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In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,



John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



3550 E. Florida Ave., Suite H  
Hemet, CA 92544  
O: (951) 766-2000 | F: (951) 766-0020

September 19, 2013

Paul Macarro  
Cultural Resources Manager  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Macarro:

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During the Phase I survey effort, 11 cultural resources were identified within the Project Survey Area that must be evaluated against the criteria of eligibility for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These resources consist of two isolated artifacts (33-021031 and 33-023477), one built-environment resource (33-013871), and eight archaeological sites. The eight archaeological sites include two multicomponent sites (CA-RIV-11571/H and CA-RIV-11574/H) that contain both



historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575, CA-RIV-11576, CA-RIV-11585, and 33-016689). Site locations are shown on the confidential Project Location Map attached to this document.

Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

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John J. Eddy, RPA  
Associate Archaeologist  
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Enclosure: Project Location Map





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September 19, 2013

Anna Hoover  
Cultural Analyst  
Pechanga Cultural Resources Department  
P.O. Box 2183  
Temecula, CA 92593

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Ms. Hoover:

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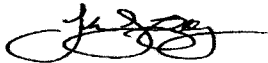
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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



3550 E. Florida Ave., Suite H  
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September 19, 2013

Joseph Hamilton  
Chairman  
Ramona Band of Cahuilla Mission Indians  
P.O. Box 391670  
Anza, CA 92539

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Hamilton:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

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September 19, 2013

Bo Mazzetti  
Chairperson  
Rincon Band of Mission Indians  
1 West Valley Road  
Valley Center, CA 92082

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

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Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

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We are interested in working with the Native American community to better understand cultural landscapes, taskscapes, and family/social group resource gathering areas from a Native perspective and we are requesting oral historical, ethnographic, ethnohistorical and other sources of information to assist us in National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) evaluations of these archaeological resources.

More specifically we need information on the Adobe Springs village site (CA-RIV-716), located approximately one-mile south of the Project Survey Area, and its associated village landscape. Some of the important questions we hope to explore are:

- Is there a Native American name for the Adobe Springs Village site or clans/families that lived there?
- What were the boundaries of the Adobe Springs village landscape and how were village landscape boundaries defined and maintained?
- Several Luiseño concepts of land classification are reported in White (1963) and Oxendine (1983). *Tchon tcho'mi* (Oxendine 1983:57) or *tch'o'num tcho'mi* (White 1963:123, 165) relates to the communal ownership of the village territory or village landscape; *tch'o'num* (White 1963:123) refers to the communal use of an area such milling areas within a village (True et al. 1974:43); and *tungva* describes properties owned by a specific family or individual (White 1963:125, 165). Are these interpretations



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In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,



John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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September 19, 2013

Vincent Whipple  
Tribal Historic Preservation Officer  
Rincon Band of Mission Indians  
1 West Valley Road  
Valley Center, CA 92082

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Whipple:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map





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September 19, 2013

Shasta Gaughen  
Historic Preservation Office  
Pala Band of Mission Indians  
35008 Pala Temecula Road, PMB 50  
Pala, CA 92059

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Ms. Gaughen:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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September 19, 2013

Randall Majel  
Chairperson  
Pauma & Yuima Reservation  
P.O. Box 369  
Pauma Valley, CA 92061

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Majel:

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Associate Archaeologist  
Applied Earthworks, Inc.

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September 19, 2013

Mark Macarro  
Chairperson  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Macarro:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

The Project proposes to extend the existing Clinton Keith Road between Antelope Road and State Route 79 (SR 79). Since the approval of the Supplemental Environmental Impact Report (SEIR) in 2006, two segments of the Project have been constructed as part of the City of Murrieta's local road improvement project for access to a new hospital, and as part of Tract 29484, respectively. There are two segments remaining to be built. The four segments are as follows:

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During the Phase I survey effort, 11 cultural resources were identified within the Project Survey Area that must be evaluated against the criteria of eligibility for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These resources consist of two isolated artifacts (33-021031 and 33-023477), one built-environment resource (33-013871), and eight archaeological sites. The eight archaeological sites include two multicomponent sites (CA-RIV-11571/H and CA-RIV-11574/H) that contain both



historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575, CA-RIV-11576, CA-RIV-11585, and 33-016689). Site locations are shown on the confidential Project Location Map attached to this document.

Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

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September 19, 2013

Paul Macarro  
Cultural Resources Manager  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

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September 19, 2013

Anna Hoover  
Cultural Analyst  
Pechanga Cultural Resources Department  
P.O. Box 2183  
Temecula, CA 92593

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

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September 19, 2013

Joseph Hamilton  
Chairman  
Ramona Band of Cahuilla Mission Indians  
P.O. Box 391670  
Anza, CA 92539

Clinton Keith Road Extension Project  
Riverside County, California

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accurate, can you elaborate on these land classification concepts and how they relate to gathering areas in the village landscape?

- How did the resources within the Project Survey Area relate to one another and to potential village landscape(s) or cultural landscape(s)?
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In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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September 19, 2013

Bo Mazzetti  
Chairperson  
Rincon Band of Mission Indians  
1 West Valley Road  
Valley Center, CA 92082

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Mazzetti:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

The Project proposes to extend the existing Clinton Keith Road between Antelope Road and State Route 79 (SR 79). Since the approval of the Supplemental Environmental Impact Report (SEIR) in 2006, two segments of the Project have been constructed as part of the City of Murrieta's local road improvement project for access to a new hospital, and as part of Tract 29484, respectively. There are two segments remaining to be built. The four segments are as follows:

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During the Phase I survey effort, 11 cultural resources were identified within the Project Survey Area that must be evaluated against the criteria of eligibility for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These resources consist of two isolated artifacts (33-021031 and 33-023477), one built-environment resource (33-013871), and eight archaeological sites. The eight archaeological sites include two multicomponent sites (CA-RIV-11571/H and CA-RIV-11574/H) that contain both



historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575, CA-RIV-11576, CA-RIV-11585, and 33-016689). Site locations are shown on the confidential Project Location Map attached to this document.

Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

All eight prehistoric sites/components may be part of a traditional family or social group resource gathering area and a component of a resource procurement and processing *taskscape* associated with a potential Adobe Springs village (CA-RIV-716) landscape. Taskscapes are considered an important element of cultural landscapes as places created and modified through repetitious activities “mapped onto” the landscape (Ingold 1993; Perry and Delaney-Rivera 2011:106) and connected physically to other places through a patchwork of trails and relationally by the social and economic meanings associated with the specific task. Archaeological sites and cultural features provide clues to the type of tasks performed on or near sites, while the physiographic landscape provides the setting (Robinson 2010:804). In other words, tasks are socially embedded within the landscape (Chadwick 2004:265; Robinson 2010). Each task derives its meaning from its position within an ensemble of tasks performed in a series or parallel, generally by groups working together (Ingold 1993; Robinson 2010). Taskscapes are, therefore, conceptualized as the entire ensemble of tasks and are “both the physical and temporal setting for these knowledgeable and unknowledgeable acts, and are also networks or weaves of practices, skills, traditions and social relations” (Chadwick 2004:265).

We are interested in working with the Native American community to better understand cultural landscapes, taskscapes, and family/social group resource gathering areas from a Native perspective and we are requesting oral historical, ethnographic, ethnohistorical and other sources of information to assist us in National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) evaluations of these archaeological resources.

More specifically we need information on the Adobe Springs village site (CA-RIV-716), located approximately one-mile south of the Project Survey Area, and its associated village landscape. Some of the important questions we hope to explore are:

- Is there a Native American name for the Adobe Springs Village site or clans/families that lived there?
- What were the boundaries of the Adobe Springs village landscape and how were village landscape boundaries defined and maintained?
- Several Luiseño concepts of land classification are reported in White (1963) and Oxendine (1983). *Tcho' tcho'mi* (Oxendine 1983:57) or *tch'o'num tcho'mi* (White 1963:123, 165) relates to the communal ownership of the village territory or village landscape; *tch'o'num* (White 1963:123) refers to the communal use of an area such milling areas within a village (True et al. 1974:43); and *tungva* describes properties owned by a specific family or individual (White 1963:125, 165). Are these interpretations





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In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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September 19, 2013

Vincent Whipple  
Tribal Historic Preservation Officer  
Rincon Band of Mission Indians  
1 West Valley Road  
Valley Center, CA 92082

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Whipple:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

The Project proposes to extend the existing Clinton Keith Road between Antelope Road and State Route 79 (SR 79). Since the approval of the Supplemental Environmental Impact Report (SEIR) in 2006, two segments of the Project have been constructed as part of the City of Murrieta's local road improvement project for access to a new hospital, and as part of Tract 29484, respectively. There are two segments remaining to be built. The four segments are as follows:

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historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575, CA-RIV-11576, CA-RIV-11585, and 33-016689). Site locations are shown on the confidential Project Location Map attached to this document.

Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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September 19, 2013

John Marcus  
Chairperson  
Santa Rosa Band of Mission Indians  
P.O. Box 391820  
Anza, CA 92539

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Marcus:

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In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,

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John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



3550 E. Florida Ave., Suite H  
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September 19, 2013

Joseph Ontiveros  
Cultural Resources Department  
Soboba Band of Luiseño Indians  
P.O. Box 487  
San Jacinto, CA 92581

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Ontiveros:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

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During the Phase I survey effort, 11 cultural resources were identified within the Project Survey Area that must be evaluated against the criteria of eligibility for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These resources consist of two isolated artifacts (33-021031 and 33-023477), one built-environment resource (33-013871), and eight archaeological sites. The eight archaeological sites include two multicomponent sites (CA-RIV-11571/H and CA-RIV-11574/H) that contain both





historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575, CA-RIV-11576, CA-RIV-11585, and 33-016689). Site locations are shown on the confidential Project Location Map attached to this document.

Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

All eight prehistoric sites/components may be part of a traditional family or social group resource gathering area and a component of a resource procurement and processing *taskscape* associated with a potential Adobe Springs village (CA-RIV-716) landscape. Taskscapes are considered an important element of cultural landscapes as places created and modified through repetitious activities “mapped onto” the landscape (Ingold 1993; Perry and Delaney-Rivera 2011:106) and connected physically to other places through a patchwork of trails and relationally by the social and economic meanings associated with the specific task. Archaeological sites and cultural features provide clues to the type of tasks performed on or near sites, while the physiographic landscape provides the setting (Robinson 2010:804). In other words, tasks are socially embedded within the landscape (Chadwick 2004:265; Robinson 2010). Each task derives its meaning from its position within an ensemble of tasks performed in a series or parallel, generally by groups working together (Ingold 1993; Robinson 2010). Taskscapes are, therefore, conceptualized as the entire ensemble of tasks and are “both the physical and temporal setting for these knowledgeable and unknowledgeable acts, and are also networks or weaves of practices, skills, traditions and social relations” (Chadwick 2004:265).

We are interested in working with the Native American community to better understand cultural landscapes, taskscapes, and family/social group resource gathering areas from a Native perspective and we are requesting oral historical, ethnographic, ethnohistorical and other sources of information to assist us in National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) evaluations of these archaeological resources.

More specifically we need information on the Adobe Springs village site (CA-RIV-716), located approximately one-mile south of the Project Survey Area, and its associated village landscape. Some of the important questions we hope to explore are:

- Is there a Native American name for the Adobe Springs Village site or clans/families that lived there?
- What were the boundaries of the Adobe Springs village landscape and how were village landscape boundaries defined and maintained?
- Several Luiseño concepts of land classification are reported in White (1963) and Oxendine (1983). *Tchon tcho'mi* (Oxendine 1983:57) or *tch'o'num tcho'mi* (White 1963:123, 165) relates to the communal ownership of the village territory or village landscape; *tch'o'num* (White 1963:123) refers to the communal use of an area such milling areas within a village (True et al. 1974:43); and *tungva* describes properties owned by a specific family or individual (White 1963:125, 165). Are these interpretations



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accurate, can you elaborate on these and other land classification concepts and how they relate to gathering areas in a village landscape?

- How did the resources within the Project Survey Area relate to one another and to potential village landscape(s) or cultural landscape(s)?
- Do the physical differences (e.g., composition and spatial patterning) among bedrock milling sites relate to social/cultural differences in site use, and if so, how?
- How did the organization of labor at bedrock milling stations within a village footprint (e.g., CA-RIV-716) differ from, or were similar to, the organization of labor at bedrock milling sites beyond the village footprint as represented by sites in the Project Survey Area?

Æ is recommending Phase II testing and evaluation for the eight archaeological sites identified within or adjacent to the Project Survey Area. Phase II investigations will include excavation and/or non-excavation strategies that may include archival research, ethnographic research, landscape analysis, and more intensive site documentation. Evaluations will consider the eligibility of each resource under all four NRHP and CRHR criteria, and will assess whether sites are contributors to a potential cultural landscape or archaeological district. The information you provide will greatly assist our efforts in developing a prehistoric context and research design to evaluate these important sites. Information will also be used to assess potential Project effects/impacts, should any of the resources be found eligible for listing on the NRHP and/or CRHR.

Finally, please inform us immediately if you or any member of your organization has information on additional areas of cultural significance that should be taken into consideration for the purpose of this Project.

Æ recognizes that time is needed to discuss the contents of this letter with your organization and prepare a written response to our request. We would appreciate responses on or before October 25, 2013. Written responses can be sent through standard mail at the address provided, or by emailing me at [jeddy@appliedearthworks.com](mailto:jeddy@appliedearthworks.com). If you need to request a time extension to prepare a written response, or would prefer to provide your comments verbally, please notify me by phone at (951) 766-2000.

In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,

A handwritten signature in black ink, appearing to read "John J. Eddy", written over a faint circular stamp or watermark.

John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



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Hemet, CA 92544  
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September 19, 2013

William J. Pink  
48310 Pechanga Road  
Temecula, CA 92592

Clinton Keith Road Extension Project  
Riverside County, California

Re: Cultural Resources Investigation for the Clinton Keith Road Extension Project, Riverside County, California

Dear Mr. Pink:

Applied Earthworks, Inc. (Æ) is contacting you on behalf of the Riverside County Transportation Department (RCTD) regarding environmental studies for the Clinton Keith Road Extension Project ("Project") in and near the City of Murrieta, Riverside County, California. The Project Survey Area is depicted on the Murrieta and Bachelor Mountain 7.5' USGS quadrangles, Township 6S, Range 2W, Section 31; Township 6S, Range 3W, Sections 35 and 36; Township 7S, Range 2W, Section 6; and Township 7S, Range 3W, Sections 1 and 2 of the San Bernardino Baseline and Meridian [S.B.B.M.] (see attached Project Location Map).

The Project proposes to extend the existing Clinton Keith Road between Antelope Road and State Route 79 (SR 79). Since the approval of the Supplemental Environmental Impact Report (SEIR) in 2006, two segments of the Project have been constructed as part of the City of Murrieta's local road improvement project for access to a new hospital, and as part of Tract 29484, respectively. There are two segments remaining to be built. The four segments are as follows:

- Segment 1 - between Antelope Road and Whitewood Road (Station [Sta] 210+00 - 237+00) [*already constructed*]
- Segment 2 - between Whitewood Road and Trois Valley Street (Sta 237+00 - 329+00) [not yet constructed]
- Segment 3 - between Trois Valley Street and Leon Road (Sta 329+00 - 347+00) [*already constructed*]
- Segment 4 - between Leon Road and SR 79 (Sta 347+00 - 380+00) [not yet constructed]

Æ is in the process of completing a Phase I cultural resources survey of the Project Survey Area, which includes a records search at the Eastern Information Center (EIC), consultation with the Native American Heritage Commission (NAHC), and a pedestrian survey of the Project APE. A search of the Sacred Land files by the NAHC did not indicate the presence of known cultural resources or sacred sites in the Project Survey Area. However, results of the records search indicate that 59 prehistoric archaeological resources (47 sites and 12 isolated artifacts), 14 historical archaeological resources (12 sites and two isolated artifacts), and six built-environment resource were recorded previously within a one-mile radius of the proposed Project.

During the Phase I survey effort, 11 cultural resources were identified within the Project Survey Area that must be evaluated against the criteria of eligibility for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR). These resources consist of two isolated artifacts (33-021031 and 33-023477), one built-environment resource (33-013871), and eight archaeological sites. The eight archaeological sites include two multicomponent sites (CA-RIV-11571/H and CA-RIV-11574/H) that contain both historical and prehistoric components and six prehistoric sites (CA-RIV-11572, CA-RIV-11573, CA-RIV -11575,



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Historical archaeological components consist of a multi-room stacked rock structure of unknown age and a mid-twentieth century historical archaeological refuse deposit. Seven of the eight prehistoric sites/components consist of bedrock milling sites.

Evidence of one prehistoric site (33-016689), consisting of a complex lithic scatter with both lithic debitage and groundstone artifacts, was not identified on the surface of during the survey and the site appears to be located outside the boundary of the Project Survey Area. However, it is unclear if the site contains a subsurface cultural deposits and whether or not subsurface deposits would extend into the Project limits. As a result, the Project Survey Area in the vicinity of 33-016689 will be investigated for intact subsurface cultural deposits associated with the site during Phase II testing and evaluation.

