alluvial fans deriving from granite and are found in areas with elevations ranging from 2,390 feet to 4,200 feet amsl.
- Greenfield sandy loam, 2% to 9% slopes, is present within 14% of the project API. Greenfield sandy loams generally occur in settings with alluvial fans and terraces deriving from granite and are found in areas with elevations ranging from 2,600 feet to 4,200 feet amsl.
- Hanford sandy loam, 2% to 9% slopes, is present within 17% of the project API. Hanford sandy loams generally occur in settings with alluvial fans deriving from granite and are found in areas with elevations ranging from 2,600 feet to 4,200 feet amsl.

The U.S. Department of Agriculture's soil types mapped within the project API demonstrate that alluvial soils are present, which have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use, as well as represent ongoing processes of development that have potential to preserve cultural material in context, depending on area-specific topographical setting.

7.3 NAHC and Tribal Correspondence

Both of Dudek's NAHC SLF search requests yielded negative results for Native American cultural resources within a 0.5-mile and 1-mile radius of the project API. Along with the results of the SLF search, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. Informal tribal outreach letters were mailed on January 15 and 20, 2025 to all California Native American Tribal representatives included on the NAHC contact lists. These letters attempted to solicit additional information relating to Native American cultural resources that may be impacted by the project. Native American Tribal representatives were requested to define a general area where known resources intersect the project API. To date, Dudek has received three responses to this information request. These responses are paraphrased below:

> Raylene Borrego of the Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians) responded on January 21, 2025. Ms. Borrego's response indicated that the project API is considered highly culturally sensitive to the Yuhaaviatam of San Manuel Nation (Yuhaaviatam), and that the Yuhaaviatam wish to engage with the CEC in Government-to-Government consultation pursuant to AB 52.
>
> Jill McCormick of the Quechan Tribe of the Fort Yuma Reservation responded on January 28, 2025. Ms. McCormick indicated that the Quechan Tribe of the Fort Yuma Reservation does not wish to comment on the project.
>
> Eunice Ambriz of the Yuhaaviatam responded on January 29, 2025. In her email, Ms. Ambriz requested Dudek provide a project map set in aerial view. Dudek responded to Ms. Ambriz on February 10, 2025, with the requested map set.

Dudek conducted a virtual follow-up meeting with the Yuhaaviatam for purposes of informal information gathering and tribal outreach efforts. The meeting took place on February 13, 2025. In attendance was Kristin Tuotso (Yuhaaviatam Tribal Archaeologist), Eunice Ambriz (Yuhaaviatam Cultural Resources Technician) and Roshanne Bakhtiary (Dudek Archaeologist). During the meeting, Dudek provided a review of the project API and the project design and discussed Dudek's inventory efforts to date, including the results of the SCCIC records search and NAHC SLF search. After a review of all available project documents, both Ms. Tuotso and Ms. Ambriz expressed interest in the project requiring mitigation measures for the inadvertent discovery of Native American cultural resources and human remains. The Yuhaaviatam also indicated that they intend to proceed with Government-to-Government AB 52 consultation with the CEC for the project. No additional information was provided during this meeting to support the presence of specific, geographically defined TCRs that could be affected by project-related construction or operation. See Appendix D for all NAHC documentation and tribal correspondence to date.

This correspondence was conducted for informational purposes only and does not constitute formal Government-to-Government consultation. In compliance with AB 52, the CEC, as lead agency, is responsible for conducting Government-to-Government consultation with tribal entities.

7.4 Pedestrian Survey

Dudek archaeologists Jessica Colston, Phillip Sharp-Garcia, Shane McDonnell, Brenda Rogers and Roshanne Bakhtiary conducted intensive-level archaeological resources pedestrian surveys of the project API in February 2023, November 2024, and February 2025. The Archaeological Survey Area encompassed the entire project API as well as all APNs identified within the project description as shown in Figure 3 (Archaeological Survey Area). This totaled approximately 321 acres. Ground surface visibility throughout the API ranged from poor to excellent. Poor ground surface visibility (0% to 25%) was observed throughout approximately 30% of the project API due to dense vegetation, and in some instances, the presence of road base (Exhibit 1). Fair (25% to 50%) to good (50% to 75%) ground surface visibility was observed within seasonal drainages, on terraces, and adjacent to the SCE Vincent Substation and accounted for approximately 50% of the project API (Exhibit 2). Excellent (75% to 100%) ground surface visibility was observed within unpaved access roads, transmission tower corridors, and alluvial washes and accounted for the remainder of the project API (20%) (Exhibit 3). Vegetation throughout the project API consisted of various species of invasive grasses, creosote (*Larrea tridentata*), juniper (*Juniperus* spp.), golden cholla (*Cylindropuntia echinocarpa*), chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos spp.),* coyote brush (*Baccharis pilularis*), scrub oak (*Quercus berberidifolia*), sage (*Saliva* spp.) and yucca (*Yucca* spp. or *Hesperoyucca* sp.). Throughout the project API there was evidence of modern dumping, vehicle overland travel, and other disturbances associated with the construction and operation of the SCE Vincent Substation and various residential properties. During these intensive-level pedestrian survey efforts, crews re-visited two previously recorded archaeological resources and recorded an additional 10 newly identified archaeological resources within the project API. DPR site forms were prepared for all resources and will be submitted to the SCCIC of the California Historic Resources Information System at California State University, Fullerton. The DPR site forms are included in Confidential Appendix E.

7.4.1 Previously Recorded Resources

P-19-002893

P-19-002893, an abandoned segment of the Southern Pacific Railroad, was revisited by Dudek archaeologists in February 2023 and November 2024. While the original mapping of P-19-002893 by SWCA places the segment within the project API, 2013 mapping by HDR places the segment outside of the project API.

Dudek's survey efforts to re-locate the resource concur with HDR's updated mapping of P-19-002893 as existing outside the project API (Purcell 2000). Metal detecting efforts conducted in 2024 also failed to identify any buried metal components of the railroad segment within the project API (negative scan). No additional efforts to record and/or evaluate this resource were conducted as part of the current study.

P-19-101014

P-19-101014, originally recorded as a can scatter isolate, was revisited by Dudek archaeologists in February 2025. Dudek relocated both previously recorded artifacts (one [1] church key opened steel beer can, and one [1] crushed yellow church key opened SAE 20 motor oil can) and recorded two additional internal side seam cans measuring 4.75 inches in height by 3 inches in diameter within the immediate vicinity. P-19-101014 measures approximately 5 meters north/south (N/S) by 5 meters east/west (E/W).

P-19-101014 is located at the base of a very steep activity eroding terrace escarpment with slopes ranging from 45° to 60° and is adjacent to the proposed gen-tie corridor. Upslope from the resource is a dirt access road. Metal detecting efforts conducted in 2025 failed to identify any buried metallic components within and adjacent to the newly recorded boundaries of P-19-101014 (negative scan).

7.4.2 Newly Identified Resources

ABS-PK-S-01

Dudek recorded ABS-PK-S-01 in February 2023 and revisited the resource in November 2024. ABS-PK-S-01 is characterized as a sparse historic-era refuse scatter consisting of a concentration of seven (7) solder top cans, three (3) miscellaneous food cans, church key opened, two (2) friction seal cans, two (2) screw top rectangular oil cans, one (1) coffee can, and one (1) large metal drum measuring approximately 22.5 inches in length by 18 inches in diameter (Concentration 1). Outside of this concentration and scattered throughout the vicinity are an additional five (5) miscellaneous bi-metal beverage cans, two (2) 1-gallon screw top rectangular oil cans, two (2) friction side seam 16-ounce condensed milk cans, one (1) bi-metal coffee can, one (1) bi-metal pull tab can, one (1) screw cap, one (1) colorless Owen's Illinois diamond marked glass bottle base, one (1) battery terminal, one (1) hole-in-top side crimped can, one (1) potted meat can, and one (1) amber Owen's Illinois marked bottle base. ABS-PK-S-01 measures approximately 35 meters (N/S) by 72 meters (E/W).

ABS-PK-S-01 is located on an actively eroding terrace escarpment with slopes ranging from 10° 30°, is directly south of a residential property, and is located within the proposed BESS facility footprint. There are multiple ephemeral drainages running across the extent of the resource in a general N/S axis. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-PK-S-01 (negative scan).

ABS-PK-S-02

Dudek recorded ABS-PK-S-02 in February 2023 and revisited the resource in November 2024. ABS-PK-S-02 is characterized as a sparse and diffuse historic-era refuse scatter consisting of three (3) solder dot cans, two (2) amber glass vases, three (3) colorless glass bases (no marks), one (1) colorless glass bottle base marked "NW", one (1) colorless glass insulator fragment marked "Armstrong's T.W.", and multiple piles of shattered modern glass. ABS-PK-S-02 measures approximately 57 meters (N/S) by 50 meters (E/W).

ABS-PK-S-02 is located on an actively eroding terrace escarpment with slopes ranging from 10° to 20° and is directly east of a seasonal drainage, west of an informal dirt roadway, and south of a residential property. ABS-PK-S-02 is located within the proposed BESS facility footprint. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-PK-S-02 (negative scan).

ABS-PK-S-03

Dudek recorded ABS-PK-S-03 in February 2023 and revisited the resource in November 2024. ABS-PK-S-03 is characterized as a historic-era refuse scatter consisting of three concentrations. Concentration 1 contains 20 food and beverage cans. Concentration 2 contains 21 indeterminate metallic constituents, and 100+ colorless glass and porcelain ceramic cup fragments. Concentration 3 contains over 100+ food and beverage cans (including

several solder dot cans), 13 ceramic porcelain teacup fragments, 12 whiteware fragments, two (2) potted meat cans, one (1) aqua Coca-Cola bottle base, and one (1) shoe sole. Outside of these concentrations, the following artifacts were observed throughout the vicinity: 23 miscellaneous food cans, church key opened, 12 sanitary seal food cans, machine opened, 11 solder top cans, 10 sanitary seal food cans, knife opened, nine (9) bi-metal beverage cans, three (3) potted meat tins, key wind, one (1) colorless RC Cola bottle, three (3) aqua Coca-Cola bottle fragments, three (3) paint cans, and one (1) tobacco flip lid container. ABS-PK-S-03 measures approximately 185 meters (N/S) and 165 meters (E/W).

ABS-PK-S-03 is located on an actively eroding terrace escarpment with slopes ranging from 20° to 30°, is east of a residential property, and is located within the proposed BESS facility footprint. Disturbances noted include evidence of vehicle overland travel and active downslope erosion. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-PK-S-03 (negative scan).

ABS-JC-S-01

Dudek recorded ABS-JC-S-01 in February 2023 and revisited the resource in November 2024. ABS-JC-S-01 is characterized as a historic-era refuse scatter consisting of two concentrations. Concentration 1 consists of 200+ sanitary seal, side-crimp cans, knife-opened, 50+ 10-ounce milk cans, 40+ cone top cans, four (4) carbon canisters with perforated sides, two (2) 1-gallon screw top rectangular oil cans, and two (2) aqua Coca-Cola bottles. Concentration 2 consists of 50+ solder top cans, eight (8) friction seal cans, one (1) friction seal paint can, one (1) cooking oil can, and one (1) bailing wire string. Outside of the concentrations there were an additional four (4) solder top cans. ABS-JC-S-01 measures 62 meters (N/S) by 62 meters (E/W).

ABS-JC-S-01 is located on an eroding terrace escarpment with slopes ranging from 10° to 30° and within the proposed BESS facility. There are multiple ephemeral drainages running across the extent of the resource in a general E/W axis. Metal detecting efforts conducted in 2024 failed to identify any buried metal components within and adjacent to the recorded boundaries of ABS-JC-S-01 (negative scan).

ABS-JC-S-02

Dudek recorded ABS-JC-S-02 in February 2023 and revisited the resource in November 2024. ABS-JC-S-02 is characterized as a historic-era refuse scatter consisting of one concentration amongst a more diffuse scatter of refuse. Concentration 1 consists of 14 solder top cans, one (1) church key opened can, one (1) ceramic white ware fragment, one (1) colorless glass fragment, and one (1) mason jar rim. Outside of the concentration, there are an additional 30+ sanitary seal food cans, 30+ solder top cans, 20+ beverage cans, church key opened, and 1 lard pail. ABS-JC-S-02 measures 25 meters (N/S) by 74 meters (E/W).

ABS-JC-S-02 is located on an eroding terrace escarpment with slopes ranging from 10° to 30° and within the proposed BESS facility. A deep seasonal drainage is noted to the west of the resource. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-JC-S-02 (negative scan).

ABS-JC-S-03

Dudek recorded ABS-JC-S-03 in February 2023 and revisited the resource in November 2024. ABS-JC-S-03 is characterized as a historic-era refuse scatter consisting of two concentrations. Concentration 1 consists of seven (7) sanitary seal food cans, machine opened, three (3) beverage cans, church key opened, and one (1) friction lid quart paint can. Concentration 2 (recorded in 2024) consists of 53 solder top food cans, machine opened, 14 8-ounce juice cans, eight (8) potted meat tins, three (3) friction closure cans measuring 4.75 inches in height by 4 inches in diameter, two (2) potted meat cans, friction closure, key wind, one (1) oil can measuring 6 inches in height by 1.5 inches in width by 3.75 inches in depth, one (1) seasoning shaker lid, one (1) cast iron pipe drain end fragment, one (1) packing flat strap band measuring 2 inches wide by 10 feet long, and one (1) friction close quart coffee can. Non-metallic artifacts in Concentration 2 include 50+ colorless glass fragments, two (2) mason jar glass quart rims, three (3) colorless pint mason jar rims, two (2) green ceramic plate fragments, and one (1) complete metal screw top glass jar marked “Glass Containers Corporation”. Outside these concentrations were an additional three (6) solder top cans and one (1) quarter paint can. ABS-JC-S-03 measures 27 meters (N/S) by 36 meters (E/W).

ABS-JC-S-03 is located on an eroding terrace escarpment with slopes ranging from 10° to 30° and within the proposed BESS facility. 2024 efforts to revisit the resource noted that many artifacts appeared to have been subject to post-depositional wind and water erosion from date of original recordation in 2023. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-JC-S-03 (negative scan).

ABS-JC-S-04

Dudek recorded ABS-JC-S-04 in February 2023 and revisited the resource in November 2024. ABS-JC-S-04 is characterized as a shallow depression containing historic-era refuse. The depression measures 12 feet (N/S) by 10 feet (E/W) and has a depth of approximately 18 inches. Artifacts within the depression consist of 30+ solder top cans, two (2) paint pails, two (2) solder top potted meat cans, knife opened, and one (1) amber glass beer bottle (in 20+ fragments).

ABS-JC-S-04 is located on a mostly flat terrace directly adjacent to several informal dirt roadways and within the proposed BESS facility. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-JC-S-04 (negative scan).

ABS-JC-S-05

Dudek recorded ABS-JC-S-05 in February 2023 and revisited the resource in November 2024. ABS-JC-S-05 is characterized as a historic-era refuse scatter consisting of 74 miscellaneous sanitary seal food cans, 37 friction seal side crimped cans, 31 bi-metal beverage cans, 16 solder top cans, church key opened, two (2) paint pails, two (2) potted meat tins, knife opened, two (2) potted meat cans, key wind, one (1) pesticide fogger can, one (1) coffee can lid, and one (1) aqua Coca-Cola bottle. ABS-JC-S-05 measures 90 meters (N/S) by 40 meters (E/W).

ABS-JC-S-05 is located on an eroding terrace escarpment with slopes ranging from 30° to 40° and is adjacent to the proposed gen-tie corridor. The downslope movement of artifacts between 2023 and 2024 indicate that ABS-JC-S-05 is actively eroding into the lower lying wash to the northeast. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-JC-S-05 (negative scan).

ABS-BR-S-01

Dudek recorded ABS-BR-S-01 in November 2024. ABS-BR-S-01 is characterized as a historic-era refuse scatter consisting of 23 whiteware fragments, four (4) porcelain fragments, melted glass (24 aqua, 10 colorless, 3 amethyst, 1 olive denoted as Concentration 1), one (1) fuel can, one (1) sanitary seal food can, one (1) rectangular spice lid, one (1) metal spring, and a decorated flat metal implement in three (3) pieces. The site also contains a concrete and granite slab fragment. This slab fragment measures 29 inches (N/S) by 15 inches (E/W) with a height of 6.5-in. ABS-BR-S-01 measures 22 meters (N/S) by 40 meters (E/W).

ABS-BR-S-01 is located on an eroding terrace escarpment with slopes ranging from 10° to 30° and is adjacent to the proposed gen-tie corridor. Metal detecting efforts conducted in 2024 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-BR-S-01 (negative scan).

ABS-RB-S-01

Dudek recorded ABS-RB-S-01 in February 2025. ABS-RB-S-01 is characterized as a diffuse historic-era refuse scatter consisting of 50+ internal side seam steel beer cans, church key opened, six (6) 1-gallon paint pails, three (3) rectangular metal cooking oil jugs, three (3) potted meat cans, two (2) miscellaneous food cans, machine opened, one (1) partially buried corrugated metal bucket, one (1) crushed one-gallon paint pail, one (1) roof vent, one (1) solder dot can, a wooden mattress frame with metal box springs, and other large indeterminate metallic constituents. ABS-RB-S-01 measures 30 meters (N/S) by 55 meters (E/W).

ABS-RB-S-01 is located within an eroding terrace escarpment with slopes ranging from 30° to 40°, is adjacent to the proposed gen-tie corridor, and located directly west of the southern tip of the SCE Vincent Substation. The diffuse nature of the refuse scatter indicates that it has been subject to post-depositional wind and water erosion. Metal detecting efforts conducted in 2025 failed to identify any buried metallic components within and adjacent to the recorded boundaries of ABS-RB-S-01 (negative scan).

Exhibit 1. Example of poor ground surface visibility, view facing west.

Exhibit 2. Example of fair/good ground surface visibility, view facing north.

Exhibit 3. Example of excellent ground surface visibility, view facing southeast.

INTENTIONALLY LEFT BLANK

8 Significance Evaluation Findings

This section summarizes the results of the significance evaluations conducted for the 11 archaeological resources identified within the project API (Table 7).

Table 7. Results of Archaeological Significance Evaluations

Resource ID	Resource Description	Eligibility Recommendation
P-19-101014	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-PK-S-01	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-PK-S-02	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-PK-S-03	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-JC-S-01	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-JC-S-02	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-JC-S-03	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-JC-S-04	Shallow depression containing historic refuse	6Z found ineligible for CRHR through survey evaluation
ABS-JC-S-05	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-BR-S-01	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation
ABS-RB-S-01	Historic-era refuse scatter	6Z found ineligible for CRHR through survey evaluation

8.1 Previously Recorded Resources

Resource P-19-101014 Evaluation

P-19-101014 is characterized as a sparce historic-era refuse scatter adjacent to a steep terrace escarpment and upslope of a dirt road. The identified SAE 20 motor oil can indicates that the primary period of deposition for the recorded component of P-19-101014 is likely dated to the mid-twentieth century (Lambton County Museums 2021). Artifacts associated with P-19-101014 were observed in a dispersed pattern within an eroding terrace escarpment, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with P-19-101014 were observed.

It is unlikely that P-19-101014 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, P-19-101014 is not associated with the lives of persons important in our past (Criterion 2). P-19-101014 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, P-19-101014 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of P-19-101014. As such, P-19-101014 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends P-19-101014 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

8.2 Newly Identified Resources

Resource ABS-PK-S-01 Evaluation

ABS-PK-S-01 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The identified food and beverage refuse indicate that the primary period of deposition for the recorded component of ABS-PK-S-01 is post-1940 (Brewery Collectables Club of America n.d.; Lockhart and Hoenig 2015). Artifacts associated with ABS-PK-S-01 were observed in a dispersed pattern within an eroding terrace escarpment and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-PK-S-01 were observed.

