

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



FROM: Economic Development Agency

SUBMITTAL DATE:
May 13, 2010

SUBJECT: Resolution No. 2010-005, Resolution of Necessity Regarding the Timoteo Site for the Public Safety Enterprise Communication Project

RECOMMENDED MOTION: That the Board of Supervisors:

- 1) Consider the attached Addendum with the Final Environmental Impact Report for the County of Riverside's Public Safety Enterprise Communication (PSEC) Project;
- 2) Find that use of the acquisition areas referenced herein will not result in any new significant environmental effects, will not substantially increase the severity of previously identified significant effects and will not necessitate new mitigation measures; and
- 3) Adopt Resolution No. 2010-005.

(Continued on Page 2)

Dan Martinez

Robert Field
Assistant County Executive Officer/EDA
By Dan Martinez, EDA Managing Director

FINANCIAL DATA	Current F.Y. Total Cost:	\$45,400	In Current Year Budget:	Yes
	Current F.Y. Net County Cost:	\$ 0	Budget Adjustment:	No
	Annual Net County Cost:	\$ 0	For Fiscal Year:	09/10
SOURCE OF FUNDS: PSEC Budget			Positions To Be Deleted Per A-30	<input type="checkbox"/>
			Requires 4/5 Vote	<input checked="" type="checkbox"/>

C.E.O. RECOMMENDATION: APPROVE

BY: *Jennifer L. Sargent*
Jennifer L. Sargent

County Executive Office Signature

Policy
 Policy

Consent
 Consent

Dept't Recomm.:
Per Exec. Ofc.:

Prev. Agn. Ref.: 3.52 of 9/2/2008; 3.40 of 04/06/2010 | District: 5

Agenda Number: **9.12**

PROCEDURES APPROVED BY: TANYA S. HARRIS
 COUNTY OF RIVERSIDE, CALIFORNIA
 BY: *Glenn R. Beloit*
 DATE: 6/24/10
 FORM APPROVED COUNTY COUNSEL
 BY: *Glenn R. Beloit*
 DATE: 6/24/10
 Departmental Concurrence

Economic Development Agency

Resolution No. 2010-005, Resolution of Necessity Regarding the Timoteo Site for the Public Safety Enterprise Communication Project

May 13, 2010

Page 2

BACKGROUND:

The County of Riverside currently operates an 800 MHz radio system for Law Enforcement and emergency first responder voice communication that is lacking in coverage and functionality. The current system has a reduced level of radio coverage throughout the County. The County of Riverside's fire and law enforcement agencies currently utilize approximately 21 transmission towers to provide voice and data transmission capabilities to assigned personnel in the field. As currently configured, the system provides voice coverage to only about 60 percent of the County. The communication system now in use is at the end of its useful life, and is no longer adequate to meet the County's voice coverage and capacity needs. Voice coverage is also lacking in geographic areas of the County critical to public safety first responders. Population growth within the County is necessitating the expansion of the voice and data coverage footprint. Additionally, due to increases in the County's emergency first responder radio usage, additional traffic-carrying capacity is required to meet the needs of emergency services personnel to serve the public. The goal of the Public Safety Enterprise Communication (PSEC) project is to replace the current radio system with a new system. The new system's voice coverage will exceed 90% of the geographic area of the County. This expansion of coverage can only be achieved by expanding the associated infrastructure. The new system is urgently needed to ensure the safety of the public, Sheriff's deputies and firefighters.

The main goal of acquiring additional sites for transmission towers is to increase public and responder safety. By expanding the area of radio coverage and increasing signal strength, responders will be able to quickly assist community members, call for assistance, and maintain communications with dispatch.

In order to achieve the functionality goals established by the Riverside County Sheriff's Department and the Riverside County Fire Department (which are listed in the following sentence), the PSEC Project must significantly increase the number of transmission towers from the currently existing number of 21 such towers to the increased number of 75 towers. Adding those additional transmission towers will result in many benefits to the radio transmitting capabilities of County public safety personnel, including an increased geographical coverage area that will cover at least 90% of Riverside County (including recently constructed warehouses, schools, and residential areas); an increased ability to penetrate into buildings and other structures (including specifically into Sheriff's stations, courthouses, jails, the Riverside County Regional Medical Center, dispatch centers, Sheriff administration buildings, and the Riverside County Administrative Center); an increased ability to communicate with the corresponding systems of the Federal government, of other Counties, and of Cities; an increased voice and data-carrying capacity (which among other benefits will result in better voice clarity); and a more dependable system.

Acquisition by the County of the subject two acquisition areas (on Riverside County Assessor's Parcel Number 473-140-001) is needed for the construction of an accessible transmission tower that will provide those listed benefits to a geographical area that (generally) includes the following areas: the Norton Younglove Reserve, the City of Moreno Valley, Redlands Blvd from the 60 freeway North to San Timoteo Canyon Road and portions of Highway 79. It will also provide microwave connectivity necessary to connect Hemet to Box Springs.

BACKGROUND: (Continued)

Specifically, the .98 acre acquisition area is needed for a communications facility including a transmission tower and equipment shelter (the "Communications Site"); and the 1.36 acre acquisition area is needed for an access road that will be used for vehicular access to and from the Communications Site, and for overhead electrical lines that will extend electrical service to the Communications Site (the "Access Road").

Attached to this Form 11 are the legal descriptions of the Communications Site and the Access Road, a map that visually depicts the Communications Site and Access Road, and copies of Riverside County Assessor's Parcel Map Numbers 473-14 and 473-12 (which visually depict APN 473-140-001 and the area surrounding APN 473-140-001). Before choosing the subject Communications Site as the location for the Timoteo transmission tower, the County considered and then rejected eleven alternative locations for that transmission tower. Based upon certain important considered criteria, including the extent of the voice transmission coverage area, the microwave connectivity to other network sites, the proximity of electrical power service to the site, and the proximity of access roads to the site, the availability of an appropriate construction staging platform on the site, the communicability of the site with other sites in the County's system, and the existence of excessive coverage overlap with other sites (including such overlap that would result in interference), the subject Communications Site is the best overall choice for the location of the important Timoteo transmission tower.

On September 2, 2008, the Board of Supervisors approved the PSEC Project and certified the Program Environmental Impact Report (PEIR) prepared for the project. The PEIR has been available to the public for well over a year in both hard-copy and on-line formats. Additional environmental analysis has been performed for the acquisition areas described herein because they were not included in the PEIR. The additional analysis establishes that use of the acquisition areas will not result in any new significant environmental effects, will not substantially increase the severity of previously identified significant effects and will not necessitate new mitigation measures. An addendum to the PEIR has been prepared which references the additional analysis. The addendum and additional analysis are attached hereto and incorporated herein by this reference.

The Economic Development Agency (EDA) has presented an offer to the property owner of Assessor's Parcel Number 473-140-001, as required by Government Code Section 7267.2. The price offered is consistent with current property values in the Badlands area based on an independent appraisal report. EDA has also offered to pay the reasonable costs, not-to-exceed \$5,000 as required by California Code of Civil Procedure Section 1263.025, for the property owner to obtain their own independent appraisal.

Although negotiations are still in progress, settlements have not been reached with the property owner. In order to ensure timely acquisition of the property, it is necessary to initiate initial steps of condemnation and it is recommended that the Board of Supervisors approve the resolution of necessity regarding the Timoteo site near Redlands Boulevard in the Badlands area of Riverside County.

The County is authorized to acquire property by eminent domain under various authorities, including Article 1, Section 19 of the California Constitution; Section 25350.5 of the

Economic Development Agency
Resolution No. 2010-005, Resolution of Necessity Regarding the Timoteo Site for the Public
Safety Enterprise Communication Project
May 13, 2010
Page 4

BACKGROUND: (Continued)

Government Code; and Sections 1240.010, 1240.020, 1240.030, 1240.040, 1240.110,
1240.410, 1240.510, and 1240.610 of the Code of Civil Procedure.

The attached Resolution has been reviewed and approved by County Counsel as to legal form.

FINANCIAL DATA:

The following summarizes the estimated funding necessary for the acquisition of the required
portion of Assessor's Parcel Number 473-140-001:

Appraised Value:	\$45,400
------------------	----------

All costs associated with this property acquisition are fully funded in the PSEC budget for FY
2009/10. Thus, no additional net county cost will be incurred as a result of this transaction.

Resolution No. 2010-005

Resolution of Necessity Regarding
the Timoteo site for the Public Safety Enterprise Communication Project

WHEREAS, the portions of real property that are the subjects of this Resolution (collectively the "Subject Properties") are located in unincorporated Riverside County, California; are portions of a larger parcel of real property that is presently designated as Riverside County Assessor's Parcel Number 473-140-001; are located in the general vicinity of the intersection of Redlands Boulevard and Timoteo Canyon Road; are legally described and pictorially depicted in the papers attached hereto as Exhibits "A" and "B" (and incorporated herein by this reference); and are referred to on attached Exhibits "A" and "B" as the "Communications Site" or the "SITE" (the "Communications Site") on the one hand, and as the "Access Road" or the "30' ACCESS EASEMENT" (the "Access Road") on the other hand;

WHEREAS, the proposed project that is the subject of this Resolution (the "Proposed Project") is known as the County of Riverside's Public Safety Enterprise Communication Project and is one to replace the County's presently existing public safety communication system (for public safety personnel including the County's fire and law enforcement agencies) with a new and improved such system that will provide communication coverage over a wider geographical area, that will provide additional carrying capacity for voice and data transmission, and that will provide other benefits over and above the presently existing system;

WHEREAS, the Communications Site will be used for a communications facility including a transmission tower and equipment shelter (and for other uses incidental to the Proposed Project and required by the Proposed Project);

1 WHEREAS, the Access Road will be used for vehicular access to and from the
2 Communications Site, for overhead electrical lines to extend electrical service to the
3 Communications Site, and for other uses incidental to the Proposed Project and required by
4 the Proposed Project;

5 WHEREAS, the interests in property that are the subjects of this Resolution (collectively
6 the "Subject Property Interests") are: (a) fee simple ownership of the Communications Site;
7 and (b) a perpetual non-exclusive easement in the Access Road; and

8 WHEREAS, the statutes that authorize the County of Riverside to acquire the Subject
9 Property Interests by eminent domain include Article 1, Section 19 of the California
10 Constitution; Section 25350.5 of the Government Code; and Sections 1240.010, 1240.020,
11 1240.030, 1240.040, 1240.110, 1240.410, 1240.510, and 1240.610 of the Code of Civil
12 Procedure.

13 Now, therefore, BE IT RESOLVED AND ORDERED by the Board of Supervisors of the
14 County of Riverside, State of California, not less than four-fifths of all members concurring, in
15 regular session assembled on June 29, 2010, that this Board finds and determines each of
16 the following:

17 1. Notice of the Board's intention to adopt this resolution of necessity was duly given
18 as required by Section 1245.235 of the Code of Civil Procedure and, on the date and at the
19 time and place fixed for hearing, this Board did hear and consider all of the evidence
20 presented;

21 2. The public interest and necessity require the Proposed Project;

22 3. The Proposed Project is planned and located in the manner that will be most
23 compatible with the greatest public good and the least private injury;

24 4. The Subject Property Interests are necessary for the Proposed Project;

25

1 5. The offer required by Section 7267.2 of the Government Code has been made to
2 the owners of record of the Subject Properties; and

3 6. To the extent that the Subject Properties are already devoted to a public use, the
4 use of the Proposed Project is a compatible use that will not unreasonably interfere with or
5 impair the continuance of the public use as it presently exists or may reasonably be expected
6 to exist in the future (California Code of Civil Procedure Section 1240.510) or the use of the
7 Proposed Project is a more necessary public use than is the presently existing public use
8 (California Code of Civil Procedure Section 1240.610).

9 BE IT FURTHER RESOLVED AND ORDERED that the County Counsel of the County
10 of Riverside (and any associated private attorneys) are hereby authorized and empowered:

11 1. To acquire (in the name of the County) the Subject Property Interests by
12 condemnation in accordance with the Constitution and laws relating to eminent domain.

13 2. To prepare and prosecute in the name of the County such proceedings in the
14 proper court having jurisdiction thereof as are necessary for such acquisition.

15 3. To make an application to the Court for an order to deposit the probable
16 amount of compensation out of proper funds under the control of the County into the County
17 Treasury and for an order permitting the County to take prejudgment possession and use the
18 Subject Property Interests for the purpose of constructing the Proposed Project.

19 4. To compromise and settle such proceedings if such settlement can be reached
20 and, in that event, to take all necessary actions to complete the acquisition, including
21 stipulations as to judgment and other matters and the causing of all payments to be made.

JRF:ra
5/11/10
052IT
13.042

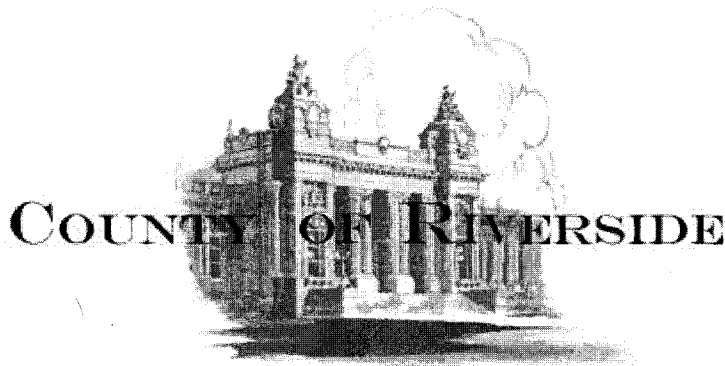
FORM APPROVED COUNTY COUNSEL
BY: Glenn Beloin 6/24/10
 GLENN R. BELOIAN DATE

**Public Safety Enterprise Communication Project
Program Environmental Impact Report
Addendum No. 1
Timoteo Communication Site**



**County Administrative Center
4080 Lemon Street, Fifth Floor
Riverside, California 92501**

June 22, 2010



Board of Supervisors

District 1	Bob Buster 951-955-1010
District 2	John F. Tavaglione 951-955-1020
District 3	Jeff Stone 951-955-1030
District 4	John Benoit 951-955-1040
District 5 <i>Chairman</i>	Marion Ashley 951-955-1050

Public Safety Enterprise Communication (PSEC) Project Program Environmental Impact Report Addendum No. 1 Timoteo Communication Site

Background

On September 2, 2008, the Riverside County Board of Supervisors adopted the Program Environmental Impact Report (PEIR) for the Public Safety Enterprise Communication (PSEC) project. The PEIR assessed the environmental impacts likely to result from the construction and operation of up to 65 communication sites throughout Riverside County and adjoining areas of San Bernardino, San Diego, and Orange Counties.

The findings of the PEIR are hereby incorporated by reference into this addendum. The PEIR determined that the environmental impacts associated with the project would be less than significant for the majority of the environmental issues that were analyzed. This finding was based on the fact that all of the PSEC sites are virtually identical and would have the same types of impacts regardless of where they were located. Issues found to result in either No Impact or a Less Than Significant Impact With No Mitigation Required were as follows:

- Agricultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities
- Climate Change

For several issue areas, the PEIR determined that potential impacts warranted the imposition of a number of standard mitigation measures. These measures were applicable to all of the sites, regardless of location. Issues found to result in a finding of Less Than Significant With Mitigation Required were as follows:

- Air Quality
- Biological Resources
- Cultural Resources
- Hydrology and Water Quality

For one issue area, aesthetics, the PEIR determined that feasible mitigation to lessen the project's impacts in this regard was not available, and that the project's impact for this issue would be unavoidable and adverse.

Despite the project's potential unavoidable and adverse impact to aesthetic resources, the County determined that the project would provide specific safety benefits, increased communication, and other advantages that outweighed the unavoidable adverse environmental impacts of the project, such that those impacts were considered acceptable. The benefits were defined as follows:

- 1) Completion of the project will increase emergency communication coverage in the County from 60 percent to 95 percent of the County's land area for emergency service personnel and their cooperators;
- 2) The increased communication coverage will provide immeasurable benefits for all residents within the County. With better coverage, there will be adequate communication capability during emergency incidents (including wildfires, earthquakes, large-scale releases of hazardous substances, and other natural or man-made disasters) that cross jurisdictional boundaries or require multiple-agency cooperation;
- 3) The project will provide a secure voice and data communication network that is not dependent upon commercial facilities for its operation;
- 4) The collocation of PSEC sites will reduce the number of individual communication sites that would otherwise be required if each agency were to construct their own separate facilities; and
- 5) When weighed against the potential for significant loss of life and property resulting from deficiencies in current communication coverage, the resulting impacts from the proposed project are quite minimal.

Based on the identified benefits of the proposed project, and pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15093, the County adopted a Statement of Overriding Considerations for the project's potential unavoidable adverse impacts to aesthetics.

Allowance for Modification and Expansion

The PEIR imposed a number of standard mitigation measures that were applicable to all of the sites. However, at the time of the PEIR's adoption, certain design details and a final location for a number of the sites had not been finalized. To provide for such a contingency, the PEIR prescribed mitigation measures to be implemented if a site or its supporting components (access roads, power alignments, etc.) were to be relocated to an area that had not been surveyed and/or assessed as part of the PEIR. This programmatic approach was adopted to allow modifications to project design without the need for recirculation of the PEIR. Specific measures prescribed in the PEIR required the County to determine that the impacts associated with the proposed relocation were consistent with the analysis and findings of the PEIR. Specific performance measures were adopted to identify the analysis necessary to make this determination. Those measures were contained in a number of mitigation measures, as follows:

Biological Resources

MM BR-1c If any construction related to the proposed project, such as access roads, is anticipated to occur outside of the area surveyed for the June 3, 2008 Habitat Assessment Report, then additional habitat assessments shall be conducted by

a qualified biologist prior to development to evaluate potential impacts. If these expanded surveys find that sensitive biological resources are present in the area to be impacted, then appropriate measures consistent with applicable laws and policies in effect at the time of the survey shall be undertaken to avoid or mitigate identified impacts. If the expanded surveys do not find sensitive biological resources in the area to be impacted, then development may then commence unimpeded within the parameters of applicable laws and policies governing such development.

MM BR-5a A consistency analysis shall be prepared for all sites governed by the Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP). This analysis may be presented as a master document that incorporates analysis for all of the sites rather than separate documents for each site. Regardless of the manner in which the analysis is presented, the development of each site must be found consistent with the WRMSHCP by the Regional Conservation Authority (RCA) and payment of the mandatory mitigation fee must be submitted prior to the site's development. Payment of the fee and a determination of consistency with the requirements of the WRMSHCP is intended to provide full mitigation under CEQA, National Environmental Policy Act, California Endangered Species Act, and Federal Endangered Species Act for impacts to the species and habitats covered by the WRMSHCP.

MM BR-5b If a site is located within a Criteria Cell as defined in the WRMSHCP, then the County shall enter into a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process with the Riverside County Environmental Planning Department (EPD) or the appropriate WRMSHCP participant. Once the HANS application is deemed complete, a HANS Criteria Determination Letter shall be issued. The application and letter must then be reviewed and accepted by the Regional Conservation Authority prior to site development.

Cultural and Paleontological Resources

MM CR-1a In the event that ground-disturbing activities extend beyond the limits of a 300-foot buffer from the surveyed site, then additional archaeological studies must be completed to determine whether historical properties or significant archaeological resources will be affected by the proposed construction plans. Ground disturbing activities may consist of, but are not limited to trenching for electrical power, creation of access roads, or access road improvements. The extent of these additional archaeological studies would be determined based upon the nature of the proposed construction plans beyond a 300-foot radius of the surveyed location. If these expanded surveys find that sensitive properties or resources are present in the area to be impacted, then appropriate measures consistent with applicable laws and policies in effect at the time of the survey shall be undertaken to avoid or mitigate identified impacts. If the expanded surveys do not find sensitive properties or resources in the area to be impacted, then development may then commence unimpeded within the parameters of applicable laws and policies governing such development.

MM CR-2a In the event that ground-disturbing activities occur at sites identified in Table 4.5-3 of the DEIR as potentially significant extend beyond the limits of a

300-foot buffer from the identified site, then additional studies may need to be completed to determine whether paleontological resources, sites or unique geologic features will be affected by the proposed construction plans. Ground-disturbing activities may consist of, but are not limited to, trenching for electrical power and creation of access roads or access road improvements. The extent of these additional studies shall be undertaken by a qualified individual, and would be determined based upon the nature of the proposed construction plans beyond a 300-foot radius of the identified and surveyed site. Should that determination conclude that additional study is necessary, then the reviews prescribed in Mitigation Measure CR-2b shall be undertaken. If the determination concludes that additional study is not necessary, then all mitigation efforts may cease.

MM CR-2b If required by the findings of Mitigation Measure CR-2a, then a Paleontological Literature Review and Records Check should be requested from an accredited institution, such as the Division of Geologic Sciences at the San Bernardino County Museum (SBCM), to determine whether there are any known paleontologic localities (sites) located within or near the project area. If the results of this review indicate that there are known localities within the project area, or within a 1-mile radius, and a qualified vertebrate paleontologist recommends a paleontological-monitoring program, then the program prescribed in Mitigation Measure CR-2c shall be implemented. If the results of this records check indicate that there are no known localities within the project area or within a 1-mile radius, and a qualified vertebrate paleontologist does not recommend a paleontological-monitoring program, then any and all additional mitigation efforts may cease.

MM CR-2c If required by the findings of Mitigation Measure CR-2b, a paleontological-monitoring program shall be established and implemented. This monitoring plan should include monitoring in sediments assigned moderate, moderate-to-high, or high paleontologic sensitivity through the literature review and records check. This mitigation-monitoring program should commence with a meeting between the contracted paleontologist and the development crew. This meeting will serve to educate the crew on when monitoring activities should begin at the site. Full-time monitoring should commence at the modern ground surface, unless otherwise indicated by a qualified vertebrate paleontologist, and should continue until the project paleontologist determines that the overall sensitivity of the area has been reduced from high or moderate to low, as a result of mitigation monitoring. Should the monitor determine that there are no paleontological resources within the impacted areas, or should the sensitivity be reduced from high or moderate to low during monitoring, all monitoring may cease.

Timoteo Communication Site Relocation

Since adoption of the PEIR in September 2008, it has been determined that the originally proposed Timoteo Communication Site location is not feasible due to construction-related constraints. Specifically, the original site is located on a narrow ridge with steep drop-offs on either side. Access to the site would be via a narrow dirt roadway atop this ridge and adequate room at the proposed construction site is not available for staging, construction, and heavy

equipment access to occur simultaneously. In addition, soils at the site do not possess sufficient bearing strength to adequately support the proposed tower. As such, the proposed Timoteo site had to be relocated to an area without these constraints that could still meet the site's critical radio coverage objectives along Redlands Boulevard and locations within Moreno Valley to the south.

The alternative site is located approximately 0.35 mile east of Redlands Boulevard within the San Timoteo Badlands. It is located approximately 0.47 mile southeast of the original location. It shares similar characteristics to the original location in that it is located in the San Timoteo Badlands, it possesses the same vegetation and habitat characteristics, it is in the same soil unit as the original location, and contains similar visual features. Exhibits are included as Appendix A of this addendum that show the alternative site's location and photographs of the site and surrounding area. An existing dirt roadway provides access to the site, and commercial power is available nearby that can be routed along the access road to the site. Since this new proposed site was not assessed in the PEIR, the County has undertaken the biological, cultural, and paleontological resources assessment work required as part of the above mitigation measures. The relevant reports are attached to this addendum and the findings are summarized as follows:

Biological Resources

As per the mitigation measures related to biological resources noted above (MM BR-1c, MM BR-5a, and MM BR-5b), a Habitat Assessment and WRMSHCP Consistency Analysis was prepared and submitted to the RCA for review and approval. The Consistency Analysis and the RCA's Consistency Determination are attached to this addendum as Appendix B.

The RCA found that the proposed action at the relocated Timoteo Communication Site was consistent with WRMSHCP requirements and that development of the proposed project will not prevent the County of Riverside from achieving the conservation goals of the WRMSHCP. No adverse environmental effects from project implementation were identified. WRMSHCP fees will be paid during the standard construction permitting process. Based on these findings, it can be determined that the proposed relocated Timoteo Communication Site is consistent with the findings contained in the PEIR, which determined that the project will not have a significant impact in regards to biological resources. As such, further action related to biological resources is not required.

Cultural Resources

As per the mitigation measure related to cultural resources noted above (MM CR-1a), a records search and a pedestrian cultural resources survey was conducted for the Area of Potential Effect (APE) of the proposed site. A report that outlines the results of these efforts is attached to the addendum as Appendix C. The results of the records search indicated that no known and previously recorded cultural resources are located within the project area, and two resources are known within one mile. However, those resources are located more than 0.5 miles from the project area and will not be affected by construction. During the pedestrian survey, no prehistoric archaeological resources were observed, and one historic-age site was detected (Site Timoteo 001). In compliance with standard professional protocols, Site Timoteo 001 was recorded onto a Department of Parks and Recreation (DPR) 523 Form and was submitted to the Eastern Information Center. Upon evaluation, it was determined that Site Timoteo 001 is not a significant historical or archaeological resource pursuant to CEQA.

Therefore, the creation and submittal of the DPR 523 Form for this resource fully suffices for mitigating potential impacts associated with the proposed project.

The results of the records search, the negative results for significant cultural resources during the pedestrian survey, and the disturbed nature of the soils within the project area render it unlikely that significant and intact subsurface resources will be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

Paleontological Resources

As per the mitigation measures related to paleontological resources noted above (MM CR-2a, MM CR-2b, and MM CR-2c), a records search and a pedestrian paleontological resources survey was conducted on the project site. A report that outlines the results of these efforts is attached to the addendum as Appendix D. The findings of the records search indicated that the site has a high potential to contain significant paleontological resources. However, impacts to these resources can be fully mitigated with the implementation of a paleontological monitoring program during construction, followed by protocol recovery and curation of any resources that may be unearthed during construction. Implementation of these recommendations as well as implementation of the mitigation measures contained in the PEIR will render the project's impact to paleontological resources as less than significant. As such, the proposed relocated Timoteo Communication Site is consistent with the findings contained in the PEIR, which determined that the project will not have a significant impact in regards to paleontological resources, provided that appropriate mitigation is followed.