All eight prehistoric sites/components may be part of a traditional family or social group resource gathering area and a component of a resource procurement and processing *taskscape* associated with a potential Adobe Springs village (CA-RIV-716) landscape. Taskscapes are considered an important element of cultural landscapes as places created and modified through repetitious activities “mapped onto” the landscape (Ingold 1993; Perry and Delaney-Rivera 2011:106) and connected physically to other places through a patchwork of trails and relationally by the social and economic meanings associated with the specific task. Archaeological sites and cultural features provide clues to the type of tasks performed on or near sites, while the physiographic landscape provides the setting (Robinson 2010:804). In other words, tasks are socially embedded within the landscape (Chadwick 2004:265; Robinson 2010). Each task derives its meaning from its position within an ensemble of tasks performed in a series or parallel, generally by groups working together (Ingold 1993; Robinson 2010). Taskscapes are, therefore, conceptualized as the entire ensemble of tasks and are “both the physical and temporal setting for these knowledgeable and unknowledgeable acts, and are also networks or weaves of practices, skills, traditions and social relations” (Chadwick 2004:265).

We are interested in working with the Native American community to better understand cultural landscapes, taskscapes, and family/social group resource gathering areas from a Native perspective and we are requesting oral historical, ethnographic, ethnohistorical and other sources of information to assist us in National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) evaluations of these archaeological resources.

More specifically we need information on the Adobe Springs village site (CA-RIV-716), located approximately one-mile south of the Project Survey Area, and its associated village landscape. Some of the important questions we hope to explore are:

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Finally, please inform us immediately if you or any member of your organization has information on additional areas of cultural significance that should be taken into consideration for the purpose of this Project.

Æ recognizes that time is needed to discuss the contents of this letter with your organization and prepare a written response to our request. We would appreciate responses on or before October 25, 2013. Written responses can be sent through standard mail at the address provided, or by emailing me at [jeddy@appliedearthworks.com](mailto:jeddy@appliedearthworks.com). If you need to request a time extension to prepare a written response, or would prefer to provide your comments verbally, please notify me by phone at (951) 766-2000.

In return correspondence please refer to this Project as the Clinton Keith Road Extension Project. I sincerely thank you for your time and consideration and look forward to collaborating with you on this effort.

Respectfully,

A handwritten signature in black ink, appearing to read "John J. Eddy", with a long horizontal flourish extending to the right.

John J. Eddy, RPA  
Associate Archaeologist  
Applied Earthworks, Inc.

Enclosure: Project Location Map



**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luiseño Mission Indians*

Post Office, Box 2183 • Temecula, CA 92593  
Telephone (951) 308-9295 • Fax (951) 506-9491

Chairperson:  
Mary Bear Magee

Vice Chairperson:  
Darlene Miranda

Committee Members:  
Evie Gerber  
Bridgett Barcello Maxwell  
Richard B. Searce, III  
Germaine Arenas

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Anna Hoover

November 13, 2013

**VIA E-Mail and USPS**

**RE: Request for Information for the Clinton Keith Road Extension Project, Riverside County [Applied Earthworks]**

Dear Mr. Eddy;

The Pechanga Band of Luiseño Indians ("the Tribe") appreciates your request for information regarding the above referenced Project. After reviewing the provided maps, we have determined that the Project area is not within reservation lands although it is within our ancestral territory.

The Tribe has reviewed the information you provided, our internal documents, and the information we gathered on our field visit. Because we know that this area is highly significant, contains known cultural sites (i.e. village complexes, activity areas, physical resources and traditional landscapes) and may contain deeply buried sites including human remains, the Tribe is concerned that the two segments of this Project that still need to be constructed could detrimentally impact cultural resources. We would be happy to meet with you and review our maps to assist with your analysis and the final studies as we have information that is not available through the Information Center.

At this time, the Tribe request to continue consultation with the Riverside County Transportation Department and to provide you with pertinent information about this Project. Further, we understand that a Phase II Testing program is being developed for the sites located within the APE. We would like to assist with the preparation and review of the documents, if possible.

Additionally, the Tribe requests the following:

- 1) Copies of all applicable archaeological reports, site records, proposed grading plans and environmental documents (EA/IS/MND/EIR, etc);
- 2) Participation in the Phase II Testing Program and any further archaeological surveys or excavations;
- 3) Government-to-government consultation with the Lead Agency; and
- 4) The Tribe believes that monitoring by a Riverside County qualified archaeologist and a professional Pechanga Tribe monitor will be required during earthmoving activities. Therefore, the Tribe reserves its right to make additional comments and recommendations once the environmental documents have been received and fully

reviewed. Further, in the event that subsurface cultural resources are identified, the Tribe requests consultation with the Project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed Project. We would like you and your client to know that the Tribe does not consider initial inquiry letters from project consultants to constitute appropriate government-to-government consultation, but rather tools to obtain further information about the Project area. Therefore, the Tribe reserves its rights to participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, and requests to be included in all correspondence regarding this Project.

Please note that we are interested in participating in surveys within Luiseño ancestral territory. Prior to conducting any surveys, please contact the Cultural Department to schedule specifics. If you have any additional questions or comments, please contact me at ahoover@pechanga-nsn.gov or 951-770-8104.

Sincerely,



Anna Hoover  
Cultural Analyst

**APPENDIX B**  
**CONFIDENTIAL SITE RECORDS**



Page 1 of 1

\*Resource Name or # : P-33-23953 Update

\*Recorded by: AECOM

\*Date: 2/5/2015

Continuation  Update

**P1. Other Identifier:** Los Alamos Road

\*P2. Location:  Not for Publication  Unrestricted

\*a. County: Riverside County

\*b. USGS 7.5' Quad: Murrieta Date: 1953 (photorev 1979) T6S; R3W; SE ¼ of Sec 31 and S ½ of Sec 36; S.B.B.M.

d. UTM: NAD83 Zone: 11S; 486893 mE/ 3717611 mN

e. Other Locational Data: The site is a portion Los Alamos Rd. that runs between Briggs Road on the East to Clifton Keith Road on the West.

\*P11. Report Citation: Wilson, Stacie and Jill Gibson. 2015. Cultural Resources Survey Report for the Proposed Southern California Edison Valley South Subtransmission Line Project, Riverside County, California. Prepared by AECOM. Submitted to Southern California Edison.

This resource, Los Alamos Road, was originally recorded by Smallwood (2014) as a two lane paved roadway. Historically the road traveled 6.33 miles between French Valley and Murrieta.

During the current intensive pedestrian survey AECOM located one segment of the road within the proposed project area. The currently updated segment is from Briggs Road on the east to Clinton Keith Road on the west. The road within this segment is comprised of a two-lane paved road situate within a rural residential setting.



**P5b. Description of Photo:**  
Overview of Los Alamos Road;  
IMG\_2687.JPG; view to the  
northwest.

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

Primary #  
HRI # 88 - 23953  
Trinomial  
NRHP Status Code 6Z  
Other Listings

Review Code

Reviewer

Date

Page 1 of 30

Resource Name or # Los Alamos Road

P1. Other Identifier:

P2. Location: a. County Riverside

Not for Publication  Unrestricted

b. USGS 7.5' Quad Murrieta, Calif. (1953 photo-revised 1979); Bachelor Mtn., Calif. (1953 photo-revised 1973)  
Crosses portions of T6-7S, R2W, T6-7S, R3W, and the Rancho Temecula land grant S.B.B.M.

Elevation: Ranging from 1,110 feet (at Jefferson Avenue) to 1,344 feet (at Briggs Road) above mean sea level

c. Address Los Alamos Road City Murrieta Zip 92562/92563

d. UTM: Zone 11;

Southwest end (intersection of Jefferson Avenue): 480,994 mE / 3,712,943 mN

Northeast end (intersection of Briggs Road): 488,198 mE / 3,717,586 mN

UTM Derivation:  USGS Quad  GPS; Google Earth NAD 1983

e. Other Locational Data: Los Alamos Road traverses 5.83 miles beginning at Jefferson Avenue in Murrieta and ending at Briggs Road near French Valley. From Ivy Street and Jefferson Avenue in downtown Murrieta, it traverses northeast and crosses Interstate 15, Interstate 215, then travels northwest of the Hogback Mountains, crosses Warm Springs Creek, and continues due east until it terminates at the intersection of Briggs Road.

P3a. Description: Historically, Los Alamos Road traversed 6.33 miles between Jefferson Avenue in Murrieta and Winchester Road in French Valley. A 0.5-mile-long segment between Briggs Road and Winchester Road has since been removed from the landscape. Today, Los Alamos Road traverses 5.83 miles beginning at Jefferson Avenue in Murrieta and ending at Briggs Road at the edge of French Valley. From Ivy Street and Jefferson Avenue in Murrieta, it traverses northeast through a densely urban landscape crossing Interstate 15 then Interstate 215. Once it leaves the boundary of the Rancho Temecula land grant, it heads into a semi-rural area characterized by 2.5-acre and 5-acre mini-ranch properties situated to the northwest of the Hogback Mountains. After cresting the hills at the northern edge of the Hogbacks, Los Alamos Road descends and crosses Warm Springs Creek and ascends again before straightening along the top of a low hill. The roadway descends again and crosses a small tributary of Warm Springs Creek before it meets Briggs Road. It terminates at the intersection of Briggs Road.

From Briggs Road west to Celia Road, the roadway is a 24- to 28-ft-wide, two-lane road surfaced with asphalt-concrete pavement, and striped with center and edge lines. The road has very little if any width along the shoulder except where there are established turn-outs at driveways. From Celia Road west to Santee Road the two-lane roadway includes multiple turn-lanes for traffic at intersections. From Santee Road to Jefferson Avenue the road is a four-lane parkway with center median, turn lanes, bike lanes, sidewalks, curbs and gutters. The Santee Road-Jefferson Avenue segment also comprises numerous intersections with signal lights, crosswalks and two freeway overpasses with ramps (Interstate 15 and Interstate 215).

The eastern 3.10 miles of roadway between 356 ft east of Celia Road to Briggs Road appears to retain good historical integrity as a two-lane asphalt-concrete paved road bounded by a mix of rural residential development and native, undeveloped land vegetated by chaparral. The portion from Warm Springs Creek east to Briggs Road was reportedly a graded dirt road until the mid-to-late 1990s (Gentry 1994:1). Meanwhile, the western 2.73 miles of roadway from 356 ft east of Celia Road to Jefferson Avenue is a completely modern four-lane parkway bounded by dense, modern urban development, and it lacks any historical integrity. Photographs of segments of Los Alamos Road were taken on June 24, 2014 to document the current setting, appearance, design, and construction of the road and adjacent areas (see Figures 1 through 12 on the attached Continuation Sheets).

P3b. Resource Attributes: HP37. Highway

P4. Resources Present:  Building  Structure  Object  Site  District  Element of District  Other:

P5a. Photograph or Drawing See attached Continuation sheets for photographs

P5b. Description of Photo: Photographs taken on June 24, 2014.

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

Primary # 88 - 23953  
HRI #  
Trinomial  
NRHP Status Code 6Z

Page 2 of 30

Resource Name or # Los Alamos Road

- P6. Date Constructed/Age of Sources:  Prehistoric  Historic  Both
- P7. Owner and Address: City of Murrieta/Riverside County Transportation Department
- P8. Recorded by: : Josh Smallwood, Applied EarthWorks, Inc., 3550 E. Florida Avenue, Suite H, Hemet, CA 92544
- P9. Date Recorded: June 24, 2014
- P10. Survey Type: Reconnaissance level survey for Section 106 and CEQA compliance
- P11. Report Citation: John J. Eddy and Josh Smallwood (2014): *Phase I Cultural Resources Assessment for the Clinton Keith Road Extension Project, Riverside County, California*. Applied EarthWorks, Inc., Hemet, CA.
- Attachments:  None  Location Map  Site 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:

**BUILDING, STRUCTURE, OBJECT RECORD**

Page 3 of 30

NRHP Status Code 6Z

Resource Name or # Los Alamos Road

- B1. **Historic Name:** Murrieta-Los Alamos Road
- B2. **Common Name:** Los Alamos Road
- B3. **Original Use:** Route between Murrieta and Los Alamos Valley
- B4. **Present Use:** local road between Murrieta and Briggs Road
- B5. **Architectural Style:** The eastern 3.10 miles of Los Alamos Road is a two-lane asphalt-paved road of standard construction, expanding to a more recently constructed modern four-lane road with multiple turn lanes from 356 ft east of Celia Road to Jefferson Avenue in Murrieta.
- B6. **Construction History:** General Land Office (GLO) plat maps dated 1860 through 1883 reveal that, while there were wagon trail routes in the surrounding region, the alignment of Los Alamos Road did not exist during those years. The nearest wagon trails were the "Stage Road to Fort Yuma" which travelled in a northwesterly direction across the Temecula Rancho through Murrieta along present-day Jefferson Avenue, and the "Road to San Bernardino" which followed a course close to Winchester Road into French Valley before heading northwesterly toward Perris. Los Alamos Road did not originate until sometime around 1891, according to County records. Records on file at the Riverside County Transportation Department indicate that the "Murrieta-Los Alamos Road" was declared a public highway by the San Diego County Board of Supervisors on April 9, 1891, when the area was still part of San Diego County (County Road Abstract page 326). The mapped right-of-way measured 60 ft wide, which was standard for through roads at that time.

The Elsinore, Calif. USGS 30-minute topographic quadrangle dated 1901, surveyed in 1897-1898, depicts a web of graded dirt wagon roads in the vicinity of Murrieta and Los Alamos Valley/French Valley, including the predecessors of today's Los Alamos Road, Briggs Road, Thompson Road, Benton Road, Winchester Road, Washington Avenue, Auld Road, Murrieta Hot Springs Road, Antelope Road, and Scott Road, among others (USGS 1901). None of these appears to have been more prevalent than the others. A 1936 Shell gasoline road map of California depicts Antelope and Scott Roads as a primary thoroughfare between Murrieta and points northeast, and Winchester, Washington, Murrieta Hot Springs, and Benton Roads as a primary route between Murrieta and Winchester/Hemet, but it does not show Los Alamos Road as being a principal route across the region (H.M. Goushá Company 1936). Historic aerials reveal that the Murrieta Hot Springs and Winchester Road route between Murrieta and French Valley/Los Alamos Valley was a paved road in 1938 (NETROnline 2014).

The U.S. Army's Murrieta, Calif. 15-minute topographic quadrangle surveyed in 1942 depicts Los Alamos Road as a "loose surface graded dry weather road" traversing from U.S. 395 (following today's Jefferson Avenue) to Briggs Road (U.S. Army 1942). At Briggs Road, one could head north, south, or east. The route east followed Thompson Road to Beeler Road (today's Pourroy Road). The primary route between Murrieta and Los Alamos Valley in 1942 appears to have followed U.S. 395 (Jefferson Avenue) southeast to Webster Avenue (today's Murrieta Hot Springs Road), then east to Banana Avenue (today's Winchester Road), north to Benton Road, and east to Washington Avenue passing Los Alamos School. This route followed a "dependable hard surface heavy duty road" its entire length (U.S. Army 1942).

By the early 1950s, segments of Banana Avenue and Washington Avenue had been joined and incorporated into a single direct route between the Temecula/Murrieta Valley and Winchester, known as Winchester Road (USGS 1953a, 1953b). This was a "medium duty" paved road its entire length. From Winchester Road, Benton Road was the main route through the Auld Valley (Los Alamos Valley), passing Los Alamos School on its way to Auld Ranch and points south and east. Los Alamos Road was still a "light duty" graded dirt road at that time (USGS 1953a). Historic aerials indicate that Los Alamos Road was graded dirt road from Interstate 15 to Winchester Road as late as 1978 (NETROnline 2014). It was not until the early 1970s that most of the residential development along Los Alamos Road came into being. Thus, the primary route between Murrieta and the Los Alamos Valley/French Valley region was to follow Jefferson Avenue to Murrieta Hot Springs Road, to Winchester Road, then heading east on either Benton Road or Auld Road. Los Alamos Road appears to have remained a local -access graded dirt road from the 1890s through the early 1970s, with the extent of its use being from the few family farms along its route. Gentry (1994) indicated that the western portion of Los Alamos Road was paved around 1987 and the segment east of Warm Springs Creek was still a graded dirt road as late as 1994.

**BUILDING, STRUCTURE, OBJECT RECORD**

Page 4 of 30

NRHP Status Code 6Z

Resource Name or # Los Alamos Road

- B7. Moved?  No  Yes  Unknown Date: Original Location:
- B8. **Related Features:** Scattered rows of olive trees, eucalyptus trees, and pepper trees are found along the eastern 3.10 miles of Los Alamos Road between 356 ft east of Celia Road to Briggs Road.
- B9a. **Architect:** Unknown b. **Builder:** Riverside County Transportation Department
- B10. **Significance:** **Theme** Development of local roads during the late nineteenth and early and mid-twentieth century  
**Area** Murrieta, French Valley, Los Alamos Valley, Southwestern Riverside County  
**Period of Significance** N/A  
**Property Type** local road **Applicable Criteria** N/A  
Background research on Los Alamos Road has found that the City of Murrieta and County of Riverside both showed interest in Los Alamos Road as a potential historical resource in the early 1990s in response to proposed road improvements and anticipated growth of the area (Gentry 1994; Riverside County Parks Department 1991; City of Murrieta 1991; Riverside County Historical Commission 1992; Govean et al. 1995). However, at present, Los Alamos Road has never been formally evaluated for historical significance, and it has not been formally designated as a historical resource by the City of Murrieta or the County of Riverside.