It is unlikely that ABS-PK-S-01 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-PK-S-01 is not associated with the lives of persons important in our past (Criterion 2). ABS-PK-S-01 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-PK-S-01 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-PK-S-01. As such, ABS-PK-S-01 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-PK-S-01 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

Resource ABS-PK-S-02 Evaluation

ABS-PK-S-02 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The insulator fragment together with the solder dot cans indicate that the primary period of deposition for the recorded component of ABS-PK-S-02 is the early/mid-twentieth century (BLM 2015; Merritt 2014). Artifacts associated with ABS-PK-S-02 were observed in a dispersed pattern within an eroding terrace escarpment, suggesting that the resource is in a secondary context. Modern debris identified throughout the general vicinity also indicate ABS-PK-S-02 has been subject to multiple, more recent, dumping episodes. No evidence of subsurface deposits associated with ABS-PK-S-02 were observed.

It is unlikely that ABS-PK-S-02 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-PK-S-02 is not associated with the lives of persons important in our past (Criterion 2). ABS-PK-S-02 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-PK-S-02 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-PK-S-02. As such, ABS-PK-S-02 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-PK-S-02 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

Resource ABS-PK-S-03 Evaluation

ABS-PK-S-03 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The vast quantity of solder dot cans dispersed throughout the site indicate that the primary period of deposition for the recorded component of ABS-PK-S-03 is the early/mid-twentieth century (BLM 2015; Merritt 2014). The RC Cola bottle further indicates a secondary period of deposition in the mid-/late twentieth century (Lockhart 2010). Artifacts associated with ABS-PK-S-03 were observed in a dispersed pattern within an eroding terrace and exhibit evidence of modern anthropogenic displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-PK-S-03 were observed.

It is unlikely that ABS-PK-S-03 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-PK-S-03 is not associated with the lives of persons important in our past (Criterion 2). ABS-PK-S-03 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-PK-S-03 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-PK-S-03. As such, ABS-PK-S-03 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-PK-S-03 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-JC-S-01

ABS-JC-S-01 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The solder top cans together with the cone top cans indicate that the primary period of deposition for the recorded component of ABS-JC-S-01 is the mid-twentieth century (BLM 2015; Maxwell 1993). Artifacts associated with ABS-JC-S-01 were observed in a dispersed pattern within an eroding terrace escarpment and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-JC-S-01 were observed.

It is unlikely that ABS-JC-S-01 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-JC-S-01 is not associated with the lives of persons important in our past (Criterion 2). ABS-JC-S-01 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-JC-S-01 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-JC-S-01. As such, ABS-JC-S-01 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-JC-S-01 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-JC-S-02

ABS-JC-S-02 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The relatively large proportion of solder top cans identified indicate that the primary period of deposition for the recorded component of ABS-JC-S-02 is the late-nineteenth/early-twentieth centuries (BLM 2015; Merritt 2014). Artifacts associated with ABS-JC-S-02 were observed in a dispersed pattern within an eroding terrace and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-JC-S-02 were observed.

It is unlikely that ABS-JC-S-02 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-JC-S-02 is not associated with the lives of persons important in our past (Criterion 2). ABS-JC-S-02 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-JC-S-02 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-JC-S-02. As such, ABS-JC-S-02 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-JC-S-02 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-JC-S-03

ABS-JC-S-03 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The relatively large proportion of solder top cans identified indicate that the primary period of deposition for the recorded component of ABS-JC-S-03 is the late-nineteenth/early-twentieth centuries (BLM 2015; Merritt 2014). Artifacts associated with ABS-JC-S-03 were observed in a dispersed pattern within an eroding terrace and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-JC-S-03 were observed.

It is unlikely that ABS-JC-S-03 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-JC-S-03 is not associated with the lives of persons important in our past (Criterion 2). ABS-JC-S-03 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-JC-S-03 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-JC-S-03. As such, ABS-JC-S-03 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-JC-S-03 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-JC-S-04

ABS-JC-S-04 is characterized as a large shallow depression containing historic-era refuse. The relatively large proportion of solder top cans identified indicate that the primary period of deposition for the recorded component

of ABS-JC-S-04 is the late-nineteenth/early-twentieth centuries (BLM 2015; Merritt 2014). Though no evidence of subsurface deposits associated with ABS-JC-S-04 were observed, the inspection of observable material on the ground surface was sufficient to gain a representative sample of associated use and chronological data for purposes of a significance determination.

It is unlikely that ABS-JC-S-04 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-JC-S-04 is not associated with the lives of persons important in our past (Criterion 2). ABS-JC-S-04 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-JC-S-04 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-JC-S-04. As such, ABS-JC-S-04 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-JC-S-04 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-JC-S-05

ABS-JC-S-05 is characterized as a historic-era refuse scatter containing mostly domestic consumables. The relatively large proportion of solder top cans identified indicate that the primary period of deposition for the recorded component of ABS-JC-S-05 is the late-nineteenth/early-twentieth centuries (BLM 2015; Merritt 2014). Artifacts associated with ABS-JC-S-05 were observed in a dispersed pattern within an eroding terrace and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-JC-S-05 were observed.

It is unlikely that ABS-JC-S-05 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-JC-S-05 is not associated with the lives of persons important in our past (Criterion 2). ABS-JC-S-05 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-JC-S-05 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-JC-S-05. As such, ABS-JC-S-05 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-JC-S-05 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-BR-S-01

ABS-BR-S-01 is characterized as a historic-era refuse scatter containing mostly ceramics and glass. Though the majority of the deposit is non-diagnostic, the presence of a single sanitary seal food can indicates the period of deposition for the recorded component of ABS-BR-S-01 is likely post-1900 (Merritt 2014). Artifacts associated with ABS-BR-S-01 were observed in a dispersed pattern within an eroding terrace and exhibit evidence of erosional displacement, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-BR-S-01 were observed.

It is unlikely that ABS-BR-S-01 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-BR-S-01 is not associated with the lives of persons important in our past (Criterion 2). ABS-BR-S-01 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-BR-S-01 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-BR-S-01. As such, ABS-BR-S-01 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-BR-S-01 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

ABS-RB-S-01

ABS-RB-S-01 is characterized as a historic-era refuse scatter containing mostly domestic consumables. Though the majority of the deposit is non-diagnostic, the presence of a single solder dot can indicates the period of deposition for the recorded component of ABS-RB-S-01 is likely the early/mid-twentieth century (BLM 2015; Merritt 2014). Artifacts associated with ABS-RB-S-01 were observed in a dispersed pattern within an eroding terrace, suggesting that the resource is in a secondary context. No evidence of subsurface deposits associated with ABS-RB-S-01 were observed.

It is unlikely that ABS-RB-S-01 is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage (Criterion 1). Additionally, ABS-RB-S-01 is not associated with the lives of persons important in our past (Criterion 2). ABS-RB-S-01 does not contain components of individual distinction, and historic-era refuse scatters of this type are ubiquitous throughout California. Therefore, it does not embody the distinctive characteristics of a type, period, method of construction, or represent the work of an important creative individual, or possesses high artistic values (Criterion 3). Additionally, ABS-RB-S-01 does not contain a significant archaeological deposit that can be excavated. Therefore, it is unlikely that additional significant information could be gathered from further investigation of ABS-RB-S-01. As such, ABS-RB-S-01 does not have the potential to provide information important to the history of the state or region (Criterion 4). In conclusion, Dudek recommends ABS-RB-S-01 as ineligible for listing on the CRHR and not a significant or unique archaeological resource under CEQA.

9 Summary and Management Considerations

Dudek's archaeological resources inventory and evaluation in support of the project suggests there is a moderate potential for the inadvertent discovery of subsurface archaeological resources during project implementation. Dudek conducted a records search of the project API and surrounding 1-mile radius at the SCCIC. The records search identified three previously recorded cultural resources that intersect with the API: P-19-002893 (abandoned Southern Pacific Railway segment), P-19-101014 (can isolate), and P-19-192581 (Antelope-Mesa 220 kV Transmission Line). P-19-002893 and P-19-101014 are addressed in this study, while P-19-192581 is addressed in the *Built Environment Inventory and Evaluation Report* prepared by Dudek for the project in 2025 (Ahmanson et al. 2025).

A NAHC SLF search was also conducted for the project in 2023 and 2025, and results were negative for Native American cultural resources within 1 mile of the project API. Additionally, a review of historic topographic maps and aerial photographs indicate the project API has remained largely undeveloped throughout the twentieth and twenty-first centuries.

Several Dudek archaeologists conducted intensive-level archaeological resources pedestrian surveys of the project API in 2023, 2024, and 2025. During these survey efforts, crews relocated one previously recorded archaeological resource (P-19-101014) and recorded an additional 10 newly identified archaeological resources within the project API. P-19-002893 was identified as being outside of the project API and thus was not subject to evaluation efforts as part of the current study.

P-19-101014, ABS-PK-S-01, ABS-PK-S-02, ABS-PK-S-03, ABS-JC-S-01, ABS-JC-S-02, ABS-JC-S-03, ABS-JC-S-04, ABS-JC-S-05, ABS-BR-S-01, and ABS-RB-S-01 were evaluated as part of the current study. Dudek recommends that all 11 archaeological resources are not eligible for listing on the CRHR and do not meet the criteria to be considered significant or unique archaeological resources under CEQA.

Based on the quantity of archaeological resources identified within a 1-mile radius of the project API, the geoarchaeological suitability of the API for supporting the presence of buried archaeological resources, and in consideration of the lack of past disturbances within the majority of the project API, there is a moderate potential for the inadvertent discovery of unanticipated archaeological resources during initial project-related ground disturbance.

9.1 Assessment of Effects and Recommendations

According to CEQA, 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 (adverse effect) on the environment and the cultural resource itself. A substantial adverse change in the significance of a historical resource (CRHR eligible resource) would be constituted by physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired.

A total of 11 archaeological resources were identified within the API during Dudek's inventory efforts for the project. Through significance evaluations as part of the current study, Dudek determined that all 11 resources do not meet

the criteria to be considered historical resources or significant or unique archaeological resources under CEQA and are recommended ineligible for listing on the CRHR. Though the project will not have any direct or indirect impacts on known significant archaeological resources, there is potential for the project to impact previously unanticipated archaeological resources during initial project-related ground disturbance.

TCRs, while often also cultural resources, do represent a separate resource class under CEQA. Potential impacts (direct and indirect) to TCRs, as defined by CEQA, should be determined by the CEC based on Government-to-Government consultation or through other tribal engagement efforts. Dudek has not received any responses to date from contacted Tribes that supports the presence of specific, geographically defined TCRs that could be affected by project-related construction or operation. Based on present information, the proposed project will not present impacts to resources of Native American value or association, including potential TCRs.

Compliance with Mitigation Measures **MM-CUL-1**, **MM-CUL-2, and MM-CUL-3** outlined below, would reduce potential impacts to previously unanticipated cultural resources and human remains during project implementation. To the extent feasible, these measures are also inclusive of TCR considerations.

MM-CUL-1 Worker's Environmental Awareness Program. Prior to the initiation of ground-disturbing work, construction crews shall be made aware of the potential to encounter cultural resources and the requirement for cultural monitors to be present during these activities. This may occur as part of a Worker Environmental Awareness Program (WEAP). Topics addressed should include definitions and characteristics of cultural resources and Tribal Cultural Resources (TCRs), regulatory requirements and penalties for intentionally disturbing cultural resources, and protocols to be taken in the event of an inadvertent discovery.

MM-CUL-2 Cultural Resources Management and Inadvertent Discovery Program. It is recommended that a Cultural Resources Management and Inadvertent Discovery Plan (CRMIDP) be prepared and subject to lead agency review prior to initiation of construction. This should detail, at a minimum, requirements for archaeological and Native American monitoring (as applicable); roles and responsibilities; inadvertent discovery, management, and communication protocols; and daily and post-construction reporting. The CRMIDP should be prepared by a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, and implemented upon approval by the CEC. Archaeological monitors shall be present part-time (and as defined by the CRIDMP) during initial ground-disturbing activities to monitor rough and finish grading, excavation, and other ground-disturbing activities in the native soils. Archaeological monitoring may be adjusted (increase, decreased, or discontinued) at the recommendation of the qualified archaeologist and based on inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. Although recommended, the requirement to include a Native American monitor should be determined by the CEC through consultation and review of the present report findings. If it is determined that Native American monitoring is required during ground-disturbing activities, an archaeological monitor shall also be present to support and coordinate with Native American efforts.

If cultural materials are discovered during initial disturbances associated with site preparation, grading, or excavation, the construction contractor shall divert all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and

significance of the find. The area of avoidance shall be assumed to be a minimum of 50 feet around the find, however, may be adjusted to support construction needs by the qualified archaeologist in coordination with the construction team so long as protection of the discovery can be ensured. If determined necessary by the qualified archaeologist for the protection of this area, it shall be delineated by a temporary physical exclusionary boundary using staking and survey tape or other similar materials. The CRMIDP shall address protocols for TCRs, integrating management strategies informed through the process of Government-to-Government consultation. In the event that a potential inadvertent cultural resources discovery may meet the definition of a TCR, the lead agency or identified representative should management strategies stipulated by approved mitigation and outlined in the CRMIDP. Non-cultural project personnel shall not handle, collect or move any archaeological materials or human remains and associated materials. To the extent feasible, project activities shall avoid these deposits. Where avoidance is not feasible, the archaeological deposits shall be evaluated for their eligibility for listing on the California Register of Historical Resources (CRHR). If the deposits are not eligible, regulations provide that avoidance is not necessary. If the deposits are eligible, adverse effects to the identified resource must be avoided, or such effects must be mitigated. Mitigation strategies are dependent on the nature of the resource, and can include, but are not necessarily limited to: preservation in place, excavation of the deposit in accordance with a data recovery plan (see California Code of Regulations [CCR] Title 4(3) Section 5126.4(b)(3)(C)) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; production of a report detailing the methods, findings, and significance of the archaeological site and associated materials; curation of archaeological materials at an appropriate facility for future research and/or display; an interpretive display of recovered archaeological materials at a local school, museum, or library; and public lectures at local schools and/or historical societies on the findings and significance of the site and recovered archaeological materials. The CEC, or designee, shall be responsible for reviewing management plans and any reports produced by the archaeologist to determine the appropriateness and adequacy of the findings and recommendations.

Daily monitoring logs should be completed by onsite archaeological monitors (and Native American monitors, if present). Within 90 days following completion of construction, the qualified archaeologist should provide an archaeological monitoring report to the lead agency for review. The intent of this report should be to document compliance with approved mitigation. This report should include the results of the cultural resources monitoring program (even if negative), including a summary of any findings or evaluation/data recovery efforts, and supporting documentation that demonstrates all mitigation measures defined in the environmental document were appropriately met. Appendices should include monitoring logs and documentation relating to any newly identified or updated cultural resources.

MM-CUL-3 Treatment of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code and the requirements of the California Code of Regulations (CCR) Section 15064.5(e), if human remains are encountered during site disturbance, grading, or other construction activities on the project site, the construction contractor shall halt work within 50 feet of the discovery; all work within 50 feet of the discovery shall be redirected and the Los Angeles County Medical Examiner (County Coroner) notified immediately. This exclusionary buffer may be adjusted based on project needs, while also ensuring the protection of this area and regulatory compliance, at the

recommendation of a qualified archaeologist. If determined necessary by the qualified archaeologist for the protection of this area, it shall be delineated by a temporary physical exclusionary boundary using staking and survey tape or other similar materials. No further disturbance shall occur in areas likely to contain human remains until the County Coroner has made a determination with regard to if the find is human in origin pursuant to Public Resources Code Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which will determine and notify the Most Likely Descendant (MLD). With the permission of the CEC and land owner, the MLD may inspect the site of the discovery. The MLD shall make recommendations or preferences for treatment within 48 hours of being granted access to the site. Public Resources Code Section 5097.98 includes reasonable options for treatment that may be requested by the MLD. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the CEC, in coordination with the landowner, shall consult with the MLD identified by the NAHC to develop an agreement for the treatment and disposition of the remains.

Upon completion of the assessment, the consulting archaeologist shall prepare a report documenting the methods and results and provide recommendations regarding the treatment of the human remains and any associated cultural materials, as appropriate, and in coordination with the recommendations of the MLD. The report shall be submitted to the CEC, or designee, and the South Central Coastal Information Center. The CEC, or designee, shall be responsible for reviewing any reports produced by the archaeologist to determine the appropriateness and adequacy of the findings and recommendations. See Table 8 for a list of the Project's agency contacts for Cultural Resources.

Table 8. Agency Contacts for Cultural Resources

Issue	Agency	Contact
Native American Tribal Cultural Resources, Traditional Cultural Properties, Most Likely Descendent Designation	Native American Heritage Commission	1550 Harbord Blvd, Suite 100 West Sacramento, California 95691 916.373.3710
Local Regulatory Requirements	Los Angeles County Planning	335A East Avenue K-6 Lancaster, California 93535 213.974.6411
Human Remains	Los Angeles County Medical Examiner	1104 N Mission Road Los Angeles, California 90033 323.343.0711

10 References

Ahmanson, K., C. Cancilla, and P. Ambacher. 2025. Built Environment Inventory and Evaluation Report, Prairie Song Reliability Project, Los Angeles County, California. On File at Dudek.

Amsden, C.A. 1937. "The Lake Mohave Artifacts." In The Archaeology of Pleistocene Lake Mohave, by E.W. Campbell, 51–95. Southwest Museum Papers No. 11. Los Angeles.

Antevs, E. 1953. "The Postpluvial or Neothermal." University of California Archaeological Survey Reports 22:9-23. Berkeley.

Basgall, M.E. 1993. "Early Holocene Prehistory of the North-Central Mojave Desert." PhD dissertation, Department of Anthropology, University of California, Davis.

Basgall, M.E. 2000. "The Structure of Archeological Landscapes in the North-Central Mojave Desert." In Archeological Passages, edited by J.S. Schneider, R.M. Yohe II, and J.K. Gardner, 123–138. Western Center for Archeology and Paleontology Publications in Archeology No. 1.

Basgall, M.E., and M.A. Giambastiani. 2000. An Archaeological Evaluation of 13 Locations in the Deadman Lake Basin, Marine Corps Air Ground Combat Center, Twentynine Palms, California. Report submitted to U.S. Army Corps of Engineers, Sacramento.

Basgall, M.E., and M.C. Hall. 1991. "Relationships between Fluted and Stemmed Points in the Mojave Desert." Current Research in the Pleistocene 8:61–64.

Basgall, M.E., and M.C. Hall. 1992. For Irwin Archaeology: Emerging Perspectives on Mojave Desert Prehistory. Society for California Archaeology Newsletter 26(5): 1-7.

Basgall, M.E., and D.M. Jurich. 2006. Archeological Investigations at Nine Prehistoric Sites in the Emerson Lake Training Area, Marine Corps Air Ground Combat Center, Twentynine Palms, California. Report on file at Natural Resources and Environmental Affairs, Marine Corps Air Ground Combat Center, Twentynine Palms, California.

Basgall, M.E., and S.A. Overly. 2004. Prehistoric Archaeology of the Rosamond Lake Basin, Phase II Cultural Resource Evaluations at 41 Sites in Management Region 2, Edwards Air Force Base, California. Report on file, Environmental Management Office, Conservation Branch, Edwards Air Force Base, California.