Determination of Findings

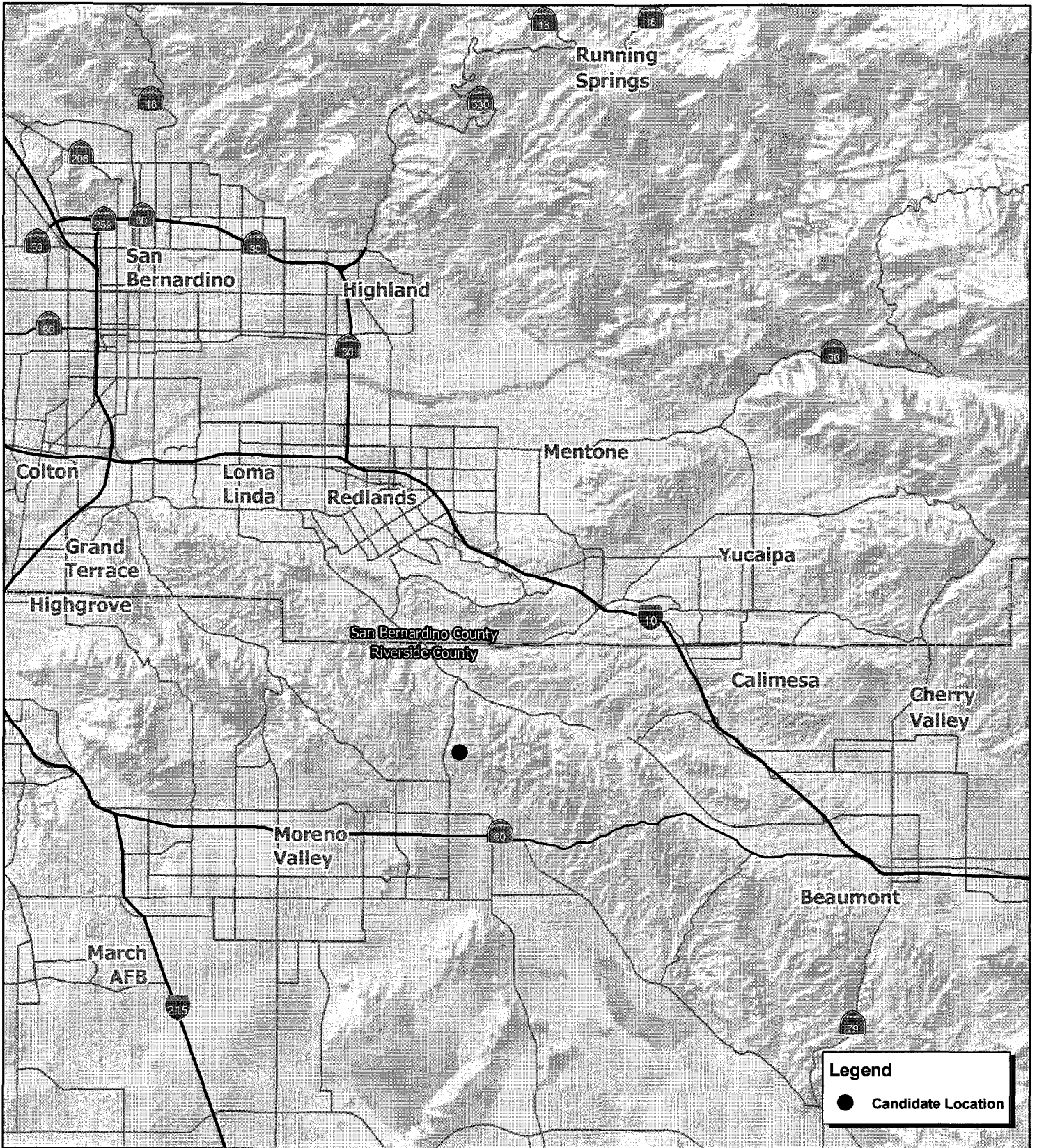
Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Timoteo Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and

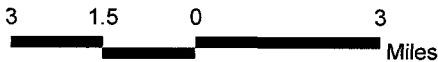
- c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

Appendix A – Communication Site Exhibits

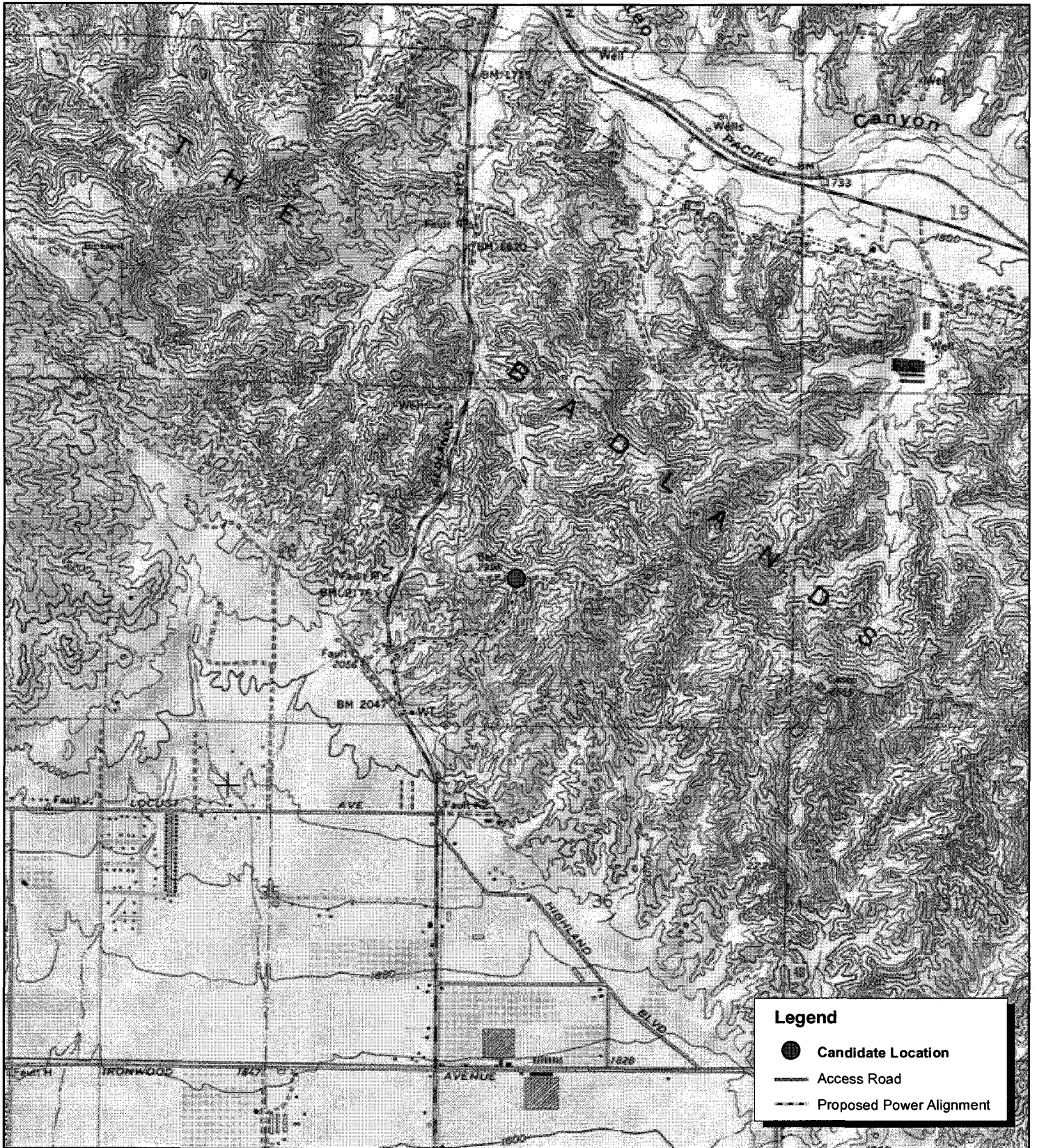


Source: ESRI.

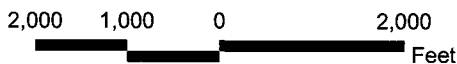


Timoteo Communication Site Regional Location Map

COUNTY OF RIVERSIDE
PUBLIC SAFETY ENTERPRISE COMMUNICATION PROJECT

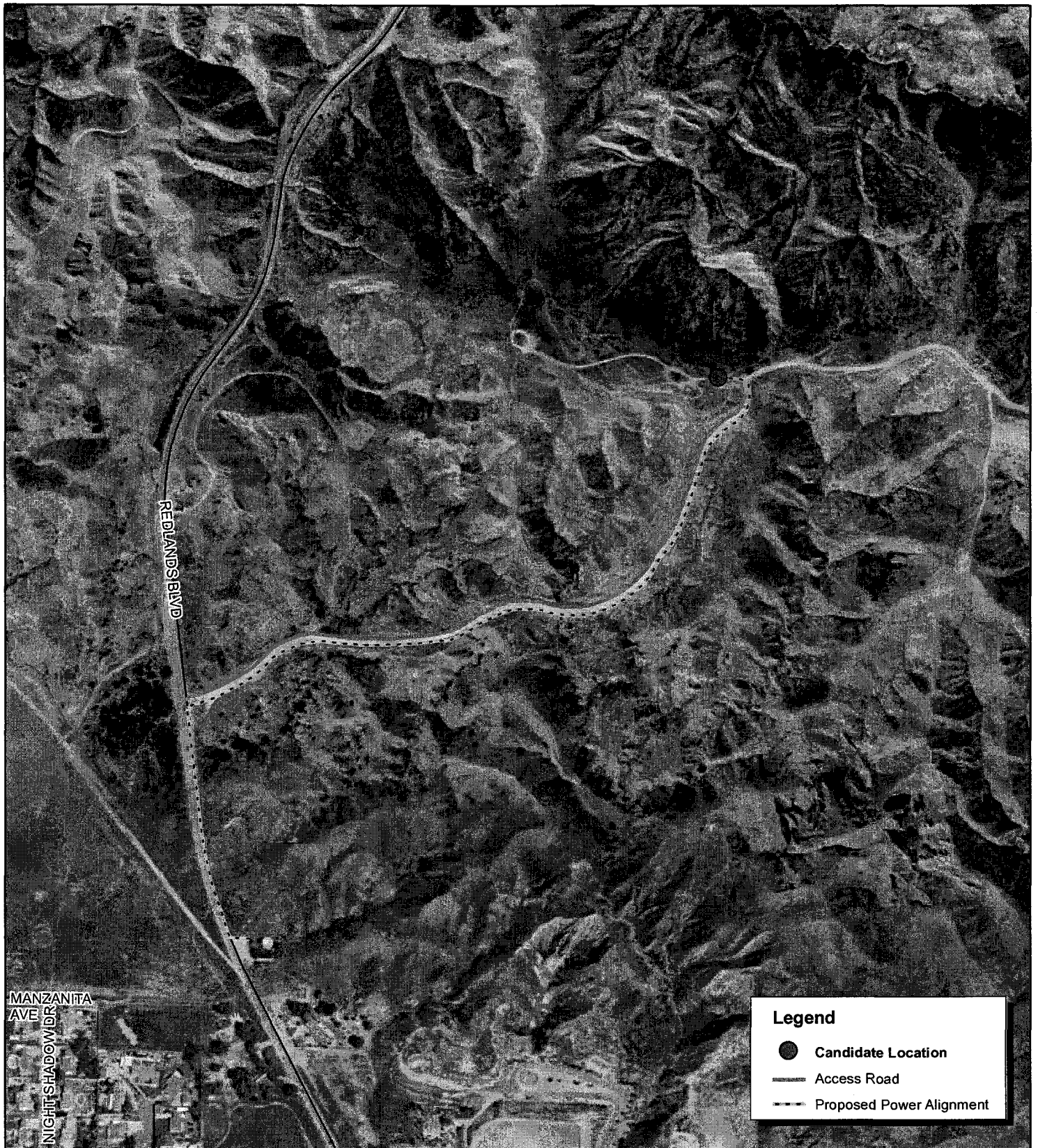


Source: Sunnymead 7.5' USGS Topographic Map, ESRI.

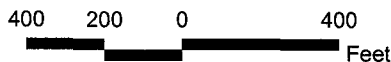


Timoteo Communication Site Local Vicinity Topographic Map

COUNTY OF RIVERSIDE
PUBLIC SAFETY ENTERPRISE COMMUNICATION PROJECT

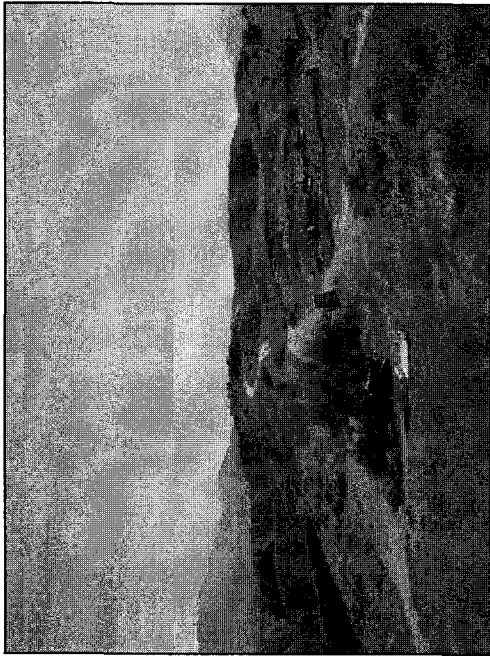


Source: ESRI.

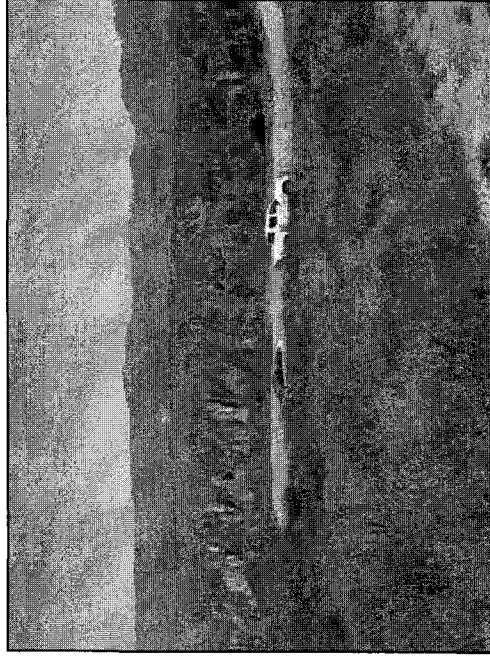


Timoteo Communication Site Local Vicinity Aerial Map

COUNTY OF RIVERSIDE
PUBLIC SAFETY ENTERPRISE COMMUNICATION PROJECT



Photograph 1: Overview of the Timoteo candidate location, facing east.



Photograph 2: View of the Timoteo candidate location, facing north. Tower location represented by parked vehicles.



Photograph 3: View of the Timoteo candidate location, facing southeast.



Photograph 4: View of the Timoteo candidate location, facing west.

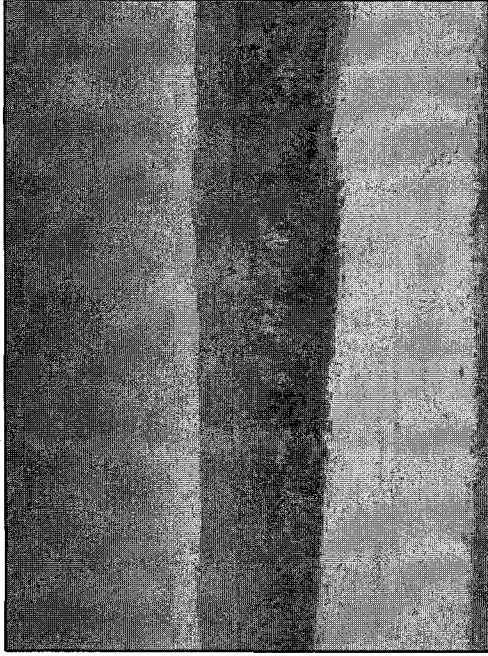
Source: PBS&J, 2010.



Timoteo Communication Site Photographs 1 to 4 PSEC Project



Photograph 5: View from the Timoteo candidate location, facing east.



Photograph 6: View from the Timoteo candidate location, facing north.



Photograph 7: View from the Timoteo candidate location, facing south.



Photograph 8: View from the Timoteo candidate location, facing west.

Source: PBS&J, 2010.



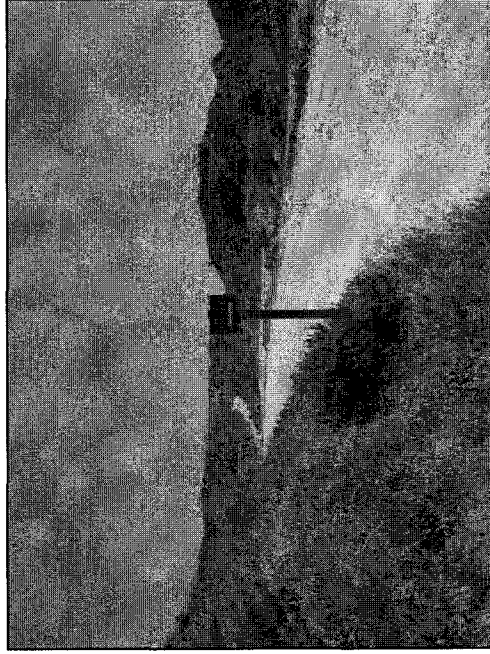
Timoteo Communication Site Photographs 5 to 8 PSEC Project



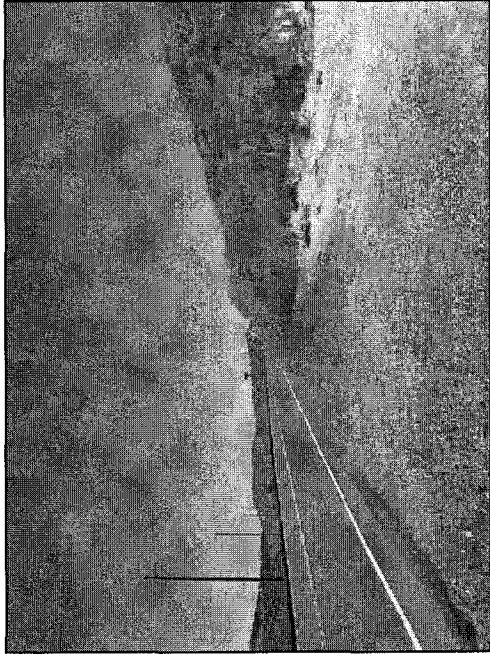
Photograph 9: Overview of existing access road and proposed power alignment, facing north.



Photograph 10: Overview of existing access road and proposed power alignment, facing east.



Photograph 11: View of access road and proposed power alignment from the intersection with Redlands Boulevard, facing northeast.



Photograph 12: View of proposed power alignment taken from near the Water Tank on Redlands Boulevard, facing north.

Source: PBS&J, 2010.



Timoteo Communication Site Photographs 9 to 12 PSEC Project

Appendix B – Biological Resources Assessments

**WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES
HABITAT CONSERVATION PLAN
CONSISTENCY ANALYSIS**

**For
County of Riverside
San Timoteo Public Safety Enterprise Communication Project**

**Approximately 2.5 Acre Project Site in San Timoteo Canyon
North of Locust Avenue and East of Redlands Boulevard
APNs: 473-120-010 and 473-140-001
Sections 25 and 26, Township 2 South, Range 3 West**

Survey Date: February 10, 2010

Prepared February 11, 2010 by:

**Chad Young
Ecological Resources Specialist
Riverside County Environmental Programs Department
(951) 955-8159
cmyoung@rctlma.org**

PROJECT OVERVIEW

The County of Riverside is required to implement a new public safety communication system in accordance with the adoption of Resolution 2008-379 by the Riverside County Board of Supervisors. The County's fire and law enforcement agencies currently utilize approximately 20 communication sites to provide voice and data transmission capabilities to assigned personnel in the field. As currently configured, the system provides coverage to only about 60 percent of the County. The communication system now in use is at the end of its useful life, and is no longer adequate to meet the County's coverage and capacity needs. Population growth within the County is necessitating the expansion of the communication system coverage area. Additionally, due to increases in the County's radio usage, additional traffic-carrying capacity is required to meet the needs of emergency services personnel to serve the public.

The Public Safety Enterprise Communication (PSEC) project is the expansion of the system's capabilities and its associated infrastructure. The new system is urgently needed to ensure the safety of the public, Sheriff's deputies and firefighters.

The proposed San Timoteo Communications project would include the grading of a 0.98 acre pad, utilize an existing access road within an existing 30-foot wide access easement (approximately 1.36 acres), and install power poles which would also be located along the southern boundary of the existing 30-foot wide access easement. The 0.98 acre pad would support a 100-foot communications tower and a 12-foot by 26-foot prefabricated equipment shelter. The communications tower and equipment shelter will be situated within a fenced area measuring 65-feet by 65-feet.

MSHCP REVIEW

The following Western Riverside County Multiple Species Habitat Conservation Plan (WRCMSHCP) Consistency Analysis, includes habitat assessments for burrowing owl (*Athene cunicularia*) Nevin's barberry, (*Berberis nevinii*), smooth tarplant (*Centromadia pungens*), and round-leaved filaree (*Erodium macrophyllum*).

The review of these two parcels includes an analysis of consistency with Sections 6.1.2, 6.1.3, 6.1.4, and 6.3.2 of the WRCMSHCP. The subject parcels are within the survey area for burrowing owl (*Athene cunicularia*) Nevin's barberry (*Berberis nevinii*), smooth tarplant (*Centromadia pungens*), and round-leaved filaree (*Erodium macrophyllum*). Given that these parcels do occur within WRMSHCP Criteria Cells, a Criteria Analysis is required.

The proposed project and supporting biological documentation shall be submitted by the Riverside County Economic Development Agency (EDA) to the Regional Conservation Authority (RCA) for WRCMSCHP consistency review under the Joint Project Review (JPR) process.

INTRODUCTION and METHODOLOGY:

This site was visited by Riverside County Environmental Programs Department (EPD) personnel, Chad Young at 9:40 AM on Wednesday, February 10, 2010. Surveys were conducted by walking 30-foot interval transects throughout the property and the buffer area and adjacent lands were visually inspected. The burrowing owl habitat assessment was conducted in accordance with the Burrowing Owl Survey Instructions for the WRCMSHCP dated March 29, 2006. Prior to the site assessment, EPD conducted a review of the California Natural Diversity Data Base (CNDDDB) for sensitive species observed in the vicinity and aerial photos of the general area of the site.

SITE CONDITIONS: Location, Weather, Topography and Soils

The approximately 2.5-acre study area is located half a mile north of Locust Avenue and east of Redlands Boulevard in Section 25 and 26, Township 2 South, Range 3 West. The proposed project site is within APNs 473-140-001 and 473-120-010 located north of the City of Moreno Valley. The proposed project footprint is located within WRCMSHCP Criteria Cells 652 and 653 (See Appendix C). Weather conditions during the site visit were cool with 10% cloud cover. Winds onsite were very mild and temperatures were between 42 and 54 degrees Fahrenheit. The site is located half a mile north of Locust Avenue and east of Redlands Boulevard, north of the City of Moreno Valley (Appendix A). The elevation of the study area is approximately 2,400 feet above sea level. Topography of the site is extremely rugged and extensive with steep sided canyons and evidence of regular sloughing. The soils present consist of Badland, based on the USDA soil survey. Land use in the vicinity consists of undeveloped open space in all directions. The study area shows evidence of a recent burn event. In addition to the burn, the study area is subject to heavy disturbances associated with off-road vehicle use and illegal dumping. The project site is characteristic of the surrounding land with no current land use other than open space. Photos were taken of the entire site and can be found in Appendix C.

OBSERVATIONS: Vegetation and Wildlife**Vegetation**

The vegetation on the study area consists of sparse scattered shrubs with heavily disturbed stands of ruderal forbs and non-native grasses; the vegetation is too sparse to constitute a coastal sage scrub plant community. The plant species observed include sugar bush (*Rhus ovata*), brittlebush (*Encelia farinosa*), deerweed (*Lotus scoparius*), chaparral yucca (*Yucca whipplei*), California aster (*Lessingia filaginifolia* var. *californica*), common sunflower (*Helianthus annuus*), Russian thistle (*Salsola kali*), black mustard (*Brassica nigra*), and slender wild oat (*Avena barbata*). All the sugar bush specimens observed were regrowth following the burn event.

Wildlife

Wildlife activity was low during the survey. Wildlife species observed includes house finch (*Carpodacus mexicanus*). Also, evidence of pocket gopher (*Thomomys* sp.) occurred across the study area. Species expected to occur are those common in heavily disturbed, mixed scrub-grassland habitats, such as desert cottontail (*Sylvilagus audubonii*), western fence lizard (*Sceloporus occidentalis*), and mourning dove (*Zenaida macroura*).

MULTIPLE SPECIES HABITAT CONSERVATION PLAN AREA (MSHCP)**MSHCP CELL CRITERIA:**

The proposed project study area is less than 2.5 acres. The majority of the project footprint consists of the existing access road, and therefore the only proposed new disturbance will occur within the .98 acre pad, and isolated drill holes for power lines. Additionally, the nature of the proposed project will produce very few edge effects and is very compatible with surrounding conservation. As discussed later in this document under Urban/Wildland Interface Guidelines, the project will in no way reduce wildlife movement through, or degrade the quality of life in habitat in the surrounding area.

The project is located within MSHCP Criteria Cell 652 and 653 which are part of Cell Group T. Cell Group T is located within Reche Canyon/Badlands Area Plan, Sub Unit 3 – Badlands North. Cell Group T is made up of approximately 32, 160-acre Criteria Cells and is roughly 4,500 acres in size. According to Table 3-12 of the MSHCP, conservation within Cell Group T “will contribute to assembly of Proposed Core 3 (See Appendix D). Conservation within this Cell Group will be connected to chaparral, coastal sage scrub, and grassland, Riversidean alluvial fan sage scrub and water habitat.” Additionally, “conservation within this Cell Group will range from 80%-90% of the Cell Group focusing in the central portion of the Cell Group.” Given the fact that land within Subunit 3 is mostly undeveloped, and recent acquisitions by the RCA in this area, both within, and adjacent to, this subunit; there is a strong likelihood that conservation goals will be met within this area. Due to the vast amount of available conservation acreage, and relatively minute project footprint, the proposed project would not conflict with the Reserve Assembly, and is therefore consistent with MSHCP Cell Criteria.

Section 6.1.2 Riverine/Riparian Areas:

The project site and surrounding area supports several drainage features consistent with Riparian/Riverine Habitat as it is defined in Section 6.1.2 of the MSHCP. These features have been mapped with the project footprint (Appendix B), and will be avoided by the proposed project. Soils onsite are coarse and easily drained and thus not conducive for the development of vernal pools or ponding for fairy shrimp habitat. The site does not contain vernal pools, ephemeral ponds or other human modified depressions. This analysis shall satisfy Section 6.1.2 of the MSHCP.

Section 6.1.3 Narrow Endemic Plant Species:

There are no surveys required for any narrow endemic plant species on this site in accordance with Section 6.1.3 of the MSHCP. Visual inspection of the site located neither rare plant species nor the potential to support rare plant species. This analysis shall satisfy Section 6.1.3 of the MSHCP.

Section 6.14 Urban/Wildlands Interface Guidelines (UWIG):

According to the MSHCP, the Urban/Wildlands Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. The proposed project site is located within Criteria Cells 652 and 653 of Cell Group T. The Urban/Wildlands Interface Guidelines, as discussed below, will be incorporated into the project to ensure that direct project-related impacts, including drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development, are avoided or minimized.

Drainage

The proposed communication tower will not generate any changes in existing conditions of storm water runoff. The small nature of the site and the minimal impervious structures proposed will minimize alterations to existing sheet flow.

A Storm Water Pollution Prevention Plan (SWPPP) was prepared for the project that provided for specific Best Management Practices (BMPs) to be implemented at each site. Implementation of BMPs will minimize undesirable runoff associated with construction of each site.