Despite the studies that occurred in the early-1990s to record, evaluate, and designate Los Alamos Road as a historical resource, Los Alamos Road was never included into the California Historical Resources Inventory or the Riverside County Historical Resources Survey. Contrary to the claims of Govean et al. (1995), Los Alamos Road was never approved as a California Point of Historical Interest or given historic designation status by the City of Murrieta. It appears the forms were filled out for inclusion in the California Historical Resources Inventory and California Point of Historical Interest, but the Inventory forms were never received and processed by the Eastern Information Center or the State of California Office of Historic Preservation (OHP), and the Point of Historical Interest form was never signed and approved by the State Historical Resources Commission and Riverside County Board of Supervisors. In addition, a formal evaluation of Los Alamos Road following the criteria of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of Murrieta Municipal Code §16.26.050 has never been carried out. Finally, Los Alamos Road is not currently included on the City of Murrieta Historical Resources Inventory (Murrieta General Plan Update 2011:5.9-13-5.9-18). The City of Murrieta General Plan Update does state that the City proposes "goals and policies...to continue the rural character and heritage of the Los Alamos area (Goal LU-22)" but this does not constitute any designation as a historical resource (Murrieta General Plan Update 2011:5.9-22).

Historical research on the settlement, development, and growth of the Murrieta/French Valley/Auld Valley/Los Alamos Valley region has indicated that Los Alamos Road is not directly associated with an important historical event, or the productive life of an important historical person, it does not embody distinctive characteristics of a type, period, or method of construction, and it does not possess data potential important to the study of our local, state, or national history. Therefore, it does not appear to meet any of the criteria of the NRHP or CRHR, as discussed below. Similarly, it does not appear to meet any of the criteria of the Murrieta Municipal Code §16.26.050.

**Regional Historical Context:** The French Valley/Warm Springs Creek region was open to settlement as early as the 1880s. The region fell within 10 mi of a railroad right-of-way (the California Southern route) granted unused public lands through the Railroad Act of 1862; therefore, odd-numbered sections of surveyed public land were granted to this railroad for resale to settlers. In Township 6 South, Ranges 2 and 3 West, SBBM, major transfers of public land to railroad control were made during the 1880s-1890s (BLM n.d.).

Even-numbered sections of public land in the area were open to homesteading and certain other forms of public land entry. Homesteading required, among other things, five years of residence on the claimed landholding and construction of a habitable dwelling. The maximum land area that an individual was allowed to homestead was 160 ac, or one-quarter of a Township section. Pioneer families in the area in the 1880s included those of Auguste, Alexandre, and Calixte Vail, Auguste Cantarini, Jean Nicolas, Pierre Pourroy, and Joseph Sauvie in French Valley, and Henry Thompson, and Charles, Henry, and William Auld in Los Alamos (Auld) Valley (Garrison 1963:165).

**BUILDING, STRUCTURE, OBJECT RECORD**

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NRHP Status Code 6Z

Resource Name or # Los Alamos Road

- B10. Regional Historical Context (continued):** The farmsteads of the Auld families were the nucleus of the Auld community and district in what was called either the Auld Valley or Los Alamos Valley (U.S. Census 1900). Approximately 2.5 mi west of the crossroads at Auld was another crossroads hamlet called Los Alamos. This was the site of the Los Alamos school, established in 1889.

Potential settlers became interested in the French Valley and adjacent areas in the early and mid-1880s. Two important developments helped to spur this interest. First, the establishment of competing transcontinental rail service between the East and southern California brought a substantial increase in tourists and emigrants by the mid-1880s, as railroad fares were reduced. This influx was accompanied by a frenzy of real estate promotion, as well as the development of organized cooperative or colony settlement schemes.

A second, more local factor encouraging settlement was the penetration of the railway network to within a few miles of the French Valley region. The towns of Murrieta, 6 mi to the southwest, and Temecula, 8 mi to the south-southwest, were reached by the California Southern line, being built to San Diego, in September of 1883 (A. A. Bynon and Son 1992:104-105,109; Garrison 1963:11-21). Temecula had existed as a small settlement since the 1850s, with its first post office service commencing in 1859, but the railroad brought growth to the town. Murrieta, on the other hand, was brought into existence by the arrival of railroad service. In 1884, the town site of Murrieta was laid out by the Temecula Land and Water Company on lands formerly a part of the Rancho Temecula. Winchester, located 7 mi to the north, was founded in 1886-1887, and was reached by a branch railroad line in the latter year (Gustafson and Serpico 1992:163-175; Tapper and Lolmaugh 1990). It was originally settled in the late 1870s by Robert Kirkpatrick and Swiss immigrant farmers Gaudenzio Garboni and Angelo Domenigoni.

Development of the two competing railroads made the export of local grain and other farm products economically more feasible. The availability of railroad transport coincided with a decade of relatively wet winters in the late 1880s and early 1890s. This also encouraged local agricultural settlement by newcomers from other parts of the country.

In the Greater French Valley region, grain production was the predominant agricultural activity in the early 1890s, with some stock grazing also carried out. As early as 1889, more than 100 railroad carloads of grain were reported shipped from Murrieta station (Garrison 1963:21). This emphasis on grain and grazing is indicated by tax assessor's records, which list only one small vineyard of Muscat grapes owned by George Auld, and no commercial orchards (Riverside County Assessor, Map Books, 1892-1969). The success of local dry-land farming varied with the intensity of local winter rainfall. Annual rainfall of 14 in. or more could provide reasonable yields of winter wheat or barley, and straw hay could be produced with a little less rainfall. While modern rainfall averages for the region have approached 13-14 in., the late 1880s and early 1890s were years of heavier than average winter rainfall in southern California, providing encouragement to those engaged in dry-land farming. The grain from French Valley was hauled to Murrieta to be transported by rail to Los Angeles and San Bernardino (Garrison 1963:138, 165, 168).

During the late 1890s, years of low rainfall brought crisis to agriculture in southern California. Both the orchard crop areas dependent on gravity flow irrigation and the dry land farm zones were severely affected. Eight of the 10 years between 1896 and 1905 were seriously deficient in winter rainfall. This led to a turnover in land ownership in the region. However, by the time of the 1900 U.S. decennial census, additional families had made their way to the area and would remain there for at least the next several decades. These included the Roripaughs and the Bucks, for whom Buck Road is named, and John Harvey. Arthur Buck, who settled the area with his brothers Andrew, Sherman, and Asaph, originally came to Murrieta from Nebraska in 1896, according to his granddaughter Thelma Buck Bronson (Bronson 2004:2). James Roripaugh had formerly resided in Nebraska as well. His son Jack would later become a well-known figure in the region as foreman of the Pauba Ranch. Thomas Milholland established a ranch at the east end of the Los Alamos Valley, to the east of Hyatt School.

**BUILDING, STRUCTURE, OBJECT RECORD**

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Resource Name or # Los Alamos Road

- B10. Regional Historical Context (continued):** The decade of the 1920s offered regional urban growth in southern California that was helpful to many farmers in the region. However, it also brought sustained national declines in the prices of many agricultural commodities due to major increases in agricultural production in the U.S. and elsewhere. Coupled with this were seven years of lower than average rainfall during the 1920s in southern California. The years 1922-1924 were particularly dry, which set off a temporary collapse of hydroelectric power generation. Fruit or alfalfa producers, depending on pumped groundwater, were less affected by these drought conditions than dry-land farm grain producers.

A review of the 1930 U.S. decennial census for the Auld-Los Alamos region shows only a moderate increase in the number of families living in the area as compared to 1900 (from approximately 20 households to 29), although there had been considerable turnover in land ownership (U.S. Census 1900, 1910, 1920, 1930). Only one farm was identified as dedicated to poultry. Beekeeping was also reported in the area in the 1930s by Viola Carlson.

Turnover in land ownership during the 1930s and the eventual recovery of agricultural prices by the eve of World War II was followed by the disruptions of the exodus of younger people into military service or leaving to work in urban areas. However, the favorable average rainfall conditions of the years from 1934 through 1944 were followed by a prolonged period of lower than average years of winter rainfall lasting until 1965. The portion of this drought cycle from 1944 through 1951 was particularly severe, with rainfall in Los Angeles, for example, totaling only little more than half of normal in the years 1947-1951. Water from the Colorado River Aqueduct was piped to the region beginning in the early 1940s. Alfalfa, potatoes, watermelons, and sugar beets soon after became the mainstay of farming in many parts of the region, but dry-land grain farming continued to be a principal crop among many of the old settler families.

The post-WWII era ushered in a boom in commercial, industrial, and residential development in and near the region's urban centers, followed by the construction of several freeways linking urban areas to one another. As urban areas were spread outward by development, once-rural areas took on a more semi-rural character, dotted by small, 2.5- and 5-ac "ranch" subdivisions. In more recent years, housing and urban development have spread outward from urban areas and swallowed up former agricultural land at an exponential rate, forever changing the character of the region. During the last decade, inexpensive land and housing transformed many of the towns in southwestern Riverside County into "bedroom" communities for those working in Los Angeles, Orange, and San Diego counties. Substantial growth over the last few decades has necessitated the construction of numerous artificial lakes, reservoirs, and other forms of municipal water storage, such as nearby Lake Perris, Lake Skinner, and the Eastside Reservoir (now, Diamond Valley Lake). Increased population and automobile traffic has resulted in the need for construction of new roads, as well as expansion and improved safety of many of the pre-existing roads throughout the region. The over-expansion of the housing market, and ultimate crash in 2007, led to a shift in the region's development trend in recent years to increase infrastructure projects to support the population growth. Recently, new residential development has been spurred by a low inventory of homes and a slowly reviving market economy.

- B10. Significance:** Los Alamos Road never achieved any recognition as one of the more important alignments or thoroughfares within the history of the Murrieta/French Valley/Auld Valley or Los Alamos Valley region. Rather, it served the same capacity, or maybe less so, than several other roads that travelled between Murrieta and Los Alamos Valley. In fact, the road was so insignificant that it did not warrant paving until the late 1980s after substantial modern residential development had occurred along its margins. Meanwhile, the predecessors of Murrieta Hot Springs Road and Winchester Road between Murrieta and French Valley/Los Alamos Valley, which were important arteries through the region, had been paved since at least 1936. Thus, Los Alamos Road does not appear to meet NRHP Criterion A or CRHR Criterion 1.

While Gentry indicated that well-known families used the road to transport their goods and family between the Los Alamos Valley and Murrieta, the road is not directly associated with the productive life of an important individual, and it does not best represent any single individual's contribution to the region's history. Therefore, Los Alamos Road is not eligible for the NRHP under Criterion B or the CRHR under Criterion 2.

**BUILDING, STRUCTURE, OBJECT RECORD**

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NRHP Status Code 6Z

Resource Name or # Los Alamos Road

- B10. Significance (continued):** Some of the earlier rows of eucalyptus, olive, and pepper trees remain along the segment of Los Alamos Road near the Hogback Mountains as they have since the 1930s, as viewed on a historic aerial dated 1938 (NETROnline 2014). However, what remains of these original plantings are sporadic in their appearance, only present as scattered, segmented rows, being inconsistent and non-rhythmic in their pattern, and lacking any coherent design. There are two culverts and two bridges along Los Alamos Road, including modern bridges over I-15 and I-215, and modern corrugated metal pipe culverts at the Warm Springs Creek crossing and the crossing at a tributary of Warm Springs Creek near Briggs Road. Overall, Los Alamos Road is modern and standard in its appearance, design, and construction, and it does not exhibit any architectural, engineering, or landscaping merits that would make it significant under NRHP Criterion C or CRHR Criterion 3. Los Alamos Road today is merely a semi-rural modern paved road spanning between Murrieta and Briggs Road, revealing some minor, elements of a by-gone era (tree rows), but none sufficient or historically significant that would meet any of the criteria of the NRHP or CRHR. As a vernacular landscape with no planned design, but organic in its development, Los Alamos Road does not retain sufficient levels of historical integrity, as the roadway itself is completely modern, and the 2.5- and 5-acre mini-ranch properties along its course are all completely modern, having been built in the 1970s and later. The few historic homes that were recorded along Los Alamos Road in the 1980s, such as the James Place at 37201 Los Alamos Road, the Hind Ranch at 37100 Los Alamos Road, and the Garringer Place at 36131 Briggs Road, are either gone, or are not visible from the public right-of-way. The primary character-defining feature of Los Alamos Road, the road itself, is completely modern in its appearance, design, materials, and construction. Thus, Los Alamos Road does not retain sufficient levels of historical integrity to be considered even potentially eligible for the NRHP or CRHR.

Furthermore, Los Alamos Road does not have the potential to yield any important archaeological data about late nineteenth or early twentieth century road-building techniques, or other subjects of local, state, or national history that is not already known or that cannot be gained from traditional avenues of research. As such, Los Alamos Road does not appear to meet NRHP Criterion D or CRHR Criterion 4.

In summary, there is no evidence that this road is directly associated with important events of recognized historical significance (NRHP Criterion A/CRHR Criterion 1), or the productive lives of any prominent historical figures in local, state, or national history (NRHP Criterion B/CRHR Criterion 2); represents the work of a prominent architect, designer, or builder, or qualifies as an important example of its type, period, region, or method of construction (NRHP Criterion C/CRHR Criterion 3). Finally, as a completely modern paved road of standard design, construction, and materials, it does not have the potential to yield any information important to the study of local, state, or national history (NRHP Criterion D/CRHR Criterion 4).

Similarly, Los Alamos Road does not appear to meet any of the criteria for historic designation under Murrieta Municipal Code §16.26.050. Specifically, it does not exemplify or reflect special elements of the City's cultural, architectural, aesthetic, social, economic, political, artistic and/or engineering heritage; it is not identified with persons, a business use or events significant in local, state, or national history; it does not embody distinctive characteristics of a style, type, period or method of construction, nor is it a valuable example of the use of indigenous materials or craftsmanship; it is not representative of the notable work of a builder, designer, or architect; and, it is not unique, nor does it have physical characteristics that represent an established and familiar visual feature of a neighborhood, community, or the City. Furthermore, Los Alamos Road does not appear to constitute a "Historic Preservation District" as defined by the City of Murrieta because it does not contain a significant concentration or continuity of (historic) buildings unified by past events, and the area is not associated with an event, person, or period significant or important to Murrieta history. In fact, the vast majority, if not all, of the residential and commercial buildings along Los Alamos Road are completely modern, having been built within the last 30 to 40 years.

- B11. Additional Resource Attributes:** (List attributes and codes) HP 30. Trees/vegetation



**BUILDING, STRUCTURE, OBJECT RECORD**

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Resource Name or # Los Alamos Road

**B12. References:**

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1992 *History and Directory of Riverside County 1893-4*. Riverside Historical Commission Press.

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n.d. General Land Office Records, Land Patent Details. Found at  
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**Bronson, Thelma Buck**

2004 Interview with Thelma Buck Bronson [n.d.]. Temecula Valley Historical Society Newsletter, July, 2004, pp. 2-3.

**City of Murrieta**

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**Garrison, Arlean V.**

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**GLO (General Land Office)**

1860a Plat map of Township 6 South, Range 3 West, San Bernardino Meridian. Surveyed 1854, 1859.

1860b Plat map of Township 7 South, Range 3 West, San Bernardino Meridian. Surveyed 1854, 1859.

1880 Plat map of Township 6 South, Range 3 West, San Bernardino Meridian. Surveyed 1854-1880.

1883 Plat map of Township 7 South, Range 3 West, San Bernardino Meridian. Surveyed 1854-1880.

**Govean, Fran, Pat Jertberg, and Beth Padon**

1995 *Cultural and Paleontological Resources Review Alignment Study of the Southwest Area Road and Bridge Benefit District and Project Analysis for Clinton Keith Road Alignment*. Prepared by Petra Resources, Inc. On file, Eastern Information Center, University of California, Riverside (RI#3916), and Riverside County Transportation Department.

**Gentry, Rita**

1994 Historic Resources Inventory, Los Alamos Road. In: "Appendix B--Los Alamos Road Documentation" of *Cultural and Paleontological Resources Review Alignment Study of the Southwest Area Road and Bridge Benefit District and Project Analysis for Clinton Keith Road Alignment*. Prepared by Fran Govean, Pat Jertberg, and Beth Padon, Petra Resources, Inc., 1995. On file, Eastern Information Center, University of California, Riverside (RI#3916), and Riverside County Transportation Department.