Bedwell, S.F. 1973. Fort Rock Basin: Prehistory and Environment. University of Oregon Press, Eugene.

Blackburn, T.C., and L.J. Bean. 1978. "Kitanemuk." In Handbook of North American Indians, Volume 8: California, edited by R.F. Heizer, 564–569. Washington, DC: Smithsonian Institution.

BLM (Bureau of Land Management). 2015. Historic Identification Guide. Accessed April 2025. https://www.ntc.blm.gov/krc/system/files?file=legacy/uploads/22015/HistoricArtifactIDGuide.pdf

Brewery Collectibles Club of America. N.d. Berr Can History. Accessed April 2025. https://bcca.com/page/beer-can-history

Byrd, B.F., D.M. Pallette, and C. Serr. 1994. Prehistoric Settlement along Rogers Dry Lake, Western Mojave Desert, California. Brian F. Mooney Associates Anthropological Technical Series No. 2. San Diego.

Campbell, E.W.C., and W.H. Campbell. 1935. The Pinto Basin Site: An Ancient Aboriginal Camping Ground in the California Desert. Southwest Museum Papers No. 9. Los Angeles.

Clewlow, C.W., Jr. 1968. "Surface Archeology of the Black Rock Desert, Nevada." University of California Archeological Survey Reports 73(1): 1–94.

County of Los Angeles. 2015a. Los Angeles County General Plan. Accessed April 2025. https://planning.lacounty.gov/long-range-planning/general-plan/

County of Los Angeles. 2015b. Los Angeles County Code of Ordinances. Accessed April 2025. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances

Davis, E.L. (editor). 1978. The Ancient Californians: Rancholabrean Hunters of the Mojave Lakes Country. Los Angeles County Museum of Natural History Science Series 29.

Davis, E.L., and C. Panlaqui. 1978. "Stone Tools, the Action Units." In The Ancient Californians: Rancholabrean Hunters of the Mojave Lakes Country, edited by E.L. Davis, 30–73. Natural History Museum of Los Angeles County Science Series No. 29.

Dumke, G.S. 1944. The Boom of the Eighties in Southern California. San Marino, California: The Huntington Library.

Earle, D.D. 1998. Muroc Community Inventory, Edwards AFB, Kern County, California. Submitted to the Air Force Flight Test Center, Environmental Management Directorate, Base Historic Preservation Office, Edwards Air Force Base, California.

Earle, D.D. 2004. "Desert Frontier Settlement and Land Use in the Antelope Valley Region, 1850–1950." In The Human Journey and Ancient Life in California's Deserts. Proceedings from the 2001 Millennium Conference, edited by M.W. Allen and J. Reed. Maturango Museum Publication No. 15.

Earle, D.D., B.L. Boyer, R.A. Bryson, R.U. Bryson, M.M. Campbell, J.J. Johannesmeyer, K.A. Lark, C.J. Parker, M.D. Pittman, L.M. Ramirez, M.R. Ronning, and J. Underwood. 1997. "Overview of Prehistoric Cultural Resources." In Cultural Resources Management Plan for Edwards AFB, California, Vol. 1. On file at Environmental Management Directorate, Base Historic Preservation Office, Edwards Air Force Base, California.

Earle, D.D., K. Lark, C. Parker, M. Ronning, and J. Underwood. 1998. Cultural Resources Overview and Management Plan for Edwards AFB, California. Volume 2: Overview of Historic Cultural Resources. Computer Sciences Corporation. Submitted to the Air Force Flight Test Center, Environmental Management Directorate, Base Historic Preservation Office, Edwards Air Force Base, California.

Fages, P. 1775. A Historical, Political, and Natural Description of California. Translated by Herbert Ingram Priestly, 1937. University of California Press, Berkeley.

Gardner, J. 2007. The Potential Impact of the Medieval Climatic Anomaly on Human Populations in the Mojave Desert. Coyote Press Archives of Great Basin Prehistory, Number 7. Mojave, California.

Giambastiani, M.A., and M.E. Basgall. 2000. Phase II Cultural Resource Evaluation for Sites CA-KER-4773/H and CA-KER-2016 in the Bissell Basin, Edwards Air Force Base, California. Prepared for Department of the Army Corps of Engineers, Sacramento.

Giambastiani, M., M. Hale, M. Richards, and S. Shelley. 2008. Draft Report Phase II Cultural Resource Evaluations at 47 Archaeological Sites on the East and Northeast Shores of Rogers Lake, Management Region 3, Edwards Air Force Base, Kern and Los Angeles Counties, California.

Glennan, W.S. 1970. Preliminary Investigations into the Subsistence and Settlement Patterns in the Antelope Valley between 3,500 and 5,000 B.P. Manuscript on file, Department of Anthropology, Antelope Valley College, Lancaster, California.

Glennan, W.S. 1971. A Glimpse at the Prehistory of Antelope Valley: Archaeological Investigations at the Sweetser Site (KER-302). Manuscript on file, Kern-Antelope Historical Society, Rosamond, California.

Grayson, D.K. 1993. The Desert's Past: A Natural Prehistory of the Great Basin. Washington, DC: Smithsonian Institution Press.

Greenburg, M., T.D. Schneider, and J. Holson. 2011. Supplemental Archaeological Survey Report, Tehachapi Renewable Transmission Project Segment 6, Los Angeles County, California. Prepared for Southern California Edison by Pacific Legacy, Inc. Report on file at the South Central Coastal Information Center at California State University, Fullerton.

Greenberg, M., and L. Schrader. 2011. California Department of Parks and Recreation 523 (Series 1/95) Form for P-19-101014. DPR on file at the South Central Coastal Information Center at California State University, Fullerton.

Hale, M., M. Giambastiani, J. Daniels, and M. Dalope. 2010. Final Report Phase II Cultural Resource Evaluations at 85 Archaeological Sites in Management Areas 2B, 2C, 3F, 3H, 3I, AND 4B, Edwards Air Force Base, Kern and Los Angeles Counties, California. Prepared for Richard Bark, JT3 LLC, Subcontract Number 1A10000101.

Hall, M.C. 2000. Archeological Survey of 2472 Acres in Adjacent Portions of Lava, Lead Mountain, and Cleghorn Pass Training Areas, Marine Corps Air Ground Combat Center, Twentynine Palms, California. Report submitted to U.S. Army Corps of Engineers, Fort Worth, Texas.

Horne, M.C., and D.P. McDougall. 2005. A Phase II Evaluation of 25 Prehistoric Archaeological Sites Located in Management Area 3, Edwards Air Force Base, California. Report on file, Environmental Management Office, Conservation Branch, Edwards Air Force Base.

Hunt, C.B. 1960. Archaeology of the Death Valley Salt Pan. University of Utah Anthropological Papers 47. Salt Lake City.

Kroeber, A.L. 1925. "Handbook of the Indians of California." Bureau of American Ethnology Bulletin 78. Washington.

Lambton County Museums. 2021. History of the Oil Can. Accessed April 2025. https://www.lambtonmuseums.ca/en/lambton-county-archives/history-of-the-oil-can.aspx

Lockhart, B. 2010. Bottles on the Border: The History and Bottles of the Soft Drink Industry in El Paso, Texas, 1881-2000. Society of Historical Archaeology Online Article. Accessed April 2025. https://sha.org/bottle/pdffiles/EPChap10a.pdf

Lockhart, B., and R. Hoenig 2015. The Bewildering array of Owens' Illinonis Glass Co. Logos and Codes. Society of Historical Archaeology Online Article. Accessed April 2025. https://sha.org/bottle/pdffiles/OwensIll_BLockhart.pdf

Loechl, S.K., T. Britt, W. Meyer, R.R. Sands, A. Smith, J.L. Webster, and L.A. Whalley. 2002. *(Draft) Integrated Cultural Resources Management Plan for Edwards Air Force Base, California*. Prepared by JT3/CH2M Hill for Department of the Air Force, Base Historic Preservation Office, Edwards Air Force Base, California.

Maxwell, D. 1993. Beer Cans: A guide for the Archaeologist. Historical Archaeology 27(1): 95-113.

Mehringer, P.J., Jr. 1986. "Prehistoric Environments." In Handbook of North American Indians, Vol. 11: Great Basin, edited by W.L. d'Azevedo, 31–50. Washington, DC: Smithsonian Institution.

Merritt, C. W. 2014. Historic Artifact Guide. Utah State Division of State History. Accessed April 2025. https://ushpo.utah.gov/wp-content/uploads/2018/08/ARCH_HistoricArtifactsGuide.pdf

Moratto, M.J. 1984. California Archaeology. Orlando: Academic Press.

Norwood, R.H. 1987. "Prehistoric Archaeology at Edwards Air Force Base, California." In Prehistory of the Antelope Valley: An Overview, edited by R.W. Robinson, 91–106.

OHP (Office of Historic Preservation). 1995. "Instructions for Recording Historical Resources." California State Parks, Office of Historic Preservation. March 1995. http://ohp.parks.ca.gov/pages/1054/files/manual95.pdf.

Pendleton, L.S.A. 1979. "Lithic Technology in Early Nevada Assemblages." Master's thesis, California State University, Long Beach.

Pritchard-Parker, M., H. Wells, H.R. Puckett, and D.R. Cooper. 1999. Phase II Cultural Resource Evaluation of Five Archaeological Sites in the Rogers Lake North Management Area, Edwards AFB, Kern County, California. Prepared by Earth Tech for the Environmental Management Directorate, Base Historic Preservation Office, Edwards Air Force Base, California.

Purcell, D.E. 2000. California Department of Parks and Recreation 523 (Series 1/95) Form for P-19-002893. Updated in 2014 by K. Tennessen. DPR on file at the South Central Coastal Information Center at California State University, Fullerton.

Rhode, D., and N. Lancaster. 1996. Past Environments of Edwards Air Force Base, California: Geological and Paleoecological Evidence. Report on file, Environmental Management Office, Conservation Branch, Edwards Air Force Base, California.

Robinson, W.W. 1979. Land in California. University of California Press, Berkeley.

Smith, S., and M. Huang. 2024. Phase I Environmental Site Assessment: Prairie Song Reliability Project, Acton, Los Angeles County, California. On File at Dudek.

Spinney, H.E., L. Fryman, S. Ashkar, S. Schneyder-Case, C. Walker, H.R. Puckett, and F.E. Budinger Jr. 2004. Cultural Resource Evaluation of Historic Period Homesites on Edwards Air Force Base, Kern and Los Angeles Counties, California. 3 vols. Tetra Tech, Inc. Submitted to U.S. Army Corps of Engineers, Sacramento District.

Sutton, M.Q. 1980. "Some Aspects of Kitanemuk Prehistory." Journal of California and Great Basin Anthropology 2(2): 214–225.

Sutton, M.Q. 1988. "An Introduction to the Archaeology of the Western Mojave Desert, California." Coyote Press Archives of California Prehistory 14.

Sutton, M.Q. 1996. "The Current Status of Archaeological Research in the Mojave Desert." Journal of California and Great Basin Anthropology 18(2): 221–257.

Tadlock, W.L. 1966. "Certain Crescentic Stone Objects as Time Markers in the Western United States." American Antiquity 31:662–675.

Tuohy, D.R. 1974. "A Comparative Study of Late Paleo-Indian Manifestations in the Western Great Basin." In A Collection of Papers on Great Basin Archaeology, edited by R. Elston and L. Sabini, 90–116. Nevada Archaeological Survey Research Paper 5.

USDA (U.S. Department of Agriculture). 2025. Web Soil Survey. USDA Natural Resources Conservation Service, Soil Survey. Accessed April 2025. https://websoilsurvey.sc.egov.usda.gov/

Wardle, H.N. 1913. "Stone Implements of Surgery from San Miguel Island, California." American Anthropologist 15(4): 656–660.

Warren, C.N. 1984. "The Desert Region." In California Archaeology, by M.J. Moratto, 339–430. Orlando: Academic Press.

Warren, C.N., and R.H. Crabtree. 1986. "Prehistory of the Southwestern Area." In Handbook of the North American Indians, Vol. 11: Great Basin, edited by W.L. d'Azevedo, 183–193. Washington, DC: Smithsonian Institution.

Waters, M.R. 1988. "Geomorphology of Drinkwater Basin." In The Late Holocene Archaeology of Drinkwater Basin, Fort Irwin, San Bernardino County, California, by M.E. Basgall, M.C. Hall, and W.R. Hildebrandt, 24–33. Report submitted to U.S. Army Corps of Engineers, Los Angeles.

Waters, M.R. 1991. "The Geomorphology of Nelson Basin and Adjacent Areas." In The Archaeology of Nelson Basin and Adjacent Areas, Fort Irwin, San Bernardino County, California, by M.E. Basgall, 15–20. Submitted to U.S. Army Corps of Engineers, Los Angeles.

WRCC (Weather Regional Climate Center). 2025. Regional Climate for Acton, California. Access April 2025. https://wrcc.dri.edu

Willig, J.A. 1988. "Paleo-Archaic Adaptations and Lakeside Settlement Patterns in the Northern Alkali Basin, Oregon." In Early Human Occupation in Far Western North America: The Clovis-Archaic Interface, edited by J.A. Willig, C.M. Aikens, and J.L. Fagan, 417–482. Nevada State Museum Anthropological Papers 21.

Willig, J.A. 1990. "Western Clovis Occupation at the Dietz Site, North Alkali Lake Basin, Oregon." Current Research in the Pleistocene 7:52–56.

Willig, J.A., and M. Aikens. 1988. "The Clovis-Archaic Interface in Far Western North America." In Early Human Occupation in Far Western North America: The Clovis-Archaic Interface, edited by J.A. Willig, C.M. Aikens, and J.L. Fagan, 1–40. Nevada State Museum Anthropological Papers 21.

Yohe, R. 1992. "A Reevaluation of Western Great Basin Cultural Chronology and Evidence for the Timing of the Introduction of the Bow and Arrow to Eastern California Based on New Excavations at the Rose Spring Site (CA-INY-372)." PhD dissertation, University of California, Riverside.

Yohe, R. 1998. "The Introduction of the Bow and Arrow and Lithic Resource Use at Rose Spring (CA-INY-372)." Journal of California and Great Basin Anthropology 20(1): 26–52.

Appendix A

Key Personnel Resumes

Roshanne S. Bakhtiary, MA

ARCHAEOLOGIST

Roshanne Bakhtiary (*she/her*) is an archaeologist with 13 years' professional experience in cultural resources management, archaeological research, and regulatory compliance in California and the Great Basin. She also has extensive knowledge in hunter-gatherer archaeology, Mission period archaeology, and California prehistory and ethnography. Previously, Roshanne has held positions as an archaeologist, osteologist, cultural training lead, project manager, and principal investigator for various projects throughout California. In these roles, she has co-authored technical reports, led fieldwork operations, produced geographic information system (GIS) based analyses, facilitated Native American coordination and outreach, conducted records searches, managed National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) compliance projects, and evaluated archaeological resources for the National Register of Historic Places under the National Historic Preservation Act Section 106 (Section 106) and the California Register of Historical Resources (CRHR) under CEQA. She also excels in communicating and consulting with various private sector clients and public agencies, negotiating budgets for projects, implementing technology-based fieldwork solutions, managing laboratory operations, conducting artifact analysis, and preparing archaeological collections for curation.

Education

University of California, Davis, PhD, Evolutionary Anthropology, In Progress

MA, Evolutionary Anthropology, 2016

California Polytechnic State University, San Luis Obispo, BS, Anthropology and Geography, 2013

Relevant Previous Experience

State Water Project, California Department of Water Resources, Los Angeles County, California. Ms. Bakhtiary served as the cultural lead on the South Central Coastal Information Center (SCCIC) and Eastern Information Center (EIC) records search collation and digitization efforts in support of the California Department of Water Resources (DWR) State Water Project (SWP). She led a team of archaeologists and GIS analysts through a series of data entry and digitization tasks that aided in the development of a state-wide buried site sensitivity model to assist DWR in their cultural resources management strategies in support of the SWP. (06/24–Present)

Adelanto-Rinaldi Line 1 Upgrade Project, Los Angeles Department of Water and Power, Los Angeles County, California. As principal archaeological investigator, Ms. Bakhtiary coordinated the records search, Native American Heritage Commission (NAHC) outreach efforts, archaeological survey, the preparation of a technical report, and provided management and compliance recommendations relating to archaeological resources for the Adelanto-Rinaldi Line 1 Upgrade Project. She also assisted in the preparation of the Cultural and Tribal Cultural Resources (TCR) CEQA document sections for the project. Considerations included compliance under CEQA. (01/24–06/24)

Belcaro Sand Canyon Project, Santa Clarita, California. As principal archaeological investigator, Ms. Bakhtiary coordinated the records search, NAHC outreach efforts, archaeological survey, the preparation of a technical report, and provided management and compliance recommendations relating to archaeological resources for the Belcaro Sand Canyon Project. As part of this effort, she evaluated three historic-era archaeological resources for inclusion in the NRHP and CRHR. Considerations included compliance under CEQA. (03/24–Present)

Santa Clarita Commerce Center Project, Santa Clarita, California. Ms. Bakhtiary served as the cultural compliance lead for a private developer on an infrastructure project in Santa Clarita, California. She prepared a cultural resources monitoring plan and worker environmental awareness program, coordinated archaeological and paleontological monitoring efforts, and worked with construction crews and the client on scheduling and compliance needs. She also assisted in the preparation of a final monitoring report. Considerations included compliance under CEQA and the City of Santa Clarita. (03/24–10/24)

Cal Poly Pomona Master Plan Update Project, Cal Poly Pomona, Pomona, California. As principal archaeological investigator, Ms. Bakhtiary coordinated the records search, NAHC outreach efforts, archaeological survey, the preparation of a technical report, and provided management and compliance recommendations relating to archaeological resources for the Cal Poly Pomona Master Plan Update Project. She also assisted in Native American consultation efforts pursuant to Assembly Bill (AB) 52. Considerations included compliance under CEQA. (02/24–Present)

The Huntington Library Scholar's Grove Housing Project, The Huntington Library, San Marino, California. As principal investigator, Ms. Bakhtiary coordinated the records search, cultural resources survey, the preparation of a technical report, and provided management and compliance recommendations relating to archaeological and built environment resources for the Scholar's Grove Housing Project. As part of this effort, she evaluated five historic-era built environment resources for inclusion in the NRHP and CRHR. Considerations included compliance under CEQA and the City of San Marino's rules and regulations outlined for the Huntington Library. (01/24–10/24)

North Coast Inceptor Reach 5 Replacement Project, City of Laguna Beach, Laguna Beach, California. As principal archaeological investigator, Ms. Bakhtiary coordinated the records search, NAHC outreach efforts, archaeological survey, extended phase I testing effort, the preparation of a technical report, and provided management and compliance recommendations relating to archaeological resources for the North Coast Inceptor reach 5 Replacement Project. She also assisted in Native American consultation efforts pursuant to AB 52 and in the preparation of the Cultural and TCR CEQA document sections. Considerations included compliance under CEQA. (02/24–Present)

U.S. Department of Housing and Urban Development Projects, Couty of Orange, Orange County, California. Ms. Bakhtiary served as a principal archaeological investigator for more than 5 County of Orange U.S. Department of Housing and Urban Development projects throughout Orange County. She coordinated the records searches, the preparation of technical reports, managed California State Historic Preservation Officer concurrence and communication efforts, and provided management and compliance recommendations relating to archaeological resources. Considerations included compliance under CEQA and Section 106 of the NHPA. (05/23–Present)

Drought Resiliency NEPA-Compliant Assessments for Cultural Resources, Western Municipal Water District, Riverside and San Bernardino Counties, California. As principal archaeological investigator, Ms. Bakhtiary coordinated records searches, NAHC outreach efforts, archaeological surveys, the preparation of technical reports, and provided management and compliance recommendations relating to archaeological resources for three residential water infrastructure projects. (08/23–04/24)

On-Call Program, Southern California Edison, Los Angeles, California. Ms. Bakhtiary served as a cultural lead for Southern California Edison's Non-Master Special Use Permit Public Lands infrastructure replacement projects throughout Southern California including on lands administered by the Bureau of Land Management, California Department of Parks and Recreation, Bureau of Indian Affairs, Bureau of Reclamation, DWR, U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and National Parks Service. She was responsible for completing archaeological desktop reviews, coordinating with public agencies, applying for permits, conducting site surveys, documenting newly recorded cultural resources, and authoring CEQA and Section 106-compliant technical reports. (03/22–03/23)

Jessica Colston

ASSOCIATE ARCHAEOLOGIST, PALEONTOLOGICAL TECHNICIAN

Jessica Colston is an archaeological and paleontological field monitor and technician with 17 years' experience. Ms. Colston has extensive field experience including identification and comparative analysis of faunal assemblages, both past and present. Ms. Colston's research interests include zooarchaeology of Pacific coast hunter-gatherers, including examination of trauma and pathology and bone tool production. Ms. Colston's faunal identification focus is continuously informed by research in paleontology of the southwest.