Toxics

According to the MSHCP, measures shall be incorporated to ensure that application of chemicals does not result in discharge to the MSHCP Conservation Area. During construction, some potentially hazardous materials (fuels, oils, etc.) will be present on the site. An Emergency Response Plan (ERP) has been compiled for the project and provides for containment actions that must be undertaken in the event of a spill or other accident. All construction activities will take place within the County's purchase/lease area. Additional impacts will not encroach upon the Conservation Area.

During project operation, the only hazardous material that will be located on the site will be propane. No pesticides, herbicides, or other materials will be utilized. Propane will be held within a pressurized tank. Propane is a regulated material, and compliance with existing regulations regarding its handling and storage will minimize the potential for impacts in this regard.

Lighting

The proposed project includes a motion activated security light which includes a down shielded design. This will minimize light spill onto adjacent areas and will therefore not interfere with wildlife movement in the area.

Noise

Construction-related noise will be mitigated consistent with the County's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be tuned and equipped with mufflers. Once operational, the only noise from the site will be from operations of the HVAC units mounted on the equipment shelter. The noise generated from these units will be minimal and will not interfere with wildlife in the area.

Invasive Plant Species

Plant species acceptable for the project's landscaping must not be considered an invasive species pursuant to Table 6.2 of the MSHCP. The proposed project does not include landscaping so there will be no impacts in this regard.

Barriers

The proposed project includes a chain link fence surrounding the compound to prevent access by wildlife and unauthorized persons. The fenced compound will be small and non-linear in nature. Therefore, the compound will not interfere with wildlife movement through the area.

Grading/Land Development

The project has been designed to keep all manufactured slopes within the boundaries of the development footprint and will not encroach into the open space/MSHCP Conservation Area.

Fuels Management

Fuels management focuses on hazard reduction for humans and their property. According to the Fuel Management Guidelines, for new development that is planned adjacent to the MSHCP Conservation Area or other undeveloped areas, brush management shall be incorporated in the development boundaries and shall not encroach into the MSHCP Conservation Area. No fuel modification zone is planned for this project.

Section 6.3.2 Criteria Area Species Surveys:

The proposed project site is located within the MSHCP survey area for burrowing owl, Nevin's barberry and smooth tarplant; therefore, habitat assessments were conducted and described below. These additional surveys for the abovementioned species were required in conjunction with MSHCP implementation to achieve coverage for these species. These survey requirements provide a level of information necessary to receive adequate coverage as defined in the MSHCP.

Animal Species

Burrowing owls use a variety of natural and modified habitats for nesting and foraging that is typically characterized by low growing vegetation. Burrowing owl habitat includes native and non-native grassland, shrub lands with low vegetation, earthen berms, pastureland, and man-made structures. In addition, burrowing owl burrows are the most important component to burrowing owl habitat. Burrowing owls do not typically create their own burrows but utilize burrows made by fossorial mammals like ground squirrels and badgers. Man-made structures such as rock piles, debris piles, agricultural ditches, and culverts also provide suitable burrows for burrowing owls.

A burrowing owl habitat assessment was conducted the morning of February 10, 2010, to evaluate the site's potential to support burrowing owls. The subject property and adjacent 100-foot buffer area was systematically searched for burrowing owl habitat and any burrows potentially suitable for burrowing owl. The 100-foot buffer area was visually inspected for signs of burrowing owls with binoculars since access to adjacent parcels was not obtained. The project site is dominated by steep sage scrub habitat that has been subject to different levels of disturbance.

This site supports poor nesting habitat for burrowing owl due to a lack of suitable burrows and squirrel activity. The few small mammal burrows observed on site were significantly undersized, approximately 2" in diameter, and likely only support small burrowing rodents. The site does not contain suitable habitat for nesting thus additional focused surveys are not required. **Plant Species**

The study area is located within an area identified by the WRCMSCHP as requiring a habitat assessment for Nevin's barberry (*Berberis nevinii*), a state and federally-listed endangered species provisionally covered by the WRCMSHCP, round-leaved filaree (*California macrophylla*), and smooth tarplant (*Centromadia pungens* ssp. *laevis*), both CNPS listed species provisionally covered by the WRMSHCP. None of the species were observed within the study area. Suitable habitat for Nevin's barberry was observed on the study area; however, no Nevin's barberry was observed on or in the vicinity of the study area. Nevin's barberry is a large, perennial plant species that is readily identifiable and easily visible outside of the species' blooming period. Therefore, no impacts to Nevin's barberry will occur. Additionally, no suitable habitat for round-leaved filaree or smooth tarplant was observed on or adjacent to the study area and no impacts to the species will occur.

CONCLUSION:

The proposed project would not preclude MSHCP Reserve Design and would have very limited impacts on surrounding conservation lands. The site does not currently support suitable habitat for burrowing owl (*Athene cunicularia*), smooth tarplant (*Centromadia pungens*), or round-leaved filaree (*Erodium macrophyllum*). Additionally, Nevin's barberry (*Berberis nevinii*) was not observed and is considered absent from the project site. While the project vicinity does support Riparian/Riverine features, these areas will be avoided and therefore the project is consistent with Section 6.1.2 of the MSHCP.

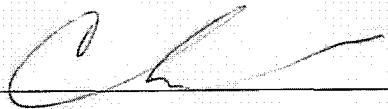
Based on the habitat assessment and the analysis contained herein, the proposed project is consistent with the WRCMSHCP and no further surveys and/or additional mitigation measures beyond payment of MSHCP Mitigation Fees are required.

Development of the proposed project will not prevent the County of Riverside from achieving the conservation goals of the MSHCP.

CERTIFICATION:

I hereby certify that the statements furnished above and in the attached exhibits present the information required for this biological evaluation and the statements provided are true and correct to the best of my knowledge and belief.

DATE: 3/1/16

SIGNED: 

REFERENCES:

California Department of Fish & Game. 2009. California Natural Diversity Data Base

Clarke, Oscar. 2007. Flora of the Santa Ana River & Environs. Heyday Books

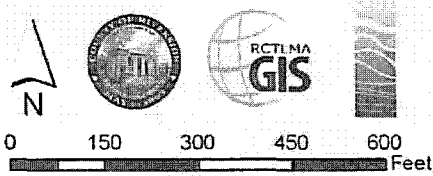
Dudek & Associates. 2003. Western Riverside County Multiple Species Habitat Conservation Plan

Natural Resources Conservation Service Web Soil Survey. 2008.
<http://websoilsurvey.nrcs.usda.gov/app/>

National Geographic. 1999. National Geographic Field Guide to the Birds of North America (3rd Edition)

APPENDIX A – Project Site

San Timoteo Communication Site

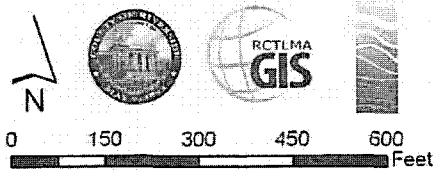





Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.

Created by J. MacNeil on February 17, 2010
\\Agency\Imagis\Workspace\MacNeil\EPD\SanTimoteo\Site\lap.mxd

APPENDIX B – Riparian/Riverine Mapping

San Timoteo Communication Site

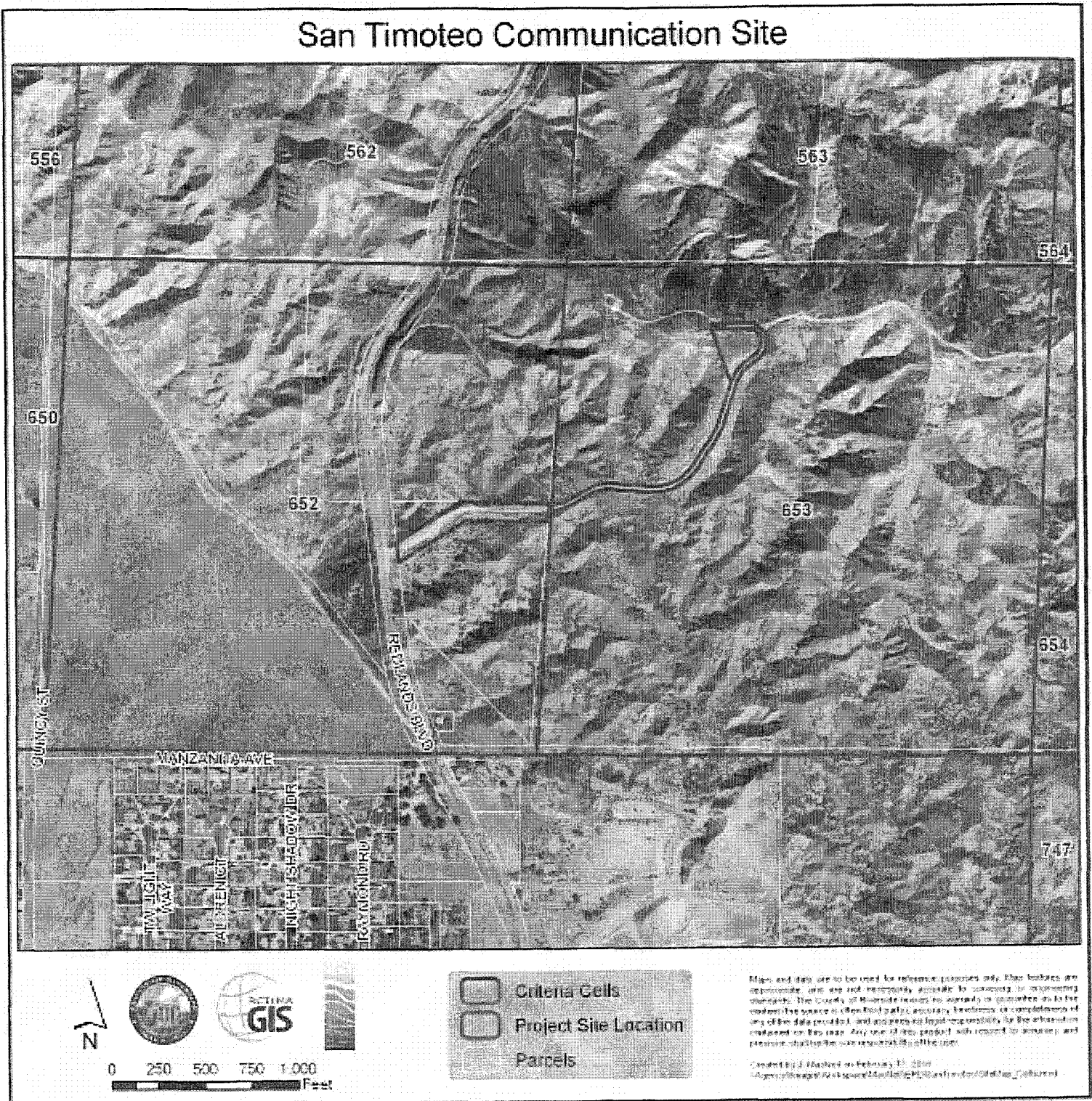


-  Project Site Location
-  Riparian/Riverine Drainage Features
-  Parcels

Maps and data are to be used for reference purposes only. Map features are approximate, and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content (the source is often third party), accuracy, timeliness, or completeness of any of the data provided, and assumes no legal responsibility for the information contained on this map. Any use of this product with respect to accuracy and precision shall be the sole responsibility of the user.

Created by J. Madril on February 17, 2010
\\Agency\lmagisi\work space\MadJ\EPD\SanTimoteo\Site\Map.mxd

APPENDIX C – Project Site and Criteria Cells



APPENDIX D – Project Site and Cell Group T

San Timoteo Communication Site



- Project Site Location
- Cell Group T
- Criteria Cells
- Parcels

Map and data are to be used for reference purposes only. Map features are approximate and are not necessarily accurate to surveying or engineering standards. The County of Riverside makes no warranty or guarantee as to the content of the source data, and assumes no liability for the use of any of the data provided, and assumes no liability for the use of any information contained on this map. Any use of this product with respect to liability and responsibility shall be the sole responsibility of the user.

Created by J. Stachler on February 17, 2009
 File path: \\gis\work\GIS\Projects\MSHCP\AppendixD\Fig_D_001\Map_SanTimoteo.aprx

APPENDIX E – Site Photos



Photo 1: Taken looking west along the drainage just south of the access road.

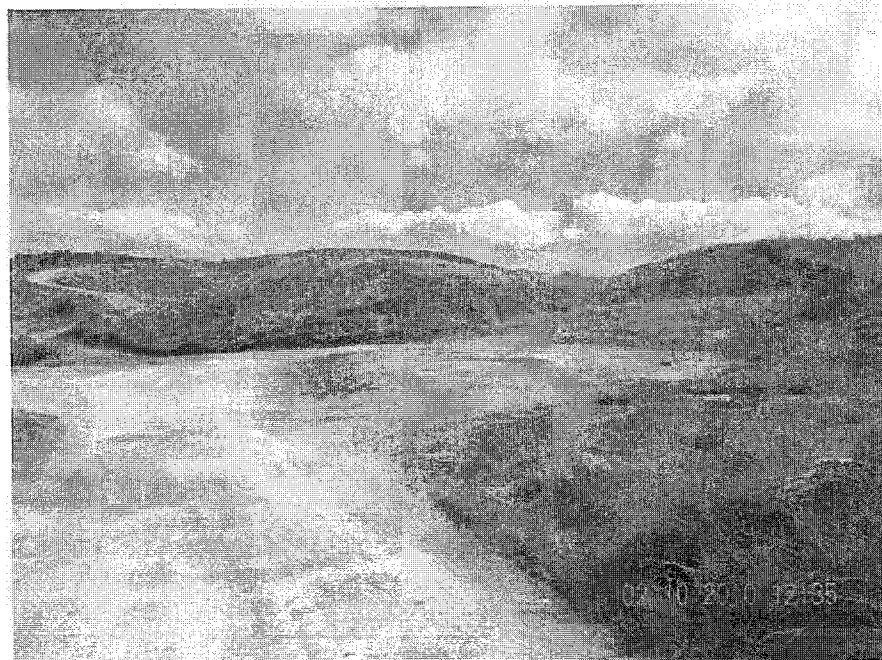
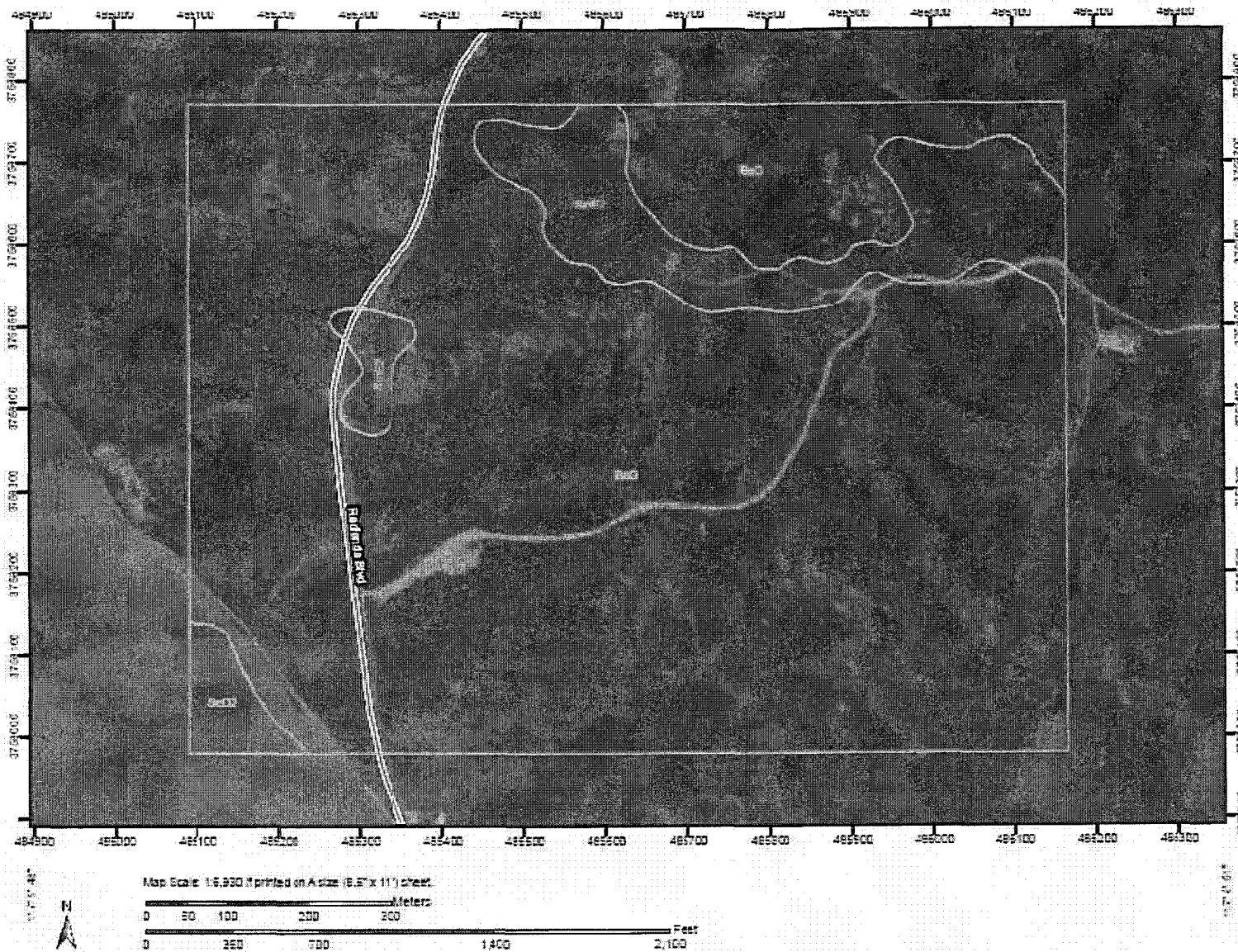


Photo 2: Taken looking south at the proposed pad location

APPENDIX F – Soil Map



Western Riverside Area, California (CA679)

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
BaG	Badland	185.4	88.2%
SeD2	San Emigdio fine sandy loam, 8 to 15 percent slopes, eroded	3.3	1.6%
SmE2	San Timoteo loam, 8 to 25 percent slopes, eroded	21.6	10.3%
Totals for Area of Interest		210.3	100.0%



Board of Directors

Chairman
Bob Buster
County of Riverside

Vice Chairman
Gary Thomasian
City of Murrieta

Marion Ashley
County of Riverside

William Batey
City of Moreno Valley

Larry Dressel
City of Beaumont

Maryann Edwards
City of Temecula

Jordan Ehrenkranz
City of Canyon Lake

Frank Hall
City of Norco

Jim Hyatt
City of Calimesa

Robin Lowe
City of Hemet

John Machisic
City of Banning

Melissa Melendez
City of Lake Elsinore

Andy Melendrez
City of Riverside

Eugene Montanez
City of Corona

James Potts
City of San Jacinto

Jeff Stone
County of Riverside

John Tavaglione
County of Riverside

Gary Thomasian
City of Murrieta

Roy Wilson
County of Riverside

Mark Yarbrough
City of Perris

Executive Staff

Charles Landry
Executive Director

March 15, 2010

Claudia Steiding
County of Riverside
Dept. of Facilities Management
3133 Mission Inn Avenue
Riverside, California 92507

Dear Ms. Steiding:

Please find the following JPR attached:

JPR 10-03-03-01. The Local Identifier is PSEC Tower – San Timoteo Communication Site. The JPR file attached includes the following:

- RCA JPR Review Form
- Exhibit A, Vicinity Map with MSHCP Schematic Cores and Linkages
- Exhibit B, Criteria Area Cells with MSHCP Vegetation and Project Location
- Exhibit C, Criteria Area Cells with Aerial Photograph and Proposed Project Impacts
- Regional Map.

Thank you,

Stephanie Standerfer
Western Riverside County Regional Conservation Authority

cc: Ken Corey
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009

Leslie MacNair
California Dept. of Fish and Game
3602 Inland Empire Blvd. #C220
Ontario, California 91764

3403 10th Street, Suite 320
Riverside, California 92501

P.O. Box 1667
Riverside, California 92502-1667

Phone: (951) 955-9700
Fax: (951) 955-8873
www.wrc-rca.org



RCA Joint Project Review (JPR)

JPR #: 10-03-03-01

Date: 3-15-10

Project Information

Permittee:	Riverside County – Facilities Management
Case Information:	PSEC Tower – San Timoteo Communication Site
Site Acreage:	2.5 acres
Portion of Site Proposed for MSHCP Conservation Area:	0

Criteria Consistency Review

Consistency Conclusion: The project is consistent with both the Criteria and other Plan requirements.

Data:

Applicable Core/Linkage: Proposed Core 3
 Area Plan: Reche Canyon/Badlands

APN	Sub-Unit	Cell Group	Cell
Portions of: 473-120-010 473-140-001	SU3 – Badlands North	T	652 563 564 653 654 657

Comments:

- a. Proposed Core 3 (Badlands/Potrero) is located in the northeast region of the Plan Area. This Core consists mainly of private lands but also contains a few Public/Quasi-Public parcels including De Anza Cycle Park. The Core is connected to Proposed Linkage 12 (north San Timoteo Creek), Proposed Linkage 4 (Reche Canyon), Proposed Constrained Linkage 22 (east San Timoteo Creek), Existing Core H (Lake Perris), Existing Core K (San Jacinto Mountains), Proposed Linkage 11 (Soboba/Gilman Springs), and Proposed Constrained Linkage 21. The Core also functions as a Linkage, connecting the San Bernardino National Forest to the southwest with San Bernardino County and other conserved areas to the north of the Core. With a total acreage of approximately 24,920 acres, Proposed Core 3 is one of the largest MSHCP Core Areas.
- b. The project site is located within Cell Group T. Conservation within this Cell Group will contribute to assembly of Proposed Core 3. Conservation within this Cell Group will focus on chaparral, coastal sage scrub, grassland, Riversidean alluvial fan sage scrub, and water habitat. Areas conserved within this Cell Group will be connected to chaparral, coastal sage scrub, and grassland habitat proposed for



RCA Joint Project Review (JPR)

JPR #: 10-03-03-01

Date: 3-15-10

conservation in Cell Group S to the west; to chaparral and grassland habitat proposed for conservation in Cell Group U to the east; to chaparral, coastal sage scrub, and Riversidean alluvial fan sage scrub habitat proposed for conservation in Cell 661 also to the east; and to grassland habitat adjacent to San Timoteo Creek proposed for conservation in Cell 298 and 385 and Cell Groups E, F, G, and H in the Pass Area Plan to the north. Conservation within this Cell Group will range from 80% to 90% of the Cell Group, focusing in the central portion of the Cell Group.

- c. The proposed project site includes grading of 0.98 acre that would support a 100-foot communications tower and a 12-foot-by-26-foot prefabricated equipment shelter. The constructed tower and equipment shelter will ultimately be contained within a fenced area measuring 65 feet by 65 feet. The project also includes utilizing an existing dirt access road to install power poles along the southern road easement boundary. The project area is in an undeveloped area. Vegetation on site is sparse with scattered shrubs, ruderal forbs, and non-native grasses. The project area was subject to a fire several years ago. The access road is not proposed to be developed further, or widened as a result of the project; however, power poles will be strategically placed along the southern roadway easement boundary. The 0.98-acre pad for the communications tower is the only new area of disturbance proposed by the project. Although the project site is located in the central portion of the Cell Group, which is targeted for Conservation, given the relatively small area of disturbance of the project itself, and given the low intensity of the use, the project would not significantly affect or prevent Reserve Assembly in and around the site. Additionally, since the proposed disturbance and use of the site would not preclude Conservation targets being met for this Cell Group, the project would not conflict with Reserve Assembly goals.

Other Plan Requirements

Data:

Section 6.1.2 – Was Riparian/Riverine/Vernal Pool Mapping or Information Provided?

Yes. There are no riparian/riverine areas on the project site. There are no vernal pools and other fairy shrimp habitat on the project site.

Section 6.1.3 – Was Narrow Endemic Plant Species Survey Information Provided?

No. The project site is not located within a narrow endemic plant species survey area (NEPSSA).

Section 6.3.2 – Was Additional Survey Information Provided?

Yes. The project site is located in a Criteria Area Species Survey Area (CASSA) for Nevin's barberry, smooth tarplant, and round-leaved filaree. The project site is also located in an Additional Survey Area for burrowing owl.



RCA Joint Project Review (JPR)

JPR #: 10-03-03-01

Date: 3-15-10

Section 6.1.4 – Was Information Pertaining to Urban/Wildland Interface Guidelines Provided?

Yes. The property is located near future and existing Conservation Areas.

Comments:

- a. Section 6.1.2: According to the report prepared by Environmental Programs Department (EPD) dated February 11, 2010, there are riparian/riverine resources near the project site, but none are proposed to be impacted by the project (see Appendix B of the EPD report). The Permittee shall ensure that culverts or drainage crossings associated with the access road are maintained and undisturbed as a result of project implementation. The soils on the site are reported to be coarse and easily drained; therefore, no suitable conditions exist for vernal pools and fairy shrimp habitat. Based on the information provided by EPD, the project demonstrates compliance with Section 6.1.2 of the MSHCP.
- b. Section 6.3.2: The project site is located in a Criteria Area Species Survey Area (CASSA) for Nevin's barberry, smooth tarplant, and round-leaved filaree. EPD performed a habitat assessment for the CASSA species on February 10, 2010. No suitable habitat for round-leaved filaree or smooth tarplant was reported to be on site. Suitable habitat was observed on site for the Nevin's barberry, since the Nevin's barberry is a perennial shrub, it can be identified outside its blooming season. EPD reports that no Nevin's barberry are within the project footprint. The project site is also located in an Additional Survey Area for burrowing owl. EPD conducted a habitat assessment for the burrowing owl on February 10, 2010, and determined there were no suitable burrows on site. Therefore, EPD determined no focused surveys for burrowing owl were warranted. Based on the information provided by EPD, the project demonstrates consistency with Section 6.3.2 of the MSHCP.
- c. Section 6.1.4: Future and existing Conservation Areas are located in close proximity to the project site. To preserve the integrity of areas dedicated as MSHCP Conservation Areas, the guidelines contained in Section 6.1.4 related to controlling adverse effects for development adjacent to the MSHCP Conservation Area should be considered by the Permittee in their actions relative to the project. Specifically, the Permittee should include as project conditions of approval the following measures:
 - i. Incorporate measures to control the quantity and quality of runoff from the site entering the MSHCP Conservation Area. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into MSHCP Conservation Areas.
 - ii. Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts, such as manure, that are potentially toxic or may adversely affect wildlife species, Habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. The greatest risk is from landscaping fertilization overspray and runoff.