**BUILDING, STRUCTURE, OBJECT RECORD**

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NRHP Status Code 6Z

Resource Name or # Los Alamos Road

**B12. References (continued):**

**H. M. Goushá Company**

1936 Shell Official Road Map of California. Copyright by the H.M. Goushá Company, Chicago.

**NETROnline**

2014 Historic Aerials dated 1938, 1967, and 1978. Found at: <http://www.historicaerials.com>.

**Riverside County Assessor**

1892-1895, Assessor's Map Book 19, Page 34.  
1896-1899, Assessor's Map Book 19, Page 38.  
1899-1913, Assessor's Map Book 19, Page 42.  
1913-1919, Assessor's Map Book 19, Page 44.  
1920-1926, Assessor's Map Book 19, Page 49.  
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**Riverside County Historical Commission**

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1942 Murrieta, Calif. 15-minute topographic quadrangle (1:62,500), aerial photographs taken 1939. Road data 1942.

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1900 Twelfth U.S. Decennial Census, State of California, Riverside County, Murrieta Judicial Township.  
1910 Thirteenth U.S. Decennial Census, State of California, Riverside County, Murrieta Township.  
1920 Fourteenth U.S. Decennial Census, State of California, Riverside County, Murrieta Township.  
1930 Fifteenth U.S. Decennial Census, State of California, Riverside County, Murrieta Township.

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NRHP Status Code 6Z

Resource Name or # Los Alamos Road

**B12. References (continued):**

USGS (U.S. Geological Survey)

1901 Elsinore, Calif. 30-minute topographic quadrangle (1:125,000), surveyed 1897-1898.

1953a Murrieta, Calif. 15-minute topographic quadrangle (1:62,500), aerial photographs taken 1951.

1953b Bachelor Mtn, Calif. 15-minute topographic quadrangle (1:62,500), aerial photographs taken 1951;  
field check 1953.

**B13. Remarks:**

**B14. Evaluator:** Josh Smallwood, M.A., RPA  
Applied EarthWorks, Inc.  
3550 E. Florida Avenue, Suite I,  
Hemet, CA 92544

**Date of Evaluation:** June 27, 2014

State of California--The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI # 33 - 23 953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



**Figure 1. A segment of Los Alamos Road heading west from Briggs Road toward the Hogback Mountains (view to the west; photograph taken June 24, 2014). This segment of road was paved in the 1990s.**

State of California--The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

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HRI #  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



**Figure 2. A segment of Los Alamos Road as it crosses Warm Springs Creek heading west (view to the northwest; photograph taken June 24, 2014). This segment of road was paved in 1987.**



**Figure 3. Modern, large-diameter corrugated metal pipe culvert under a segment of Los Alamos Road where it crosses Warm Springs Creek (view to the south; photograph taken June 24, 2014). These culverts were added in 1987 when the road was paved.**

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DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI # 88 - 28953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update

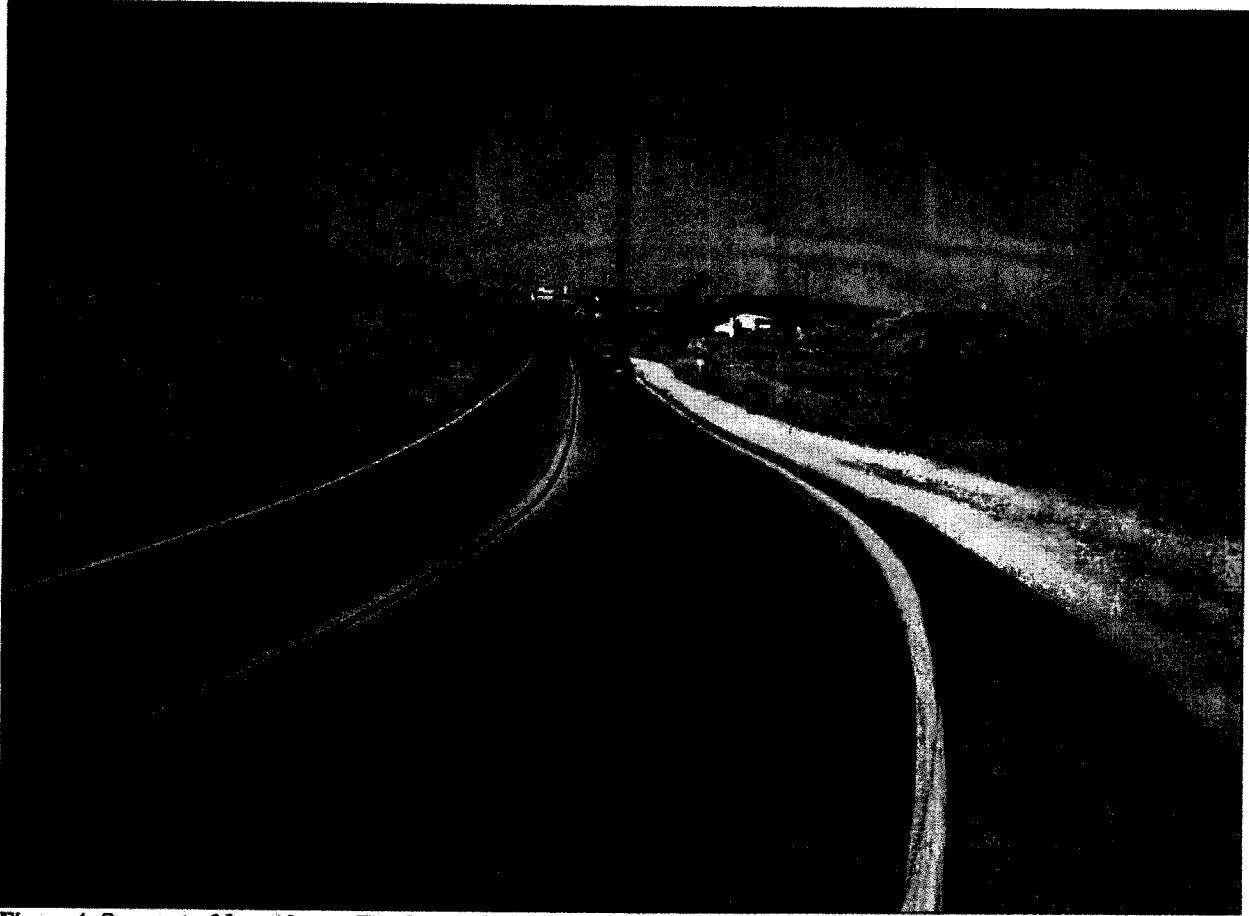


Figure 4. Segment of Los Alamos Road ascending hill and heading west toward the Hogback Mountains (view to the west; photograph taken June 24, 2014). This segment of road was paved in 1987.

State of California--The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI # 00 - 23953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



**Figure 5. Segment of Los Alamos Road traversing along the northwest side of the Hogback Mountains through an area bounded by a few scattered eucalyptus trees (view to the southwest; photograph taken June 24, 2014). This segment of road was paved in 1987. Residential development along this stretch occurred in the 1970s.**



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Primary #  
HRI # 33-23953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update

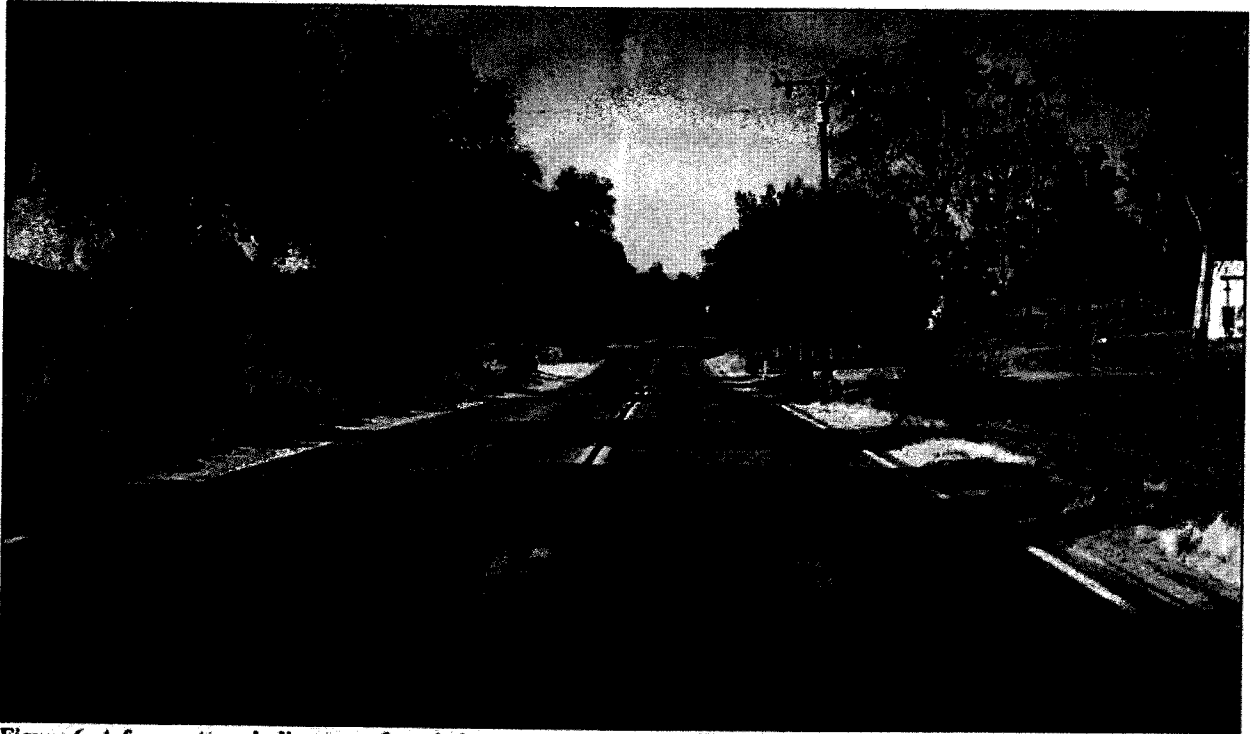


Figure 6. A few scattered olive trees found along a segment of Los Alamos Road traversing along the northwest side of the Hogback Mountains (view to the southwest; photograph taken June 24, 2014). This segment of road was paved in 1987. Residential development along this stretch occurred in the 1970s.

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DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
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Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



**Figure 7. A few scattered pepper trees found along a segment of Los Alamos Road approaching Ruth Ellen Way/Celia Road (view to the southwest; photograph taken June 24, 2014). This segment of road was paved in 1987. Residential development along this stretch occurred in the 1970s.**



**Figure 8. Los Alamos Road as it passes through a modern residential subdivision before entering dense urban development at Whitewood Drive (view to the southwest; photograph taken June 24, 2014). This segment of road was paved and widened within the last 30 years as urban development has pushed the boundaries of Murrieta eastward.**

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DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

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HRI # 23 - 23953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



Figure 9. An urban commercial segment of Los Alamos Road near Hancock Avenue (view to the southwest; photograph taken June 24, 2014). This segment of road and the adjacent development was built within the last 30 years.

State of California—The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

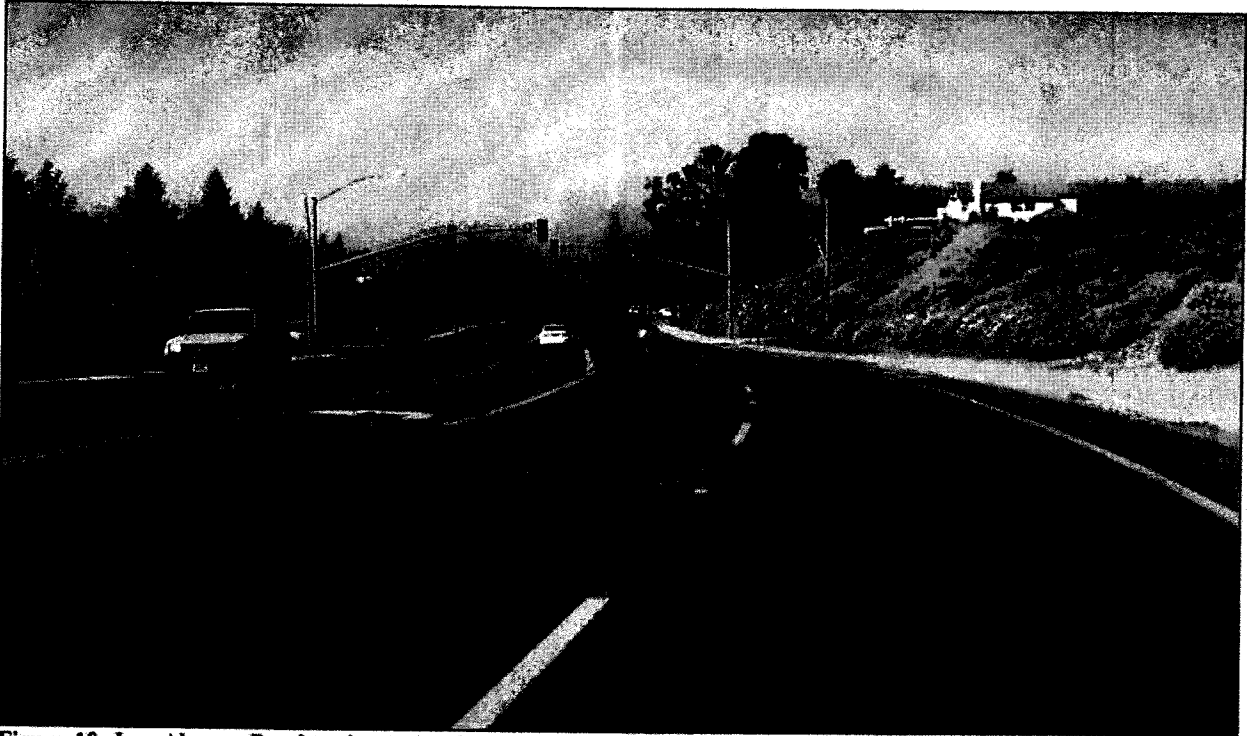
Primary #  
HRI # 33 - 23953  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



**Figure 10. Los Alamos Road as it approaches Lincoln Avenue (view to the southwest; photograph taken June 24, 2014). This segment of road and the adjacent development was built within the last 30 years.**

State of California--The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary # 33 - 23953  
HRI #  
Trinomial

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Resource Name or # Los Alamos Road

Recorded by: Josh Smallwood Date June 24, 2014

Continuation  Update



Figure 11. Los Alamos Road as it approaches Madison Avenue (view to the southwest; photograph taken June 24, 2014). This segment of road and the adjacent development was built within the last 30 years.

State of California--The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI #  
Trinomial

99-23953

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Resource Name or #

Los Alamos Road

Recorded by: Josh Smallwood    Date June 24, 2014

Continuation     Update



**Figure 12. Los Alamos Road as it approaches Jefferson Avenue (view to the southwest; photograph taken June 24, 2014). This segment of road and the adjacent development was built within the last 30 years.**

99-29953

State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
CONTINUATION SHEET

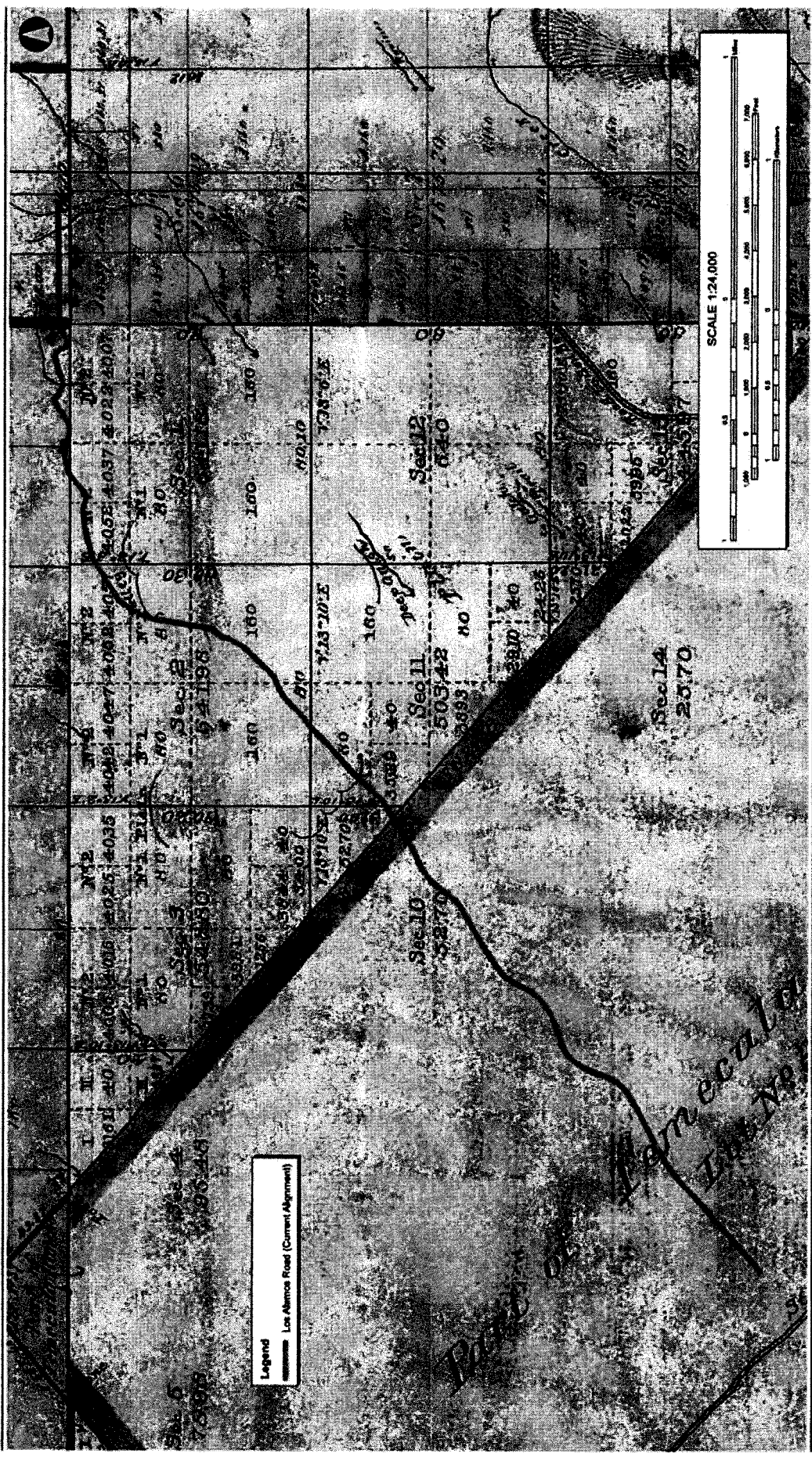
Page 23 of 30

Map Name: T6S/R1W (1880), T6S/R2W (1880), T7S/R3W (1883), and T7S/R2W (1860) GLO Maps surveyed 1852-1883