Education

University of California, Santa Cruz
BA, Anthropology (Archaeology emphasis), 2009

Certifications

CPR/First Aid

Archeological Technician Certificate, 2007

Certificate of Completion Paleontology, 2024

Driver's License, Class M1

Professional Affiliations

Lambda Alpha National Honors Society

Society for American Archaeology

Society for California Archaeology

Anza-Borrego Paleontological Society

Project Experience

Preserve at River Bend, City of Pala, California. Responsible for leading a crew on a Phase I survey in an archaeologically sensitive area adjacent to tribal reservation land and sacred landscape. Results of the survey were positive and the reporting included previous work for evaluation and tribal coordination.

Lone Oak Monitoring, CWC Lone Oak 24 LLC, San Diego, California. Coordinated daily archaeological and Native American monitoring for a residential development in an archaeologically sensitive area adjacent to jurisdictional waterways. Authored the Negative Monitoring report at the conclusion of the mass grading component of the project.

Hotel del Coronado North Parking Garage, HDC South Beach Development LLC, Coronado, California. Responsible for monitoring into paleontological sensitive soils, and responsible for the recovery of any fossiliferous materials.

Costco Project, La Mesa, California. Drafted the Negative Survey Letter for the development of an adjacent commercial lot for Costco Gas station installation.

Archaeological Significance Evaluation, Confidential Client, San Diego, California. Served as archaeological technician and report writer for evaluation excavations on previously recorded sites within the project's area of potential effect. Responsibilities included identification and documentation of archaeological features, artifacts and cultural soils. Report writing included the interpretation of the excavation results, both in terms of the artefactual assemblage and the sediments observed throughout the project area.

16970 Sunset Boulevard Cultural, Crest Real Estate, Los Angeles, California. Identified and documented archaeological and historical features on historic property.

235 North La Luna, Thomas and Kelly Adams, Ojai, California. Serving as archaeological technician. Responsible for excavation, documentation and collection of archaeological materials during phase II shovel testing.

Newland Sierra Project, Newland Sierra LLC, San Diego, California. Catalogued and performed data entry for collection previously housed with Palomar College.

Del Mar Beach Resort, Del Mar Beach Resort Investors LLC, San Diego County, California. Excavated, identified, and recorded archaeological materials recovered during phase II testing on site. Vertebrate and invertebrate analysis was performed in lab.

Highland Mesa Development II, Highland Mesa Development II Corp., Escondido, California. Served as archaeological technician. Monitored cultural resources during construction development for residential use.

The Yokohl Ranch Company Environmental Impact Report, Tulare County, California. Catalogued and sorted records of artifacts and features collected by project for analysis.

Villa Storia Affordable Housing Project, Villa Storia CIC LP, City of Oceanside, California. Served as archaeological technician. Identified and recorded cultural resources in the project area, which included on-site coordination with Native American monitors and subconsultants.

Twin Oaks Valley Road Residential Project, Pacific Real Estate Services, City of San Marcos, California. Wrote Negative Monitoring Report.

Villa Storia Monitoring, Beazer Homes Holding Corporation, City of Oceanside, California. Served as archaeological technician. Monitored ground disturbance in native soils adjacent to the Mission San Luis Rey during construction activities. This involved identification of ceramics, faunal bone, and historic ranching artifacts and impacts. Coordination with multiple subconsultants and Native American Monitors was also required.

Discovery Village South, City of San Marcos, California. Served as archaeological technician. Responsible for identification of historic and prehistoric cultural resources during survey of undeveloped project area.

973 K Street, SimonCRE Alpha III LLC, City of San Miguel, California. Served as archaeological technician. Responsible for pre-construction survey of lot purposed for commercial development. Responsible for coordination with the Native American monitors and evaluation of surface deposits of cultural materials. Proximity to the San Miguel Mission indicated likely subsurface deposits. Responsible for the preparation of Negative Findings Letter.

Bay Crossing Water Transmission Mains, City of Newport Beach, California. Co-authored phase I report for the remediation of transmission lines in Newport Bay. Reporting included language for mitigation measure recommendations tailored to the coastal environment of the project.

Bellefield Solar Energy, Bellefield Energy LLC, City of Mojave, California. Served as archaeological technician for phase II testing for evaluation excavations on newly and previously recorded sites within the project's area of potential effect. Responsibilities included identification and documentation of archaeological features, artifacts and cultural soils.

Botanical Surveys, Confidential Client, San Diego County, California. Responsible for co-authorship of the work plan and impact assessment plan for a confidential solar project. Preparation of these documents included the supplemental creation of an archaeological district, under SHPO guidelines. Faunal osteological identification/assessments contributed the work plan by proactively 'clearing' archaeological sites where any osteological material was previously recorded that was not clearly identified as non-human.

Adam Giacinto

ARCHAEOLOGIST

Adam Giacinto is an archaeologist with more than 19 years' experience preparing cultural resource studies and environmental documents, and managing archaeological survey, evaluation, and data recovery-level investigations. His research interests include prehistoric hunter-gatherer cultures and contemporary conceptions of heritage as represented within the regulations. He has gained practical experience in archaeological and ethnographic field methods while conducting research in the Southwest US, Mexico, and Eastern Europe. He brings experience implementing and managing all scales of projects and is experienced in compliance requirements for local, state, and federal regulatory contexts. He specializes in sensitivity modeling and cultural resources compliance projects, managing monitoring for large-scale transportation and energy projects.

Education

San Diego State University
MA, Anthropology, 2011

Santa Rosa Junior College
AA, Anthropology, 2004

Sonoma State University
BA, Anthropology/ Linguistics, 2006

Professional Affiliations

Register of Professional Archaeologists

Society for California Archaeology American Anthropological Association Institute of Archaeomythology

American Anthropological Association

Selected Project Experience

Tribal Cultural Resources (TCR) Studies, City of Los Angeles Planning Area.
Mr. Giacinto has acted as principal investigator on more than 35 TCR studies throughout the City of Los Angeles planning area. The goal of these investigations is to review the archaeological, historical, academic, and ethnographic record for potential TCR information, then ground contemporary AB 52 consultation information in this context while providing recommendations related to reasonable approaches for management. (2015–Present)

Archaeological/ Zanja Madre Studies, City of Los Angeles Planning Area.
Mr. Giacinto has acted as principal investigator on more than 15 archaeological studies within the Los Angeles Down Town area focused on assessing the potential presence of the "Zanja Madre", a water conveyance system that was developed as a system of ditches in the early 1800s and continued into use through the early 1900s. These projects include reviewing South Central Coastal Information Center (SCCIC) records search information, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) information, a review of in-house Dudek data and references, Sanborn Fire Maps, historical topographic and aerial information and, at times, the application of ground penetrating radar (GPR). GPR has been used on 6 projects to date with the intent of identifying buried portions of the Zanja Madre. The most pertinent of these include the following projects. (2017–Present)

- 6th and Alameda Project, Private Developer, Downtown Los Angeles, California (2017–2019)
- South Park Towers, Private Developer, Downtown Los Angeles, California (2017–2019)
- Palmetto Project, Private Developer, Downtown Los Angeles, California (2017–2019)
- Buena Vista Project, China Town, Los Angeles, California (2019–ongoing)

- Santa Ana Watershed Project Authority Reach 5 Project, Riverside County, California. As principal investigator, Mr. Giacinto managed provided recommendations to SAWP for a monitoring approach that would satisfy both State Water Board and Pechanga tribe interests. Project included archaeological monitoring of areas along Temescal Canyon Road and met compliance under CEQA and Section 106 of the NHPA.

Santa Margarita Hidden Ridge Project, Orange County, California. As principal investigator, Mr. Giacinto managed the survey, SCCIC archival searches, tribal correspondence, and reported management recommendations for a cultural resources inventory. The proposed intersection two NRHP-listed resources and a NRHP-listed archaeological district. Mr. Giacinto developed and managed testing efforts to appropriately define significant deposits and prepared a monitoring plan. Considerations included compliance under CEQA and Section 106 of the NHPA, and project was successfully permitted.

Orange Coast College Initial Study (IS), Coast Community College District, Orange, California. As principal archaeological investigator, Mr. Giacinto coordinated records search, NAHC and Native American consultation, archaeological survey, preparation of a technical report, and provided management and compliance recommendations relating to cultural resources on three Orange County College campuses.

Pure Water Plan Constraints Study and PEIR, City of San Diego, California. As principal investigator and field director, Mr. Giacinto managed preparation of a constraints study for the Pure Water Project. Work involved a records search of over 100 mile linear miles of San Diego. Site record information from more than 1,236 cultural resources was processed, coded, and integrated within a geospatial sensitivity model to identify archaeological and built environment constraints throughout the proposed alignment. Maps were then generated using generalized grid units to provide a visual model of relative archaeological resource sensitivity while maintaining the appropriate level of confidentiality for public dissemination to assist in planning.

California High Speed Rail, Fresno-Bakersfield, California. As principal investigator, oversees, implements, and reports upon cultural inventory, evaluation, data recovery and compliance efforts under Section 106 of the NHPA, Federal Rail Authority, CEQA, and local Guidelines for Fresno to Bakersfield section. Oversight of Native American monitors, built environment specialists and archaeologists, management of cultural monitoring implementation and site treatment, client reporting, meetings and report preparation. Implementation of mitigation included exploratory archaeological investigations at multiple NAHC-eligible resources.

Operations and Maintenance On-Call, Department of Water Resources. As primary Dudek archaeological and tribal resources consultant, Mr Giacinto manages cultural resources projects for DWR. These include the Cultural Resources Inventory for the B.F. Sisk Dam Safety of Dams Modification Project, Delta Dams Raise Project (three reservoirs), MP 230 Project, and Upper Feather River Projects (three dam locations) and preparation of a Programmatic Agreement for Cultural resources for DWR. Mr Giacinto is familiar with the DWR Tribal Engagement and AB 52 processes. (2019–ongoing)

McCoy Solar Energy Project and Blythe Solar Power Project, Blythe, California. As principal investigator, Mr. Giacinto supervised, implemented, and reported upon compliance efforts for construction of more than 4000 acres of solar work under Section 106 of the NHPA, BLM Guidelines, CEQA, California Energy Commission, and County of Riverside Guidelines. Mr. Giacinto was the lead multiple formal trainings with monitors and council members from the Colorado River Indian Tribes regarding federal and state regulations relating to human remains, County and BLM guiding documents, identification of cultural material, and the multiple understandings of "cultural resources". History (NIAH), Mexicali, Mexico. (2014–ongoing)

DUDEK

Shane McDonnell

ARCHAEOLOGICAL/PALEONTOLOGICAL FIELD TECHNICIAN

Shane McDonnell (*he/him*) is an archaeological and paleontological field technician with experience as a construction field monitor, monitoring construction in Southern California on various projects including residential, commercial, and renewable energy. He has worked individually and with larger crews on monitoring efforts and assisting with keeping clients in compliance. He is skilled in excavating with specialized equipment.

Education

University of Wyoming
BS, Anthropology, 2021

Certifications

San Diego City Certified Archaeological Monitor

Project Experience

Development

Village 8 East, HomeFed Corporation, Chula Vista, California. Served as an archaeological and paleontological monitor for mass grading and excavating associated with a Master Plan development keeping the client in compliance under a programmatic environmental impact report (EIR).

Amazon Logistics Facility "Otay Enrico," Otay Enrico LLC, Otay Mesa, California. Served as a paleontological monitor for drilling, excavations, and grading associated with building an Amazon Logistics facility within the Otay Formation.

Panera Bread, Manna Development Group, San Marcos, California. Served as an archaeological monitor for construction activities associated with building a new commercial Panera Bread business near San Marcos Creek.

Skylark Murai, Lennar Corporation, San Marcos, California. Served as an archaeological monitor for mass grading and grubbing activities associated with the building of a new home development in San Marcos.

Brightline Survey and Excavation, Victorville to Hesperia, California. San 6 Discovery. Served as an archaeological field technician participating in surveys and excavations along the Interstate (I) 15 corridor from Victorville to Hesperia for the future construction of a high-speed rail system.

Discovery SAN 6 Industrial Project. Served as an archeological/paleontological monitor for mass grading and excavations associated with building an Amazon Logistics facility within the Otay Formation.

Solana Highlands. Served as an archaeological/paleontological monitor for mass grading and excavations associated with residential housing development in Solana Beach, CA.

North River Farms. Served as an archaeological/paleontological monitor for mass grading and excavations associated with residential housing development in Oceanside, CA.

Energy

Drew Solar, Swinterton, Calexico, California. Served as a paleo lab technician, assisting with processing recovered mudstone geological formation fossiliferous sediments, drying, organizing, and labeling in the lab for sorting and curation.

Sandrini Solar, Rosendin, Fresno, California. Served as a paleontological monitor for construction activities associated with building a solar farm.

Arlington Solar Energy Center, NextEra, Blythe, California. Served as an archaeological and paleontological monitor for construction activities associated with building a solar farm and battery energy storage systems on Bureau of Land Management land.

Survey 13836, Confidential Client, Calipatria, California. As a dual paleontologist and archaeologist, worked with a crew of 5 to 9 people to survey 4,000 acres of active farmland for cultural resources associated with a new solar farm development. Documented concrete canals and transmission lines for the built environment/historic architecture team.

Municipal

San Marcos Creek, City of San Marcos, California. Served as an archaeological monitor for ground-disturbing activities associated with removal of invasive plant species, rerouting utilities, redevelopment of surface streets, and building bridges to rework the San Marcos Creek to avoid flooding of roads and make into a wetland for the proliferation of biological species.

Specialized Training

- Advanced Archaeology Field School, University of Wyoming, Guernsey, Wyoming. Excavated, mapped, and surveyed archaeological artifacts in situ at the Hell Gap Paleoindian Site in Southeastern Wyoming using water screening, EDMwin software, and a total station. Cleaned and cataloged discovered artifacts, such as bison vertebrae/cranium and stone tools from sediment (10,000–12,000 years old), based on taxonomic properties to be analyzed for a collaborative technical report.

Brenda Lee Rogers

ARCHAEOLOGIST

Brenda Lee Rogers (*she/her*) is a professional archaeologist with 34 years' archaeological experience in the United States. Since 1991, she has conducted field and laboratory studies of archaeological sites in Arizona, California, Delaware, Illinois, Nevada, New Jersey, New York, and Pennsylvania. She has supervised large field crews of archaeologists and provided training in excavation strategies, map drafting, artifact illustrations, site tours, press relations, and processing artifacts. Brenda also has considerable experience proofreading and organizing paperwork and editing and cowriting reports. She has also been involved in teaching students of all ages about archaeology. Brenda has served as an archaeological site steward in California off and on since 2009.

Education

Bard College
BA, Anthropology, 1990

Professional Affiliations

Society of California Archaeology

Ventura County Archaeological Society

Certifications

Occupational Safety and Health Administration (OSHA) 40-hour HAZWOPER)

Selected Project Experience

Gabriel Energy Storage -TO No. 13, Aypa Power Development LLC, Irwindale, California. Served as archaeologist. Conducted in-person research at South Central Coastal Information Center, which involved accessing confidential records and transferring information to hand-drawn topographical maps as well as copying and uploading records. Conducted pedestrian survey, wrote survey report. Co-authored archaeological report. (2025)

Atlas Main (X and XI) Solar Project, Hanwha Q CELLS USA Corp, Salome, Arizona. Served as archaeological monitor. Assisted with monitor coordination and communication between client and project manager. Worked with client to protect archaeologically sensitive areas and monitored geotechnical ground testing. Recorded archaeological finds and worked closely with Native American monitors to protect the cultural resources. Documented all work through photographs and completion of monitoring logs. Edited and uploaded daily field logs. (2025)

Atlas Main (V and VI) Solar Project, Hanwha Q CELLS USA Corp, Salome, Arizona. Served as archaeological monitor. Monitored large-scale vegetation removal and grading. Recorded archaeological finds and worked closely with Native American monitors to protect the cultural resources. Assisted biologists with ground survey for impacted animal burrows. Documented all work through photographs and completion of monitoring logs. Edited and uploaded daily field logs. (2025)

Luthra Solar Project, New Leaf Energy Inc., Riverside, California. Served as field archaeologist. Conducted pedestrian survey of project site and prepared a written report. Coordinated efforts with other field personnel. (2025)

Pacific Gas and Electric Vegetation Management, Arcadis US Inc., Point Reyes, California. Served as archaeological monitor. Completed pre-work archaeological surveys and monitored vegetation management, while ensuring sensitive areas were protected. Documented all work through photographs and completion of monitoring logs. (2024)

Painter Battery Energy Storage System Cultural Resources Extended Phase I, Jupiter Power LLC, Carpinteria, California. Served as crew lead and field archaeologist. Planned testing strategy and excavated augers and test units to recover subsurface remains. Recorded field notes and documented efforts with photographs and field map application. Assisted with preparation of data for the report. (2024)

3803 W. Mission Blvd CEQA 15183 Exemption, City of Pomona, Los Angeles, California. Served as archaeologist. Conducted in-person research at South Central Coastal Information Center, which involved accessing confidential records and transferring information to hand-drawn topographical maps as well as copying and uploading records. Conducted a field survey of project area, documented with photographs. Prepared a written report and submitted a photo log. (2024)

Ocean Meadows Cultural Services, Ocean Meadows Investors, Goleta, California. Served as archaeological monitor. Monitored ground disturbance during construction work on site. Monitored grading and drilling activities. Documented work with photographs and prepared a daily written report. Reviewed and edited all monitoring logs and prepared a monitoring report. (2024)

Phelan 20 Acres, Cambria 60 Partners LLC, Hesperia, California. Served as field archaeologist. Completed pedestrian survey of project area. Completed photo documentation and prepared a survey report. Conducted in-person research at South Central Coastal Information Center, which involved accessing confidential records and transferring information to hand-drawn topographical maps as well as copying and uploading records. Assisted in report preparation. (2023)

North Cat Canyon Oil Field, Santa Barbara County Council Resources Inventory, Langan Engineering and Environmental Services LLC, Orcutt, California. Served as archaeologist. Co-authored Phase I Archaeological Survey Report. (2023)

Desert Valley Hospital Emergency Department Project, Prime Healthcare, Victorville, California. Served as archaeologist. Co-authored Cultural Resources Technical Report. Conducted in-person research at South Central Coastal Information Center, which involved accessing confidential records and transferring information to hand-drawn topographical maps and copying and uploading records. Completed pedestrian survey of project site and prepared a written report. (2023)

Thousand Oaks Los Robles Cancer Center, City of Thousand Oaks, California. Served as field archaeologist. Completed pedestrian survey of project site and prepared a written report. Conducted in-person research at South Central Coastal Information Center, which involved accessing confidential records and transferring information to hand-drawn topographical maps as well as copying and uploading records. Assisted in report preparation. (2023)

Queen of the Valley Hospital, West Covina, California. Served as archaeological monitor. Conducted construction monitoring of trenching for infrastructure. Documented work with photographs and written report. (2021–2022)

Kellogg Crossing Self-Storge, Goleta, California. Served as archaeological monitor. Conducted construction monitoring of all ground disturbance. Documented work with photographs and prepared daily written reports. (2022)

Trails at Lyons Canyon, NUWI-Lyons Canyon LLC, Los Angeles, California. Served as archaeologist. Co-authored Cultural Resources Technical Report. (2022)

Philip Sharp-Garcia

ARCHAEOLOGIST AND PALEONTOLOGICAL FIELD TECHNICIAN

Philip Sharp-Garcia (*FIL-ip sharp GAR-see-a*) is a field archaeologist with 17 years' experience in compliance monitoring, surveying, and data recovery. Mr. Sharp-Garcia is trained to identify artifacts, features, and flora in the Southern California desert. They also have experience as an acoustic monitor, air quality monitor, biological monitor, compliance monitor, and paleontological monitor.