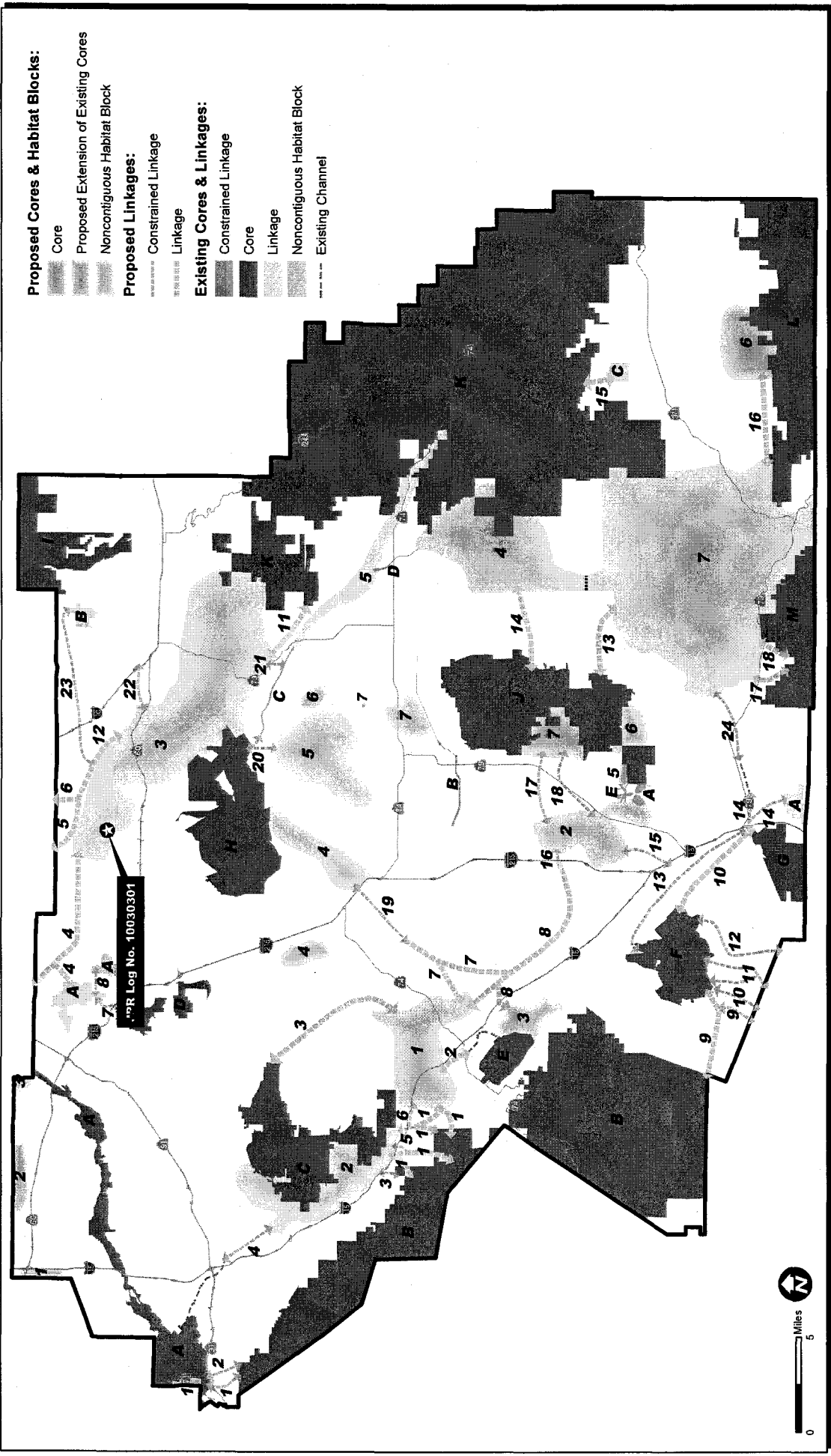
RCA Joint Project Review (JPR)

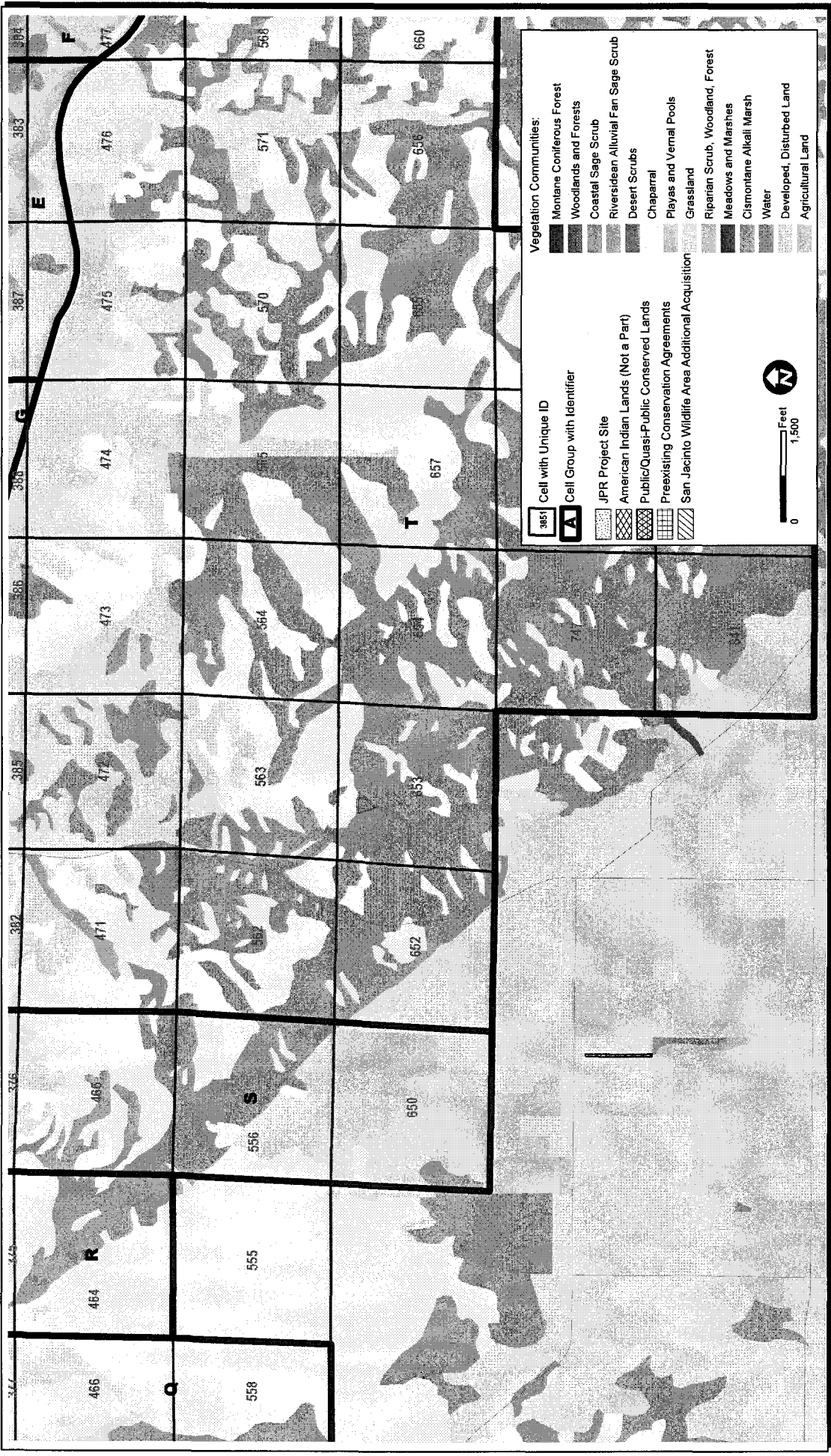
JPR #: 10-03-03-01

Date: 3-15-10

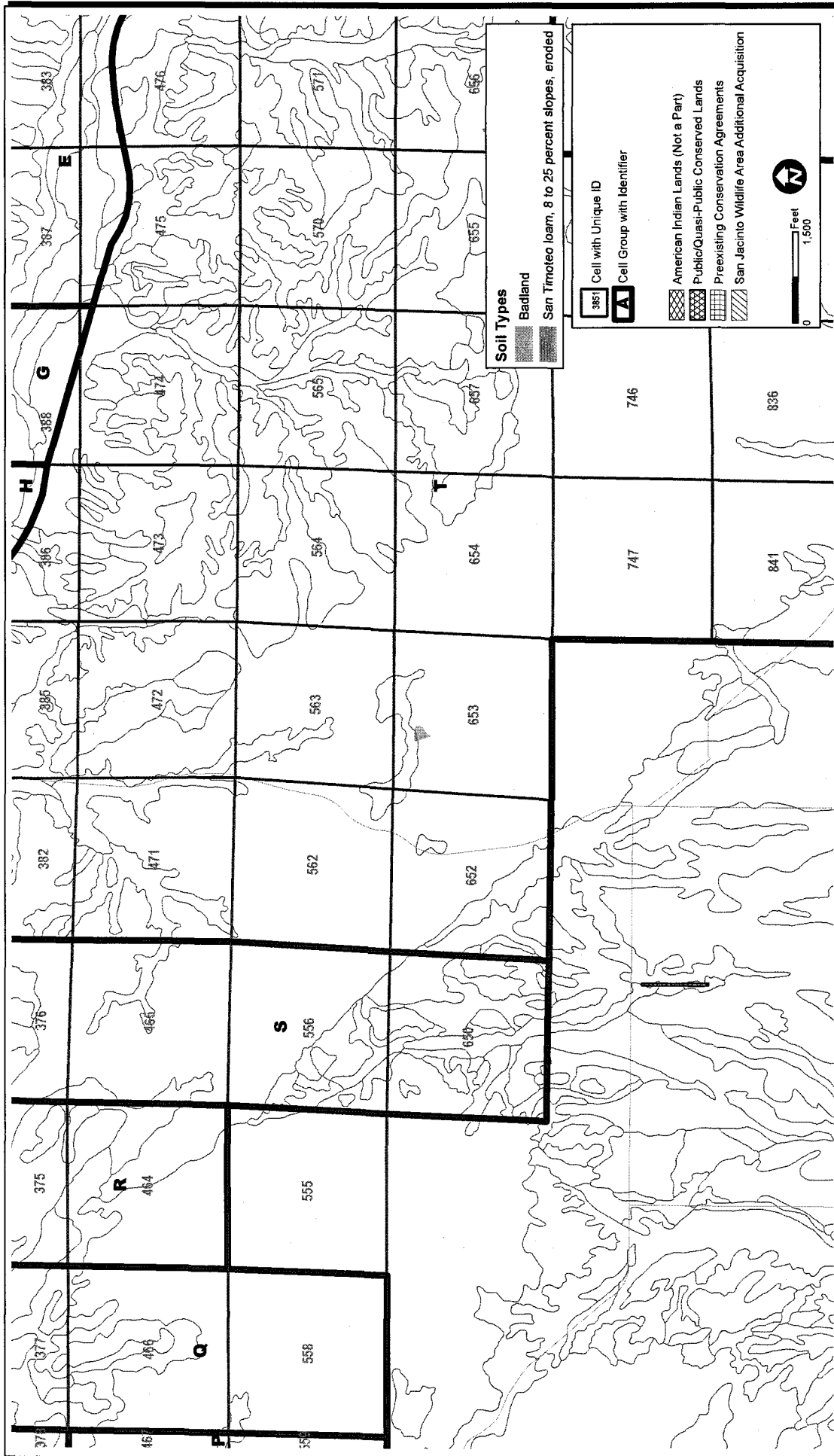
- iii. Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area is not increased.
- iv. Proposed noise-generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards.
- v. Consider the invasive, non-native plant species listed in Table 6-2 of the MSHCP in approving landscape plans to avoid the use of invasive species for the portions of the project that are adjacent to the MSHCP Conservation Area. Considerations in reviewing the applicability of this list shall include proximity of planting areas to the MSHCP Conservation Areas, species considered in the planting plans, resources being protected within the MSHCP Conservation Area and their relative sensitivity to invasion, and barriers to plant and seed dispersal, such as walls, topography, and other features.
- vi. Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate, in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping into the MSHCP Conservation Areas. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms.
- vii. Manufactured slopes associated with the proposed site development shall not extend into the MSHCP Conservation Area.

SNS



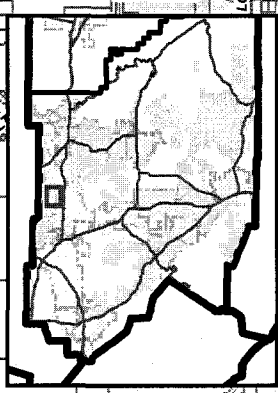
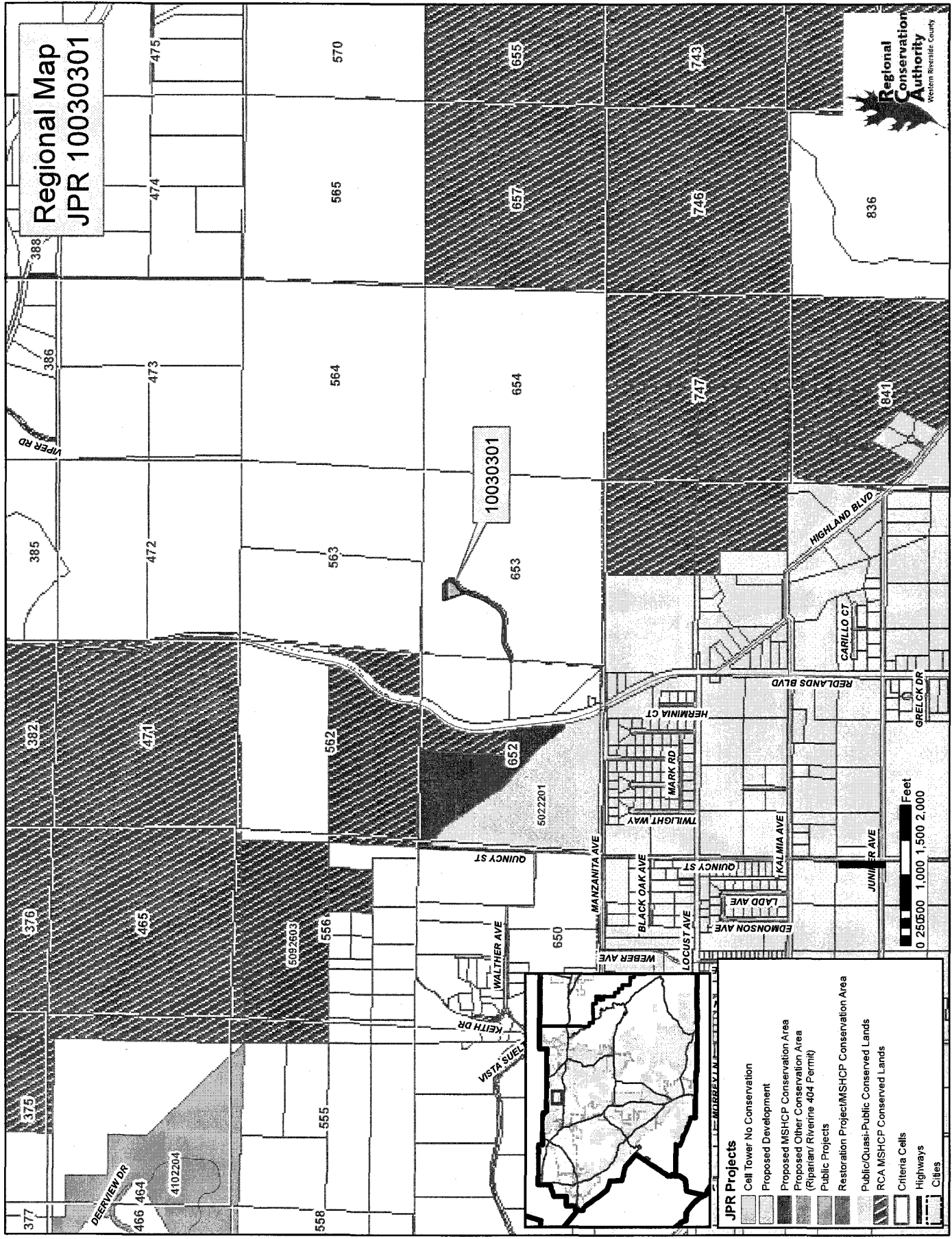


JPR Log No. 10030301
Criteria Area Cells with MSHCP Vegetation and Project Location



Criteria Area Cells with MSHCP Soils and Project Location

**Regional Map
JPR 10030301**



JPR Projects

- Cell Tower No Conservation
- Proposed Development
- Proposed MSHCP Conservation Area
- Proposed Other Conservation Area (Riparian/Riverine 404 Permit)
- Public Projects
- Restoration Project(MSHCP) Conservation Area
- Public/Quasi-Public Conserved Lands
- RCA MSHCP Conserved Lands
- Criteria Cells
- Highways
- Cities

Scale: 0 25000 1,000 1,500 2,000 Feet

Appendix C – Cultural Resources Assessment



An employee-owned company

June 8, 2010

Ms. Claudia Steiding, Senior Environmental Planner
County of Riverside
Economic Development Agency
3403 10th Street, 4th Floor
Riverside, CA 92501

Subject: ADDENDUM to the Cultural Resources Assessment for the Public Safety Enterprise Communication (PSEC) Project, Riverside, Orange, San Bernardino, and San Diego Counties, California (MBA 2008a) - Timoteo Communication Site.

Dear Ms. Steiding:

PBS&J has completed a Cultural Resources Assessment (CRA) for the PSEC project Timoteo Communication Site. Michael Brandman Associates (MBA) previously completed a CRA for the PSEC project entitled: Cultural Resources Assessment Public Safety Enterprise Communication Project Riverside, Orange, San Bernardino, and San Diego Counties, California (MBA 2008a). MBA 2008a was completed in support of a California Environmental Quality Act (CEQA) Programmatic Environmental Impact Report (PEIR) for the PSEC project, certified by the County of Riverside Board of Supervisors on September 2, 2008 (MBA 2008b). The PEIR conditioned additional studies in the event that infrastructure projects were deemed necessary for any of the original PSEC candidates, or if new candidate locations were identified. Therefore, this addendum was generated to assess a new PSEC project candidate location known as the Timoteo Communication Site, and includes the results of updated records searches and an archaeological pedestrian survey. The addendum was completed in accordance with the mitigation measures contained in the PEIR (MBA 2008b) and CEQA.

Proposed Project and Establishment of the Project Area

The PSEC project proposes to expand the operational coverage and data transmission capabilities of the Riverside County emergency services radio tower network by constructing numerous new communications facilities and associated infrastructure. The proposed project considered in this addendum consists of the construction, operation, and maintenance of one new communication site within the larger PSEC project network, known as the Timoteo Communication Site. The proposed Timoteo Communication Site consists of the construction of a 65-foot by 65-foot communication site with a 100-foot, lattice-style self-supporting tower. Equipment will be contained within the 65-foot by 65-foot site. Electric power will be provided by an alignment measuring approximately 1.25 miles in length, extending from an existing power source on Redlands Boulevard (33°57'41.5"N//117°09'30.2"W NAD 83) to the site (33°58'02.1"N//117°09'09.8"W NAD 83). The provision of power will be attained by the construction of an overhead alignment, and consist of numerous wooden utility poles to be placed approximately 5 feet from an existing dirt access road extending from Redlands Boulevard to the site. This existing dirt road will provide access to the proposed site.

The Timoteo Communication Site project area was defined by considering an Area of Potential Effect (APE) for the tower and associated power alignment. This project area (APE) consists of the proposed radio tower location with a 300-foot buffer extending in every direction, as well as the entirety of the proposed power alignment with a 50-foot buffer on all sides. Considering the proposed project impact areas, in conjunction with a buffer, accounts for all direct and potential indirect effects of project implementation. The project area totals 14.0 acres, and is outlined in Attachment A – Communication Site Exhibits.

Project Area Location

The Timoteo Communication Site project area is generally found in the vicinity of Moreno Valley in Riverside County, north of State Route 60, south of Interstate 10 (I-10) and west of State Route 79. Specifically, the project area is 0.35 mile east of Redlands Boulevard in the Badlands region, in Sections 25 and 26 of Township 2 South, Range 3 West (SBBM), as found on the U.S. Geological Survey (USGS) Sunnymead, California, 7.5-minute topographic quadrangle. Attachment A provides a regional location map, as well as local vicinity topographic and aerial maps.

Cultural Setting

Given the diversity of the prehistoric and historic backgrounds applicable to Riverside County, the PEIR CRA (MBA 2008a) was organized into groups based upon geographic location, environmental characteristics, soils maps, and ethnographic maps presented in Kroeber (1925), Heizer (ed. 1978), Heizer and Elasser (1980) and Moratto (1984). These groupings allowed for the organized presentation of prehistoric and historic background material for a sizable and diverse region. The PSEC project candidate locations were grouped based upon their location in the northwestern quarter of Riverside County (Group A), the southwestern quarter of Riverside County (Group B), the northern margin of interior Riverside County and the Mojave Desert (Group C), the Colorado Desert as influenced by Coachella Valley/Lake Cahuilla chronologies (Group D) and the Colorado River Valley (Group E). With reference to the PEIR CRA, the Timoteo Communication Site project area is located within Group A – Northwestern Quarter of Riverside County, and the prehistoric and historic context of this region is outlined in Section 3 of the report (MBA 2008a).

The project area is ethnographically mapped within lands that have been associated with the Cahuilla (Heizer 1978 and Kroeber 1925). The Cahuilla traditional use area is vast, with borders extending southeast from the modern City of Riverside in the north to Borrego Springs in the south. From Borrego Springs, the border trends easterly below the Santa Rosa Mountains, bisecting the Salton Sea, and further inland past the Chocolate Mountains. The Cahuilla northern border then trends southeast from near the modern City of Riverside in the west, along the southern margin of the San Bernardino Mountains to beyond the Chocolate Mountains in the east (Bean 1978). It should be noted that tribal boundaries were likely fluid, allowing for contact, trade, and diffusion of ideas between neighboring groups, such as the Serrano and Luiseno in this portion of Riverside County. Additional information about the ethnohistoric background for this area is outlined in Section 3 of the PEIR CRA (MBA 2008a).

CHRIS Records Search Results

The California Historical Resources Information System (CHRIS) records search was conducted on March 31, 2010 at the Eastern Information Center (EIC), located at the University of

California, Riverside. The search was conducted by PBS&J Archaeologist Marnie Aislin-Kay, B.A., and included a review of previous cultural resources surveys and documented resources for the project area and all lands found within 1 mile. To identify the presence/absence of cultural resources, Ms. Aislin-Kay examined various current inventories, including: The National Register of Historic Places (NRHP); California Register of Historical Resources (CRHR); California Historical Landmarks (CHL); California Points of Historical Interest (CPHI); and the California State Historic Resources Inventory (HRI) through the Office of Historic Preservation Historic Property Data File (HPDF) for Riverside County. Archival maps were additionally inspected for indications of historic-age structures and features in the area.

The results of the records search indicated that no cultural resources have been recorded within the project area, and that two resources are known within the 1-mile search radius. These resources and their relative location to the project area are outlined in the table below.

Known Cultural Resources Located Within the 1-Mile Records Search Radius

Site Number	Associated Document Information/ Recorder Name and Date	Resource Description	Within ~1-mile to 0.5-mile Radius	Within ~0.5-mile to 0.25-mile Radius	Within ~0.25-mile Radius	Within Project Area?
P-33-12817	No associated documents listed. Recorded by L.L. Bowles, 1981.	Prehistoric age – A small food processing site with two portable metates. This site was not observed in a 2006 update.	●	—	—	No
P-33-15675	No associated documents listed. Recorded by J.M. Sanka, and M. Aislin-Kay of Michael Brandman Associates, 2006.	Historic age – A low-density metal can and glass scatter related to household goods, and several features associated with a water conveyance system.	●	—	—	No

Twelve area-specific survey reports are on file with the EIC for the 1 mile search radius. None of the reports addressed the project area, indicating that the project area has not been previously surveyed for cultural resources. The details of these reports are summarized below.

Known Cultural Resources Reports within the 1-Mile Records Search Radius

	Report Number	Details
1	RI-0024	This report did not address the project area.
2	RI-1700	This report did not address the project area.
3	RI-2171	This report did not address the project area; however, it did address approximately 680 acres near the southern portion of the project area (ARU 1987). The survey returned negative results for observable cultural resources within the search radius.
4	RI-2251	This report did not address the project area.
5	RI-2252	This report did not address the project area.

	Report Number	Details
6	RI-4388	This report did not address the project area.
7	RI-5289	This report did not address the project area.
8	RI-5293	This report did not address the project area.
9	RI-6253	This report did not address the project area; however, it did address approximately 99 acres found immediately to the south and west of the southern portion of the project area (CRM Tech 2004). The survey returned negative results for observable cultural resources.
10	RI-7128	This report did not address the project area.
11	RI-8171	This report did not address the project area, but was completed for another PSEC project Timoteo candidate location (MBA 2008a). The previous Timoteo candidate is located approximately 0.40 mile to the northwest of the present candidate location. The survey returned negative results for observable cultural resources.
12	RI-8242	This report did not address the project area.

During the records search, archival maps were reviewed for the presence of historic-age structures and development within the project area and the general vicinity. The results of this review are presented below, and assist in determining the probability for encountering historic-age resources during the pedestrian survey and during project implementation. Archival maps can also provide insight about historic-era land use patterns.

Archival Topographic Map Review

Topographic Map Name and Date	Review
War Department, US Army Corps of Engineers 1942 Perris Quadrangle 15-minute	This map shows that historic age structures and features were not located within the project area. Redlands Boulevard is shown as a named Redlands Road, and this road traverses the southern-most portion of the project area. The location of this road within the project area is similar to its modern placement. The general vicinity exhibits various roads, and their locations are generally similar to the modern USGS Sunnymead, CA 7.5-minute topographic map (1967, revised 1980). Fewer structures are shown adjacent to the roads in comparison to the modern topographic map within the 1 mile search radius.

General Land Office Records Search

The Bureau of Land Management (BLM) General Land Office (GLO) records search indicated that the entirety of Section 25 of Township 2 South, Range 3 West was transferred to the Southern Pacific Railroad on August 15, 1894. This transferred occurred under the authority of the July 27, 1866 Atlantic and Pacific Railroad Grant (14 Stat. 292). No additional patents are listed for Section 25.

The southeast quarter of Section 26 of Township 2 South, Range 3 West was transferred to Leonart Hoffman on April 15, 1891. This transfer occurred under the auspices of the Cash Entry Sale of April 24, 1820 (3 Stat. 566). Additional patents are listed for Section 25 between 1891 and 1982, and include acreage beyond the boundaries of the project area.

Native American Heritage Commission Record Search

PBS&J sent a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC) to determine whether any properties of traditional cultural value were recorded within the project area or in the general vicinity on April 12, 2010. The response from the NAHC was dated April 20, 2010, and indicated that no SLF-listed resources were known within the project area or within a 0.50-mile radius. However, the response letter did indicate that Native American cultural resources were known in close proximity to the project area. This appears to indicate that documented resources of traditional cultural value are known nearby, but more than 0.50 mile from the project area. The response letter also provided a listing of Native American contacts that might have knowledge about the project area and the presence or absence of any properties of religious and cultural significance not listed in the SLF. For this reason, and to ensure that all potential Native American resources are adequately addressed, letters to each of the listed tribal contacts were sent on June 4, 2010. These information request letters described the proposed project, contained a project area map, the results of the NAHC SLF search, and a request for any cultural resource data pertinent to the project area. The purpose of the letters was for information scoping purposes only, and does not constitute formal consultation. As of the date of this addendum, no responses have been received. In the event that responses are received in the future, they will be forwarded to the County of Riverside Economic Development Agency.