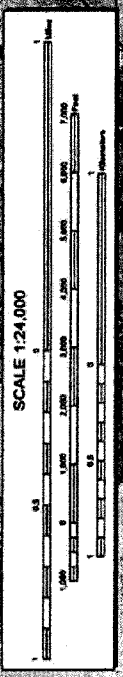
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Primary #  
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Scale: 1:24,000  
Date: 2014



Legend  
— Los Alamos Road (Current Alignment)





State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

23 - 23953

Primary #  
HRI#

Trinomial

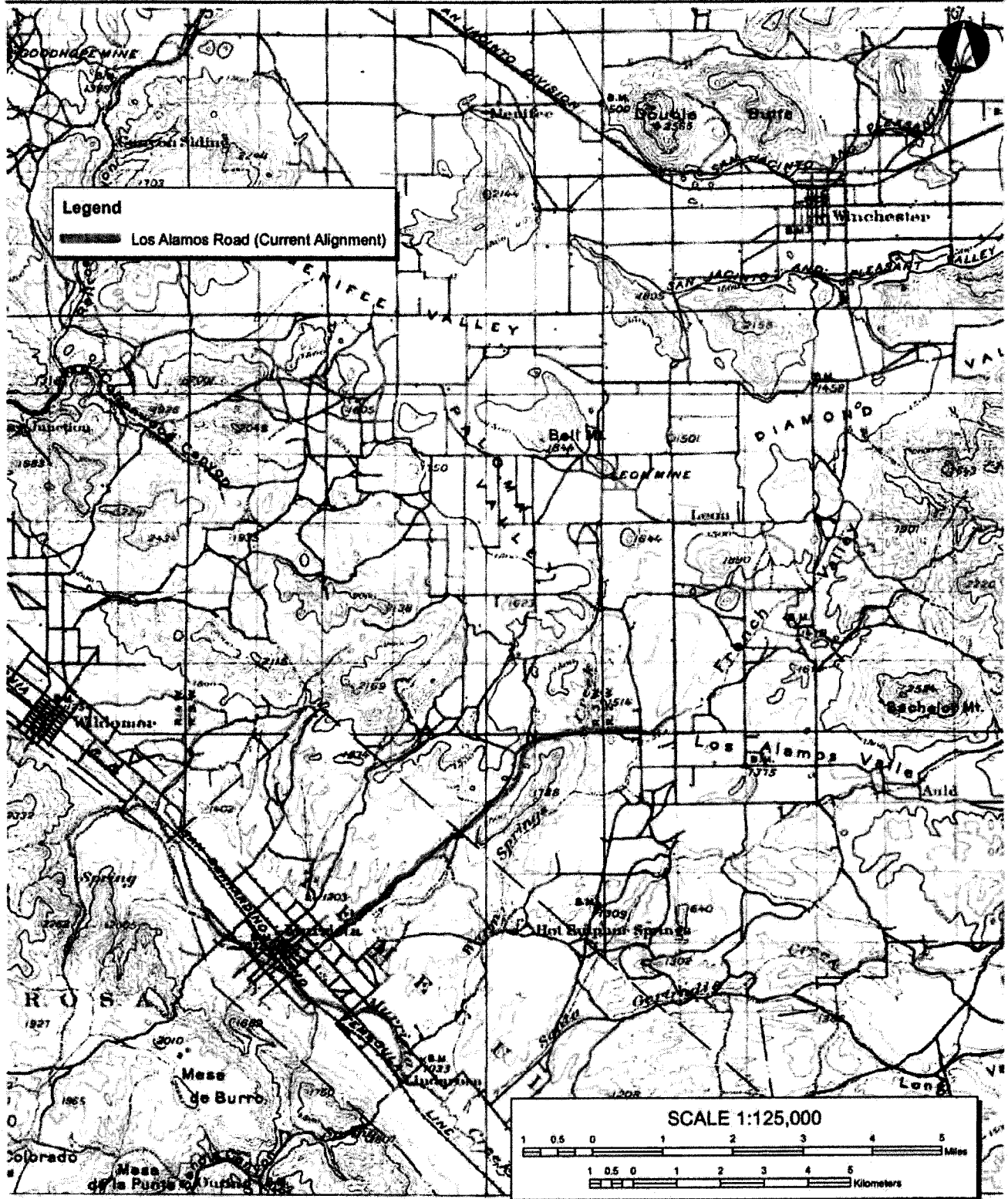
Page 24 of 30

Resource Name or #: Los Alamos Road

Scale: 1:125,000

Map Name: Elsinore (1901), CA 30' USGS Quadrangle; surveyed in 1897-1898

Date: 2014





A 1936 Shell gasoline road map of California depicts Antelope and Scott Roads as a primary thoroughfare between Murrieta and points northeast, and Winchester, Washington, Murrieta Hot Springs, and Benton Roads as a primary route between Murrieta and Winchester/Hemet, but it does not depict Los Alamos Road as being a principal route across the region at that time (H.M. Goush  Company 1936).

33-23953

State of California — The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**CONTINUATION SHEET**

Primary #  
HRI#  
Trinomial

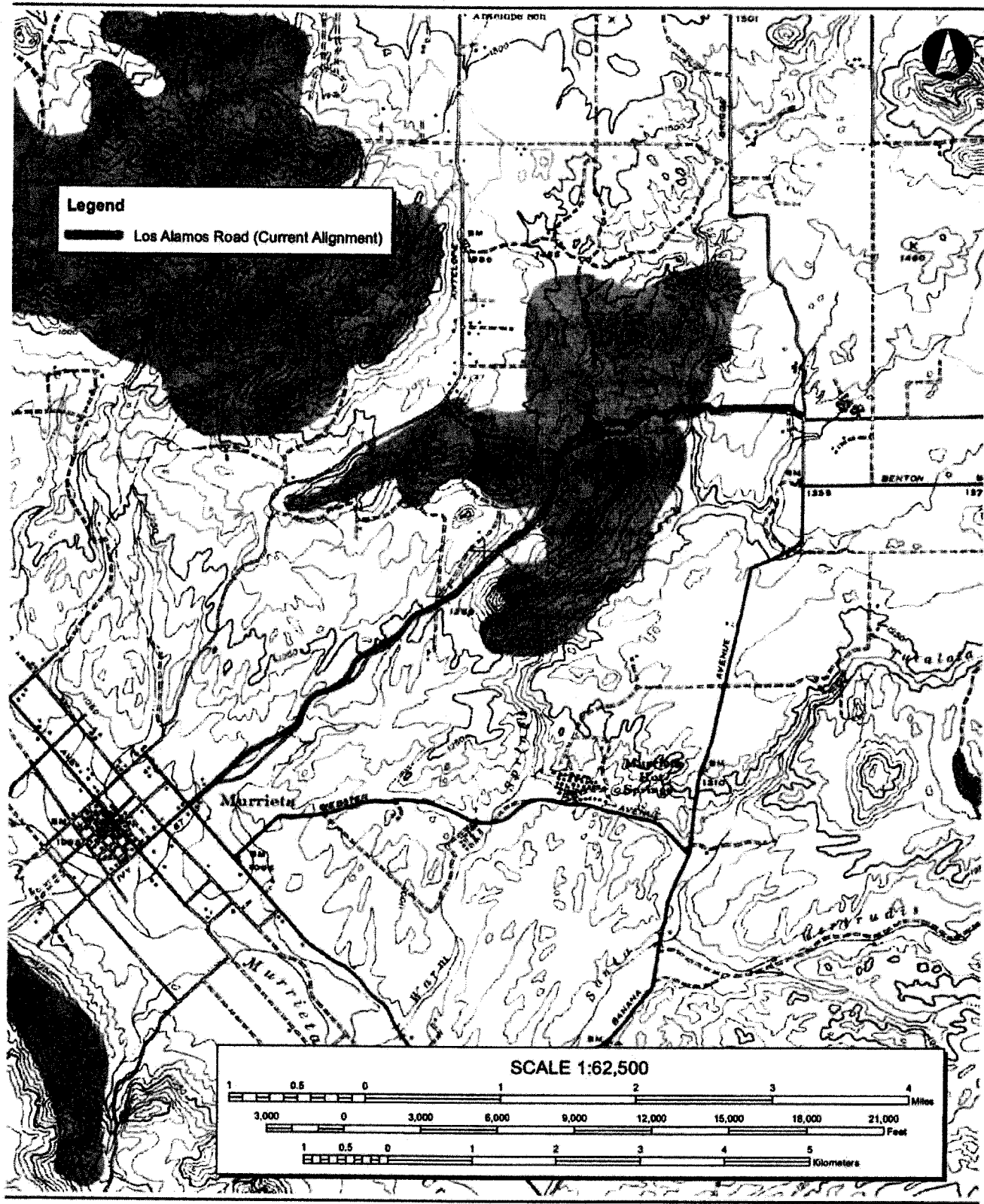
Page 26 of 30

Resource Name or #: Los Alamos Road

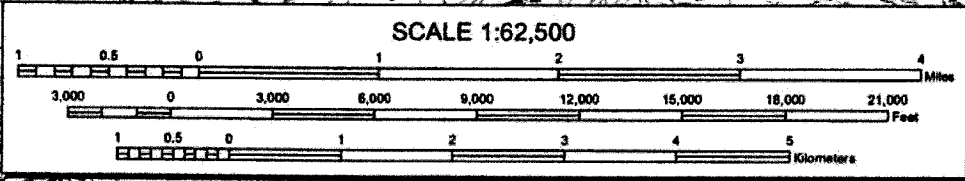
Scale: 1:62,500

Map Name: Murrieta (1942), CA 15' Quadrangle, U.S. Army Corp of Engineers; road data 1942

Date: 2014

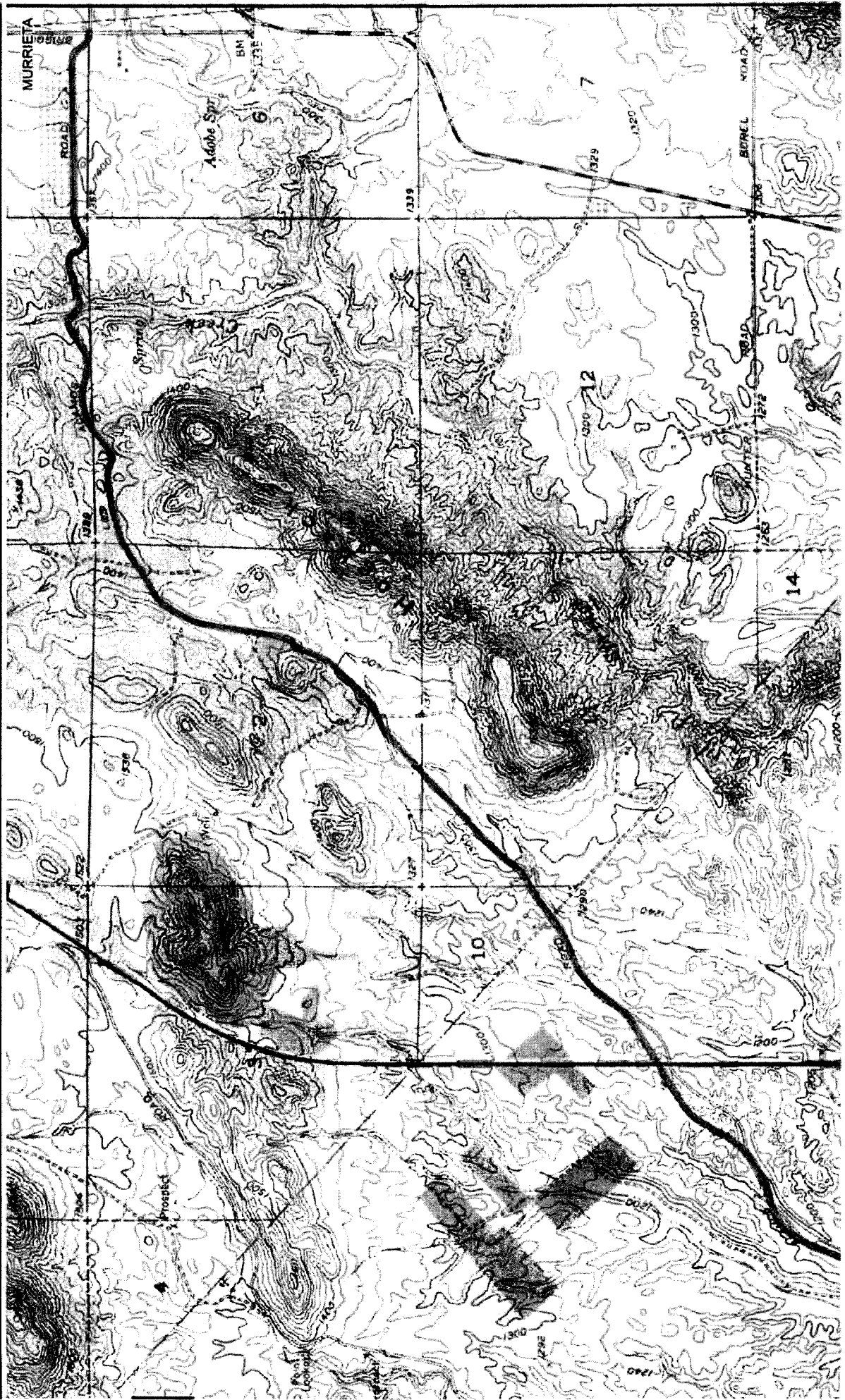


**Legend**  
— Los Alamos Road (Current Alignment)



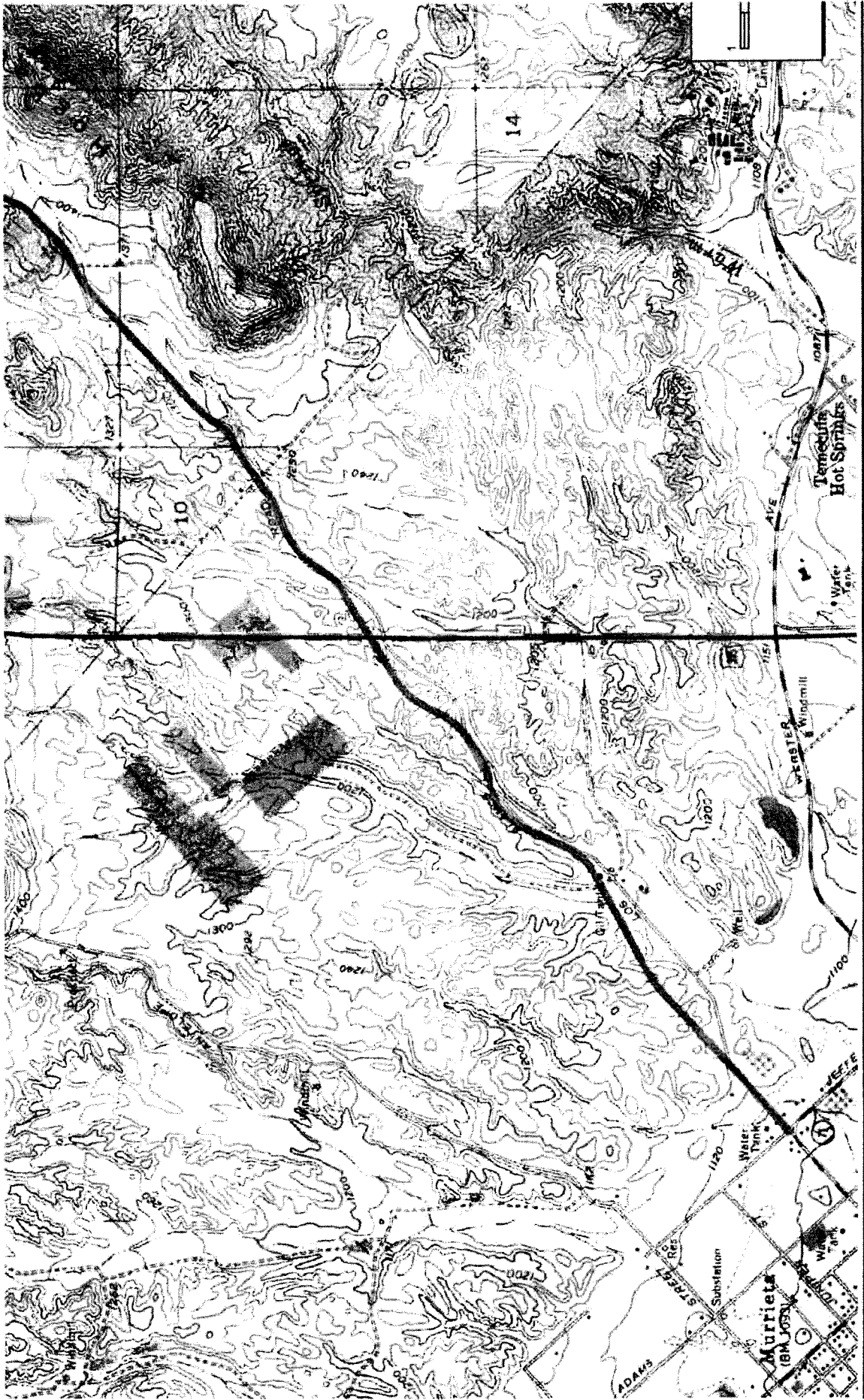
33-20053

U.S. G.S. 7.5 quadrangles, aerial photogrammetric taken 1951, first check 1955





23-23953



99 - 23953

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**SKETCH MAP**

Page 28 of 30

Drawn by: J. Smallwood, C. Inervey

Resource Name or #: (Assigned by recorder) Los Alamos Road  
Scale: 1:24,000 (1 inch = 2,000 feet)