Education

San Bernardino Valley College, GIS courses, 2011

San Diego State University BA, Anthropology, 2007

Imperial Valley College AA, Anthropology, 2003

Certifications

AED/CPR/First Aid, 2023

Wilderness First Aid Certification, 2022

40-hour HAZWOPER, 2018

CPR/First Aid, 2017

Quino Butterfly Exam, 2016

Desert Tortoise Council Workshop, 2015

Visual Emissions Examination, 2013

Section 106 Certification, 2012

Flat Tail Horned Lizard Certification, 2012

Recycled Water Site Supervisor Training, 2011

Project Experience

Trails at Carmel Mountain Ranch, Lennar Homes of California, Inc, City of Poway, California. Served as lead archaeological monitor. Responsible for monitoring for archaeological resources during ground disturbing activities, reviewed daily logs, compiled monthly monitor log summaries, scheduled other monitors, and wrote the final report.

San Marcos Boulevard at Discovery, City of San Marcos, California. Served as archaeological monitor on a stormwater drainage pipe installation and road improvement project. Responsible for monitoring for archaeological resources during ground disturbing activities, dug and screened soil, and mapped discoveries in the field using an iPad/iPhone.

HomeFedV8E, HomeFed Corporation, City of Chula Vista, California. Served as a paleontological field technician. Responsible for monitoring for paleontological resources during ground disturbing activities.

Trilogy at the Polo Club, Shea Homes, City of Indio, California. Served as a paleontological field technician. Responsible for monitoring for paleontological resources during ground disturbing activities. Coordinated with Native American tribal cultural consultants.

Villa Storia Monitoring, Beazer Homes Holding Corporation, City of Oceanside, California. Served as archaeological technician. Responsible for monitoring ground disturbance in native soils adjacent to the Mission San Luis Rey during construction activities. Identified ceramics, paleontological soil samples, and historic ranching artifacts and impacts. Coordinated with multiple subconsultants and Native American monitors.

Confidential Solar Energy Center, Confidential Energy Client, Riverside County, California. Served as both an archaeological field technician and paleontological field technician. Responsible for cultural and paleontological resources construction monitoring during construction of 900 acres of solar fields and 20 linear miles of transmission corridor. Coordinated with multiple subconsultants and Native American tribal cultural consultants.

Bureau of Land Management Monitoring, Confidential Energy Client, San Diego County, California. Served as third-party lead archaeological inspector. Responsible for training other Dudek third-party archaeological and environmental inspectors, verifying compliance of construction with Bureau of Land Management (BLM) and county permits and Conditions of Approval. Coordinated with multiple subconsultants.

Confidential Solar Energy Project, Confidential Energy Client, City of Blythe, California. Served as lead archaeological monitor for compliance with BLM and California Energy Commission guidelines and regulatory conditions. Coordinated archaeological and Native American tribal cultural consultants throughout the nearly 900-acre project area. Completed archaeological survey, data recovery, and daily monitoring work. Reviewed daily reporting logs from all archaeological and Native American tribal cultural consultants prior to submittal to BLM and California Energy Commission leads and Memorandum of Agreement/Programmatic Agreement consulting parties. Tasked with ensuring general compliance among construction personnel and environmental monitors with biological, stormwater, noise, dust, and other environmental work conditions.

Confidential Solar Energy Project, Confidential Energy Client, San Luis Obispo County, California. Responsible for ensuring that multiple on-site ground disturbing activities had appropriate archaeological and paleontological monitoring coverage, as well as scheduling and recording archaeological and paleontological materials discovered while monitoring. Orchestrated and coordinated with multiple subconsultants, Native American tribal cultural consultants, archaeological field technicians, and paleontological monitors. Responsible for final identification and assessment of archaeological and paleontological resources.

Confidential Solar Energy Project, Confidential Energy Client, Riverside County, California. Served as lead archaeological monitor for compliance with BLM and Riverside County guidelines and regulatory conditions. Completed incidental oversight and compliance implementation as client representative and intermediary with third-party archaeologists throughout more than 1,800 acres of solar field and 20 linear miles of transmission corridor. Completed archaeological survey, artifact collection, and daily monitoring work. Reviewed daily reporting logs from all archaeological and tribal cultural consultants working under client contract prior to submittal to BLM and Memorandum of Agreement consulting parties. Tasked with ensuring general compliance among construction personnel and environmental monitors with biological, stormwater, noise, dust, and other environmental work conditions.

Confidential Wind Energy Project, Confidential Energy Client, Santa Barbara County, California. Served as an archaeological field technician and dug and screened shovel test pits. Used an iPad to digitally document discoveries in the field.

Confidential Solar Energy Project, Confidential Energy Client, Pinal County, Arizonia. Served as an archaeologist I on a Dudek survey of BLM land in Arizona for a potential solar farm. Drove four-wheel drive vehicles in the field, surveyed 900 acres of flat land, used a GPS receiver and an iPad/iPhone to create maps, and took photos.

Camp Wilson Infrastructure Upgrades, RQ Berg JV, City of Twentynine Palms, California. Served as lead archaeological monitor for compliance with base regulatory conditions. Coordinated archaeological monitoring of the project area and completed the archaeological survey, site recordation, and daily monitoring work. Reviewed daily reporting logs from archaeological monitors prior to base leads. Tasked with ensuring general compliance and interfacing with base field personnel.

Appendix B

(Confidential) SCCIC Records Search Results

Appendix C

(Confidential) Cultural Resources Overview Map

Appendix D
NAHC and Tribal Correspondence

All occurrences of the Project's former name have been redacted. Red text boxes containing the current Project name have been used to indicate replacements, while black boxes have been applied where redaction was necessary without substitution.

Sacred Lands File & Native American Contacts List Request

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95501
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Dudek No. 14419.02

County: Los Angeles

USGS Quadrangle

Name: Pacifico Mountain & Acton

Township: 5N Range: 12W Section(s): 22, 23, 26, 27, 28, 29, 32, 33, 34, and 35

Company/Firm/Agency:

Dudek

Contact Person: Jessica Colston

Street Address: 605 Third Street

City: Encinitas, CA Zip: 92024

Phone: (760) 815-6642 Extension:

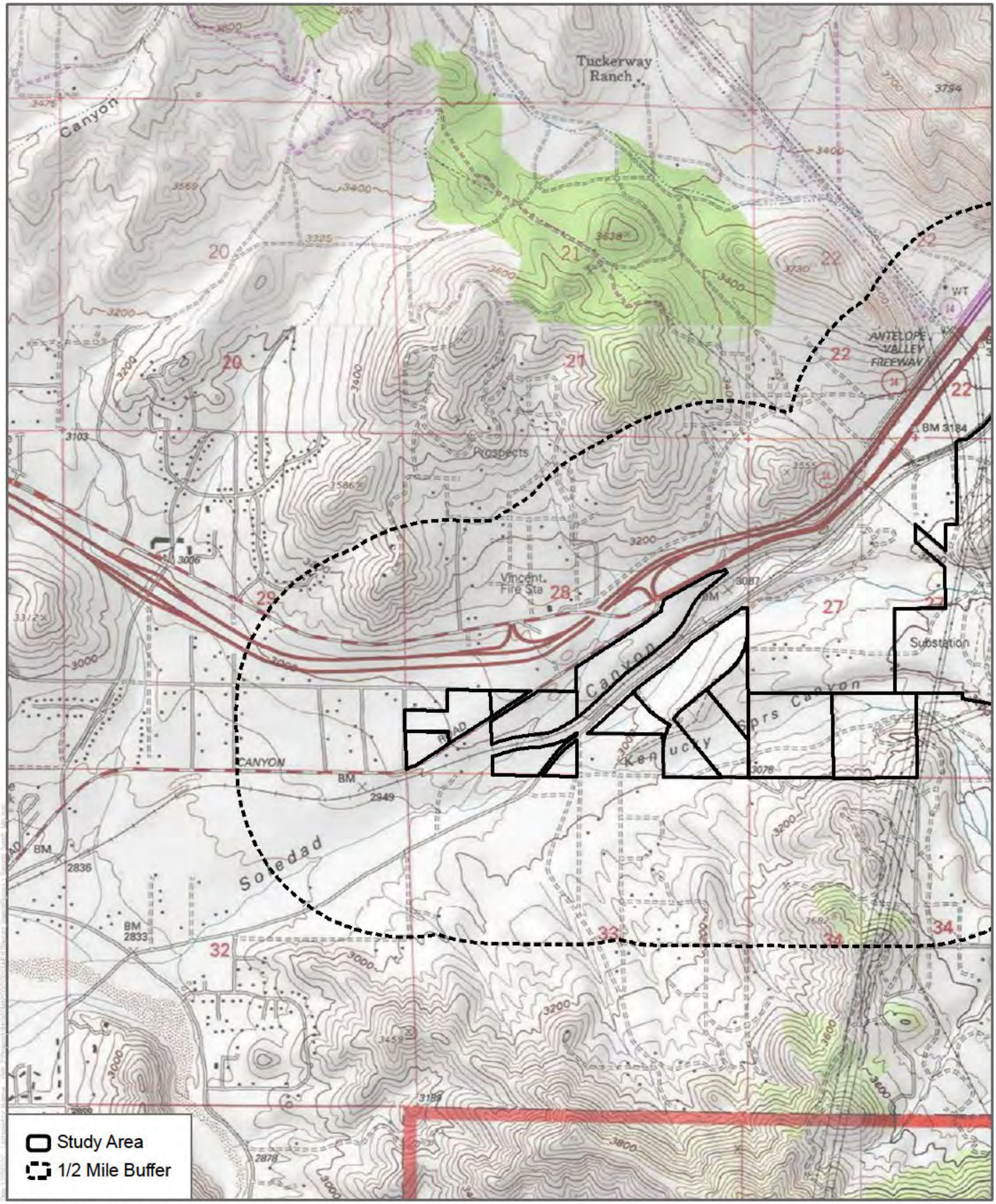
Fax:

Email: jcolston@dudek.com

Project Description:

The project will entail developments adjacent to HWY-14.

☑ Project Location Map is attached



SOURCE: USGS 7.5-Minute Series Pacifico Mountain, Acton Quadrangles
Township 5N; Range 12W; Sections 22,26,27,28

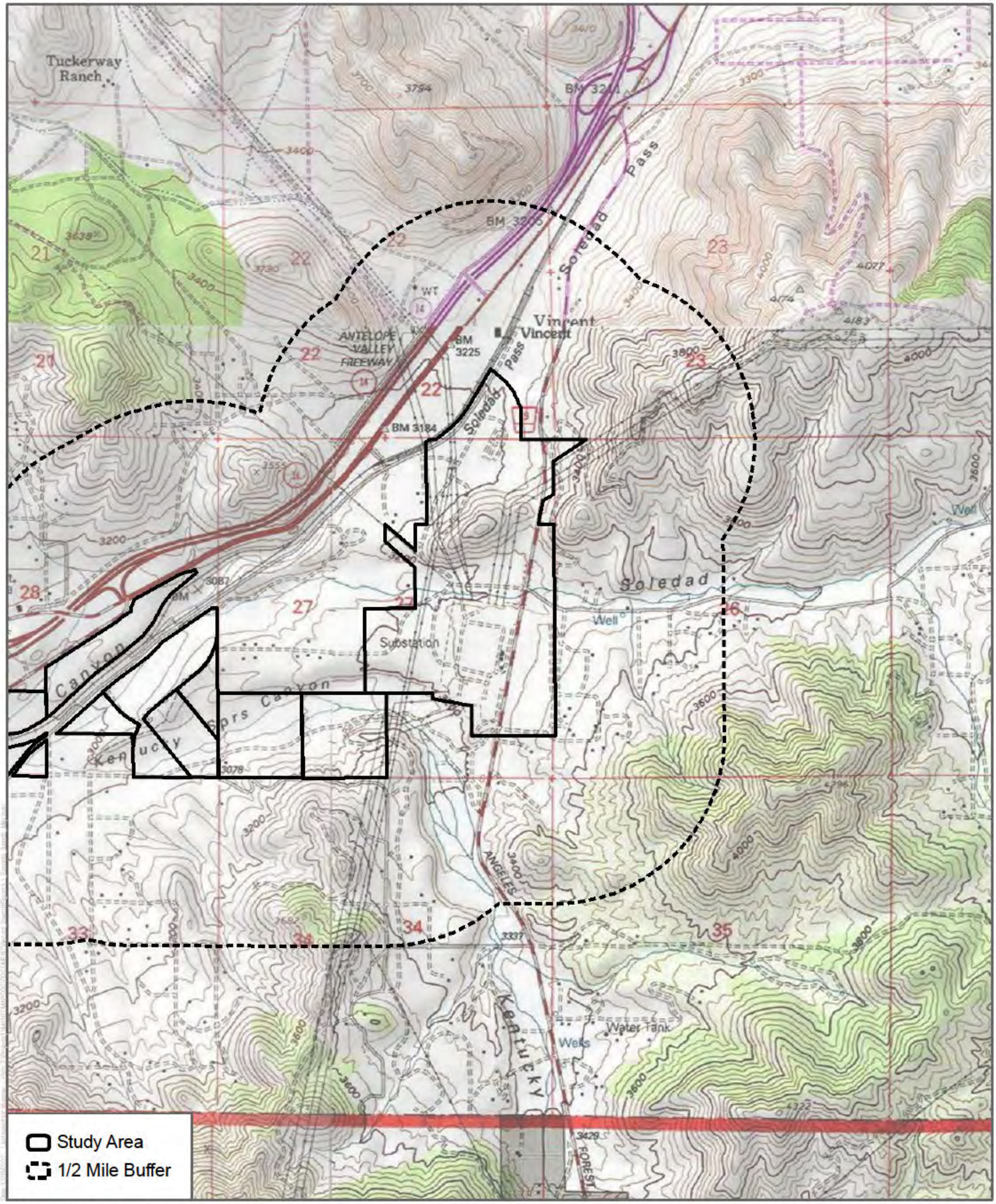
DUDEK

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

FIGURE 1-1

Records Search

Prairie Song Reliability Project



SOURCE: USGS 7.5-Minute Series Pacifico Mountain, Acton Quadrangles
Township 5N; Range 12W; Sections 22,26,27,28

DUDEK

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

FIGURE 1-2

Records Search

Prairie Song Reliability Project

NATIVE AMERICAN HERITAGE COMMISSION

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

January 27, 2023

Jessica Colston
Dudek

Via Email to: jcolston@dudek.com

Re: [redacted] Dudek No. 14419.02 Project, Los Angeles County

Dear Ms. Colston:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

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

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

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
1/27/2023

Fernandeno Tataviam Band of Mission Indians
Rudy Ortega, Tribal President
1019 Second Street, Suite 1 — Tataviam
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
thcp@tataviam-nsn.us

Morongo Band of Mission Indians
Ann Brierty, THPO
12700 Pumarra Road — Cahuilla, Serrano
Banning, CA, 92220
Phone: (951) 755 - 5259
Fax: (951) 572-6004
abrierty@morongo-nsn.gov

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Road — Cahuilla, Serrano
Banning, CA, 92220
Phone: (951) 755 - 5110
Fax: (951) 755-5177
abrierty@morongo-nsn.gov

Quechan Tribe of the Fort Yuma Reservation
Jill McCormick, Historic Preservation Officer
P.O. Box 1899 — Quechan
Yuma, AZ, 85366
Phone: (760) 572 - 2423
historicpreservation@quechantribe.com

Quechan Tribe of the Fort Yuma Reservation
Manfred Scott, Acting Chairman
Kw'ts'an Cultural Committee
P.O. Box 1899 — Quechan
Yuma, AZ, 85366
Phone: (928) 750 - 2516
scottmanfred@yahoo.com

San Fernando Band of Mission Indians
Donna Yocum, Chairperson
P.O. Box 221838 — Kitanemuk, Vanyume, Tataviam
Newhall, CA, 91322
Phone: (503) 539 - 0933
Fax: (503) 574-3308
ddyocum@comcast.net

San Manuel Band of Mission Indians
Jessica Mauck, Director of Cultural Resources
26569 Community Center Drive — Serrano
Highland, CA, 92346
Phone: (909) 864 - 8933
Jessica.Mauck@sanmanuel-nsn.gov

Serrano Nation of Mission Indians
Mark Cochrane, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (909) 528 - 9032
serranonation1@gmail.com

Serrano Nation of Mission Indians
Wayne Walker, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (253) 370 - 0167
serranonation1@gmail.com

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Dudek No. 14419.02 Project, Los Angeles County.

Roshanne Bakhtiary

From: Roshanne Bakhtiary
Sent: Monday, December 30, 2024 8:49 AM
To: NAHC@NAHC
Subject: DUDEK [redacted] PN 13594.09 SLF Search Request
Attachments: DUDEK_13594.09[redacted]SLF.pdf

Dear NAHC,

Please find attached to this email the NAHC Sacred Lands File Search request with project location map for the [redacted] (Dudek #13594.09) located in unincorporated Los Angeles County, California. Dudek is requesting an NAHC Sacred Lands File Search for any sacred sites, tribal cultural resources, and other places of Native American community value that may fall within a one-mile radius of the proposed project location.