All correspondence has been incorporated into Attachment B.

Pedestrian Survey

On April 8, 2010 PBS&J Archaeologist Jennifer M. Sanka, M.A. visited the candidate location to survey the project area. The entirety of the project area was examined using a block-transect technique with 5- to 15-meter spacing, where appropriate. Portions of the project area exhibiting significant slopes were not surveyed, and included areas found directly to the north and southwest of the proposed tower location. Photographs depicting the project area are included in Attachment A.

The pedestrian survey revealed that there are no observable prehistoric archaeological resources, and one historic-age site found within the project area (Site Timoteo 001). Site Timoteo 001 is found to the north of the existing access road in the southern portion of the project area, and consists of an extremely sparse refuse scatter. The Timoteo candidate is located directly south of an existing dirt road, and is presently undeveloped. The candidate location is generally flat, and is within an area that appears to have been used as a vehicle parking area or turn-out (Photographs 1-4). Adjacent lands are all undeveloped, with the exception of an existing east-west trending dirt access road, found directly to the north of the candidate. This dirt road continues to the east, and leads to a private residence. This residence is found beyond the boundaries of the project area. Another dirt road generally trends north-south, and is found directly to the east of the candidate location. The two dirt roads form a perpendicular intersection to the east of the candidate (Photograph 3). The north-south trending dirt road was used to obtain access to the candidate, and is the proposed route of the associated power alignment.

The candidate location has undergone moderate ground disturbance, due to extensive vehicular activity. Disturbed soils were also noted next to the existing dirt roads, and surrounding the candidate location. Adjacent lands to the north exhibit an existing east-west dirt road followed

by a steep slope, which extends into the undulating Badlands topography (Photograph 6). San Timoteo Canyon Road is observable in the distance. Directly east of the candidate is the north-south trending access road and then a small hill covered with vegetation (Photograph 5). The land found to the south similarly exhibits a small, vegetation covered hill (Photograph 7). The area found to the west of the candidate includes an extension of the east-west trending dirt road, which circles back toward the candidate and forms a cul-de-sac (Photographs 1 and 8). Surface visibility at the candidate was excellent at 100 percent, and decreased significantly (0 to 20 percent) in areas not subject to vehicular activity. The observed soils at the candidate and within the dirt roads appeared to be graded, and were highly compacted. Soils consisted of a light brown silt-sand with numerous granitic, quartz, and quartzite, pebble-sized inclusions.

The proposed Timoteo power alignment trends from the Timoteo tower site to an existing power source at a water tank along Redlands Boulevard (Photographs 9-12). The proposed power alignment exhibits a decline in elevation from the northeast to the southwest, and meanders around and through numerous knolls and small ridges. The entirety of the project area is presently undeveloped, with the exception of the existing dirt access road and the paved Redlands Boulevard. All adjacent lands are undeveloped, with the exception of the private residence noted to the east of the candidate location, and the water tank complex found at the southern terminus of the power alignment. A residential housing tract is found beyond the project area, and to the southwest. Additional rural-residential lots are found to the southeast of the project area.

Surface visibility was excellent at 100 percent within the existing access road, and in the areas immediately adjacent to the road. However, visibility decreased significantly (0 to 20 percent) due to the presence of dense vegetation outside of these areas. Soils observed in and adjacent to the existing road were similar to the soils at the candidate location, consisting of light brown silt-sand, with pebble-sized inclusions (Photographs 9-11). Soils adjacent to Redlands Boulevard and near the water tank complex exhibited imported, angular gravels (Photograph 12). Firebreaks and jeep trails exhibiting vegetative re-growth were noted within and adjacent to the project area (Photograph 10).

Modern refuse was noted throughout the project area during the entirety of the survey, including: fragments of clear and amber beer bottles, beer cans, bricks and mortar, car parts, cans, wood, nails, and coils from a mattress/box spring (Photograph 14). Fragmented green, clear and amber beverage glass was noted at the candidate location, and scrap wood, tarps, a portable restroom, and a 1980s-1990s pick-up truck were observed to the west of the candidate (Photograph 13). The fragmented mandible of an animal (presumably canine) was noted within the pile of scrap wood. Scrap wood and a mattress were observed to the northeast of the intersection of the access road and Redlands Boulevard (Photograph 15). An additional concentration of refuse was detected to the north of the access road, and included both modern and recent historic-age constituents. This concentration was recorded as Site Timoteo 001 (Photograph 16).

Cultural Resources Detected During the Pedestrian Survey

During the pedestrian survey no prehistoric archaeological resources were observed, and one historic-age site was detected (Site Timoteo 001). Site Timoteo 001 consists of a sparse recent historic-age refuse scatter containing fragments of amber, clear, green, flat aqua (window) and mirror glass. Additional items were noted, and include: modern clay pigeons, a few small

caliber bullet casings, a modern baby food jar lid, and three sherds of recent historic-age ceramics. The majority of the observed items were modern in age, with the exception of the three potentially historic-age ceramic sherds, and two heavily patinated glass fragments (Photograph 16). The items were all found within an area measuring 30 feet in diameter, and directly north of the existing access road. The artifacts did not continue into the berm of the access road, or continue across the road; rather, wood, modern car parts, modern nails and coils from a mattress/box spring were found directly south of the road and to the south-southeast of Site Timoteo 001. All artifacts were located at the surface, and the site does not appear to exhibit vertical depth. The presence of illegal refuse dumping in this general area, as evidenced by numerous modern refuse piles along the nearby access road, appear to indicate that the site represents a single refuse dumping episode. In addition, the inclusion of a high percentage of modern refuse within Site Timoteo 001 indicates that this refuse dumping episode likely took place within the modern era, and happens to include approximately five artifacts of recent historic-age.

Site Timoteo 001 was recorded onto a Department of Parks and Recreation (DPR) 523 form (Attachment D), which was subsequently submitted to the EIC for the assignment of a permanent identification number. The assignment of a Primary Number is pending for Site Timoteo 001.

Statement of Significance: Site Timoteo 001

An archaeological site may be considered an historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California pursuant to PRC § 5020.1(j), or if it meets the criteria for listing on the California Register of Historical Resources (CRHR) pursuant to California Code of Regulations (CCR) at Title 14 CCR § 4850. In order for a resource to be considered eligible for listing in the CRHR, the resource must demonstrate fulfillment of one or more 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.

The most recent amendments to the CEQA guidelines direct lead agencies to first evaluate an archaeological site to determine if it meets the criteria for listing in the CRHR. If an archaeological site is an historical resource, in that it is listed or eligible for listing in the CRHR, potential adverse impacts must be considered as stated in PRC § 21084.1 and 21083.2(1). If an archaeological site is considered not to be an historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it would be treated in accordance with the provisions of that section. A non-unique archaeological resource means an archaeological artifact, object, or site does not meet the criteria for eligibility for listing on the CRHR, as noted in subdivision (g) of PRC § 21083.2. A non-unique archaeological resource requires no further consideration, other than the recording of its components and features.

Site Timoteo 001 consists of a single episode refuse scatter that is surficial in nature. The site contains several artifacts that are of recent historic-age; however the majority of the artifact content is from the modern era. The artifacts do not appear to offer any additional interpretive data to the history of this region beyond the information gathered during this study. None of the constituents of the resource appear to be historically significant; therefore, they are considered a non-unique resource. For this reason, the recordation of the site and the submittal of the DPR 523 form to the EIC for the assignment of a primary number suffices for mitigating potential adverse impacts. No additional work is recommended for this resource prior to project construction. It should also be noted that no ground disturbance is proposed within the boundaries of the site; therefore, the site will be entirely avoided during construction.

Summary and Recommendations

The results of the records search indicated that no known and previously recorded cultural resources are located within the project area, and two resources are known within 1 mile. These resources are found more than 0.50 mile from the project area and will not be affected by construction. Twelve area-specific survey reports have been conducted within 1 mile of the project area, and none of these reports addressed the project area. During the pedestrian survey, no prehistoric archaeological resources were observed, and one historic-age site was detected (Site Timoteo 001). Site Timoteo 001 was recorded onto a DPR 523 Form and was submitted to the EIC for the assignment of a primary number. The site does not appear to be significant and is considered neither a historical nor an archaeological resource pursuant to CEQA. Therefore, the creation and submittal of the DPR 523 Form for this resource fully suffices for mitigating potential impacts associated with the proposed project.

The results of the records searches, the negative results for significant cultural resources during the pedestrian survey, in conjunction with the disturbed nature of the soils within the portions of the project area proposed for construction activities render it unlikely that significant and intact subsurface resources will be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources, and PBS&J does not recommend a program to mitigate effects to cultural resources.

Accidental Discovery of Human Remains

There is always the possibility that ground-disturbing activities during construction may uncover previously unknown, buried human remains. If human remains are discovered during any phase of construction, including disarticulated or cremated remains, all ground-disturbing activities should cease within 100 feet of the remains. California State Health and Safety Code § 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. It is further recommended that a professional archaeologist with Native American burial experience conduct a field investigation of the specific site and consult with the Most Likely Descendant (MLD), if any, identified by the NAHC. As necessary and appropriate, a professional archaeologist may provide technical assistance to the MLD, including but not limited to, the excavation and removal of the human remains.

Please also note that Federal laws and standards apply in certain situations, including the Native American Graves Protection and Repatriation Act (NAGPRA) and its regulations found in the Code of Federal Regulations at 43 CFR 10.

Accidental Discovery of Cultural Resources

It is always possible that ground-disturbing activities may uncover presently obscured or buried and previously unknown cultural resources. In the event that buried cultural resources are discovered during construction, such resources could be damaged or destroyed, potentially resulting in significant impacts to cultural resources. If subsurface cultural resources are encountered during construction, if evidence of an archaeological site or if other suspected historic resources are encountered, it is recommended that all ground-disturbing activity cease within 100 feet of the resource. A professional archaeologist shall be consulted to assess the find, and to determine whether the resource requires further study. The qualified archeological personnel shall assist the Lead Agency by generating measures to protect the discovered resources. Potentially significant cultural resources could consist of, but are not limited to: stone, bone, fossils, wood, or shell artifacts or features, including structural remains, historic dumpsites, hearths and middens. Midden features are characterized by darkened soil, and could conceal material remains, including worked stone, fired clay vessels, faunal bone, hearths, storage pits, or burials and special attention should always be paid to uncharacteristic soil color changes. Any previously undiscovered resources found during construction should be recorded on appropriate DPR forms and evaluated for significance under all applicable regulatory criteria.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect the resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study. This does not apply to Native American burial-related resources, as their treatment and disposition is governed by existing laws, including NAGPRA.

Please feel free to contact me at 909.890.5951, x.2505 if you have any questions, or if PBS&J can provide additional assistance regarding cultural resource management issues.

Sincerely,



Jennifer M. Sanka, M.A., RPA
Associate Project Manager/Archaeologist

Attachments: Attachment A – Communication Site Exhibits
Attachment B – NAHC SLF Search and Information Scoping
Attachment C – Professional Qualifications
Attachment D – DPR 523 Form (Non-Confidential)

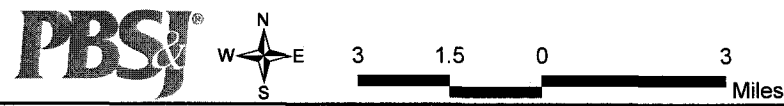
References

- Archaeological Research Unit (ARU). 1987. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California. RI-2171. Report on file at the Eastern Information Center, University of California, Riverside.
- Bean, L.J. 1978. Cahuilla. In Handbook of North American Indians, Vol. 8: California, edited by R.F. Heizer, pp. 575-587. Washington, DC: Smithsonian Institution.
- CRM Tech. 2004. Historical/Archaeological Resources Survey Report, Tentative Tract Map No. 31206, Near the City of Moreno Valley, Riverside County, California. RI-6253. Report on file at the Eastern Information Center, University of California, Riverside.
- Heizer, R.F., ed. 1978. Handbook of North American Indians, Vol. 8: California. Washington, DC: Smithsonian Institution.
- Heizer, R.F. and A.B. Elasser. 1980. The Natural World of the California Indians. Berkeley and Los Angeles: University of California Press.
- Kroeber, A.L. 1925. Handbook of the Indians of California. Bulletin 78. Bureau of American Ethnology. Washington, DC: Smithsonian Institution.
- Michael Brandman Associates (MBA). 2008a. Cultural Resources Assessment Public Safety Enterprise Communication Project, Riverside, Orange, San Bernardino, and San Diego Counties, California. (RI-8171). Report on file at the Eastern Information Center, University of California, Riverside.
- Michael Brandman Associates (MBA). 2008b. Environmental Impact Report Public Safety Enterprise Communication Project, Riverside, Orange, San Bernardino, and San Diego Counties, California.
- Moratto, M.J. 1984. California Archaeology. San Diego: Academic Press.

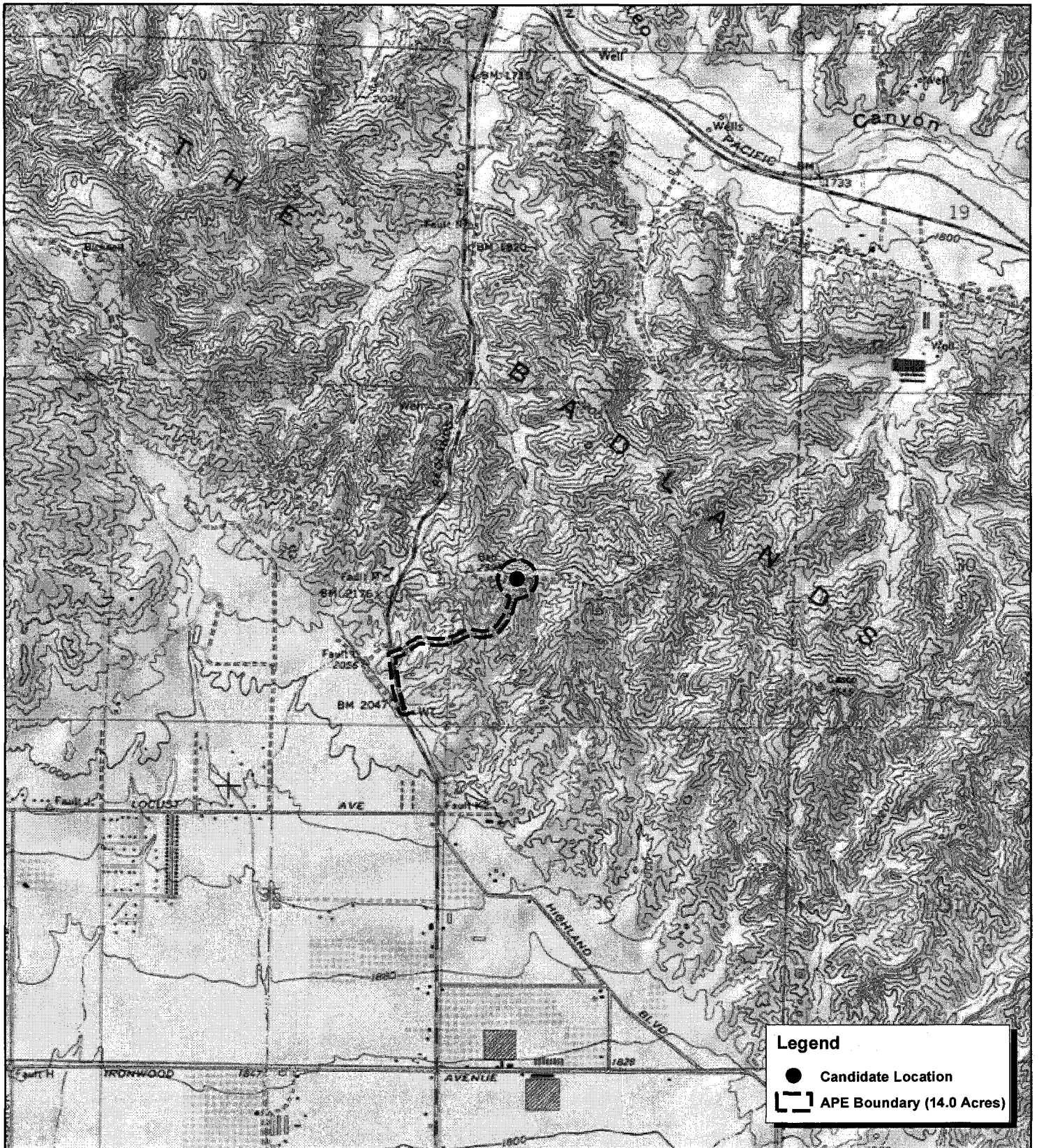
Attachment A – Communication Site Exhibits



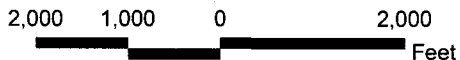
Source: ESRI.



Timoteo Communication Site Regional Location Map

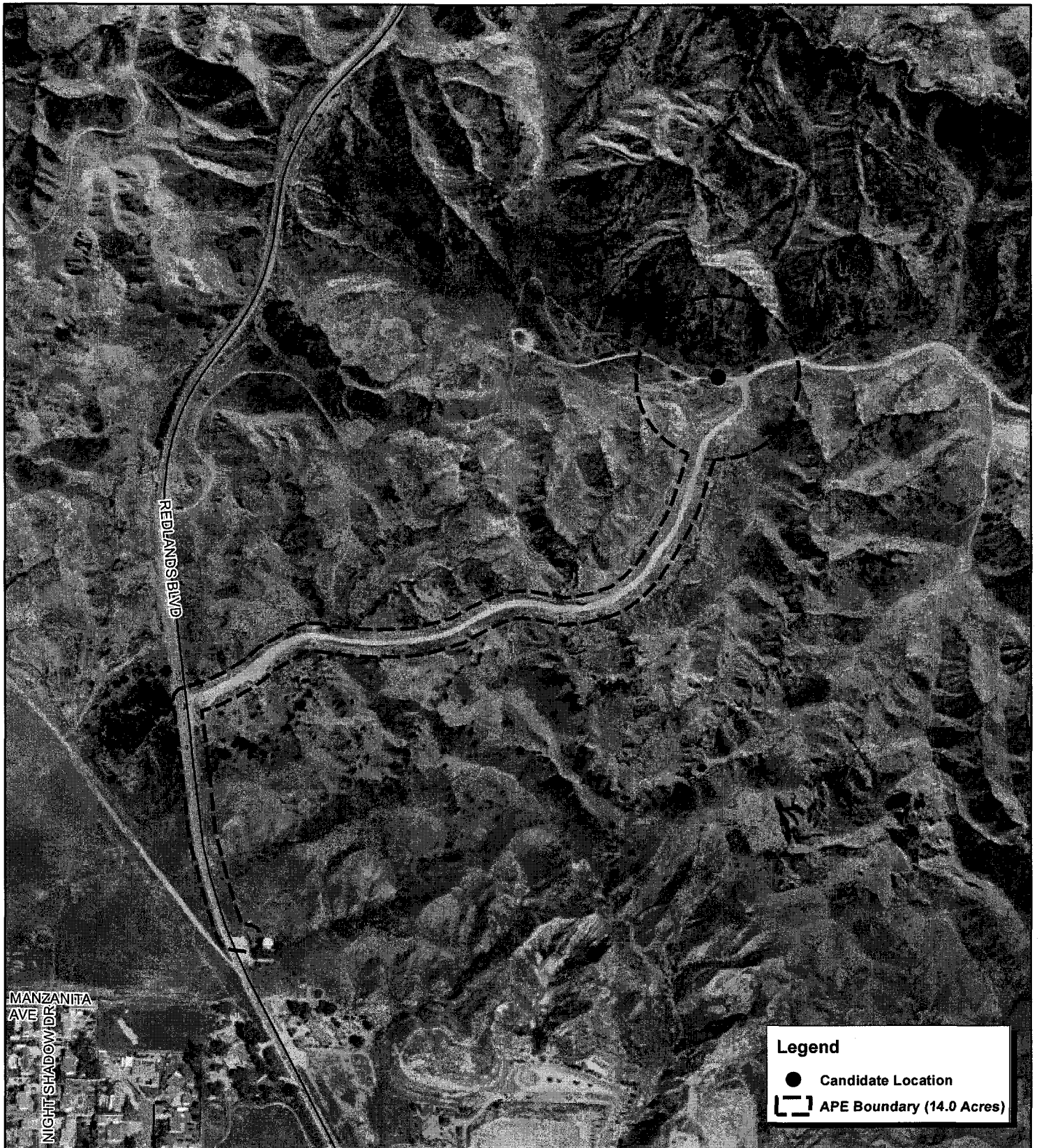


Source: Sunnymead 7.5' USGS Topographic Map, ESRI.

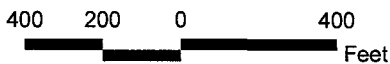


Timoteo Communication Site Local Vicinity Topographic Map

COUNTY OF RIVERSIDE
PUBLIC SAFETY ENTERPRISE COMMUNICATION PROJECT



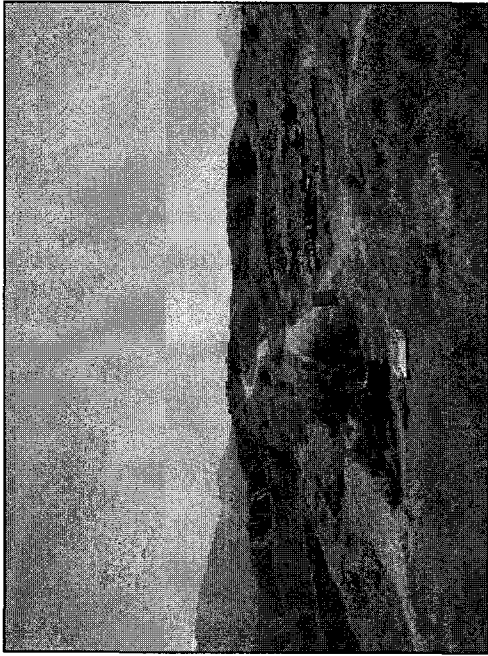
Source: ESRI.



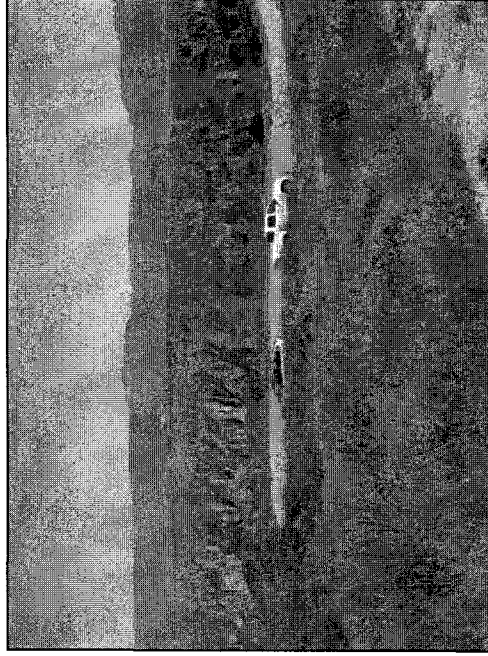
Timoteo Communication Site Local Vicinity Aerial Map

Legend

- Candidate Location
- ▭ APE Boundary (14.0 Acres)



Photograph 1: Overview of the Timoteo candidate location, facing east.



Photograph 2: View of the Timoteo candidate location, facing north. Tower location represented by parked vehicles.



Photograph 3: View of the Timoteo candidate location, facing southeast.



Photograph 4: View of the Timoteo candidate location, facing west.

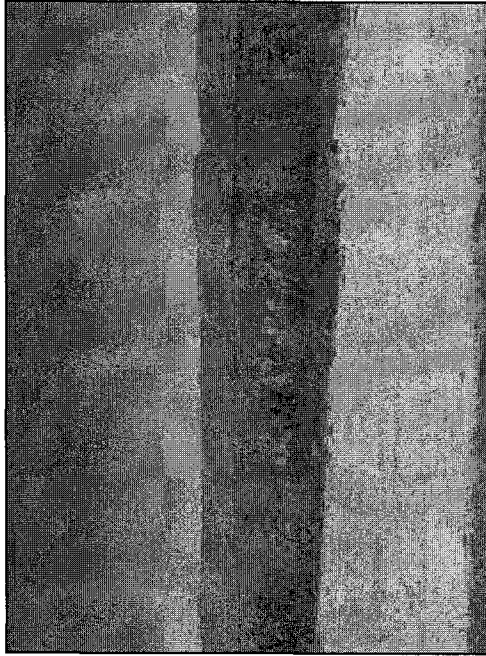
Source: PBS&J, 2010.



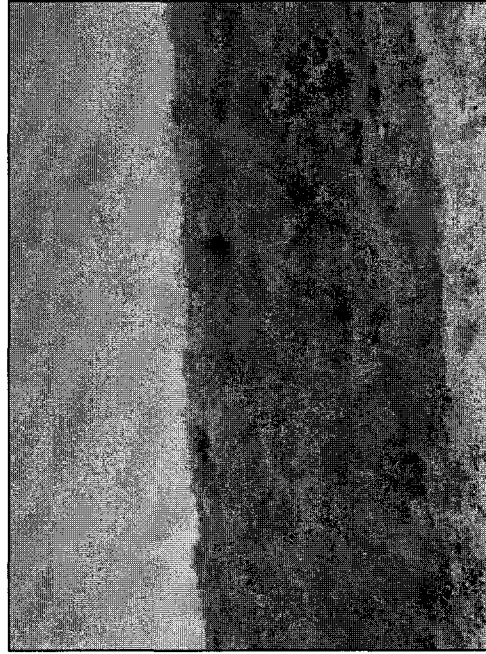
Timoteo Communication Site Photographs 1 to 4 PSEC Project



Photograph 5: View from the Timoteo candidate location, facing east.



Photograph 6: View from the Timoteo candidate location, facing north.



Photograph 7: View from the Timoteo candidate location, facing south.



Photograph 8: View from the Timoteo candidate location, facing west.

Source: PBS&J, 2010.