Primary #  
HRM  
Trinomial

Date of map: July 2014



State of California — The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
**LOCATION MAP**

Primary # 33-29953  
 HRM#  
 Trinomial

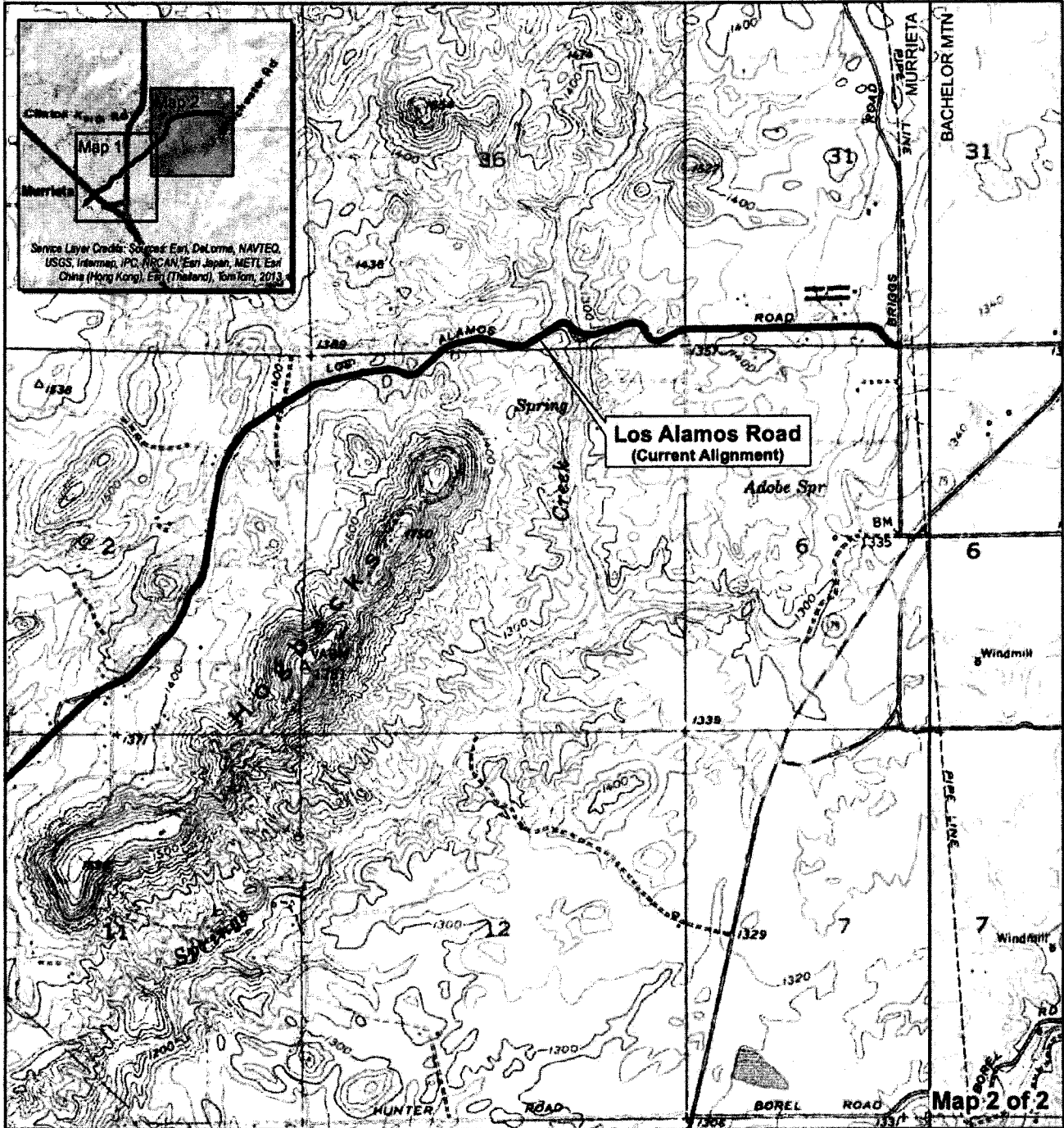
Page 30 of 30

Resource Name or #: Los Alamos Road

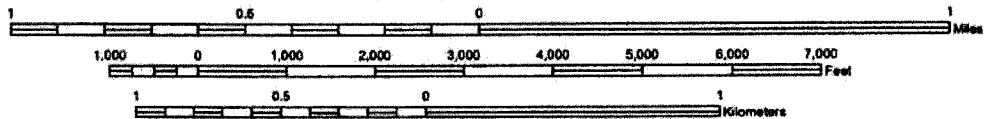
Scale: 1:24,000

Map Name: Murrieta (1953, photorevised 1979) and Bachelor Mtn. (1953, 1973, 1978), CA, USGS 7.5' quadrangles

Date: 2014

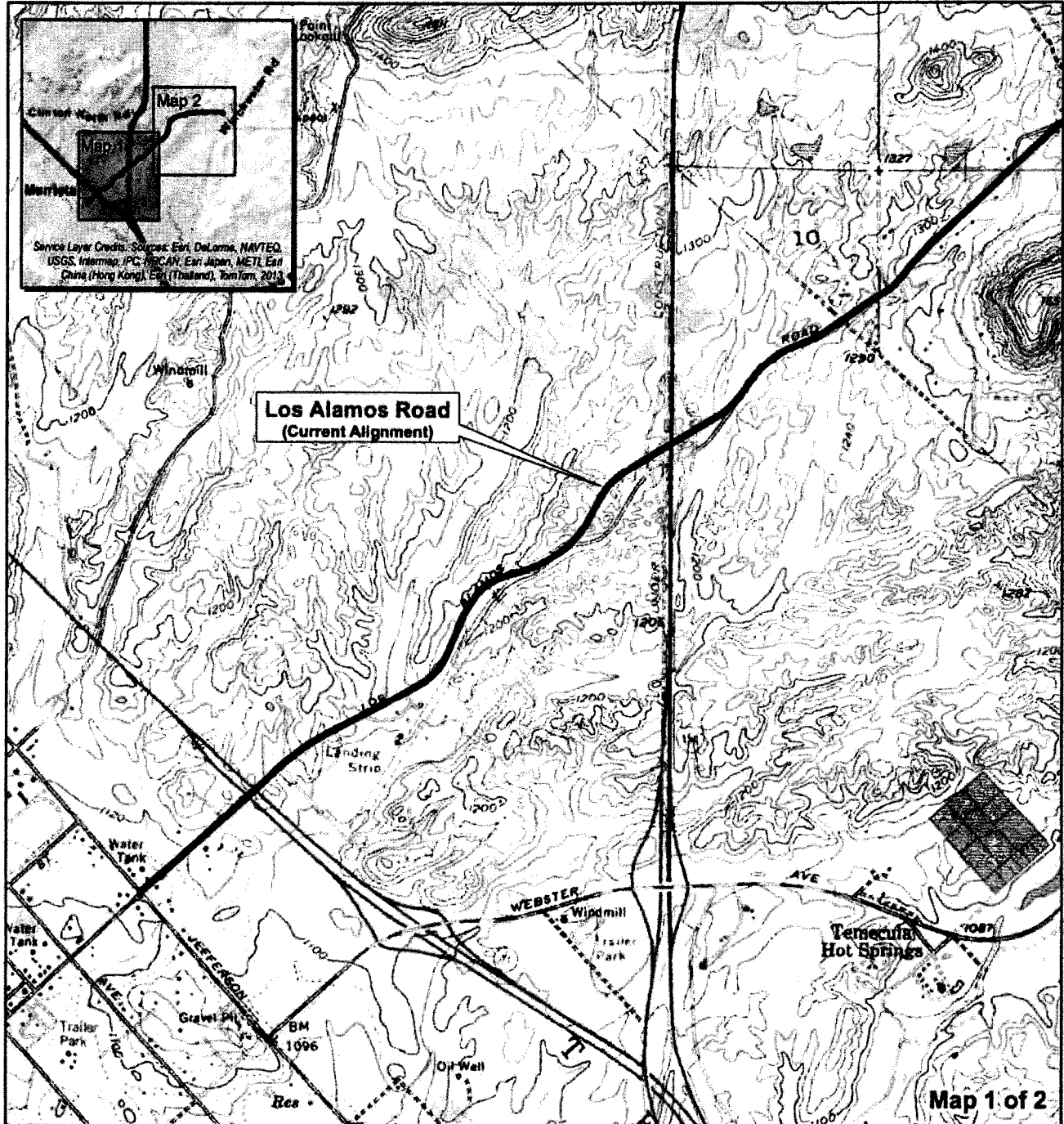


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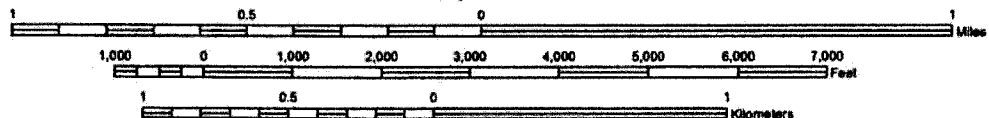


TRUE NORTH

Map 2 of 2

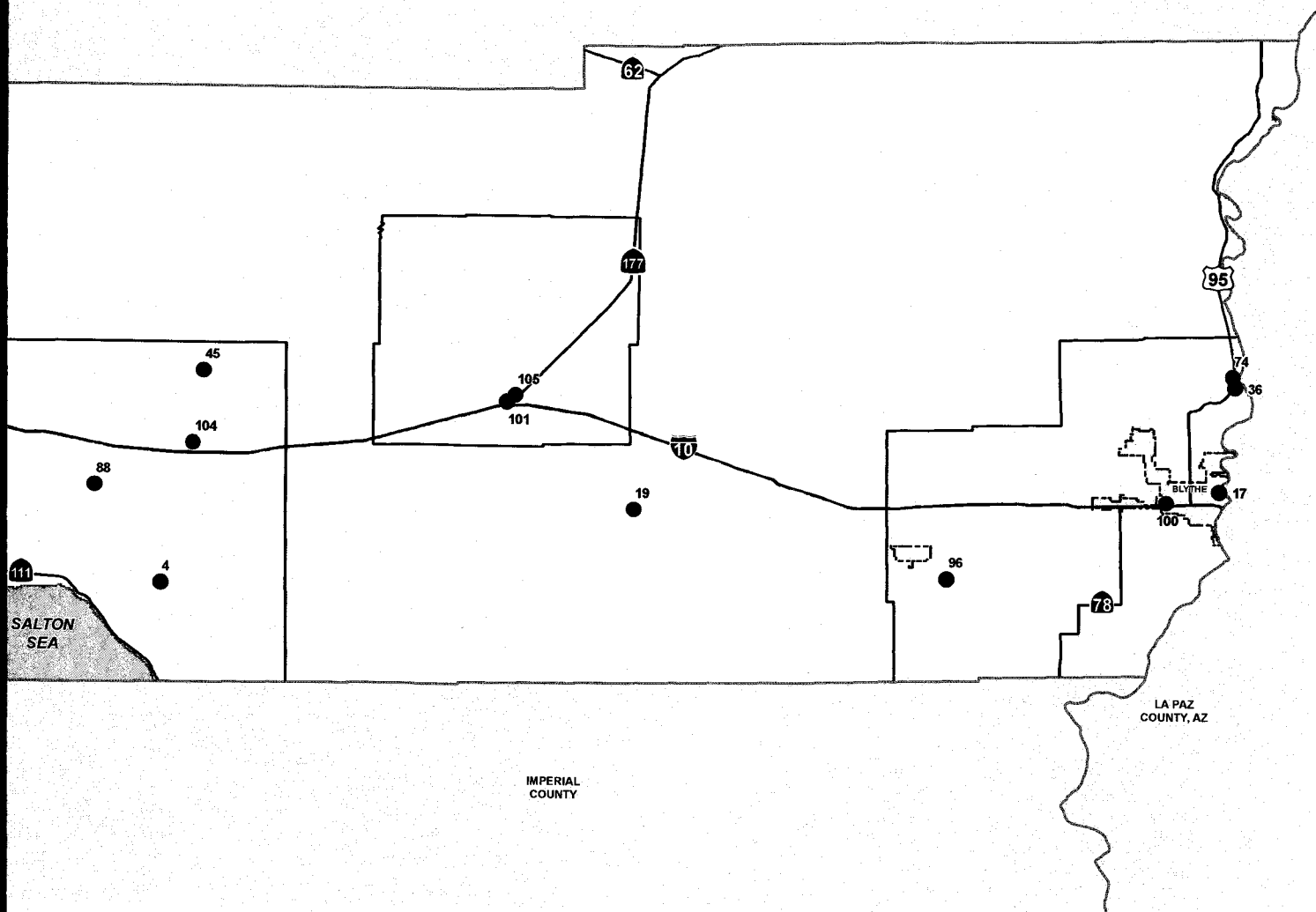


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TRUE NORTH





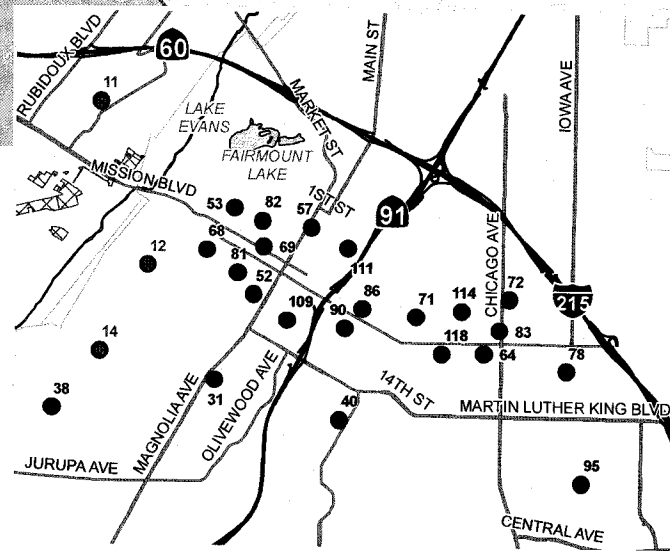
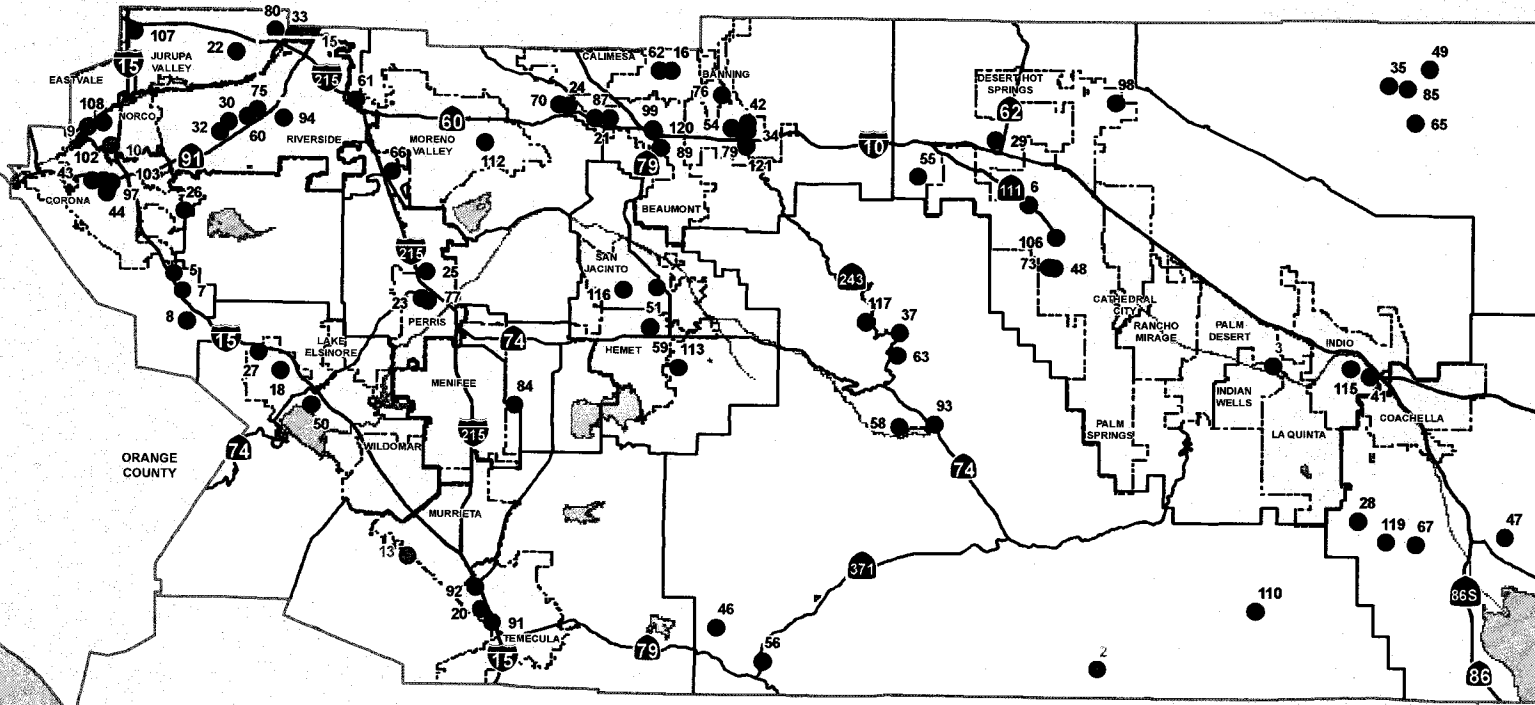
Data Source: Riverside County (2011)