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

Thank you,

Roshanne Bakhtiary
Archaeologist
DUDEK

O: 949 373 8307 **C:** 760 557 0998
dudek.com

Sacred Lands File & Native American Contacts List Request

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

Information Below is Required for a Sacred Lands File Search

Project: Prairie Song Reliability Project

County: Los Angeles

USGS Quadrangle Name: Ritter Ridge, Palmdale, Acton, Pacifico Mountain

Township: 5N **Range:** 12W **Section(s):** 12, 22, 23, 26, 28, 29, 32, 33, 34, 35

Company/Firm/Agency: Dudek

Street Address: 605 3rd Street

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

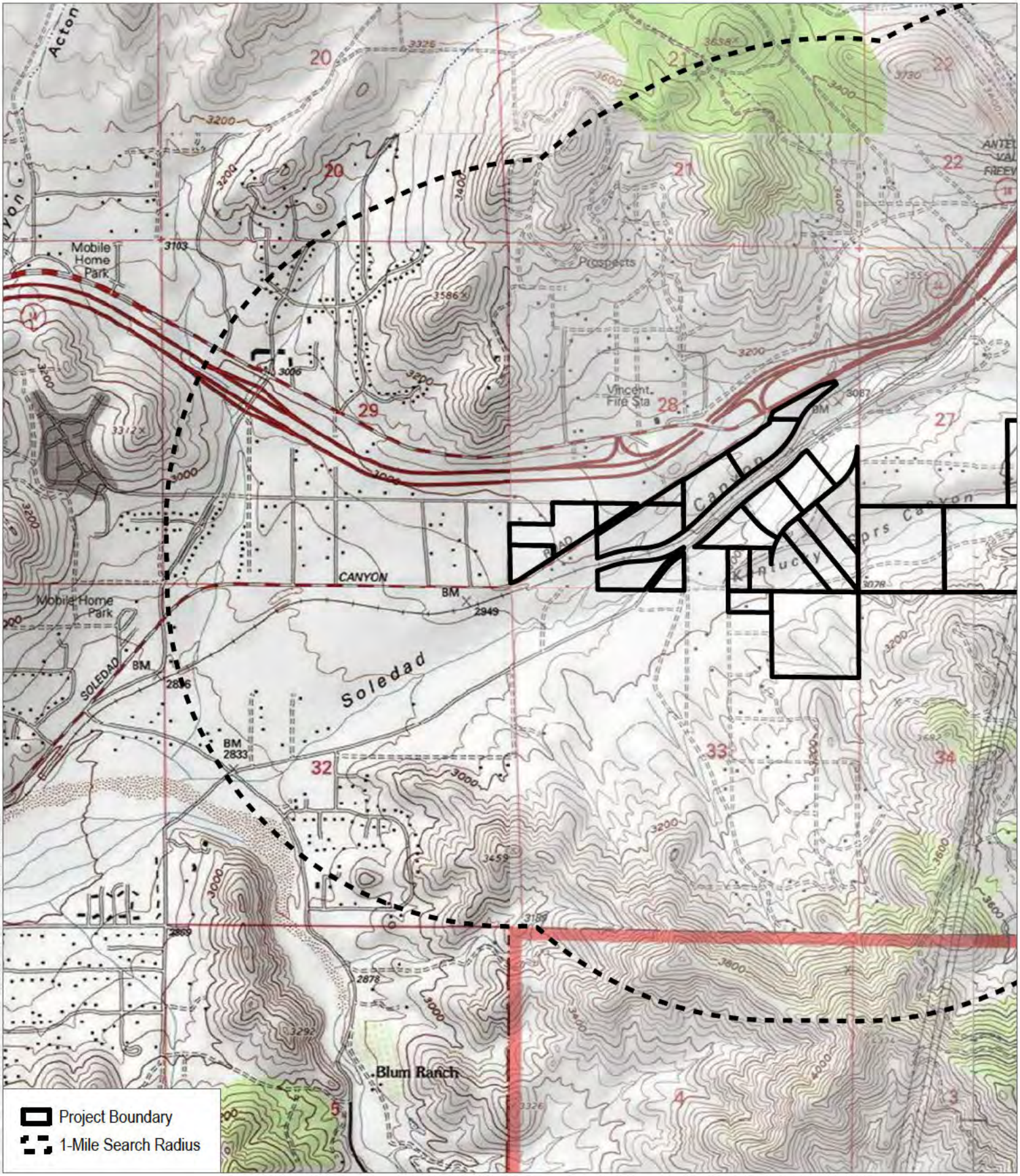
Phone: (760) 557-0998

Fax:

Email: rbakhtiary@dudek.com

Project Description:

The project involves the construction and operation of an up to 1,150-megawatt battery energy storage system located on approximately 83.5 acres of land.



SOURCE: USGS 7.5-Minute Series Ritter Ridge, Palmdale, Acton, Pacifico Mountain Quadrangles

Township 5N| Range 12W| Section 21, 22, 23, 26, 28, 29, 32, 33, 34, 35

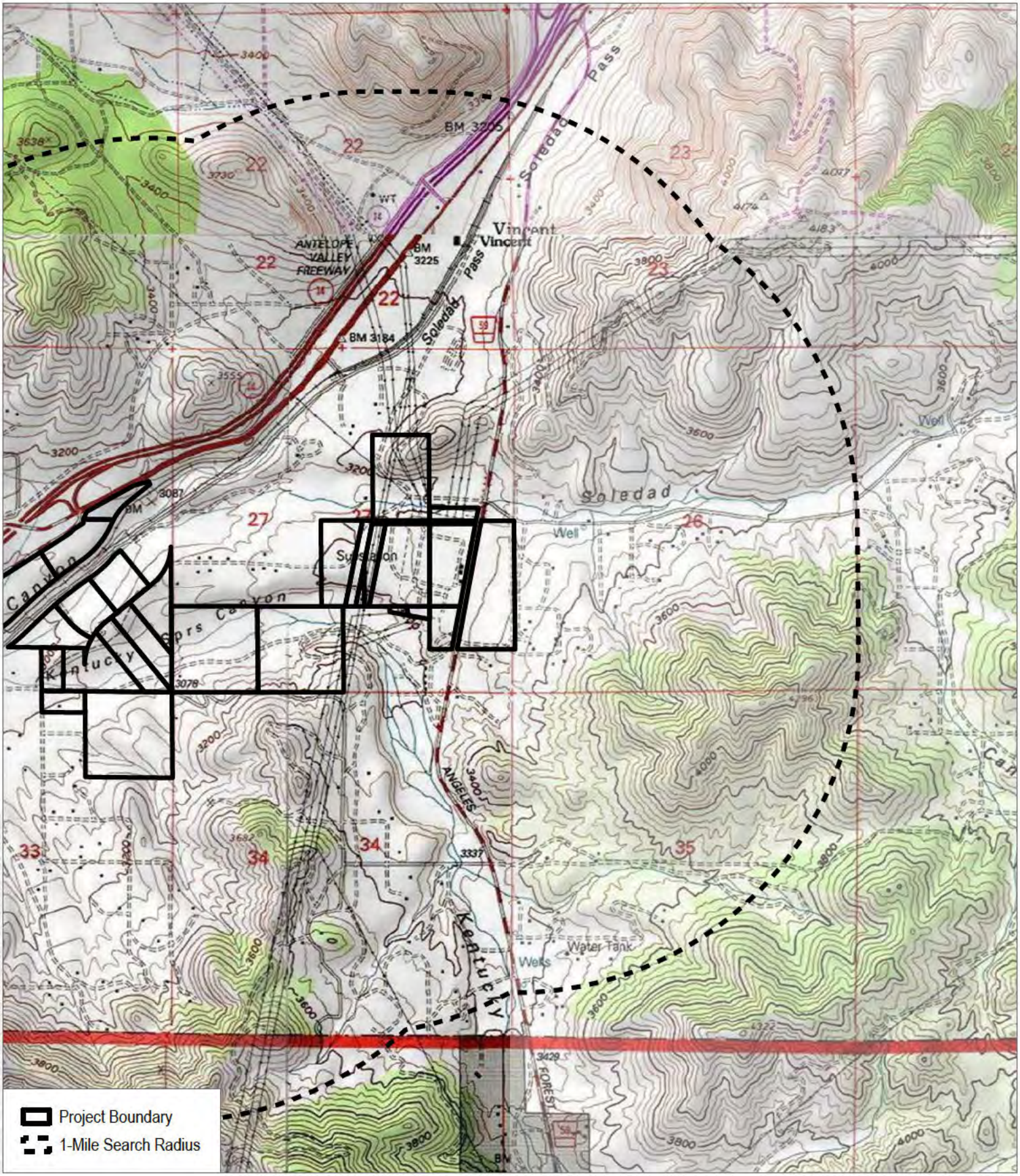
DUDEK

0 1,000 2,000 Feet 0 300 600 Meters 1:24,000

FIGURE 1-1

Records Search

Prairie Song Reliability Project



SOURCE: USGS 7.5-Minute Series Ritter Ridge, Palmdale, Acton, Pacifico Mountain Quadrangles
Township 5N| Range 12W| Section 21, 22, 23, 26, 28, 29, 32, 33, 34, 35

DUDEK

0 1,000 2,000 Feet 0 300 600 Meters 1:24,000

FIGURE 1-2

Records Search

Prairie Song Reliability Project

Roshanne Bakhtiary

From: Green, Andrew@NAHC <Andrew.Green@nahc.ca.gov>
Sent: Thursday, January 16, 2025 11:44 AM
To: Roshanne Bakhtiary
Subject: [redacted]
Attachments: SLF No [redacted] 1.16.2025.pdf; [redacted] 1.16.2025.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning,

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

Regards,

Andrew Green
Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Andrew.Green@nahc.ca.gov
Direct Line: (916) 573-1072
Office: (916) 373-3710

NATIVE AMERICAN HERITAGE COMMISSION

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

January 16, 2025

Roshanne Bakhtiary
Dudek

Via Email to: rbakhtiary@dudek.com

Re: [redacted], Los Angeles County

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

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

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

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
1/16/2025

Tribe Name	F/N	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Fernandeno Tataviam Band of Mission Indians	N	Sarah Brunzell, CRM Manager	1019 Second Street San Fernando, CA, 91340	(818) 837-0794		CRM@tataviam-nsn.us	Tataviam	Kern, Los Angeles, Ventura	5/25/2023
Morongo Band of Mission Indians	F	Robert Martin, Chairperson	12700 Pumarra Road Banning, CA, 92220	(951) 755-5110	(951) 755-5177	abrierty@morongo-nsn.gov	Cahuilla Serrano	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego	
Morongo Band of Mission Indians	F	Ann Brierty, THPO	12700 Pumarra Road Banning, CA, 92220	(951) 755-5259	(951) 572-6004	abrierty@morongo-nsn.gov	Cahuilla Serrano	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego	
Quechan Tribe of the Fort Yuma Reservation	F	Jill McCormick, Historic Preservation Officer	P.O. Box 1899 Yuma, AZ, 85366	(928) 261-0254		historicpreservation@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego	5/16/2023
Quechan Tribe of the Fort Yuma Reservation	F	Manfred Scott, Acting Chairman - Kw'ts'an Cultural Committee	P.O. Box 1899 Yuma, AZ, 85366	(928) 210-8739		culturalcommittee@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego	5/16/2023
Quechan Tribe of the Fort Yuma Reservation	F	Jordan Joaquin, President, Quechan Tribal Council	P.O.Box 1899 Yuma, AZ, 85366	(760) 919-3600		executivesecretary@quechantribe.com	Quechan	Imperial, Kern, Los Angeles, Riverside, San Bernardino, San Diego	5/16/2023
San Fernando Band of Mission Indians	N	Donna Yocum, Chairperson	P.O. Box 221838 Newhall, CA, 91322	(503) 539-0933	(503) 574-3308	dyocum@sfbmi.org	Kitanemuk Vanyume Tataviam	Kern, Los Angeles, San Bernardino, Ventura	5/8/2023

Tribe Name	F/N	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
San Manuel Band of Mission Indians	F	Alexandra McCleary, Senior Manager of Cultural Resources Management	26569 Community Center Drive Highland, CA, 92346	(909) 633-0054		alexandra.mccleary@sanmanuel-nsn.gov	Serrano	Kern, Los Angeles, Riverside, San Bernardino	1/16/2024
Serrano Nation of Mission Indians	N	Wayne Walker, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(253) 370-0167		serranonationl@gmail.com	Serrano	Kern, Los Angeles, Riverside, San Bernardino	10/10/2023
Serrano Nation of Mission Indians	N	Mark Cochrane, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(909) 578-2598		serranonation1@gmail.com	Serrano	Kern, Los Angeles, Riverside, San Bernardino	10/10/2023

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Battery' Energy Storage System Project, Los Angeles County.

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

January 15, 2025 13594.09

Mr. Rudy Ortega, Tribal President
Fernandeno Tataviam Band of Mission Indians
1019 Second Street, Suite 1
San Fernando, CA 91340

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Ortega,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

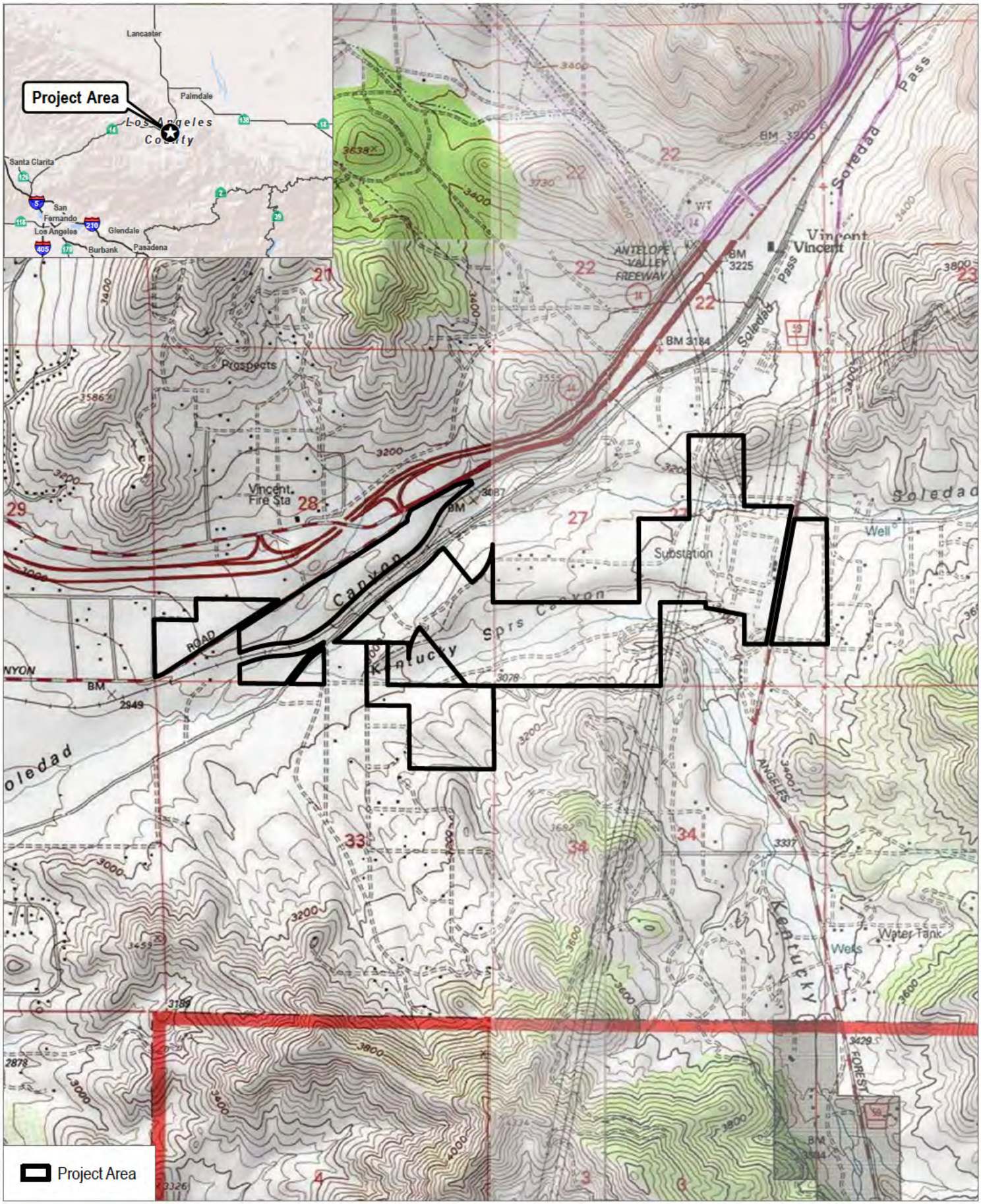
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Martin,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

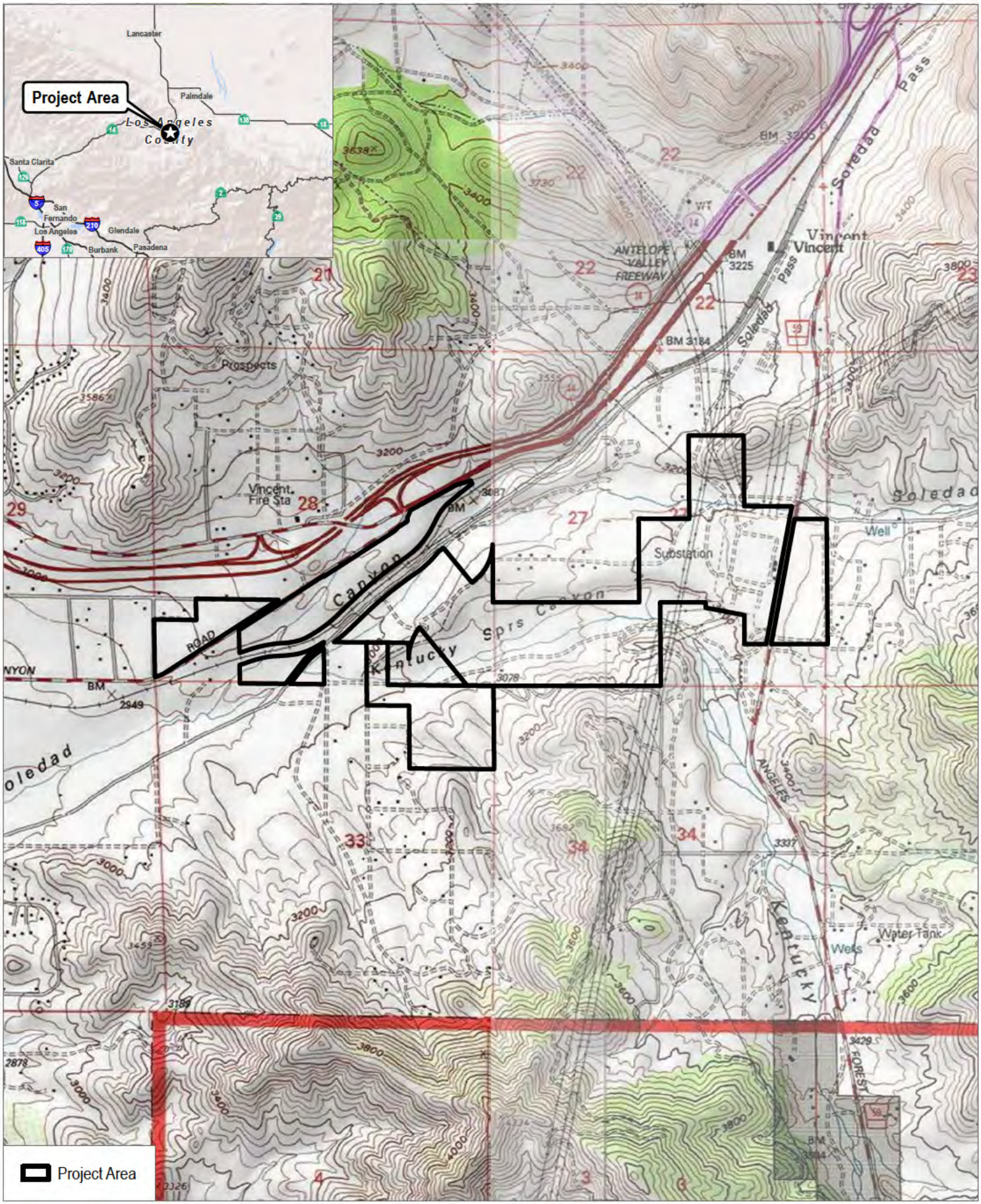
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Ms. Brierty,