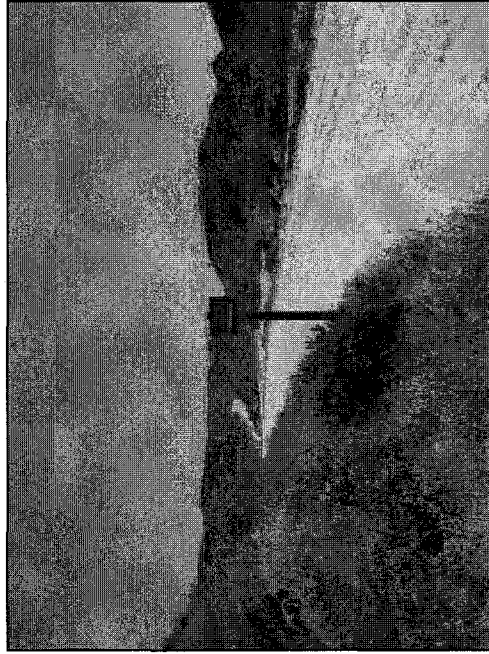
Timoteo Communication Site Photographs 5 to 8 PSEC Project



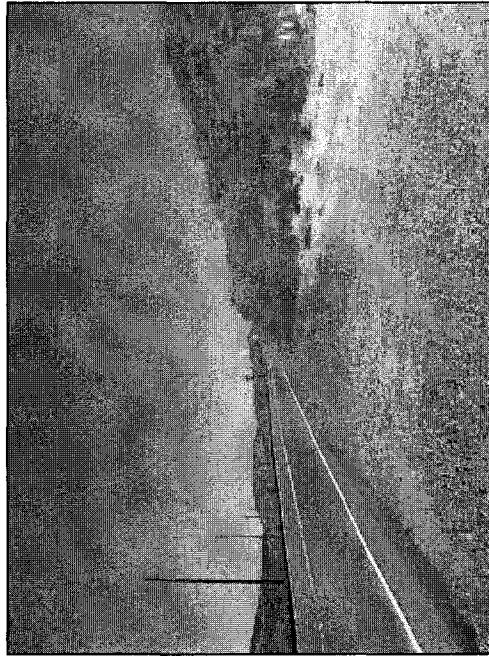
Photograph 9: Overview of existing access road and proposed power alignment, facing north.



Photograph 10: Overview of existing access road and proposed power alignment, facing east.



Photograph 11: View of access road and proposed power alignment from the intersection with Redlands Boulevard, facing northeast.

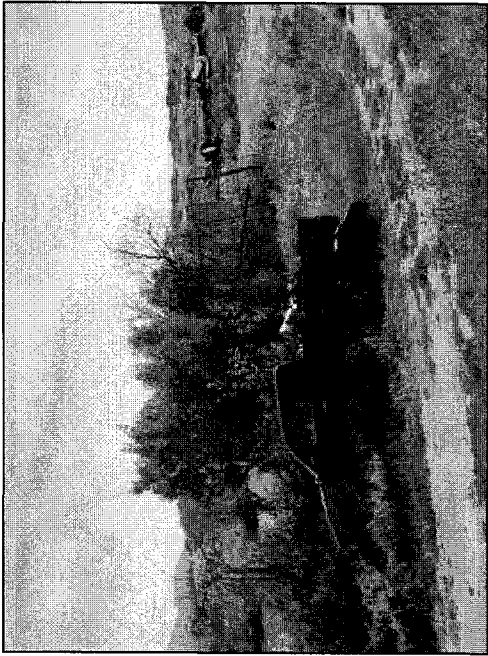


Photograph 12: View of proposed power alignment taken from near the Water Tank on Redlands Boulevard, facing north.

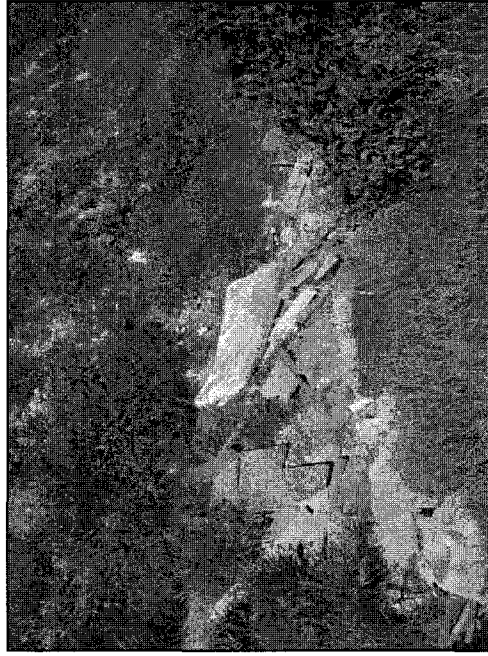
Source: PBS&J, 2010.



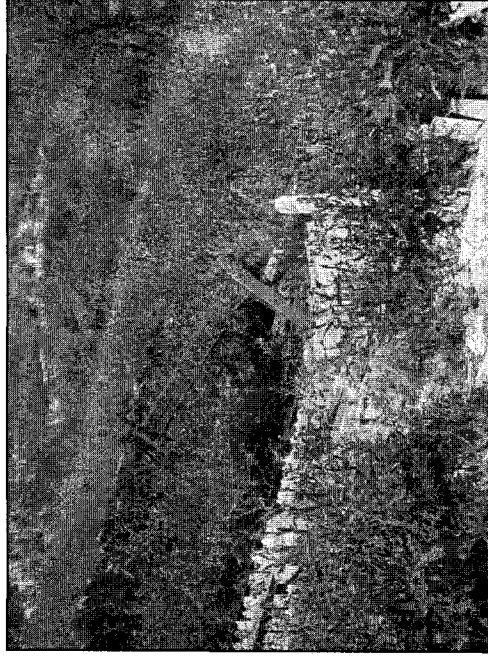
Timoteo Communication Site Photographs 9 to 12 PSEC Project



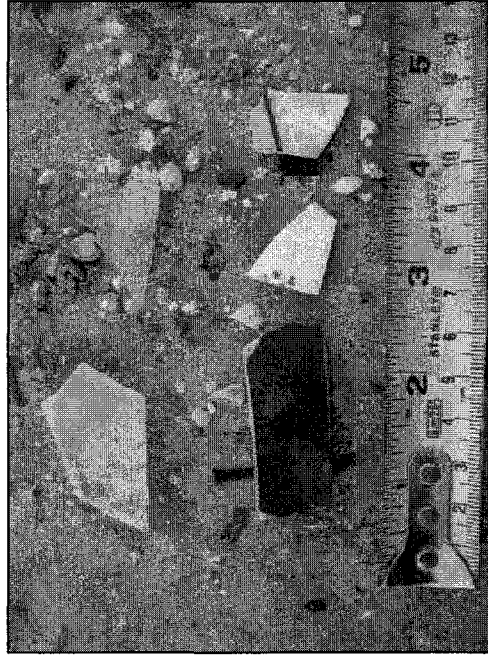
Photograph 13: View of modern refuse found to the west of the Timoteo candidate location, facing east.



Photograph 15: View of modern refuse located northeast of the intersection of the access road and Redlands Boulevard, facing northwest.



Photograph 14: View of modern refuse found to south of existing access road and across road from Site Timoteo 001, facing south-southeast.



Photograph 16: Close-up of historic-age refuse from Site Timoteo 001. Plan view.

Source: PBS&J, 2010.



Timoteo Communication Site Photographs 13 to 16 PSEC Project

Attachment B – NAHC SLF Search and Information Scoping



An employee-owned company

April 12, 2010

Native American Heritage Commission
c/o Mr. Dave Singleton
915 Capitol Mall, Suite 364
Sacramento, CA 95814-4801

VIA EMAIL: ds_nahc@pacbell.net

Subject: Request for a Sacred Lands File Search for the Timoteo Communication Site for the Public Safety Enterprise Communication (PSEC) Project, located on 14-Acres in the Moreno Valley area, Riverside County, California (USGS Sunnymead, CA. 7.5-minute topographic quadrangle)

Mr. Singleton:

PBS&J would like to determine whether any sacred sites are listed in the NAHC Sacred Lands File (SLF) for an Area of Potential Effect (APE) relating to the PSEC project Timoteo Communication Site. The proposed tower and associated power alignment are located within a 14-acre APE in the Moreno Valley area of Riverside County.

The APE is located in Riverside County, and is found on USGS Sunnymead, CA. 7.5' topographic quadrangle, Township 2 South, Range 3 West, in portions of Sections 25 and 26.

Please notify us of any SLF-listed traditional cultural resources that may be affected by the proposed project. This project and any archaeological survey results are explained in further detail in our forthcoming Cultural Resources Assessment document.

If you have any questions or concerns, please do not hesitate to contact me via the information listed below. PBS&J thanks you in advance for your time and effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer M. Sanka'.

Jennifer M. Sanka, M.A., RPA
Associate Project Manager
PBS&J
JMSanka@pbsj.com

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-8300
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



April 20, 2010

Ms. Jennifer M. Sanka, M.A., RPA, Associate Project Manager

PBSJ650 East Hospitality Lane, Suite 450
San Bernardino, CA 92408

Sent by FAX to: 909-890-3610

No. Pages: 4

Re: Request for a Sacred Lands File Search and Native American Contacts List for the proposed "Timoteo Communications Site for the Public Safety Enterprise Communications (PSEC) Project": located on 14-acres in the City of Moreno Valley, Riverside County, California

Dear Ms. Sanka:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources (c.f. CA Public Resources Code §21070; also c.f. *Environmental Protection Information Center v. Johnson* [1981] 170 Cal App. 3rd 604), was able to perform a record search of its Sacred Lands File (SLF) for the affected project area (APE) requested. The California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines. Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." The NAHC SLF search **did not indicate** the presence of Native American cultural resources within one-half - mile radius of the proposed project site (APE). However, there are Native American cultural resources in close proximity to the APE.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Culturally-affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation Coordinator's office (at (916) 653-7278, for referral to the nearest Information Center of which there are 10.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] et seq), 36 CFR Part 800.3 (f) (2), the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 et seq.) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

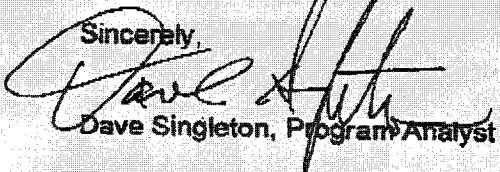
Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery.

Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 - 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties.' However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC. Consultation on specific projects must be the result of an on-going relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. A relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

The response to this search for Native American cultural resources is conducted in the NAHC Sacred Lands Inventory, established by the California Legislature (CA Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10) although Native Americans on the attached contact list may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior' discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,


Dave Singleton, Program Analyst

Attachment: Native American Contacts

Native American Contacts
April 20, 2010
Riverside County

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resource Center
P.O. Box 1477 Luiseno
Temecula, CA 92593
pmacarro@pechanga-nsn.
(951) 308-9295 Ext 8106
(951) 676-2768
(951) 506-9491 Fax

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning, CA 92220 Serrano
mcontreras@monongo-nsn.
(951) 755-5025
(951) 201-1866 - cell
(951) 922-0105 Fax

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza, CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

San Manuel Band of Mission Indians
Ann Brierty, Policy/Cultural Resources Department
26569 Community Center Drive Serrano
Highland, CA 92346
abrierty@sanmanuel-nsn.
(909) 864-8933 EXT-3250
(909) 649-1585 - cell
(909) 862-5152 Fax

San Manuel Band of Mission Indians
James Ramos, Chairperson
26569 Community Center Drive Serrano
Highland, CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

Kupa Cultural Center (Pala Band)
Shasta Gaughen, Assistant Director
35008 Pala-Temecula Rd. PMB Box Luiseno
Pala, CA 92059
cupa@palatribe.com
(760) 891-3590
(760) 742-4543 - FAX

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 609 Cahuilla
Hemet, CA 92546
srtribaloffice@aol.com
(951) 658-5311
(951) 658-6733 Fax

Willie J. Pink
48310 Pechanga Road Luiseno
Temecula, CA 92592
wjpink@hotmail.com
(909) 936-1216
Prefers e-mail contact

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. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Timoteo Communications site for the Public Safety Enterprise Communication (PSEC) Project, located on 14-acres in the Moreno Valley Area of Riverside County, California for which a Sacred Lands File search and Native American Contacts list were requested.

**Native American Contacts
April 20, 2010
Riverside County**

**Serrano Nation of Indians
Goldie Walker
6588 Valaria Drive
Highland , CA 92346
(909) 862-9883**

Serrano

**Cahuilla Band of Indians
Luther Salgado, Sr.
PO Box 391760
Anza , CA 92539
tribalcouncil@cahuilla.net
915-763-5549**

Cahuilla

**Anna Hoover, Cultural Analyst
Pechanga Cultural Resources Department
P.O. Box 2183
Temecula , CA 92593
(951-770-8104
(951) 694-0446 - FAX
ahoover@pechanga-rsn.gov**

Luiseno

**Joseph Ontiveros, Cultural Resource Department
SOBOBA BAND OF LUISENO INDIANS
P.O. BOX 487
San Jacinto , CA 92581
(951) 654-5544, ext 4137
(951) 663-5279
jontiveros@soboba-msn.gov**

Luiseno

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. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Timoteo Communications site for the Public Safety Enterprise Communication (PSEC) Project; located on 14-acres in the Moreno Valley Area of Riverside County, California for which a Sacred Lands File search and Native American Contacts list were requested.



An employee-owned company

June 4, 2010

SAMPLE

Subject: Information Scoping Letter associated with one Archaeological Survey Project: The Timoteo Communication Site and Power Alignment for the Public Safety Enterprise Communication (PSEC) Project, located in the Moreno Valley Area, County of Riverside, California (USGS Sunnymead, CA. 7.5-minute topographic quadrangle)

To Whom It May Concern:

PBS&J has completed an archaeological resources survey for a project area measuring 14 acres in the Moreno Valley Area of Riverside County, CA. The proposed project is the establishment of the Timoteo Communication Site, including a power alignment measuring about 1.25-miles in length. The PSEC project proposes to construct a network of towers to enhance the emergency services network within Riverside County and adjacent to the County borders. The Timoteo Communication Site is currently conceived as a self-supporting, three-legged tower measuring 100-feet in height, with an associated overhead power-line. The power alignment will be placed approximately five feet from an existing dirt access road that extends from a power source on Redlands Boulevard to the Timoteo Communication Site (33°58'02.1"N// 117°09'09.8"W, NAD 83). The archaeological survey conducted in support of this project returned negative findings for prehistoric age archaeological resources and one concentration of recent historic age refuse, consisting of glass and ceramic fragments, small caliber bullet casings, and modern clay-pigeons. These highly fragmented items were found within an area measuring about 10 meters in diameter.

Environmental regulations, including Section 106 of the NHPA of 1966, NEPA and CEQA, consider the effects a project may have on cultural resources, including Historic Properties. The definition of "Historic Properties" can include properties of traditional religious and cultural significance to Native American groups and individuals. To determine whether the proposed project may impact any Historic Properties, including traditional cultural properties, PBS&J has conducted research on the project area, including the request of a Sacred Land File (SLF) search from the Native American Heritage Commission (NAHC). The NAHC does not indicate that any sacred sites are located in this project area or within a 0.50-mile radius of the project area. However, the NAHC recommends additional consultation with regard to development projects in order to avoid any unanticipated discoveries. To this end, the NAHC has listed you as a contact, and has indicated that you may have information about the potential for this project area to contain resources not found in the SLF. This letter is not associated with a formal consultation process, but is an information request that shall be included in our cultural resources assessment document.

We have enclosed location maps showing the general location of the project area, and the project area with reference to the Sunnymead, CA. topographic map. Generally, the project area is found in the vicinity of Moreno Valley in Riverside County, north of State Route 60, south of Interstate 10 and west of State Route 79. Specifically, the project is 0.35 miles east of Redlands Boulevard in the Badlands region, in Sections 25 and 26 of Township 2 South, Range 3 West.

June 4, 2010

Page 2

We wish to ask if you have any information or concerns about this project area, and/or if the proposed project may have an impact on cultural resources that are important to you. Please feel free to contact me at 909.890.5951, x. 2505 or jmsanka@pbsj.com if you have any questions or information, or you may address and mail a response to my attention at our San Bernardino Office.

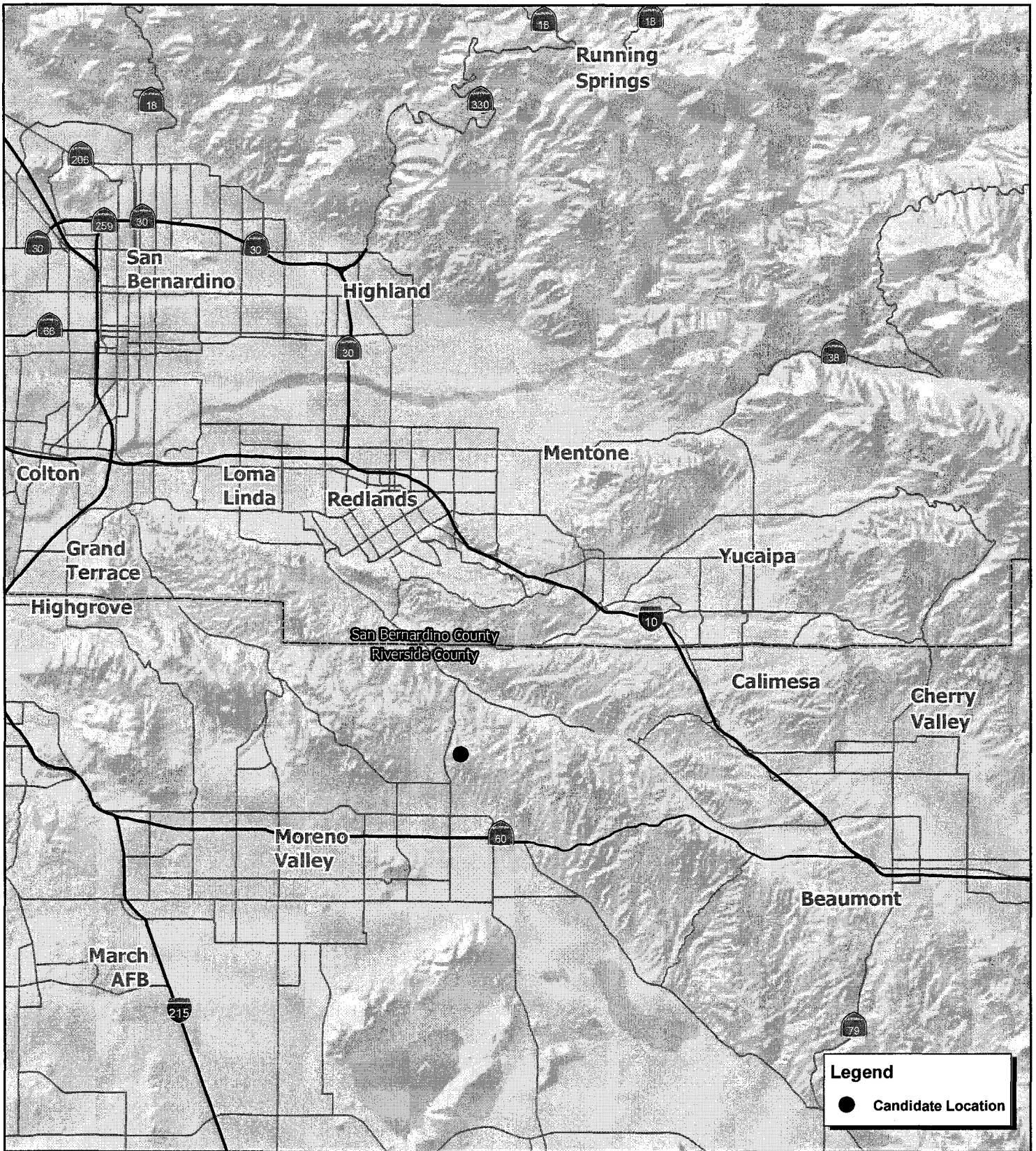
Sincerely,



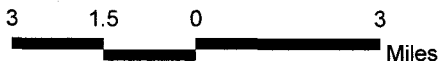
Jennifer M. Sanka, M.A., RPA
Associate Project Manager/Archaeologist
PBS&J
JMSanka@pbsj.com

Enclosure: Regional Location Map
Local Vicinity Topographic Map





Source: ESRI.

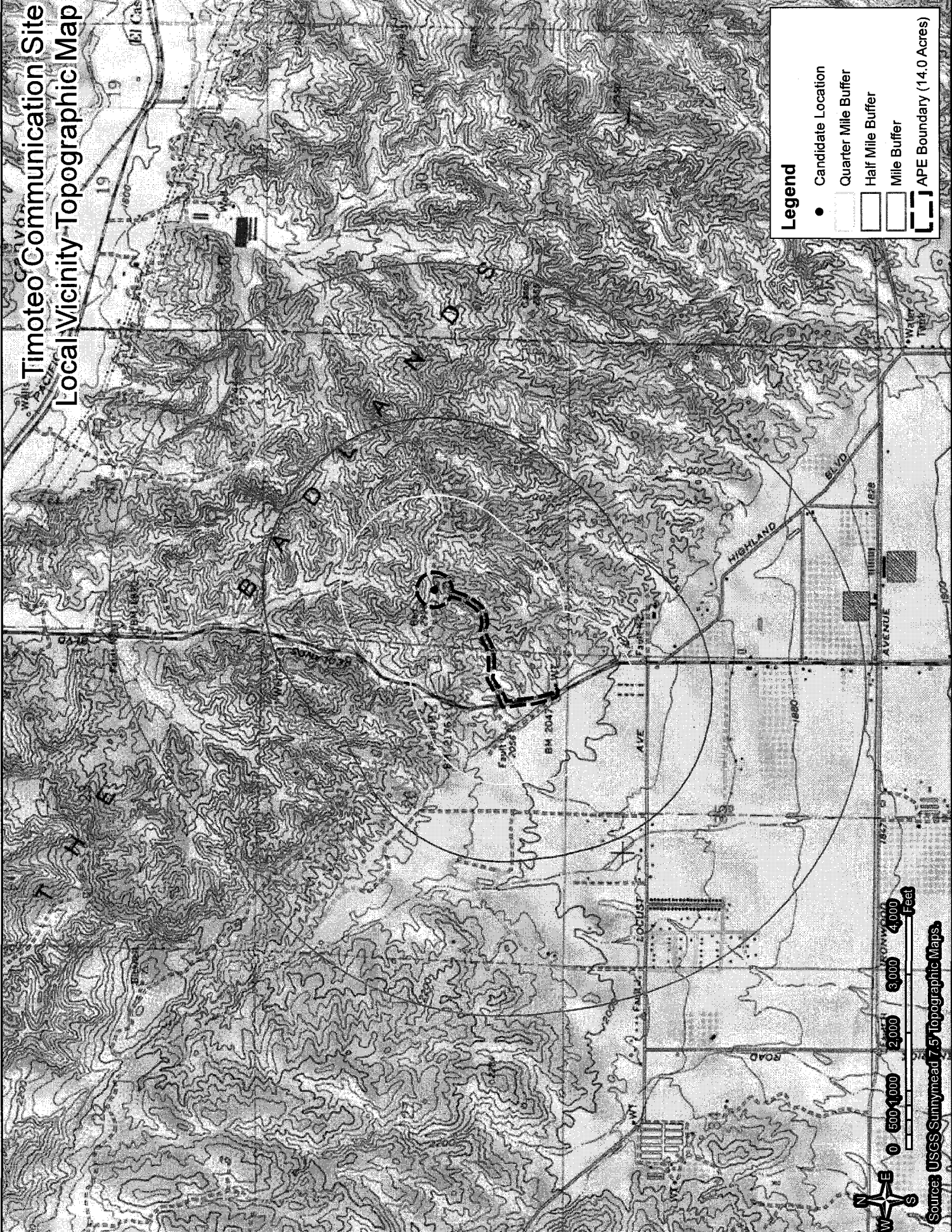


Timoteo Communication Site Regional Location Map

100006021 - 05/2010 | Timoteo_Regional_Location.mxd

COUNTY OF RIVERSIDE
PUBLIC SAFETY ENTERPRISE COMMUNICATION PROJECT

Timoteo Communication Site Local Vicinity Topographic Map



Legend

- Candidate Location
- Quarter Mile Buffer
- Half Mile Buffer
- Mile Buffer
- ▭ APE Boundary (14.0 Acres)

Source: USGS Sunnymead 7.5' Topographic Maps

Attachment C – Professional Qualifications

Jennifer M. Sanka, RPA

Associate Project Manager/Archaeologist
PBS&J

Education

M.A., Religion (Hebrew Bible and Archaeology), Duke University, Durham, North Carolina, 2003
Graduate Certification, Women's Studies, Duke University, Durham, North Carolina, 2003
B.A., Anthropology, Comparative Religion (with Honors), Classical Humanities, Miami University, Oxford, Ohio, 2001

Registrations/Licenses

Registered Professional Archaeologist (RPA), California, 15927, 2006

Certifications

Certified Riverside County Archaeologist, California, 103, 2007

Professional Affiliations

Archaeological Institute of America (AIA)
Register of Professional Archaeologists (RPA)
Society for California Archaeology (SCA)

Ms. Sanka, RPA, is a professional archaeologist and serves as an associate project manager with PBS&J's environmental division. Working in the archaeological field since 1999, she has gained seven years of cultural resource management (CRM) experience, including six years of CRM experience in Southern California. During her employment in Southern California, she has gained project coordination experience by completing numerous projects from the scope of work and fee proposal phase to the production of deliverables and subsequent invoicing.

Ms. Sanka has conducted pre-field assessments, archival research, pedestrian field surveys, site evaluation, testing programs, data recovery projects and analyses, and has authored, certified and provided third-party assessments of numerous Cultural Resources EIR and EIS Sections, CEQA, NEPA and Section 106 compliant documents. These projects have required building and maintaining relationships with a variety of federal, state and local entities, including the Bureau of Land Management (BLM), the United States Forest Service (USFS), the National Parks Service (NPS), the United States Army Corps of Engineers (USACE), Bureau of Indian Affairs (BIA), County and City planning departments, County and City cultural resources managers, and Southern California Native American groups. Her Southern California projects have included residential, commercial, and mixed use developments, public schools, emergency services, transportation expansions, and military training facilities.

Ms. Sanka's PBS&J project experience includes:

Prado Basin Sediment Management Demonstration Archaeological Studies and EIR-EIS Services, Orange County Water District, Riverside, San Bernardino and Orange Counties, California. Project archaeologist and project manager for the Prado Basin Sediment Management Demonstration Project. This project considers the potential impacts of removing sediment from behind the Prado Dam and its subsequent distribution within the main channel of the Santa Ana River. This work effort includes the consideration of the Prado Basin, as well as the Santa Ana River from the Dam to the Pacific Ocean. Duties include managing a monitoring program, managing records searches at CHRIS centers and with the NAHC, completing an intensive pedestrian survey, completing an assessment document, and providing contributions to the resultant EIR-EIS.

Caltrain High Speed Train Corridor - San Francisco to San Jose Archaeological Studies and EIR-EIS Services, California High Speed Rail Authority, San Francisco, San Mateo, and San Jose Counties, California. Staff Archaeologist responsible for background document review and a contributing author to the Cultural Resources Section of the EIR-EIS. Project experience includes the review of local jurisdiction planning documents. The studies and documentation were completed in support of the proposed Caltrain High Speed Train Corridor, San Francisco to San Jose segment, to be submitted to the Federal Railroad Administration. This project entails assessing a 47-mile corridor of the Caltrain route, envisioned to link with other proposed High Speed Train Routes throughout the entirety of California.

Simi Valley General Plan Update Draft EIR, Ventura County, Simi Valley, California. Author of the Cultural Resources Section of the City of Simi Valley

Jennifer M. Sanka, RPA

Associate Project Manager/Archaeologist

General Plan Update EIR. Section included a summary of the significant resources within the City and the Sphere of Influence, Native American information scoping, and proposed measures and policies to address potential future impacts on cultural resources.