- |   |   |   |  |
|---|---|---|--|
| 23 Pinacate Mining District                   | 48 Desert Inn                               | 73 Palmdale Railroad Site                     | 98 Yerxa's Discovery   |
| 24 SAAHATAPA                                  | 49 Desert Queen Mine                        | 74 Palo Verde Diversion Dam                   | 99 Beaumont Carnegie Library                                       |
| 25 Southern Hotel                             | 50 Elsinore's Hottest Sulphur Spring        | 75 Parent Naval Orange Tree                   | <b>Post WWI to WWII Period (1920-1945)</b>                         |
| 26 Temescal Tin Mines                         | 51 Estudillo Mansion                        | 76 Pedley-Type Dam                            | 100 Blythe Depot   |
| 27 Third Serrano Adobe                        | 52 First Church of Christ                   | 77 Ferris Depot                               | 101 Site of Contractor's Hospital                                  |
| 28 Toro Village                               | 53 First Congregational Church of Riverside | 78 Peter Weber House                          | 102 Corona Founders Monument                                       |
| 29 Whitewater                                 | 54 Gilman Ranch                             | 79 Henderson/Reid Building                    | 103 Corona Theater   |
| <b>Early Statehood (1869-1919)</b>            | 55 Hall City & Grade                        | 80 Riverside Cement Co                        | 104 Desert Training Center   |
| 30 Administration Building, Sherman Institute | 56 Hamilton School                          | 81 Riverside County Courthouse                | 105 Eagle Mountain Iron  |
| 31 All Souls Universalists Church             | 57 Harada House                             | 82 Federal Post Office                        | 106 El Mirador Hotel and Tower                                     |
| 32 Arlington Library and Fire Hall            | 58 Hemet Dam & Lake Hemet                   | 83 Riverside-Arlington heights Fruit Exchange | 107 Galleano Winery  |
| 33 Armory Hall                                | 59 Hemet Depot                              | 84 Garbani Rocco Homestead                    | 108 Lake Norconian Club  |
| 34 Banning Woman's Club                       | 60 Heritage House                           | 85 Ryan House & Lost Horse Well               | 109 M.H. Simon Undertaking Chapel                                  |
| 35 Barker Dam                                 | 61 Highgrove Hydroelectric Plant            | 86 San Pedro, LA and Salt Lake Railroad Depot | 110 Martinez Canyon Rockhouse                                      |
| 36 Blythe Intake                              | 62 Highland Springs                         | 87 San Timoteo Canyon Schoolhouse             | 111 Mission Court Bungalows  |
| 37 Camp Emerson                               | 63 Idyllwild                                | 88 Shaver's Well                              | 112 Old Moreno School  |
| 38 Chinatown                                  | 64 Loring Opera House                       | 89 St Boniface School                         | 113 Ramona Bowl  |
| 39 Citrus Experiment Station                  | 65 Lost Horse Mine                          | 90 Sutherland Fruit Company                   | 114 Riverside Municipal Auditorium and Soldier's Memorial Building |
| 40 Citrus Machinery Pioneering                | 66 March Field Historic District            | 91 Temecula Old Town Historic District        | 115 Smiley Place   |
| 41 Coachella Valley Water District            | 67 Martinez Historic District               | 92 Temecula Quarries                          | 116 Soviet Transpolar Landing Site                                 |
| 42 Coplin House                               | 68 Masonic Temple                           | 93 Thomas-Garner Ranch                        | 117 Speed of Light Experiment                                      |
| 43 Carnegie Andrew Library                    | 69 Mission Inn                              | 94 Victoria Avenue                            | 118 University Heights Jr. High School                             |
| 44 Corona High School                         | 70 Nobles Ranch                             | 95 William Childs House                       | 119 Valerie Jean Date Garden                                       |
| 45 Cottonwood Oasis                           | 71 North Park                               | 96 Wiley's Well                               | 120 Bogart House   |
| 46 Cottonwood School                          | 72 Old WCA Building                         | 97 Woman's Improvement Club                   | 121 Old Banning High School  |

Figure OS-7



**HISTORICAL RESOURCES**



- Exploration
- Mission
- Mexican/Rancho
- Early Californian
- Early Statehood
- Post WWI to WWII

- ~ Highways
- Area Plan Boundary
- ⊕ City Boundary
- ☁ Waterbodies

**Exploration Period (1772-1818)**

- 1 Anza crossing of Santa Ana River
- 2 Anza Camp and Crossing
- 3 Indian Wells

**Mission Period (1769-1833)**

- 4 Dos Palmas
- 5 Old Temescal Road
- 6 The Original Palm Springs
- 7 Serrano Boulder
- 8 Serrano Tanning Vats

**Mexican/Rancho Period (1833-1848)**

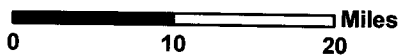
- 9 Bandini-Cota Adobe
- 10 Bandini Adobe Site
- 11 Louis Rubidoux House
- 12 Mt Rubidoux
- 13 Rancho Santa Rosa
- 14 Rubidoux Grist Mill
- 15 Trujillo Adobe

**Early Californian Period (1848-1889)**

- 16 Weaver Adobe
- 17 Bradshaw Ferry Crossing
- 18 Butterfield Stage Station
- 19 Com Springs
- 20 First Post Office, Temecula
- 21 Frink Ranch
- 22 Jensen Alvarado Ranch



December 8, 2015



Disclaimer: 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.



SAN BERNARDINO COUNTY

LA PAZ COUNTY, AZ

IMPERIAL COUNTY

Data Source: Riverside County (2011)

Exploration Period (1772-1848)	Mission Period (1769-1843)	Early Statehood (1849-1915)	Mexican/Ranchero Period (1843-1861)	Sanic California Period (1861-1891)
1	1	23	9	16
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Figure OS-7

HISTORICAL RECORDS



es are

Response to Webster to Supervisors re EA 43201 MND, June 4,

Due to the length and organization of Ms. Cecilia Webster's May 29<sup>th</sup> Letter, we have attempted to respond section by section. Our responses are in Red below. This was a group effort by several experts and consultants. Also, since many of these issues were already addressed in correspondence to her previous letters, in meetings with her and at Planning Commission, we try to keep our responses brief. Additionally, since several of the issues discussed do not directly relate to this project we did not answer them.

This letter is organized as follows:

Section Heading	Page
Objection I. The Project application to Riverside County Planning was premature, such that review of the planning application by the County and associated agencies such as WRC-RCA preceded by more than a year the point at which ownership/title of the project site was fit for conveyance, sub-division and sale .....	3
Objection II. The Project is Inconsistent with the Multipurpose Open Space (OS) Provisions of the Riverside County General Plan (GP) governing Groundwater Recharge, Floodplain and Riparian Area Management, and Wetlands (GP, December 8, 2015, Chapter 5, pages OS-12 thru OS-16, Policies OS 4.3, 4.6, 4.9, 5.1, 5.3, 5.6 and 6.2) - and Riverside County ORDINANCE NO. 348.4896 .....	4

Section Heading (Contd.)	Page
Objection III. EA43201 and County Staff failed to justify to the Planning Commission how the Project can be permitted to exceed the General Plan traffic model trip generation level required by the State Highway 79 Policy Area (SWAP 9.2) - and Riverside County ORDINANCE NO. 348.4896 .....	8
Objection IV. The Project is Inconsistent with the MSHCP and Riverside County ORDINANCE NO. 348.4896.....	11
Objection V. The Drainage Report (EA 43201, Appendix K) for the Project is Defective; it Contains Material Errors and Omissions that have not been critically reviewed by County staff.....	16
Objection VI. The analysis of the floodplain in the eastern third of the Project site is grossly defective .....	22
Objection VII. The Applicant and County have failed to justify reliance on deferred mitigation regarding identification/location of water well(s) and septic system(s) on the project site, in compliance with state water laws.....	25
Objection VIII. Cumulative environmental impacts of the Project due to its overlap with the County's proposed Clinton Keith Road Extension are not addressed .....	28
Objection IX. The EA 43201 MND Does Not Represent the County's Independent Judgement .....	30
June 7, 1994 Minutes of the Board of Supervisors approving settlement between Cecelia Webster, County of Riverside and Board of Supervisors (Superior Court Case No. 218564).....	31

***I. The Project application to Riverside County Planning was premature, such that review of the planning application by the County and associated agencies such as WRC-RCA preceded by more than a year the point at which ownership/ title of the project site was fit for conveyance, sub-division and sale.***

On June 2nd, 2017 Edward A. Richard as Trustee, declared “to the best of his knowledge” and signed as Property Owner an application to Riverside County Planning Department an application for MSHCP Habitat Acquisition and Negotiation Strategy (“HANS application”).

On June 11th, 2018 Edward A. Richard as Trustee, signed as sole Property Owner an Indemnification Agreement to defend, indemnify and hold harmless the County of Riverside et al. with respect to the County’s decisions to approve the Project.

On August 10th, 2018 Edward A. Richard as Trustee and Newland Homes LLC filed in Superior Court of California (County of Riverside), a complaint for QUIET TITLE and QUIET TITLE (ADVERSE POSSESSION) (Case No. MCC1800914). On page 1 of the Complaint, the plaintiffs identify the title problem to the most northerly six feet running across the entire EA43201 Project site *and extending east into the adjacent Riverside County TLMA parcel that the County purchased from Edward and Elinor Richard for \$425,000 in 2007 (even though it appears that the County of Riverside TLMA et al. are not mentioned or party to the Complaint)*. Without these most northerly six feet of the EA43201 Project, the entire project is unfeasible without major redesign. The Complaint notes that plaintiff Newland is under contract to purchase the Project site from plaintiff Richard.

On December 7th, 2018, after a trial in Riverside Superior Court, a judgement for Plaintiffs Richard and Newland was entered.

The Applicant and Planning Commission in written and oral testimony before the 4/3/2019 Public Hearing, emphasized the importance they attach to dates when title is obtained. Applicants submitted their HANS application to the County on June 29th, 2017 and the JPR for the Project was transmitted by RCA to the County on February 15th, 2018 - with the Wildlife Agencies’ negative review of the JPR following on March 5, 2018. Applicants’s representative Mr. Krout testified on 4/3/2019 that there were “Hans Meetings, a number of them, in July and August of 2018”.

RCA had acquired for conservation 67 acres of land 260 feet due south of the Project on June 7, 2018 (37 acre parcel closest to the Project) and July 3, 2018 (an additional 30 acres), with the acquisition completed *after RCA’s due diligence regarding title/title insurance for each of the parcels - and before Applicant even began their formal attempt to obtain clear title (“ANY CLOUD ON PLAINTIFF’S TITLE” in the Complaint filed in Superior Court, noted above)*.

The acts of title searches and obtaining title insurance are simple tasks constituting minimal due diligence in any real estate transaction. When did Newland and Richard learn of Richard’s title problems? What and when did they disclose the ownership

dispute to the County, after their discovery? Why didn't this problem with Richard's title emerge during the County's 2007 purchase of land from Richard - land having the same problematic title as in the 2018 Superior Court Complaint? The file reviewed by the Planning Commission contains neither consideration of the fundamental matter of Project site ownership and title, nor consistency of same with their/staffs'/Applicants' 4/3/2019 position that title for surrounding conservation lands must be in hand prior to the HANS/JPR process if they are to be considered by the County in review of EA 43201 and proposed MND.

**Conclusion to I.** The cloud on Applicants' title disclosed in Superior Court on August 10, 2018 must be addressed by the County in its review of the EA 43201 MND, prior to any approval, given that the County cannot review and award entitlements to persons lacking clear title to project sites. The failure of Applicant Richard to obtain clear title to the Project site prior to filing a development application invalidates County reviews of the application, since development approvals require that subdivision and sale of property be legally sound.

**Response:** This comment shows the commenter's confusion of the facts. Quiet title action was merely to clean up a gap on title; this was not an ownership dispute. Under adverse possession, Mr. Richard owned the property years ago. Both parties that could have held title to the gap were signatories to the application: Mr. Edward Richard and Mr. John Olsen. There was no question of ownership. It had been established years ago but the County surveyor requested a recorded record of the ownership. Additionally, it should be clarified that the meeting with the Wildlife Agencies took place on April 19, 2018 and May 2, 2018. This is not a CEQA issue.

**II. *The Project is Inconsistent with the Multipurpose Open Space (OS) Provisions of the Riverside County General Plan (GP) governing Groundwater Recharge, Floodplain and Riparian Area Management, and Wetlands (GP, December 8, 2015, Chapter 5, pages OS-12 thru OS-16, Policies OS 4.3, 4.6, 4.9, 5.1, 5.3, 5.6 and 6.2). Furthermore, Riverside County ORDINANCE NO. 348.4896 (Effective 1/10/19) SECTION 2.2. GENERAL PLAN CONSISTENCY states that "No discretionary permit shall be approved pursuant to this ordinance unless it is determined that the permit is consistent with the General Plan."***

Floodplains, watercourses and floodways "form a complex physical and biological system that not only supports a variety of natural resources, but also provides natural flood and erosion control. In addition, the floodplain represents a natural filtering system, with water percolating back into the ground and replenishing groundwater. When a watercourse is divorced from its floodplain... natural, built-in benefits are either lost,

Response to Webster to Supervisors re EA 43201 MND, June 4, altered, or significantly reduced” (page OS-13, Floodplain and Riparian Area Management, para 1).

“The open space of floodplains adjacent to rivers and streams helps store and release floodwaters, thus reducing flood flow and peaks and their subsequent impacts during small and frequent flood events” (page OS-13, Floodplain and Riparian Area Management, para 2).

This Project violates GP OS Policies by proposing to build within a 100 year floodplain, and to destroy half of the 2 acres of floodplain on the Project site. The existing floodplain is a valuable water resource which currently (and historically)...

**Response:** These statements are false. As stated in response to comment #5 on the 5<sup>th</sup> page of the letter from Proactive Engineering Consultants dated March 28, 2019, the project is NOT proposing to build homes in the floodplain. This has also been repeated to Ms. Webster numerous times in letters, a multi-hour meeting with her and her husband and at the Planning Commission meeting. Despite this information being provided to her repeatedly, she has consciously chosen to ignore this information. The project site is designated Medium Density Residential (MDR) in the General Plan, not Open Space. The County staff has determined and the Planning Commission affirmed that the project is consistent with the General Plan. The project also is preserving riparian the area onsite, which is again consistent with the very policies cited above. We have offered to meet with any experts she has retained to discuss confusion she or they may have, but it appears she has no expert since nobody with specific expertise in civil engineering or hydrology has participated in any of the discussion or correspondence prepared on behalf of Ms. Webster to-date.

...provides stormwater retention, groundwater recharge and mitigation of downstream flooding for a ~2.5 square mile watershed. The proposed alteration of the floodplain will negatively impact these functions, exacerbate downstream flooding, and increase flooding hazards to public safety. Additionally, potential impacts to wildlife in the wetland/riparian area that are likely to result from loss of the adjacent floodplain have not been addressed.