[redacted] proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

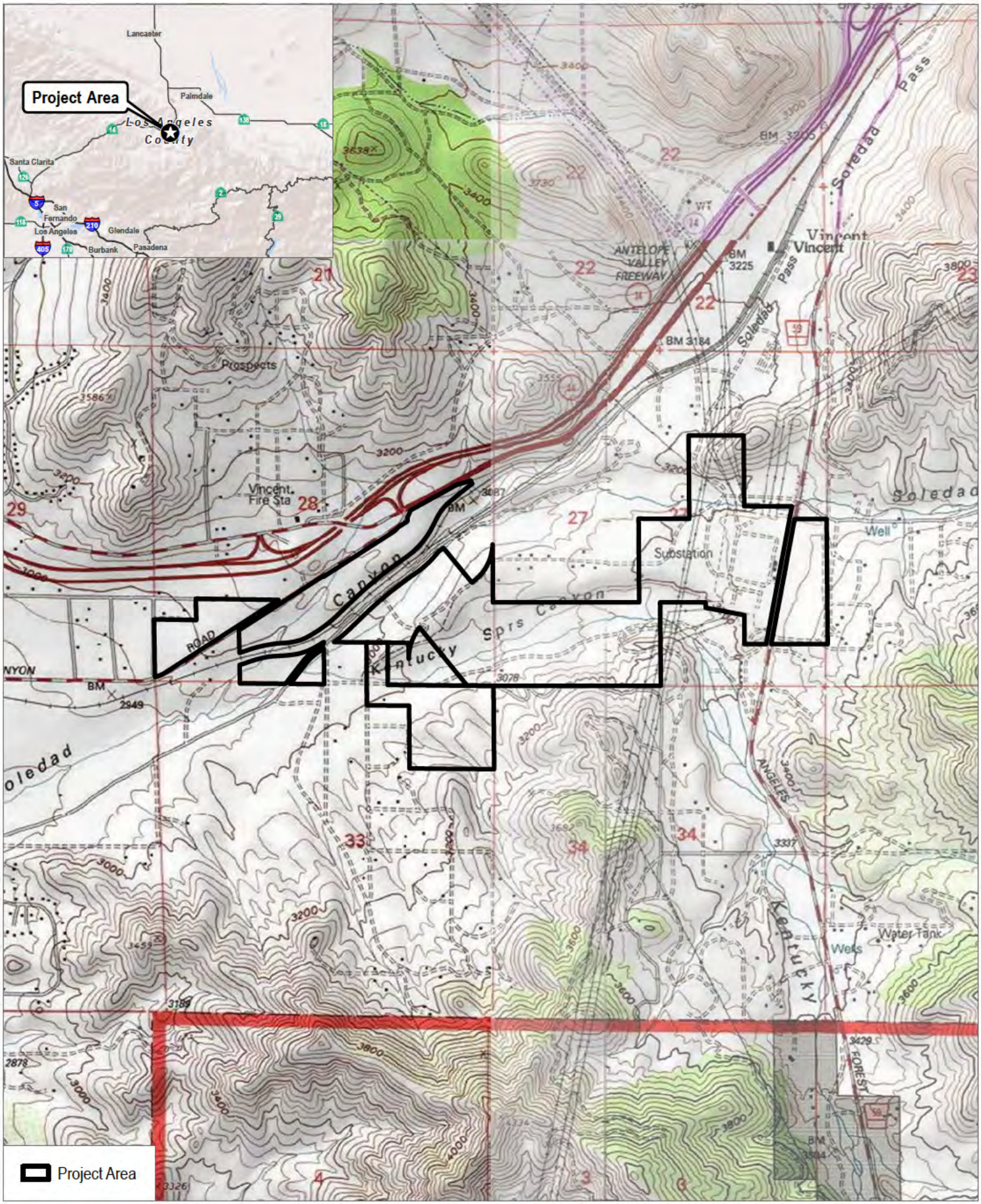
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

Ms. Jessica Mauck, Director of Cultural Resources
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Ms. Mauck,

[redacted] proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

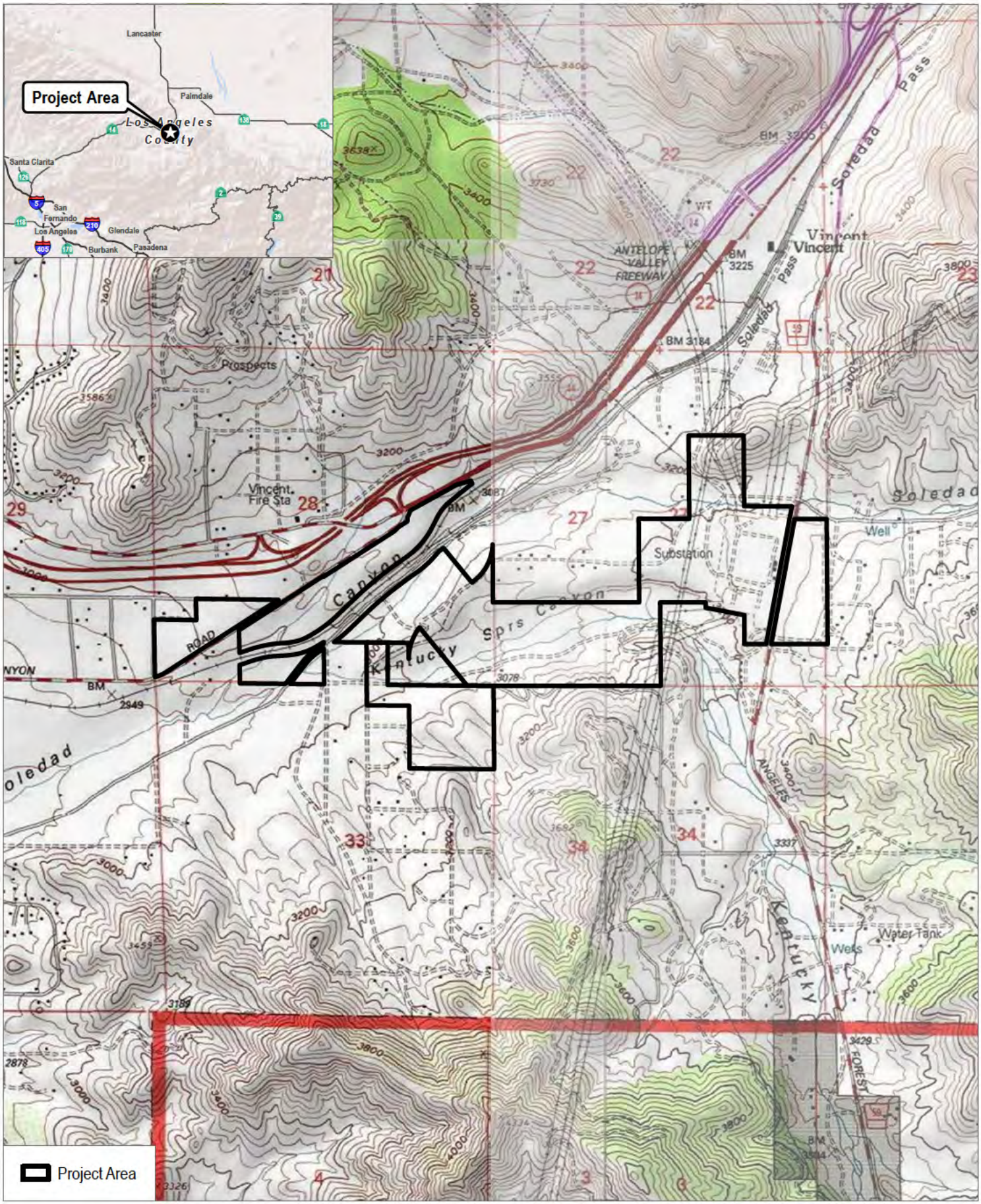
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Scott,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

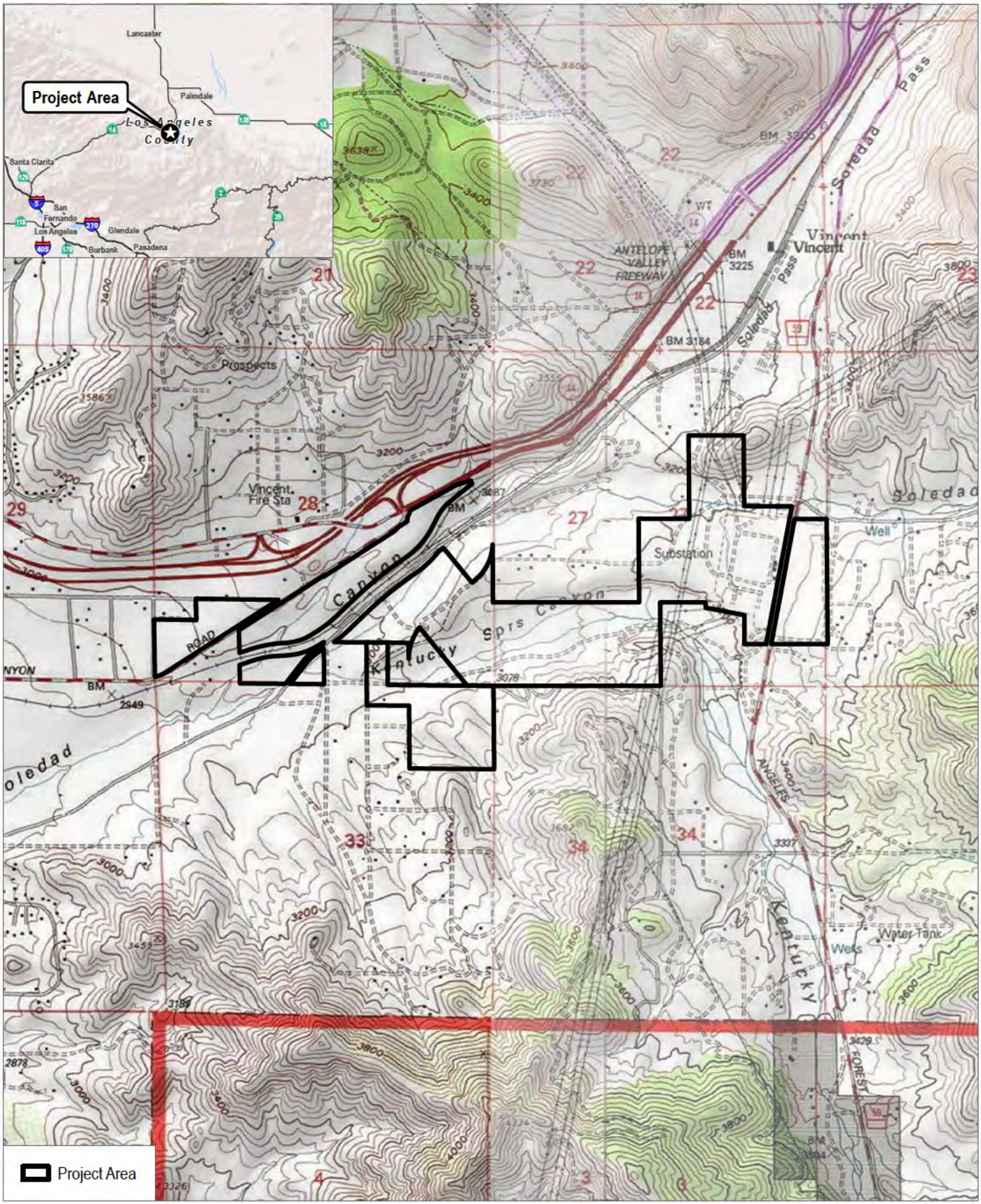
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Ms. McCormick,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

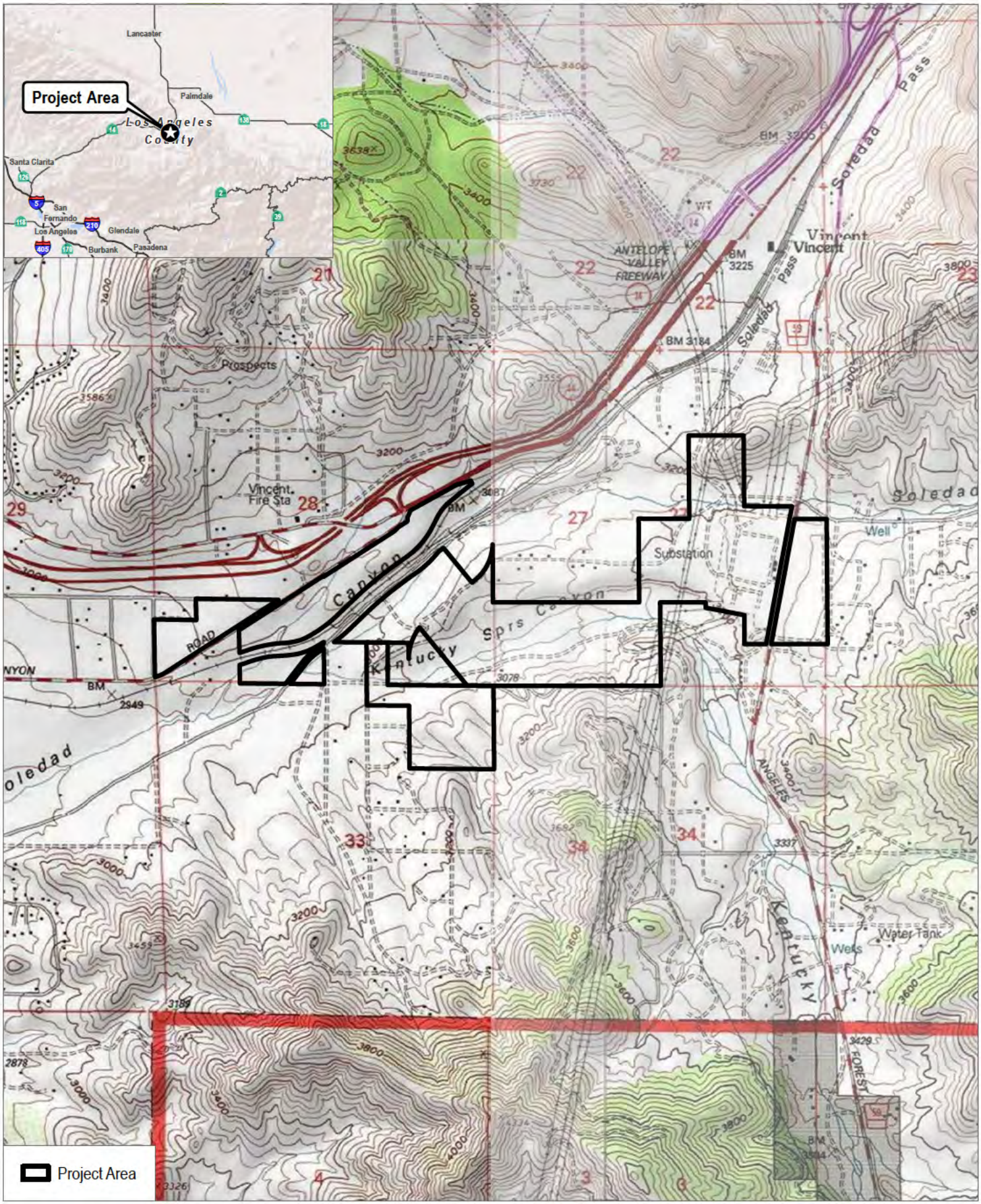
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

Ms. Donna Yocum, Chairperson
San Fernando Band of Mission Indians
P.O. Box 221838
Newhall, CA 91322

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Ms. Yocum,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

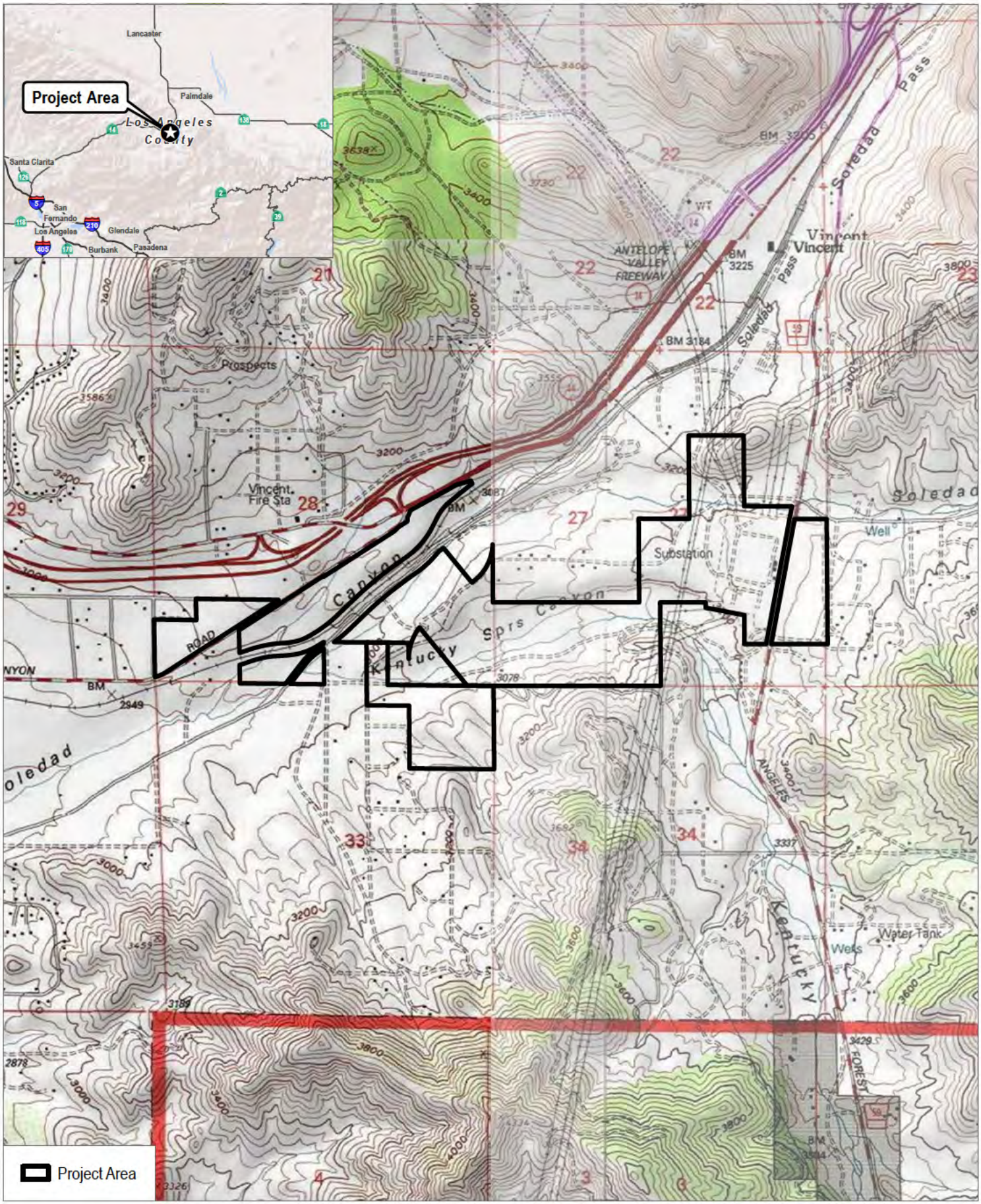
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Walker,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

