HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT

CACTUS CLUB HOTEL PROJECT

Assessor's Parcel Numbers 0608-051-02, -03, and -04 Near the City of Twentynine Palms, San Bernardino County, California

For Submittal to:

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March 8, 2023 CRM TECH Contract No. 3954A Title: Historical/Archaeological Resources Survey Report: Cactus Club Hotel

Project, Assessor's Parcel Numbers 0608-051-02, -03, and -04, near the

City of Twentynine Palms, San Bernardino County, California

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USGS Quadrangle: Sunfair, Calif., 7.5' quadrangle (Section 35, T1N R7E, San Bernardino

Baseline and Meridian)

Project Size: 12.64 acres

Keywords: Southern Mojave Desert; Phase I cultural resources survey; no "historical

resources" under CEQA

EXECUTIVE SUMMARY

Between September 2022 and March 2023, at the request of Jennings Environmental, LLC, CRM TECH performed a cultural resources study on 12.64 acres of undeveloped land near the City of Twentynine Palms, San Bernardino County, California. The subject property of the study consists of Assessor's Parcel Numbers 0608-051-02, -03, and -04, located on the southeast corner of the intersection of Twentynine Palms Highway (State Route 62) and Mile Square Road, in the northeast quarter of Section 35, T1N R7E, San Bernardino Baseline and Meridian.

The study is part of the environmental review process for the proposed construction of a hotel, known as the Cactus Club Hotel, on the property. The County of San Bernardino, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA). The purpose of this study is to provide the County with the necessary information and analysis to determine whether the project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or around the project area. In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search, contacted Native American representatives, pursued historical background research, and carried out an intensive-level field survey.

During the field survey, a few scattered domestic refuse items, primarily beer cans and glass bottle fragments from the late historic period, were noted on the surface within the project area with no indication of any substantial artifact concentration. Such isolated refuse, generally the result of incidental trash discarding, are virtually ubiquitous in populated areas and along major transportation corridors. Without any documented historical background, and in the absence of an exceptional quantity or qualify of artifacts, these refuse items demonstrate little potential for historic significance. Therefore, they are not considered potential "historical resources" and require no further study.

Outside but adjacent to the project boundaries, the segments of Twentynine Palms Highway and Mile Square Road were previously recorded into the California Historical Resources Inventory as Sites 36-010525 and 36-024821, respectively. As working components of the modern transportation infrastructure, however, these roadways do not retain sufficient historical character to be considered potential "historical resources" due to upgrading and maintenance during the modern period. Furthermore, the proposed project has no potential to affect the overall appearance and character of the roads. Therefore, they, too, require no further consideration in the CEQA compliance process for this project.

Based on these findings, CRM TECH recommends to the County of San Bernardino a finding of *No Impact* regarding "historical resources." No further cultural resources investigation is recommended for this project unless construction plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are encountered during any earthmoving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

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INTRODUCTION

Between September 2022 and March 2023, at the request of Jennings Environmental, LLC, CRM TECH performed a cultural resources study on 12.64 acres of undeveloped land near the City of Twentynine Palms, San Bernardino County, California (Figure 1). The subject property of the study consists of Assessor's Parcel Numbers 0608-051-02, -03, and -04, located on the southeast corner of the intersection of Twentynine Palms Highway (State Route 62) and Mile Square Road, in the northeast quarter of Section 35, T1N R7E, San Bernardino Baseline and Meridian (Figures 2, 3).

The study is part of the environmental review process for the proposed construction of a hotel, known as the Cactus Club Hotel, on the property. The County of San Bernardino, as the lead agency for the project, required the study in compliance with the California Environmental Quality Act (CEQA; PRC §21000, et seq.). The purpose of this study is to provide the County with the necessary information and analysis to determine whether the on the property would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or around the project area.

In order to identify such resources, CRM TECH initiated a historical/archaeological resources records search, contacted Native American representatives, pursued historical background research, and carried out an intensive-level field survey. The following report is a complete account of the methods, results, and final conclusion of the study. Personnel who participated in the study are named in the appropriate sections below, and their qualifications are provided in Appendix 1.