Santa Monica Land Use and Circulation Element Update Draft EIR, Los Angeles County, Santa Monica, California. Co-author of the Cultural Resources Section of the City of Santa Monica Land Use and Circulation Element (LUCE) Update EIR. Section included a summary of the significant resources within the City, Native American information scoping, and proposed measures to address potential future impacts on cultural resources.

Southwestern Solar, LLC Constraints Analysis Study, Fresno, Imperial, Kern, Los Angeles, Riverside, and San Bernardino Counties, California; Lyon and Washoe Counties, Nevada; and Pima County, Arizona. Project archaeologist responsible for managing and interpreting CHRIS and NAHC records search data for 14 properties throughout California, Nevada and Arizona. The research was completed to identify cultural resource constraints for future solar facility development, and included a resultant report of findings. Later phases of the project include intensive pedestrian surveys and reports generated in compliance with CEQA, NEPA and Section 106 of the NHPA.

Anaheim Rapid Connection Transit Corridor Survey, Federal Transportation Authority, Orange County, Anaheim, California. Staff archaeologist responsible for the pedestrian field survey and a contributing author to the Archaeological Survey Report. The survey and report were completed in support of the proposed Anaheim Rapid Connection Transit Corridor Study, submitted to the Federal Transportation Authority (FTA Region IX Office). This project envisions connecting the proposed Anaheim Regional Transportation Intermodal Center (ARTIC) in the Platinum Triangle area of the City of Anaheim to the general area of the Anaheim Resort.

Malibu Middle and High School Campus Improvements Survey, Los Angeles County, Malibu, California. Staff archaeologist responsible for portions of the pedestrian field survey and a contributing author to the phase I cultural resources assessment. The study was performed at the request of the Santa Monica-Malibu Unified School District, and was completed in accordance with CEQA and the City of Malibu Local Coastal Program.

Public Safety Enterprise Communication (PSEC) Project Environmental Compliance Services Phase 3, Riverside County Economic Development Agency, Riverside County, California. Associate project manager for the third phase of the PSEC project which involves placement of up to 65 new communication facilities for the County sheriff and fire departments throughout Riverside County. Responsible for mitigation compliance at all sites, as well as compilation of NEPA Environmental Assessments (EAs) for 19 sites on Bureau of Land Management (BLM), U.S. Forest Service, National Park Service, and Bureau of Indian Affairs lands.

Public Safety Enterprise Communication (PSEC) Project Environmental Compliance Services Phase 3, Riverside County Economic Development Agency, Riverside County, California. Cultural resource manager for the third phase of the PSEC project which involves the assessment of any new PSEC

Jennifer M. Sanka, RPA
Associate Project Manager/Archaeologist

Project communication sites and/or associated infrastructure not considered during Phases 1 and 2 of the project. Duties include conducting and managing records searches at CHRIS centers and Class III intensive pedestrian surveys throughout Riverside County, on both public and private lands.

Prior to joining PBS&J, Ms. Sanka's experience with other companies included:

Public Safety Enterprise Communication (PSEC) Project Environmental Compliance Services Phases 1 and 2, Riverside County Facilities Management, Riverside County, California. Project archaeologist and project manager for the cultural resources constraints analysis, and certifying author of the CRA in support of an EIR/EA. Ms. Sanka's role included conducting and managing records searches and Class III intensive pedestrian surveys/Phase I surveys for over 125 proposed emergency services radio tower facilities throughout Riverside County, and along the Riverside County borders in Orange, Imperial, San Bernardino and San Diego Counties. This sizable work effort included communication and permitting efforts with several district offices of the Bureau of Land Management (BLM), the U.S. Forest Service, and the National Park Service, as well as informal consultation efforts with local resource agencies and numerous Southern California Native American groups and individuals. Phases 1 and 2 of this on-going project involved the supervision of various staff members and several subcontracted archaeologists and architectural historians.

Blythe Mining Cultural Resources Assessment, Bureau of Land Management, Riverside County, Blythe, California. Project archaeologist and author of a Cultural Resources Assessment, including Class I records review and Class III Intensive Pedestrian Survey results, for the Collective Asset Partners, LLC Surface Mining project located on BLM lands near the Big Maria Mountains and Blythe.

Guava Street Improvements Survey, Riverside County, Murrieta, California. Project archaeologist and author of phase I cultural resources assessment for SB&O, Inc. This project was completed in accordance with Section 106 of the NHPA, and included working closely with the client and the City of Murrieta. The project resulted in mitigation measures to satisfy the evolving needs of the City of Murrieta with regard to Native American involvement in discretionary projects, to be included in an Initial Study.

Tra Vigne Subdivision Survey, Madera County, Madera, California. Project archaeologist and author of a phase I cultural resources assessment for the County of Madera proposed Tra Vigne subdivision. This proposed residential project included portions of the culturally sensitive San Joaquin River, as well as resultant informal consultations with local Native American groups and individuals.

Marina Park Assessment, Orange County, Newport Beach, California. Project archaeologist and co-author of a Phase I CRA and Significance Evaluation document completed in accordance with Section 106 of the NHPA for the City of Newport Beach. This document included the recordation of six historic-age properties within and adjacent to the proposed Area of Potential Effect, as well as determinations of eligibility for the NRHP, CRHR and the local registers. The proposed mixed-use development included portions of the

Jennifer M. Sanka, RPA

Associate Project Manager/Archaeologist

culturally sensitive California coastline, as well as resultant informal consultations with local Native American groups and individuals.

Desert Oasis Plaza Survey and Paleontologic Mitigation Program, San Bernardino County, Victorville, California. Project archaeologist and certifying author of a Phase I Cultural Resources Assessment. Ms. Sanka also served as the project manager for the paleontologic mitigation-monitoring program for this Hall and Foreman, Inc. commercial development project in the City of Victorville.

Desert Plaza Survey, San Bernardino County, Victorville, California. Project archaeologist and certifying author of a phase I cultural resources assessment for this Hall and Foreman, Inc. commercial development project in the City of Victorville.

Silverlakes Recreation Complex Assessment, Riverside County, Norco, California. Project archaeologist and co-author of a phase I cultural resources assessment and Significance Evaluation document completed in accordance with Section 106 of the NHPA for Belstarr, Inc. This document included the recordation of a historic-age property and determinations of eligibility for the NRHP, CRHR and the local registers. This project included sensitive historic-age residential and equestrian structures of local significance, and resultant informal consultations with various members of City of Norco historic resources groups.

Catt Street Survey, Riverside County, Wildomar, California. Project archaeologist and certifying author of a Phase I Cultural Resources Assessment. This proposed senior living facility was located within Unincorporated Riverside County and written to their published standards.

Moreno Valley 6.66 Acre Survey, Riverside County, Moreno Valley, California. Project archaeologist and author of a phase I cultural resources assessment for this 6.66 acre commercial development in the City of Moreno Valley.

Alessandro Boulevard Retail Building Survey, Riverside County, Moreno Valley, California. Project archaeologist and author of a phase I cultural resources assessment for Terracon. This proposed commercial development was located in the City of Moreno Valley.

Stetson Crossing Survey, Riverside County, Hemet, California. Project archaeologist and author of a phase I cultural resources assessment for the Stetson Crossing Partners, LLC Stetson Crossing project. This document was written in support of an EIR located in the City of Hemet.

Holy Name of Jesus Catholic Church Survey, San Bernardino County, Redlands, California. Project Archaeologist and author of a phase I cultural resources assessment for this Urban Environs project in the City of Redlands. Mitigation included the recordation of an historic-age water conveyance system and evaluations for inclusion in the CRHR.

Almond Plaza Project, San Bernardino County, Redlands, California. Project Archaeologist and author of a phase I cultural resources assessment for this Urban Environs project in the City of Redlands. Mitigation included the

Jennifer M. Sanka, RPA
Associate Project Manager/Archaeologist

recording of an historic-age water conveyance system and evaluations for inclusion in the CRHR.

APN 283-110-019 Survey, Riverside County, Corona, California. Project archaeologist and author of a phase I cultural resources assessment for the REID Co. APN 283-110-019 commercial development project. Mitigation included updates to existing site forms, whereupon previously recorded resources were potentially incorrectly mapped within the project area.

Highgrove Business Center Survey, Riverside County, Highgrove, California. Project archaeologist and author of a phase I cultural resources assessment for this Bixby Land Company light industrial development project. The proposed project was located within Unincorporated Riverside County and written to their published standards.

Stagecoach Park Survey and Paleontologic Mitigation Program, Riverside County, Corona, California. Project archaeologist and author of a Phase I Cultural Resources Assessment. Ms. Sanka also served as the project manager for the paleontologic mitigation-monitoring program for this City of Corona Department of Parks and Recreation proposed public park.

Brookside South Streambed Recharge Survey, Riverside County, Beaumont, California. Project archaeologist and author of a phase I cultural resources assessment and subsequent addendum on the Noble Creek recharge project in the City of Beaumont. This project was completed on behalf of the San Geronio Pass Water Agency.

TTM 32270 Survey and Test Excavations, Riverside County, Riverside, California. Project archaeologist, project manager and field crew chief for the Phase I and Phase II Cultural Resources Assessment and Significance Evaluation for a project in the City of Riverside. This proposed residential development was completed for the Hawarden Development Corporation and assessed several prehistoric age bedrock milling sites.

Temescal Plaza Survey, Riverside County, Corona, California. Project archaeologist and author of a phase I cultural resources assessment for the Temescal-Leroy, LLC commercial development project. This project was located in Unincorporated Riverside County and was written to their published specifications.

Rubidoux Industrial Park Survey, Riverside County, Rubidoux, California. Project archaeologist and author of a phase I cultural resources assessment for the proposed construction of a light industrial development. This project was located in Unincorporated Riverside County and was written to their published specifications.

Palm Desert Sheriff Station Survey, Riverside County, Palm Desert, California. Project archaeologist and author of a phase I cultural resources assessment completed for the County of Riverside Department of Facilities Management. This project assessed a potential Riverside Sheriff Station Site and was written to the published specifications of Riverside County.

TTM 31646 Avenue L Survey, Riverside County, Calimesa, California.

Jennifer M. Sanka, RPA
Associate Project Manager/Archaeologist

Project archaeologist and author of a phase I cultural resources assessment for Urban Environs. This project addressed a proposed residential development and was submitted to the City of Calimesa.

Mid-County Land Reserve Survey, Riverside County, Cabazon, California. Project archaeologist and author of a phase I cultural resources assessment for the County of Riverside Department of Facilities Management. This project assessed a potential Riverside Jail Site and was written to the published specifications of Riverside County. Mitigation included the recordation of several historic age isolated finds.

Garnet Site Reclamation Survey, Riverside County, North Palm Springs, California. Project archaeologist and author of a phase I cultural resources assessment for the Granite Construction Company. This project considered the impacts of a comprehensive surface reclamation project, and was written in accordance with the published specifications of Riverside County.

Perris Boulevard Survey, Riverside County, Perris, California. Project archaeologist and author of a phase I cultural resources assessment for the Vogel Properties light industrial development. Mitigation included the recordation of the remnants of an historic age house, and evaluation for inclusion in the CRHR.

Anderson Property Survey and Significance Evaluations, Riverside County, Moreno Valley, California. Staff archaeologist and co-author of a phase I cultural resources assessment for Highland-Fairview Properties. This proposed residential development impact analysis included the recordation and evaluation of an historic age residence for inclusion in the CRHR and at the local level.

TTM 34779 Survey, Riverside County, Moreno Valley, California. Staff archaeologist and author of a phase I cultural resources assessment for a residential development proposed by Highland-Fairview Properties.

TTM 34778 Survey, Riverside County, Moreno Valley, California. Staff archaeologist and author of a phase I cultural resources assessment for a residential development proposed by Highland-Fairview Properties.

TTM 34777 Survey, Riverside County, Moreno Valley, California. Staff archaeologist and author of a phase I cultural resources assessment for a residential development proposed by Highland-Fairview Properties.

Sycamore Canyon Boulevard Survey and Test Excavations, Riverside County, Riverside, California. Staff archaeologist and field crew chief for the Phase I and Phase II Cultural Resources Assessment and Significance Evaluation for a project in the City of Riverside. This proposed residential development was completed for the Investment Banking Group, and assessed several prehistoric age bedrock milling sites.

Jack Rabbit Trail Survey, Riverside County, Beaumont, California. Staff archaeologist and author of a phase I cultural resources assessment and paleontological records review for Shea Homes. Mitigation included recordation of several previously undetected historic age archaeological sites, as well as updates to previously recorded historic age resources. Additional mitigation was recommended for the historic age transportation corridor known as Jack Rabbit

Trail, including additional recordation efforts and interpretive signage.

Redlands Commerce Center Survey, San Bernardino County, Redlands, California. Staff archaeologist and author of a phase I cultural resources assessment and paleontological records review for the proposed Redlands Commerce Center. Mitigation included the recordation and evaluation of an historic age water conveyance system for inclusion in the CRHR.

La Cadena, LLC Survey, Riverside County, Riverside and Highland, California. Staff archaeologist and author of a phase I cultural resources assessment and paleontological records review for a development project proposed by the La Cadena, LLC.

Najavo Road Survey, San Bernardino County, Apple Valley, California. Staff archaeologist, field crew chief, and author of a phase I cultural resources assessment and paleontological records review for a due diligence completed at the request of the Watsonland Company. Mitigation included the recordation of several historic age resources, and updates to several previously recorded historic age resources.

Iowa Industrial Park Survey, San Bernardino County, Redlands, California. Staff archaeologist and author of a phase I cultural resources assessment for a light industrial project proposed by the IDS Real Estate Group. Mitigation included the recordation and evaluation for inclusion in the CRHR for numerous historic age resources.

Mesa Verdes Estates Secondary Access Road Survey, Riverside County, Calimesa, California. Staff archaeologist and author of a phase I cultural resources assessment for a proposed road alignment to provide access to a City school facility. This project also included the implementation of a paleontologic mitigation-monitoring program completed by a subcontracted firm.

Merill Avenue Survey, San Bernardino County, Chino, California. Staff archaeologist and author of a phase I cultural resources assessment for the Watson Land Company. Mitigation included the recordation and evaluation for inclusion in the CRHR of two historic age dairies known locally as the Van Vliet and Albers Dairy Farms.

Van Buren Street Survey, Riverside County, Coachella, California. Staff archaeologist and author of a phase I cultural resources assessment for the Coachella Land Company in the City of Coachella. Mitigation included the recordation and evaluation for inclusion in the CRHR of an historic age orange grove and associated water conveyance system.

Phase I Surveys, Kern, Imperial, Riverside, San Bernardino and San Diego Counties, California. Field technician for various phase I surveys in Southern California, which include the City of Bakersfield Off Road Vehicle project; Camp Pendleton, Oceanside, CA; Aerial Gunnery Range, Chocolate Mountains; China Lake Naval Air Weapons Station, Ridgecrest; and various other projects located in the City of Hemet, the City of Moreno Valley and the City of Fontana.

Phase II Test Excavations, California and North Carolina. Field technician for phase II testing programs, which included the Twenty-nine Palms Military

Jennifer M. Sanka, RPA

Associate Project Manager/Archaeologist

Training Facility Testing near Twenty-nine Palms and Barstow; Palm Springs, Riverside County, California; Fort Bragg, Fayetteville, North Carolina; and Greensboro (Randolph County), North Carolina.

Phase III Data Recovery Projects, California and Maryland. Field technician for Phase III full data recovery projects, including Santiago Hills in the City of Orange, CA; Downtown Los Angeles Public School number nine project. Excavation and Relocation of an historic cemetery, Los Angeles, Los Angeles County, California; and a historic age homestead near Pokomoke City, Wooster County, Maryland.

Roman Aqaba Project (RAP) Excavations, Aqaba, Jordan. Student Trench Supervisor for the 2000 and 2002 field seasons of the port City of Aila at modern Aqaba, Kingdom of Jordan. The project was sponsored by North Carolina State University, Raleigh, NC, and focused on the economy of this Roman frontier port in the Province of Arabia. This site additionally explored the possibility that the earliest known purposeful built Christian Church was located at Roman Aila. Ms. Sanka's experience at this site included the excavation of a probe for diagnostic pottery along the Byzantine Era curtain wall and salvage archaeology within a Nabatean – Early Roman transition period domestic complex. Ms. Sanka additionally processed and attended pottery calls for all ceramics recovered from her supervised trenches.

Milford Works I Excavations, Oxford, Ohio. Archaeological field school, sponsored by Miami University, Oxford, OH. The excavation of this site focused on salvage archaeological techniques and artifact processing for a proto-historic site located to the northeast of the City of Oxford, Ohio.

Professional Development

Geology for Archaeologists. County of Riverside Transportation and Land Management Agency Continuing Education Course. Palm Desert, CA. Spring 2009.

Riverside County History and Research Resources. County of Riverside Transportation and Land Management Agency Continuing Education Course. Palm Desert, CA. Spring 2009.

An Introduction to Professional Practice under Section 106 of the NHPA. SWCA. Mission Viejo, CA. November 2007.

Project Management Fundamentals. ZweigWhite AIA/CES course. Michael Brandman Associates, Irvine, CA. Fall 2006.

CEQA Basics: Understanding the California Environmental Process. AEP. Chapman University, Orange, CA. Fall 2006.

Governor's Office of Planning and Research (OPR) Land Use Planning and the Protection of Native American Cultural Places. AEP. Irvine, CA. Fall 2006.

Marnie Aislin-Kay

Field Technician
PBS&J

Education

B.A., Anthropology, California
State University, Long Beach
(2002)

Professional Affiliations

Society for California Archaeology
(SCA)

Ms. Aislin-Kay has more than 10 years experience which includes all aspects of field assessments, archival research, along with pedestrian field surveys, site evaluation and testing, and data recovery and analysis in both prehistoric and historic archaeology. She has documented and mapped prehistoric and historic archaeological sites and has extensive pipeline and construction monitoring experience, as well as cultural resources overview talks and education for pre-construction meetings.

Ms. Aislin-Kay has conducted work in a variety of locations in California, such as military facilities and with work in coastal, mountain, and desert regions. Ms. Aislin-Kay has co-authored and contributed to a variety of environmental compliance documents including environmental assessments, environmental impact statements, and environmental impact reports. She also has experience with Sections 106 and 10 of NHPA, NEPA, and CEQA.

Ms. Aislin-Kay's PBS&J project experience includes:

Public Safety Enterprise Communication (PSEC) Project Environmental Compliance Services Phase 3, Riverside County Facilities Management, Riverside County, California. Field technician for the third phase of the PSEC project which involves the assessment of any new PSEC project communication sites and/ or associated infrastructure not considered during Phases 1 and 2 of the project. Duties include Class III intensive pedestrian surveys throughout Riverside County, on both public and private lands.

Prior to joining PBS&J, Ms. Aislin-Kay's experience with other companies included:

Public Safety Enterprise Communication (PSEC) Project Environmental Compliance Services Phases 1 and 2, Riverside County Facilities Management, Riverside County, California. Staff archaeologist for the cultural resources constraints analysis, and co-author of the CRA in support of an EIR-EA. Ms. Aislin-Kay's role included conducting literature searches and Class III intensive pedestrian surveys and Phase I surveys for over 125 proposed emergency services radio tower facilities throughout Riverside County, and along the Riverside County borders in Orange, Imperial, San Bernardino and San Diego Counties.

NEPA Compliance-Telecommunication Facilities, AT&T Mobility, Cricket Communications, Sprint/Nextel, Verizon, American Tower Corporation, Cingular, Royal Street, T-Mobile Vista Towers, DW Horizon, Imperial, San Diego, San Bernardino and Riverside Counties, California. Serving as a project manager and staff archaeologist, provided compliance for telecommunication facilities throughout Southern California. Documents were prepared in strict compliance with the National Environmental Policy Act (NEPA) for the implementation of cellular communication facilities. These projects include the preparation of NEPA level compliance documents in accordance with the Federal Communication Commissions regulations as it specifically pertains to telecommunication facilities. In addition, federal or local jurisdictional rules and regulations and consultations were incorporated into individual documents for each cultural resource records search, Phase I survey and Phase II site testing, view shed impact assessments, including



recommendations for architectural and historical structure assessment, and mitigation construction monitoring.

Victorville WinCo Survey, Victorville, Hall & Foreman Inc., California. Staff archaeologist and co-author of a Phase I cultural resources assessment for the Hall and Foreman, Inc., commercial development project in the City of Victorville.

Stagecoach Park Survey and Paleontologic Mitigation Program, City of Corona, Corona, California. Staff archaeologist, Phase I cultural resources assessment for this City of Corona Department of Parks and Recreation proposed public park.

Camp Pendleton Marine Base, USMC, San Diego County, California. Archeological field assistant, responsibilities included data recovery excavation and significance testing, screening, note keeping, artifact collection and sorting, and unit profile drawing at Camp Pendleton Marine Base.

Otay River Toll Road Construction Project, OTAY RIVER CONSTRUCTORS, San Diego County, California. Educating all project participants and their field representatives, regarding the handling of cultural resources both historic and prehistoric. This included both project procedures for dealing with unanticipated discoveries and the known cultural sites in accordance with the law.

Twenty Nine Palms U.S. Military Marine Base Field Survey, USMC, Twenty Nine Palms, California. Archaeological field assistant, Phase I field survey. Survey involved 20-meter transects, use of GPS and topographic maps, photography and site mapping and recordation in the Quakenbush section of Twenty Nine Palms U.S. Military Marine Base.

Hellman Ranch, John Laing Homes, Seal Beach, California. Field technician and archaeological monitor. Assisted with emergency burial excavations. More than 20 Native American (Tongva-Gabrieleno) remains were discovered during ongoing monitoring of four previously tested sites. Responsibilities included excavation and removal of individuals for repatriation and reburial, coordination with Native Americans, and monitoring of grading activities. All work performed with ongoing construction and time restraints.

Level 3 Long Haul Fiber Optics Project, California Loop Segment WS06, Level 3, Vandenberg Air Force Base to Burbank, California. Cultural resources field monitoring coordinator, responsibilities included daily coordination of field monitors, scheduling, and logistics. In addition, performed long term daily monitoring of heavy equipment and construction crews in a variety of rigorous environments, note keeping and report writing, as well as archaeological site testing using a variety of excavation techniques, screening, note keeping, and artifact collection.

Salvage Excavation of a Burial Feature at CA-SBA-1213, Level 3 Long Haul Fiber Optic Project, California Loop Segments WS04, WS05, WS06, Level 3, Sacramento to San Bernardino and San Jose to Burbank, California. Cultural resources field monitor, field assistant, and report contributor, responsibilities included performing long term daily monitoring of heavy

Marnie Aislin-Kay

Field Technician

equipment and construction crews in a variety of rigorous environments, note keeping and report writing, as well as archaeological site testing using a variety of excavation techniques, screening, note keeping, and artifact collection.

Attachment D – DPR 523 Form (Non-Confidential)

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # 33-18077
HRI #
Trinomial
NRHP Status Code

Other Listings
Review Code

Reviewer

Date

Page 1 of 4

*Resource Name or #: Site Timoteo 001

P1. Other Identifier: PBS&J Temporary Site Identifier: Site Timoteo 001

***P2. Location:** Not for Publication Unrestricted

*a. County: Riverside

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad: Sunnymead Date: 1967, revised 1980 T 2S; R 3W ; SE ¼ of the SE ¼ of Sec 26; SBBM

c. Address:

City: Moreno Valley (unincorporated) Zip:

d. UTM: Zone: 11; 0485433 mE// 3758253 mN (NAD 83) - Approximate center point

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) . Elevation: Approximately 2110' ASL.
From State Route 60, exit Redlands Boulevard and proceed north. Turn right (east) onto an unnamed dirt road that extends from Redlands Boulevard, approximately 0.50 mile north of the intersection of Redlands Boulevard and Locust Avenue. The site is located directly north of the unnamed dirt road, about 500 feet from the intersection of the dirt road and Redlands Boulevard.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)
Site Timoteo 001 consists of an extremely sparse recent historic-age refuse scatter containing fragments of amber, clear, green, flat aqua (window) and mirror glass. Additional site constituents include: modern clay pigeons, a few small caliber bullet casings, a modern baby food jar lid, and three sherds of recent historic-age ceramics. The majority of the observed items were modern in age, with the exception of the three potentially historic-age ceramic sherds, and two heavily patinated glass fragments (See P5b). The items were all found within an area measuring 30 feet in diameter, and directly north of an unnamed dirt access road extending east from Redlands Boulevard.

***P3b. Resource Attributes:** (List attributes and codes) AH4

***P4. Resources Present:** Building Structure Object Site District Element of District Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #) Close-up of fragmented ceramics and glass from Site Timoteo 001. Plan view.

***P6. Date Constructed/Age and Sources:** Historic
 Prehistoric Both

***P7. Owner and Address:**

***P8. Recorded by:** (Name, affiliation, and address)
JM Sanka
PBS&J
650 East Hospitality Lane, Ste 450
San Bernardino, CA 92408

***P9. Date Recorded:** 04/08/10

***P10. Survey Type:** (Describe)
Phase I Pedestrian Survey

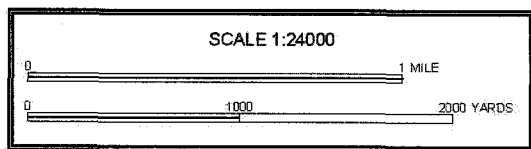
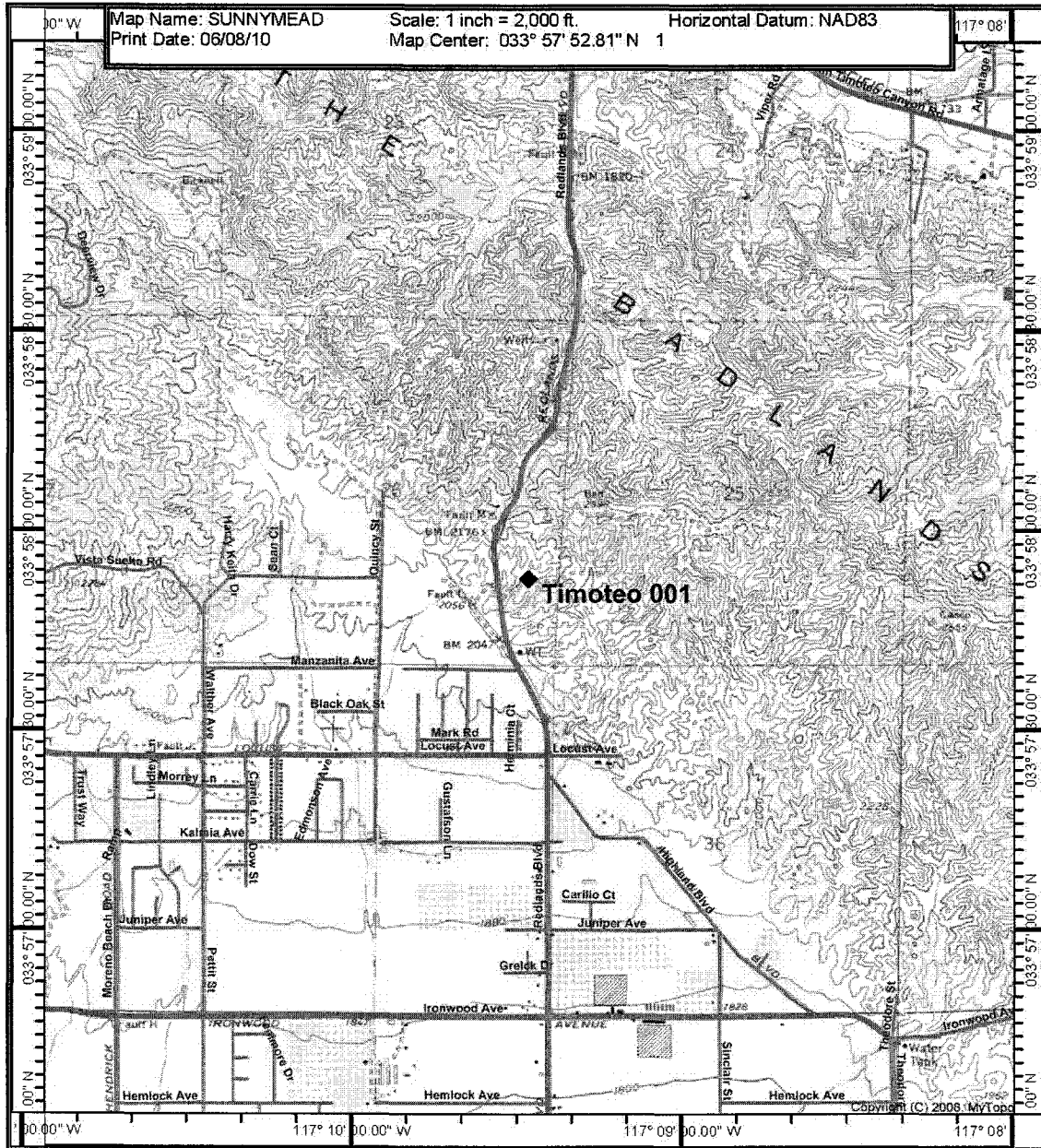
***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") Sanka, JM (PBSJ). 2010.