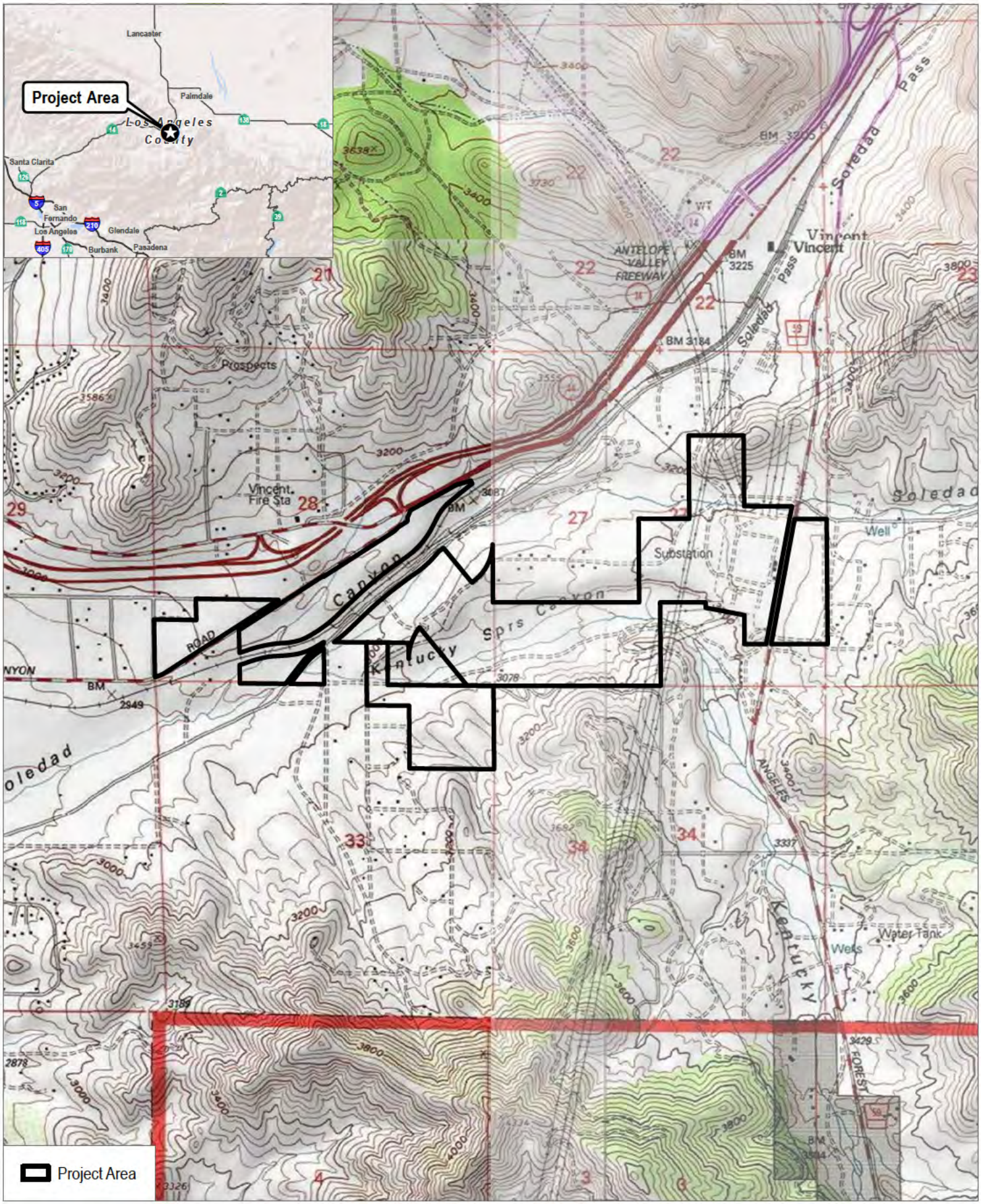
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 15, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Cochrane,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

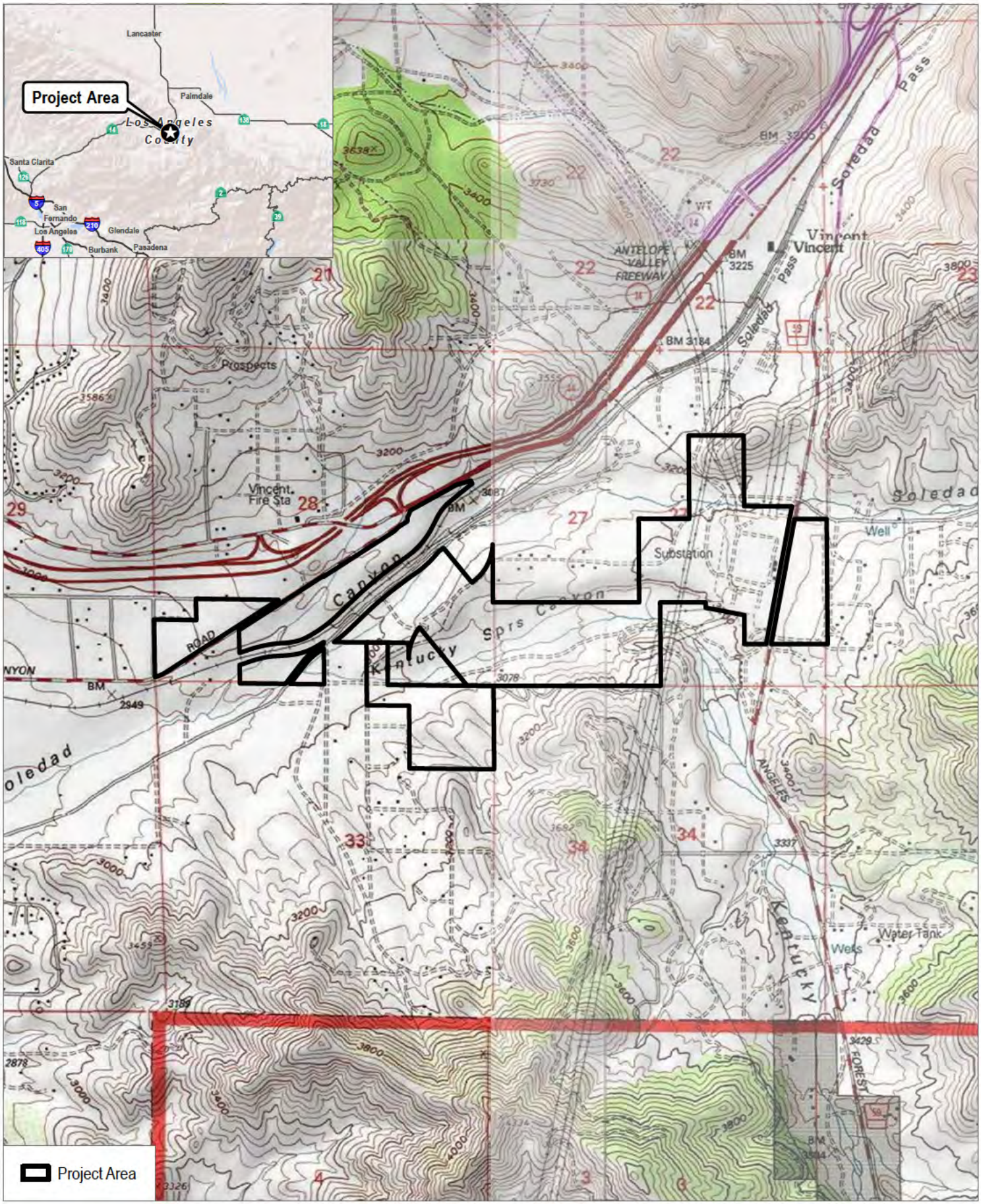
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 20, 2025 13594.09

Ms. Alexandra McCleary, Senior Manager of Cultural Resources Management
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Ms. McCleary,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

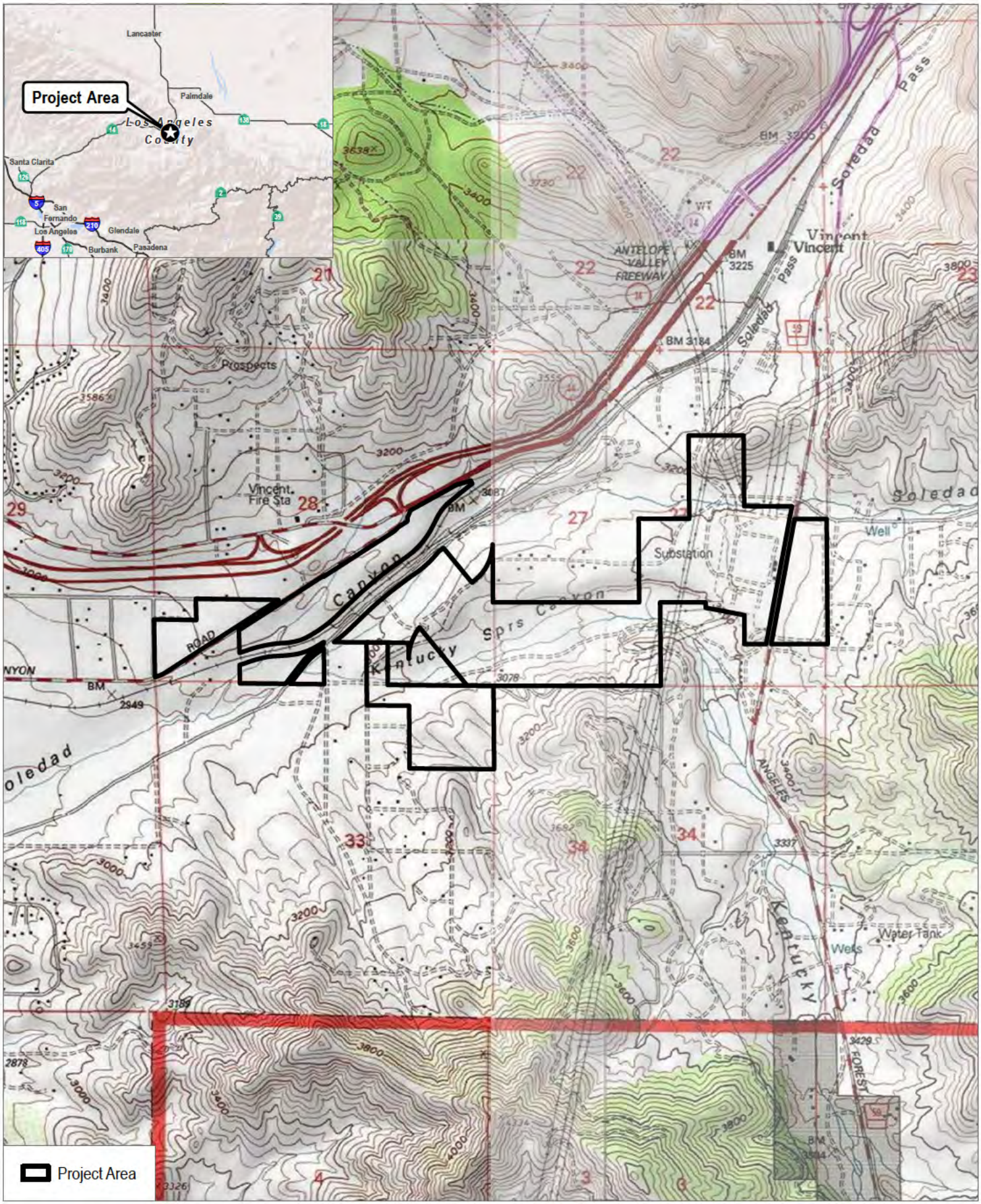
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

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

January 20, 2025 13594.09

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

Subject: Information Request for the Prairie Song Reliability Project, Los Angeles County, California

Dear Mr. Joaquin,

[redacted] LLC proposes to construct, operate, and eventually decommission the up to 1,150-megawatt [redacted] (Project) located on approximately 83.5 acres of land in the unincorporated community of Acton, Los Angeles County, California. Key components of the Project include a battery energy storage system facility, an operations and maintenance building, a Project substation, a 500-kilovolt overhead generation interconnection transmission line, and interconnection facilities within the existing Southern California Edison-operated Vincent Substation. The Project falls within Sections 27, 28, 33 and 34 of Township 5 North and Range 12 West of the Acton and Pacifico Mountain, California U.S.G.S. 7.5-minute Series Quadrangle (see Figure 1, Project Location Map).

As part of the cultural resources study prepared for the Project, Dudek has engaged the Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Tribal representatives and organizations who hold knowledge of cultural resources in or near the proposed Project area. The NAHC emailed a response on January 27, 2023, indicating that the SLF search did not identify the presence of Native American cultural resources within a half-mile radius of the Project area.

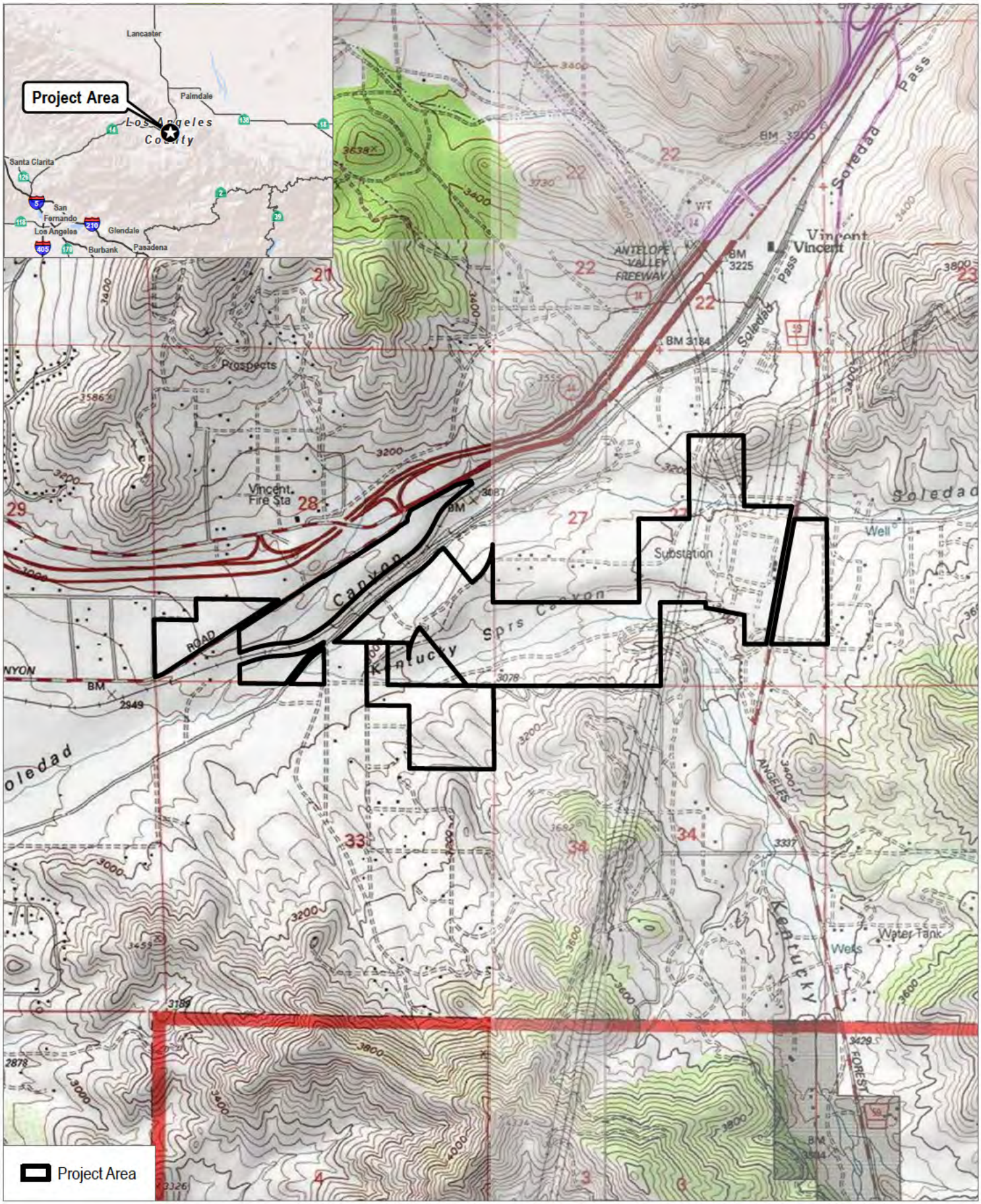
If you have any knowledge of cultural resources within or near the proposed Project area, or questions regarding the Project, please contact me by phone or email. Our engagement with Tribal representatives and organizations is invaluable to ensuring thorough and respectful Project planning.

Please note that this letter is not intended as notification under Assembly Bill 52 (AB 52), which mandates formal consultation with California Native American Tribes under the California Environmental Quality Act (CEQA). Through the AB 52 process, Tribal representatives and organizations seeking notification or consultation regarding the Project must contact the lead agency, the California Energy Commission, in writing pursuant to Public Resources Code Section 21080.3.1 (b).

Respectfully,

Roshanne Bakhtiary, M.A.
Archaeologist
DUDEK
Phone: (760) 557-0998
Email: rbakhtiary@dudek.com

Attachments: *Figure 1. Project Location Map*



SOURCE: USGS 7.5' Series 1:24,000

Acton & Pacifico Quadrangle - Township 5N Range 12W Section 27,28,33,34

DUDEK

0 1,000 2,000 Feet

0 280 560 Meters

FIGURE 1

Project Location

Prairie Song Reliability Project

Roshanne Bakhtiary

From: Raylene Borrego <Raylene.Borrego@sanmanuel-nsn.gov>
Sent: Tuesday, January 21, 2025 5:15 PM
To: Roshanne Bakhtiary
Subject: Response to Information Request: [redacted], Los Angeles County, California

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Dear Roshanne,

Thank you for contacting the San Manuel Band of Mission Indians concerning the above-mentioned proposed project area. San Manuel appreciates the opportunity to review the project documentation received by the Cultural Resources Management Department on January 21st, 2025. Based on our current knowledge, the proposed project site is considered highly culturally sensitive by the Tribe due to its proximity to the Santa Clara River and previously recorded sites.

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

I'd also like to update our point of contact for all matters concerning cultural resources, as Ms. Jessica Mauck is no longer working for SMBMI. The preferred person to contact is:

Alexandra McCleary
Director of Cultural Resources Management
Office: (909) 864-8933 ext. 2023
Work Mobile: (909) 633-0054
Email: Alexandra.mccleary@sanmanuel-nsn.gov

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

Kindly,
Raylene

Raylene Borrego
Cultural Resources Technician
Raylene.Borrego@sanmanuel-nsn.gov
O:(909) 864-8933 x 50-2035
M:(909) 737-3349
26569 Community Center Dr Highland, California 92346

Roshanne Bakhtiary

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Tuesday, January 28, 2025 8:44 AM
To: Roshanne Bakhtiary
Subject: [redacted]

Follow Up Flag: Follow up
Flag Status: Completed

Good morning,
This email is to inform you that the Historic Preservation Office does not wish to comment on this project. We defer to the local Tribes and support their determinations on this matter. Email correspondence is the preferred method of communication with this office. Hard copies of project letters are not required if an email containing the project documents has been sent to the Historic Preservation Office.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

Roshanne Bakhtiary

From: Eunice Ambriz <Eunice.Ambriz@sanmanuel-nsn.gov>
Sent: Wednesday, January 29, 2025 9:54 AM
To: Roshanne Bakhtiary
Subject: Response to Information Request - [redacted], Los Angeles County
Attachments: [redacted]pdf

Good morning,

Could you please provide us with a map/s such as an aerial view of the proposed project area so we can assess the exact location? Please let me know if you have any questions.

Thank you,
Eunice

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

Appendix E
(Confidential) DPR Site Forms