**Response:** See letter from Proactive Engineering Consultants dated March 28, 2019. The project will not be impacting flooding or runoff downstream. Again, as discussed with Ms. Webster at length, the hydrology studies show that there will be no increased impacts to flooding.

**Groundwater Recharge Policies not addressed in EA 43201:**

**OS 4.3 Ensure that adequate aquifer water recharge areas are preserved and protected. (AI 3, 56,57)**

The existing floodplain is an aquifer water recharge area that merits preservation and protection. Approval of the Project will destroy half of the floodplain on the Project site. Therefore, approval of this project violates Policy OS 4.3 because it fails to preserve or protect a valuable water recharge area.



Response to Webster to Supervisors re EA 43201 MND, June 4,

**Response:** See above responses—the project will not destroy the floodplain. Also refer to page 42 of the MND and supporting reports and letters referenced above by Proactive Engineering, which state that there will be a less than significant impact on groundwater.

**OS 4.6 Retain storm water at or near the site of generation for percolation into the groundwater to conserve it for future uses and to mitigate adjacent flooding... (AI 57)**

1. Currently, stormwater from an ~20 acre watershed west of the project ponds on the project site and percolates into the groundwater. Approval of the Project will collect this stormwater and discharge it directly into the main channel of the watercourse on the east side of the project site 300 feet upstream, increasing stormwater runoff and contributing to flooding of adjacent properties.

**Response:** The above statements are not accurate. See letters from Proactive Engineering Consultants dated March 28 (2 separate letters), April 1, April 2, April 9 and May 30, 2019. The area that the site contributes toward percolation of water into the ground is minimal and any reduction in percolation is more than made up via the water quality basin described below.

- Such amount would contribute less than 2% of the approximate 2000cfs of volume, assuming worst case condition of 45 cfs in a 100 year storm event.
- All onsite drainage that used to discharge directly into the main channel will instead discharge into an onsite detention/infiltration and water quality basin, helping to reduce the amount of downstream flooding during storm events.

2. Currently, the existing 2 acre floodplain on the eastern side of the property retains substantial amounts of stormwater, contributing to both recharge of the underlying aquifer and the mitigation of downstream flooding. Substantial evidence has been entered into the record to document how critical and effective a role the floodplain plays in mitigating flooding across Los Alamos Road and to rural residences, south of the project site (written comments and oral testimony by Webster to the PC on 3/27/19 and 4/3/19).

**Response:** The above statements are not accurate relative to the project site. See above response regarding limited effect the project site has on the flooding condition. In addition, this project will offer a solution to the flooding hazard of Los Alamos Road by providing an alternative route for people to drive through the project site rather than take Los Alamos.

This project violates OS 4.6 because it will not retain stormwater, instead causing a substantial decrease in existing stormwater retention on the site, and will exacerbate rather than mitigate flooding of adjacent properties.

**Response:** The above statements are not accurate and not based on any analysis or expert advice. See previous responses, above. The project is required to retain stormwater in a detention and infiltration basin.

Response to Webster to Supervisors re EA 43201 MND, June 4,

**OS 4.9 Discourage development within watercourses and areas within 100 feet of the outside boundary of the riparian vegetation, the top of the bank, or the 100 year floodplain, whichever is greater.**

Approval of the Project will be in the 100 year floodplain, immediately adjacent to riparian vegetation. The County, though, has not proposed project modifications or conditions to discourage or move Project development from the floodplain, even in part.

Therefore, approval of this project violates Policy OS 4.9 because it does not discourage floodplain development.

Response: This is not accurate. See previous responses regarding the project not being in a flood basin. The project does not provide a 100-foot buffer to the riparian area, but it does avoid impact to it. The County, RCA and wildlife agencies see no issue with the proposed buffer.

**Floodplain and Riparian Area Management Policies not addressed in EA 43201:**

**OS 5.1 Substantially alter floodways or implement other channelization only as a “last resort,” and limit the alteration to:**

- a. that necessary for the protection of public health and safety only after all other options are exhausted;
- b. essential public service projects where no other feasible construction method or alternative project location exists; or
- c. projects where the primary function is improvement of fish and wildlife habitat. (AI 25, 59, 60)

“The floodway is the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the 100-year flood without cumulatively increasing the water surface elevation more than one foot” (page OS-14).

Applicant and County have failed to identify the boundary of the existing floodway on the Project site. Absent this critical information, and given that Applicant proposes to build right up against the wetland/riparian area of the watercourse, the Project will almost certainly encroach into the existing floodway. Approval of the Project therefore violates OS 5.1 because it will likely cause substantial alteration of a floodway, but meets none of the requirements that would permit such an alteration.

Response: This is not accurate. See previous response letters from Proactive Engineers and above. The project is not developing a floodplain; therefore OS 5.1 does not apply.

**OS 5.3 Based on site specific study, all development shall be set back from the floodway boundary a distance adequate to address the following issues: (AI 59, 60, 133)**

- a. public safety;
- b. erosion;

Response to Webster to Supervisors re EA 43201 MND, June 4,

- c. **riparian wetland buffer;**
- d. **wildlife movement corridor or linkage;**
- e. **slopes;**
- f. **type of watercourse.**

The existing floodway boundary has not been identified, and no site specific study of OS 5.3 issues a-f has been provided. The Project violates OS 5.3 because Applicant and County have failed to identify or address the required issues; development is not set back from the floodway boundary by an adequate distance.

Response: This is not accurate. The pre- and post-development floodplain boundary has been identified in the various drainage and hydrology reports. See the MND Hydrology section and supporting technical studies.

**OS 5.6 Identify and, to the maximum extent possible, conserve remaining upland habitat areas adjacent to riparian and wetland areas that are critical to the feeding, hibernation, or nesting of wildlife species associated with these wetland and riparian areas. (AI 60,61)**

The Project violates OS 5.6 by failing to conserve any upland habitat areas adjacent to the riparian and wetland areas.

Response: As stated in the project general biological assessment, there was no upland habitat areas on the project site.

**Wetlands Policies not addressed in EA 43201:**

**OS 6.2 Preserve buffer zones around wetlands where feasible and biologically appropriate. (AI 61)**

This project proposes to build right up against the wetland. In approving this Project, the County is violating OS 6.2 by not requiring preservation of existing buffer zones around the wetland/riparian area. Both required General Plan mitigation measures are feasible but there is no evidence that the County considered such required buffer zones.

**Conclusion to II:** EA 43201 states merely that “The proposed project includes 3.5 acres of dedicated open space that would support the General Plan Multipurpose Open Space Policies”. But no evidence or analysis is provided to demonstrate that this Project actually complies with any OS Policies, making it highly likely that this Project will result in numerous significant environmental impacts that OS Policies are designed to avoid, necessitating preparation of an EIR.

**Response:** This is not accurate and a baseless assertion. See previous responses regarding hydrology, drainage and biological impacts. The MND uses substantial evidence prepared by experts to arrive at the conclusion that the project is consistent with the General Plan and will have a less than significant impact .

***III. EA 43201 and County Staff failed to justify to the Planning Commission how the Project can be permitted to exceed the General Plan traffic model trip generation level required by the State Highway 79 Policy Area (SWAP 9.2). Furthermore, Riverside County ORDINANCE NO. 348.4896 (Effective 1/10/19)***

***SECTION 2.2. GENERAL PLAN CONSISTENCY states that  
“No discretionary permit shall be approved pursuant to this ordinance unless it is determined that the permit is consistent with the General Plan.”***

On July 26, 2017, County staff instructed Applicant and Applicant’s engineer to:

1. Please show how this project complies with the Highway 79 Policy Area within the Southwest Area Plan policy 9.2. This typically requires 9% reduction in trips generated from residential development. The project is 12.6 gross acres in the Medium Density Residential designation, which would require 3.185 (9% reduction from 3.5 as is the midpoint which the General Plan Traffic Study is based), which results in 38 dwelling units for this project.

Applicant failed to respond to this 2017 requirement.

At the Planning Commission 4/3/2019 hearing, staff provided the following finding in their report:

**File No(s). Change of Zone No. 7937, Tentative Tract Map No. 37294 and Plot Plan No. 26249  
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Continued from: March 20, 2019  
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**FINDINGS AND CONCLUSIONS**

**In order for the County to approve a proposed project, the following findings are required to be made:**

**Land Use Findings:**

3. The Project site is located within the Southwest Area Plan’s Highway 79 Policy Area, which was created to address transportation infrastructure capacity within the policy area. Residential developments within this policy area are required to be consistent with SWAP 9.2, and reduce their density by 9% from the midpoint of the density range of the applicable land use designation to achieve a reduction in traffic generated from the area. The project site is located in Community Development: Medium Density Residential – 2-5 dwellings units per acre this 9% reduction would require the proposed project to be limited to 39 dwelling units. However, SWAP 9.2 also provides that individual projects may exceed the General Plan traffic model trip generation level if it can be shown that sufficient reductions have occurred on other projects. Certain Specific Plans and Tentative Tract Maps within the Highway 79 Policy Area have fully developed their residential component below the maximum allowed number of dwellings units allowed by the Specific Plan. County staff is maintaining a tracking sheet that identifies projects that have underdeveloped from what the General Plan and Highway 79 Policy Area would allow and has left excess capacity and a reduction in trips as well as identifying projects that have utilized this excess capacity for an up to date count on available capacity. At this time, the identified excess capacity in the policy area stands at 11 units, 9 of which would be utilized by this project.

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The above conclusion lacks any specificity regarding the basis for staff's conclusion, that 11 excess capacity housing units are currently available in the SH-79 Policy Area, and that 9 of them could be allocated to this Project. In contrast to the staff report for this Project, previous presentations to the Planning Commission for other projects have provided detailed information; e.g., the February 7, 2018 PC hearing on Change of Zone No. 7833, Tentative Tract Map No. 36504, below:

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2. The project site is located within the Highway 79 Policy Area of the Harvest Valley/Winchester Area Plan. The Highway 79 Policy Area and applicable policies (policies C 2.7 and SWAP 9.2 as shown below) requires developments to reduce their density by 9% from the density analyzed in the General Plan.

C 2.7 provides the following: Maintain a program to reduce overall trip generation in the Highway 79 Policy Area (Figure C-2) by creating a trip cap on residential development within this policy area which would result in a net reduction in overall trip generation of 70,000 vehicle trip per day from that which would be anticipated from the General Plan Land Use designations as currently recommended. The policy would generally require all new residential developments proposals within the Highway 79 Policy Area to reduce trip generation proportionally, and require that residential projects demonstrate adequate transportation infrastructure capacity to accommodate the added growth.

SWAP 9.2 provides the following: Maintain a program in the Highway 79 Policy Area to ensure that overall trip generation does not exceed system capacity and that the system operation continues to meet Level of Service standards. In general, the program would establish guidelines to be incorporated into individual Traffic Impact Analysis that would monitor overall trip generation from residential development to ensure that overall within the Highway 79 Policy Area development projects produce traffic generation at a level that is 9% less than the trips projected from the General Plan traffic model residential land use designations. Individually, projects could exceed the General Plan traffic model trip generation level, provided it can be demonstrated that sufficient reductions have occurred on other projects in order to meet Level of Service standards. As applied to the project area and its general plan land use designations, this 9% reduction would require the proposed project to be limited to 516 dwelling units. The Tentative Tract Map proposes 527 dwelling units, which exceeds the typical maximum allowed by the policy area by 11 units. However, SWAP 9.2 also provides that individual projects may exceed the General Plan traffic model trip generation level if it can be shown that sufficient reductions have occurred on other projects.

When this policy area was created with the 2003 General Plan, the buildout assumptions and resulting traffic generation assumptions for already adopted Specific Plans were based on the total allowed units within a given Specific Plan. These assumptions have not changed. For Specific Plans approved prior to the adoption of the 2003 General Plan where no further amendments were proposed, they were allowed to develop to their approved, entitled maximum number of dwelling units and not subject to the requirement to reduce their number of units by 9% based on implementation guidance developed by staff. Certain approved Specific Plans within Highway 79 Policy Area (policy area) have been identified that both have not been amended since the adoption of the 2003 General Plan (therefore entitled to the maximum number of units they were approved for) and that developed below the maximum allowed number of units they were entitled to develop and are completely built out. Four of these Specific Plans (Specific Plan Nos. 184, 213, 238, and 284) accounts for a total of 576 units that are undeveloped within the Highway 79 Policy Area that were assumed to be developed in the traffic analysis for the 2003 General Plan. Of these 396 units, 426 have already been allocated to Tentative Tract Map No. 36785, 115 have already been allocated to Specific Plan No. 312 Amendment No. 2 and 24 units have already been allocated to Tentative Tract Map No. 32323, leaving 20 units remaining from this collection of Specific Plans available. Based on this review, there is a demonstrated reduction in units and

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traffic from these other projects that offset the additional 11 units proposed by this project than what would typically be allowed by the policy area utilizing the individual 9% reduction method. Although the application of a 9% reduction in density on an individual project basis has been the typical practice to achieve consistency with the policy area, the policy area also allows for a demonstration that sufficient reductions have occurred on other projects. Based on the above undeveloped units under similar ownership and Specific Plan units elsewhere in the policy area, this demonstrates that although the project individually exceeds the limit on units, there are reductions in units elsewhere in the policy area that are assumed to be developed within the traffic analysis for the General Plan that more than balance out the individual exceedance this project proposes. Therefore, based on the above, the project is consistent with the Highway 79 Policy Area.

The staff report above, for SP312A2/TTM 32323, provides the number and project origin of excess capacity housing units which have been identified in the SH-79 Policy Area (576), and the numbers of units that have been allocated to various projects to date (576; 426 to TTM 36785, 115 to SP 312A2, 24 to TTM 32323, and 11 to TTM 36504).

Following description of the Highway 79 Policy Area Excess Capacity “tracking sheet” that County Staff described to the Planning Commission on 4/3/2019, I obtained a draft spreadsheet from County TLMA (showing a different number of excess capacity units allotted to SP312A2 than were represented to the Planning Commission on February 17, 2018 (for Tract 36504, shown above) and, separately, to the Planning Commission on June 7, 2017 for Tract Map 32323; the number given to me was 106, rather than 115.

**Conclusion to III:** There are no excess capacity housing units currently available in the SH-79 Policy Area for allocation to this, or any other, project. Therefore, approval of this Project violates the General Plan/Highway 79 Policy Area requirement for mandatory trip reductions, because the Project exceeds the permitted number of housing units for the site by 9-10 units.

**Response:**

- The County Transportation Department has conducted a thorough analysis and determined it there are available excess units and the project could use some of those units.
- Unlike previous projects that received excess allocations, applicant has agreed to pay a fee equivalent \$5000/excess unit per Condition of Approval that will be utilized by the County for Highway 79 Policy Area infrastructure improvements.

***IV. The Project is Inconsistent with the MSHCP***

1. The California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service (the Wildlife Agencies) disagreed with County's and RCA's determination, that the Project is consistent with the MSHCP.

**Wildlife Agencies' letter, March 5, 2018 (previously entered into the record)**

"The above analysis indicates that the Reserve Assembly requirements in Cell Group Z will not be achieved even if the remaining undeveloped area is conserved. It seems therefore that the entire project area should come into conservation."

"The JPR analysis states adjustments to Proposed Core 2 and or Cell Group Z will need to be made by the RCA and concludes the development of the Project site would not impede reserve assembly because it is not connected to existing conservation."

"We disagree with the RCA's conclusion that the proposed Project development is consistent with MSHCP Reserve Assembly requirements. The Regional Map included in the JPR packet does not show a barrier to connectivity between the existing conservation and the proposed Project site. We are also unclear how the RCA proposes to adjust Proposed Core 2 and or Cell Group Z. We request that either a Criteria Refinement for Cell Group Z be completed or the mechanism for adjusting Proposed Core 2 and or Cell Group Z be identified and implemented prior to project approval."

There is no evidence in the record that refutes the Wildlife Agencies' expert opinion as to the potential value of the project site to the MSHCP, or that retracts their objections to approval of the Project prior to remedy of the Cell Group Z shortfall. And there is no evidence that the County, as Permittee, has resolved the conservation acreage shortfall in Cell Group Z:

**Charles Landry, Executive Director RCA (personal communication 5/9/2019)**

"To the RCA's knowledge, no final decisions have been made by the County to address the Cell Group Z shortfall."

Therefore, there is no factual basis for County and Applicants' assertion in EA 43201 that the Project site would "neither contribute or further impede the conservation goals for Cell Group Z" (page 17), because how those goals will be met is still problematic, and a land donation from the Project site would certainly contribute to solving the shortfall. Rather, evidence in the record indicates that exclusion of the Project site from MSHCP Reserve Assembly participation will negatively impact MSHCP Reserve Assembly goals for Cell Group Z. The Project is therefore inconsistent with the MSHCP.

**RESPONSE:**

- The author is not in a position to determine consistency with the MSHCP. The County and RCA have determined the project is consistent with the MSHCP.
- The MSHCP does not require that each Criteria Cell or Cell Group meet the target acreage set forth in the Cell Group description set forth in Section 3.3.15 of the