Letter Report - Subject: ADDENDUM to the Cultural Resources Assessment for the Public Safety Enterprise Communication (PSEC) Project, Riverside, Orange, San Bernardino, and San Diego Counties, California (MBA 2008a) - Timoteo Communication Site. Report on-file at the County of Riverside Economic Development Agency and the Eastern Information Center, University of California, Riverside.

***Attachments:** NONE Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (List):

DPR 523A (1/95)

*Required information



ARCHAEOLOGICAL SITE RECORD

Page 3 of 4

*Resource Name or #: Site Timoteo 001

*A1. Dimensions: a. Length: × b. Width: 30-feet in diameter.

Method of Measurement: Paced Taped Visual estimate Other:

Method of Determination (Check any that apply.): Artifacts Features Soil Vegetation Topography
 Cut bank Animal burrow Excavation Property boundary Other (Explain):

Reliability of Determination: High Medium Low Explain: Visual Inspection

Limitations (Check any that apply): Restricted access Paved/built over Site limits incompletely defined
 Disturbances Vegetation Other (Explain):

A2. Depth: None (High Probability) Unknown Method of Determination: Visual Inspection

*A3. Human Remains: Present Absent Possible Unknown (Explain): None observed within the site during the pedestrian survey

*A4. Features (Number, briefly describe, indicate size, list associated cultural constituents, and show location of each feature on sketch map.):
No associated features.

*A5. Cultural Constituents (Describe and quantify artifacts, ecofacts, cultural residues, etc., not associated with features.): Artifacts consisted of fragments of amber, clear, green, flat aqua (window) and mirror glass, modern clay pigeons, a few small caliber bullet casings, a modern baby food jar lid, and three sherds of recent historic-age ceramics. The majority of the observed items were modern in age, with the exception of the three potentially historic-age ceramic sherds, and two heavily patinated glass fragments. The items were all found within an area measuring 30 feet in diameter, and directly north of an existing dirt road.

*A6. Were Specimens Collected? No Yes (If yes, attach Artifact Record or catalog and identify where specimens are curated.)

*A7. Site Condition: Good Fair Poor (Describe disturbances.): Maintenance activities associated with the adjacent dirt road.

*A8. Nearest Water (Type, distance, and direction.): Unnamed drainage found approximately 1000' to the west of the site.

*A9. Elevation: Approximately 2110' ASL

A10. Environmental Setting (Describe culturally relevant variables such as vegetation, fauna, soils, geology, landform, slope, aspect, exposure, etc.): The vegetation within the vicinity of Site Timoteo 001 consists of sparse scattered shrubs with heavily disturbed stands of ruderal forbs and non-native grasses. The plant species observed during the County of Riverside Environmental Programs Department (EPD) biological resources survey included: sugar bush (*Rhus ovata*), brittlebush (*Encelia farinosa*), deerweed (*Lotus scoparius*), chaparral yucca (*Yucca whipplei*), California aster (*Lessingia flaginifolia* var. *californica*), common sunflower (*Helianthus annuus*), Russian thistle (*Salsola kali*), black mustard (*Brassica nigra*), and slender wild oat (*Avena barbata*) (EPD 2010).

A11. Historical Information:

*A12. Age: Prehistoric Protohistoric 1542-1769 1769-1848 1848-1880 1880-1914 1914-1945
 Post 1945 Undetermined Describe position in regional prehistoric chronology or factual historic dates if known:

A13. Interpretations (Discuss data potential, function[s], ethnic affiliation, and other interpretations): The artifacts recorded as Site Timoteo 001, and found to the north of a maintained dirt road did not continue into the berm of the road, or continue across the road; rather, wood, modern car parts, modern nails and coils from a mattress/box spring were found directly south of the road and to the south-southeast of the site. All artifacts were located at the surface, and the site does not appear to exhibit vertical depth. The presence of illegal refuse dumping in this general area, as evidenced by numerous modern refuse piles along the nearby access road, appear to indicate that the site represents a single refuse dumping episode. In addition, the inclusion of a high percentage of modern refuse within Site Timoteo 001 indicates that this refuse dumping episode likely took place within the modern era, and happens to include approximately five artifacts of recent historic-age.

A14. Remarks: Site Timoteo 001 does not appear to offer any additional interpretive data to the history of this region beyond the information gathered in the creation of this form. None of the constituents of the resource appear to be historically significant, and the site is recommended ineligible for inclusion in the CRHR.

A15. References (Documents, informants, maps, and other references):

County of Riverside Environmental Programs Department (EPD). 2010. Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis For County of Riverside San Timoteo Public Safety Enterprise Communication Project. Report on-file at the County of Riverside Economic Development Agency.
Michael Brandman Associates (MBA). 2008a. Cultural Resources Assessment Public Safety Enterprise Communication Project, Riverside, Orange, San Bernardino, and San Diego Counties, California. (RI-8171). Report on file at the Eastern Information Center, University of California, Riverside.
Sanka, JM (PBSJ). 2010. Letter Report - Subject: ADDENDUM to the Cultural Resources Assessment for the Public Safety Enterprise Communication (PSEC) Project, Riverside, Orange, San Bernardino, and San Diego Counties, California (MBA 2008a) - Timoteo Communication Site. Report on-file at the County of Riverside Economic Development Agency and the Eastern Information Center, University of California, Riverside.

A16. Photographs (List subjects, direction of view, and accession numbers or attach a Photograph Record.): See Photographic Record.

Original Media/Negatives Kept at:

*A17. Form Prepared by: J. Sanka

Date: June 8, 2010

Affiliation and Address:

J. Sanka (PBS&J)
650 East Hospitality Lane, Suite 450
San Bernardino, CA 92408
DPR 523C (1/95)

*Required information

PHOTOGRAPH RECORD

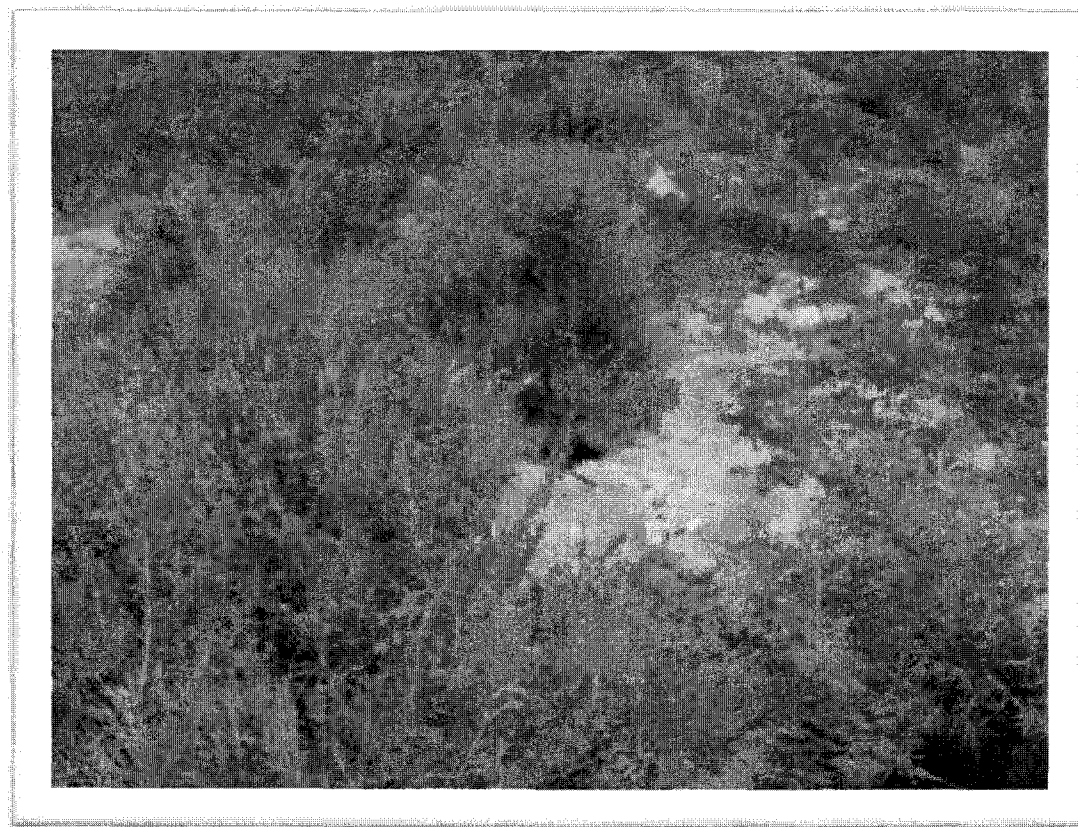
Camera Format:

Lens Size:

Film Type and Speed: digital

Negatives Kept at: none- digital

Photographs and photograph list.						
Mo.	Day, Year	Time	Exposure	Subject/Description	View To	Accession#
04	8, 2010	a.m.	1	Overview of Site Timoteo 001, taken from an adjacent dirt access road.	N-NW	



Photograph 1. Overview of Site Timoteo 001, taken from an adjacent dirt access road. View to the north-northwest.

Appendix D – Paleontological Resources Assessment



PALEO ENVIRONMENTAL ASSOCIATES

Paleontologic Resource Management

2248 Winrock Avenue
Altadena, CA 91001-3205
626/797-9895 tel., fax
paleo@earthlink.net

1731 New Hampshire Drive
Costa Mesa, CA 92626
714/241-8880, 949/552-5852
mroeder1@earthlink.net

TO: Ms. Jennifer M. Sanka, M.A.
PBS&J
650 East Hospitality Lane, Suite 450
San Bernardino, CA 92408

FROM: E. Bruce Lander, Ph.D.
Paleo Environmental Associates, Inc.
2248 Winrock Avenue
Altadena, CA 91001-3205

DATE: April 13, 2010

SUBJECT: **Paleontologic resource inventory and impact assessment in support of County of Riverside Public Safety Enterprise Communication Project, Timoteo Communication Site, Riverside County, California**

Introduction

The County of Riverside Economic Development Agency's (County's) Public Safety Enterprise Communication Project (PSEC), Timoteo Communication (Project) Site is located on the southwestern slope of The Badlands in unincorporated Riverside County. A tripole communication tower will be installed just east of Redlands Boulevard and immediately east of, and on the same hill as, benchmark 2398 (Bad) (Figure 1). The existing access road begins at Redlands Boulevard, approximately 0.5 mile north of the intersection of the latter street and Locust Avenue, and about 1.3 miles north of the intersection of Redlands Boulevard and State Route 60 (Moreno Valley Freeway). The Project site is situated in the northeastern $\frac{1}{4}$ of the southwestern $\frac{1}{4}$ of Section 25 in Township 2 South and Range 3 West of the San Bernardino Base and Meridian (Figure 1). Topographic map coverage of the Project site is provided at a scale of 1:24,000 by the United States Geological Survey Sunnymead Quadrangle, California—Riverside Co., 7.5-Minute Series (Topographic) (1973, photoinspected 1973, photorevised 1980). Construction-related earth-moving activities at the Project site would include grading for the communication tower pad, as well as augering for tower footings and for utility poles along the access road.

The County has required that this paleontologic resource inventory and impact assessment be conducted in support of Project construction because of the potential for paleontologic resources being adversely affected by construction-related earth-moving activities at the Project site. The sedimentary stratigraphic unit underlying the Project site has yielded fossilized remains in the Project site vicinity.

Environmental Setting

Surficial geologic mapping of the Project site and vicinity by Morton and Matti (2001) and Dibblee (2003) indicates that the Project site (including access road) is underlain by the Middle

Member or main part of the continental San Timoteo Formation, which includes the Bautista Formation of Frick (1921) (Reynolds and Reeder 1986, 1991). In The Badlands, the San Timoteo Formation comprises two or three units. The Middle Member of Morton and Matti (2001) appears to be the same as the upper part of Unit 3 of Albright (1999), and the Lower Silty Facies of Reynolds and Reeder (1986, 1991). The Middle Member consists mostly of (1) thick, light-gray, pebbly to cobbly, moderately to well indurated layers of medium- to coarse-grained sandstone with (2) conglomerate beds being more common in the upper part; (3) subordinate, pale brown to light gray, fine-grained sandstone beds and pebbly sandstone layers, and (4) numerous reddish-brown sandstone intervals and reddish-brown clay-rich paleosols (Morton and Matti 2001).

Paleontologic resources include fossilized remains and the respective fossil localities, associated specimen data and corresponding geologic and geographic locality data, and the fossil-bearing strata. Although no previously recorded fossil locality was documented as occurring at the Project site as a result of the field survey of 4-8-2010, the literature review and the archival search at the Natural History Museum of Los Angeles County Vertebrate Paleontology Department (LACM) that were completed in support of this inventory and assessment documented numerous previously recorded fossil localities as occurring in the Middle Member (including Unit 3, Lower Silty Facies) very near the Project site. These localities have yielded fossilized bones and teeth representing taxonomically diverse assemblages that comprise extinct species of land mammals. These taxa include rabbits (cottontail), rodents (gopher; cotton and kangaroo rats; woodrat; pocket and deer mice), and horses assignable to the early to middle Blancan North American Land Mammal Age (NALMA) (Blancan I to Blancan III; early to middle Pliocene Epoch) (Frick 1921, Reynolds and Reeder 1986, 1991, Albright 1999, Bell et al. 2004). These and other localities have produced fossilized remains representing other species, and include the bones and scales of fishes, the shells of fresh-water and/or land snails, and leaves representing taxonomically highly diverse assemblages comprising extinct species of land plants (cedar; fir; Coulter, sugar, and yellow pines; big-cone spruce; alder; ash; aspen; barberry; box elder; buck and deer brushes; currant; dogwood; false indigo; holly-leaf cherry; lilac; madrone; magnolia; maple; mountain mahogany; poplar; serviceberry; snow berry; cottonwood; silk-tassel and sugar bushes; sycamore; willow; reed) (Axelrod 1966, Reynolds and Reeder 1986, 1991).

The land mammal remains from the Middle Member of the San Timoteo Formation are considered to be scientifically highly important because the taxa they represent have been critical in determining the geologic ages of the respective fossil-bearing strata, whereas the mollusk and, in particular, the land plant remains are regarded as similarly important because the species they represent have been essential in reconstructing the depositional paleoenvironments, habitats, and paleoclimates represented by the strata. Moreover, the land mammal and land plant remains also represent taxonomically highly diverse assemblages. Finally, nonmarine mollusks and land mammal and plant remains are comparatively rare in the fossil record. Based on these previously recorded fossil occurrences, there would probably be a high potential for scientifically highly important fossilized remains being encountered by construction-related earth-moving activities at the Project site. For this reason, the Middle Member of the San Timoteo is considered to be highly important paleontologically.

Adverse Environmental Impacts

Similarly, there also would be a correspondingly high potential for the disturbance and loss of

paleontologic resources as a result of these earth-moving activities. Therefore, the Middle Member of the San Timoteo Formation would be regarded as paleontologically highly sensitive to the adverse environmental impact of such activities at the Project site (Figure 1).

Identifiable fossilized remains recovered from the Middle Member at the Project site would be considered to be particularly important scientifically if they represented a new or rare species; a geologic (temporal) or geographic range extension; a new taxonomic record for the stratigraphic unit; an age-diagnostic or environmentally sensitive species; or a skeletal element different from, or a specimen more complete than, those now available for its respective species. The recovery of remains representing an age-diagnostic species would be essential in determining the age of the fossil-bearing strata, whereas the recovery of remains representing an environmentally sensitive species would be critical in paleoenvironmental, habitat, or paleoclimatic reconstruction. In addition, such remains would contribute to more comprehensive documentation of the diversity of plant and animal life that existed at and near the Project site during the early to middle Pliocene Epoch.

Legal Mandates

Under California law, fossil localities are protected by the California Environmental Quality Act of 1970 (CEQA); California Administrative Code, Title 14, Section 4306 *et seq.*; and California Public Resources Code (PRC) Section 5097.5. CEQA requires that public agencies not approve a project as proposed unless there is a feasible alternative or feasible mitigation measures available that would substantially lessen the significant environmental effects of the project (Chapter 1, Section 21002). California PRC 5097 protects vertebrate fossil localities, including fossilized footprints or any other paleontologic feature, situated on public land. In response to these acts, the County, as the CEQA lead agency for the Project, has developed its own measures for protecting paleontologic resources on land under its jurisdiction.

Mitigation

If implemented, the following measures would reduce the impact of construction-related earth-moving activities at the Project site to a less-than-significant level. The measures are in compliance with Society of Vertebrate Paleontology (Reynolds et al. 1995, 1996) standard measures for mitigating the adverse environmental impact of construction on paleontologic resources and for the museum repository acceptance of a mitigation program fossil collection. The measures would be completed in conformance with any County requirement for the Project that addresses the mitigation of impacts on paleontologic resources.

Task 1—Retention of Paleontologist.—Prior to any earth-moving activity, the services of a qualified paleontologist approved by the County will be retained to implement the following mitigation measures.

Task 2—Museum Storage Agreement.—The paleontologist will develop a formal agreement with a recognized museum repository, such as the LACM, regarding any condition that will be required before the fossilized remains recovered as a result of implementing these measures will be accepted by the repository for permanent storage and maintenance.

Task 3—Paleontologic Monitoring and Fossil or Sample Recovery.—Earth-moving activities

will be monitored on a full-time basis by a paleontologic construction monitor to allow for the recovery of larger fossilized remains. Monitoring will consist of visually inspecting fresh exposures and debris piles generated by these activities. Sedimentary rock samples will be collected from selected stratigraphic levels and stockpiled for later processing. The monitor will have the authority to divert earth-moving activities temporarily around a fossil or sampling locality until the remains or a rock sample have been recovered from that locality. The monitor will recover any remains or sample as quickly as possible to avoid or minimize any construction delay. Oriented rock samples will be recovered for paleomagnetic analysis.

Task 4—Final Laboratory Tasks.—Stockpiled rock samples will be processed to allow for the recovery of smaller fossilized remains that normally are too small to be observed by the monitor in the field. No more than 3,000 pounds of rock will be processed. All fossil specimens recovered from the Project site as a result of monitoring or sample processing will be treated (prepared, identified, curated, and catalogued) in accordance with designated museum repository requirements. As appropriate, splits of the rock samples will be submitted to commercial laboratories for pollen or microfossil identification and analysis, and oriented rock samples will be submitted for paleomagnetic analysis.

Task 5—Reporting.—The monitor will maintain daily monitoring logs that record the fossilized remains or rock samples that were recovered, and associated specimen or sample data and corresponding geologic and geographic locality data. A final technical report of results and findings will be prepared by the paleontologist in accordance with any County requirement.

Literature Cited

Albright, L.B., III. 1999. Biostratigraphy and vertebrate paleontology of the San Timoteo Badlands, southern California. *University of California Publications in Geological Sciences* 144:1-121.

Axelrod, D.I. 1966, The Pleistocene. Soboba Flora of southern California. *University of California Publications in Geological Sciences* 60:1-79.

Bell, C.H., E.L. Lundelius Jr., A.D. Barnosky, R.W. Graham, E.H. Lindsay, D.R. Ruez Jr., H.A. Semken Jr., S.D. Webb, and R.J. Zakrzewski. 2004. The Blancan, Irvingtonian and Rancholabrean Mammal Ages. Pp. 232-314 in M. O. Woodburne (ed.). *Late Cretaceous and Cenozoic Mammals of North America*. Columbia University Press, New York.

Dibblee, T.W., Jr. 2003. Geologic map of the Sunnymead/south ½ of Redlands Quadrangles, San Bernardino and Riverside County, California. *Dibblee Geology Center Map* DF-110.

Frick, C. 1921. Extinct vertebrate faunas of the badlands of Bautista Creek and San Timoteo Canyon, southern California. *University of California Publications, Bulletin of the Department of Geology* 12(5):277-424.

Morton, D.M., and J.C. Matti. 2001. Geologic map of the Sunnymead 7.5' Quadrangle, Riverside County, California, Version 1.0. *United States Geological Survey Open-file Report* 01-450.

Reynolds, R.E., and W.A. Reeder. 1986. Age and fossil assemblages of the San Timoteo Formation, Riverside County, California. *In* M.A. Kooser and R.E. Reynolds (eds.). *Geology around the margins of the eastern San Bernardino Mountains. Publications of the Inland Geological Society* 1:51-56.

Reynolds, R.E., and W.A. Reeder. 1991. The San Timoteo Formation, Riverside County, California. *In* M.O. Woodburne, R.E. Reynolds, and D.P. Whistler (eds.). *Inland southern California: The last 70 million years: A self-guiding tour of major paleontologic localities from Temecula to Red Rock Canyon: Fossils, structure, and geologic history. San Bernardino County Museum Association Quarterly* 38(3&4):44-48.

Reynolds, R.E., et al. 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: Standard guidelines. *Society of Vertebrate Paleontology News Bulletin* 163:22-27.

Reynolds, R.E., et al. 1996. Conditions of receivership for paleontologic salvage collections. *Society of Vertebrate Paleontology News Bulletin* 166:31-32.

2010-2
riverside co. psec-timoteo.doc

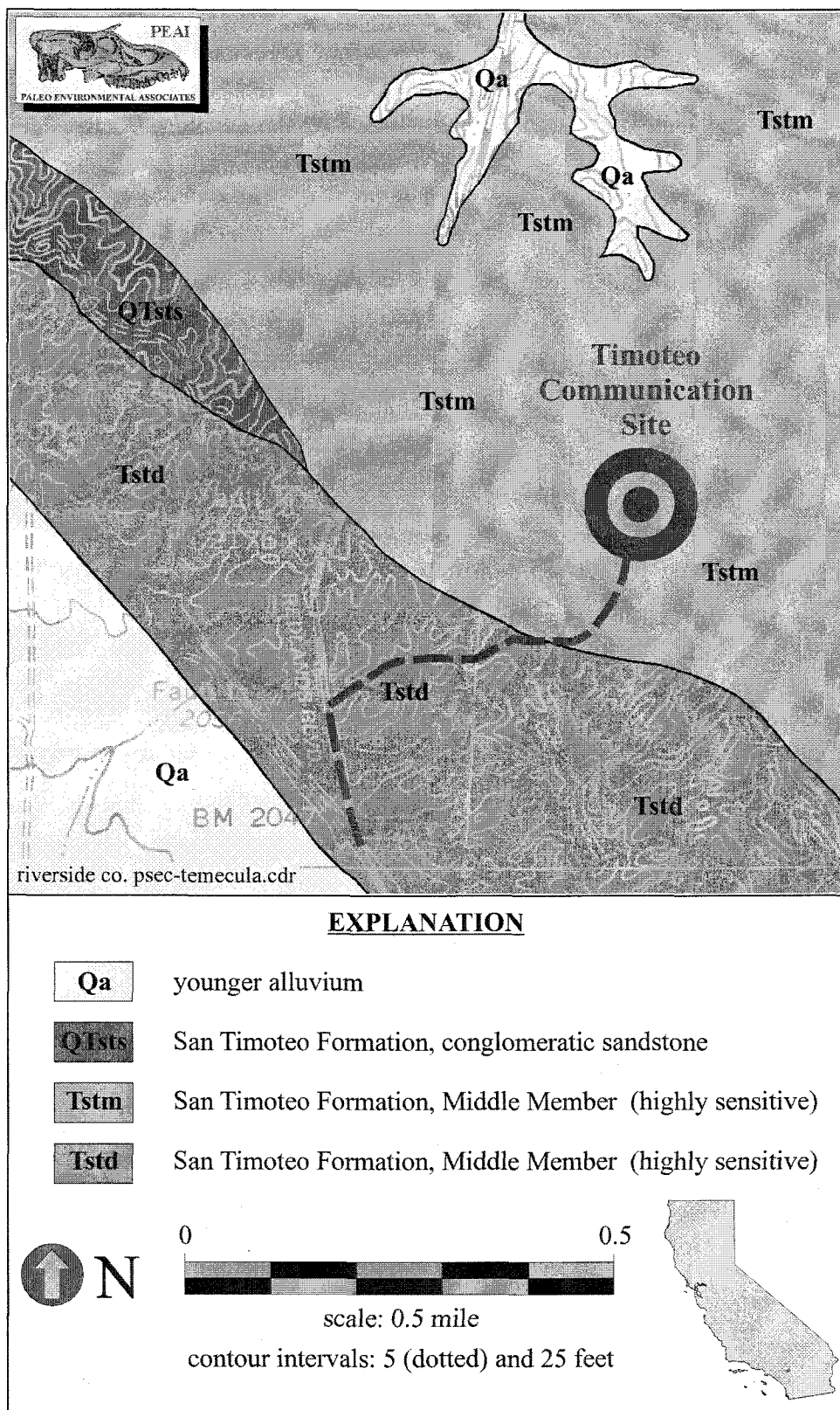


Figure 1.—Paleontologic resource impact sensitivity map, County of Riverside Public Safety Enterprise Communication Project, Timoteo Communication Site, Riverside County, California. Base map: United States Geological Survey Sunnymead Quadrangle California—Riverside Co., 7.5-Minute Series (Topographic) (1967, photoinspected 1973, photorevised 1980). Geology after Morton and Matti (2001) and Dibblee (2003).