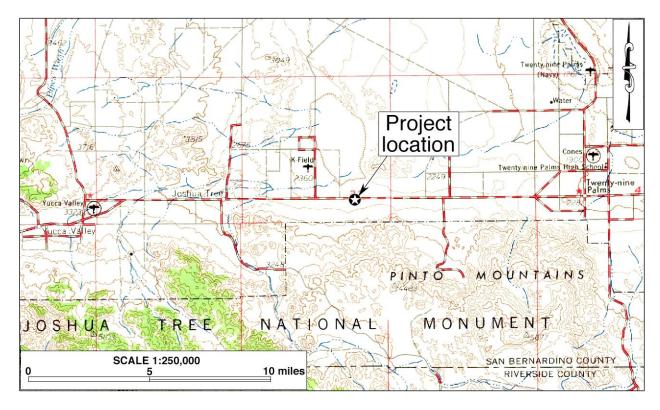


Figure 1. Project vicinity (based on USGS San Bernardino, Calif., 120'x60' quadrangle [USGS 1969]).

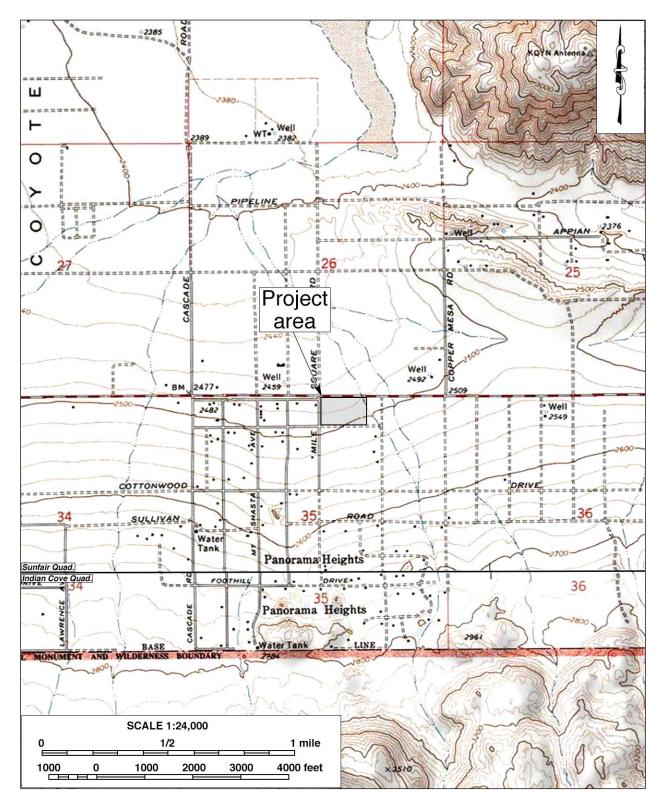


Figure 2. Project area (based on USGS Indian Cove and Sunfair, Calif., 7.5' quadrangles [USGS 1972; 1995]).



Figure 3. Aerial view of the project area.

SETTING

CURRENT NATURAL SETTING

The project area is located in the Morongo Basin, on the southern edge of the Mojave Desert, northeast of the Little San Bernardino Mountains, and northwest of the Pinto Mountains. The climate and environment of the area is typical of the southern California "high desert" country, so-called because of its higher elevation in relation to the Colorado Desert to the south. The climate is marked by extremes in temperature and aridity, with summer highs averaging over 100°F and winter lows averaging 35°F. The average annual precipitation is roughly five inches, most of which occurs during late winter, early spring, and the occasional monsoon storms in summer.

Situated approximately 1.3 mile to the west of the Twentynine Palms city limits, the project location lies in a sparsely populated rural residential area that features a widely spaced grid of unpaved roads and single-family homes on typically 1.25-acre to 5-acre lots. The property is bounded on the north by Twentynine Palms Highway, on the west by Mile Square Road, on the south by Cactus Drive, and on the east by undeveloped open desert land (Figures 3, 4). Elevations within the project boundaries range from 2,470 feet to 2,510 feet above mean sea level, and the terrain is relatively level with a slight decline to the northwest.

The project area has been lightly disturbed in the past. The surface soil observed is Quaternary alluvium situated on an alluvial fan, consisting of fine- to coarse-grained silty sand mixed with gravels, fine to coarse pebbles, and small cobbles. The vegetation in this area belongs to the Creosote Bush Scrub plant community, consisting of various seasonal grasses, bushes such as brittlebush (*Encelia virginensis*), and other species of shrubs, including creosote bush (*Larrea tridentata*), beavertail cactus (*Opuntia basilaris*), and pencil cholla cactus (*Cylindropuntia* sp.; Schoenherr 1992).



Figure 4. Typical landscape in the project area, view to the northwest (photograph taken on October 25, 2022).

CULTURAL SETTING

Prehistoric Context

In order to understand the progress of Native American cultures prior to European contact, archaeologists have devised chronological frameworks on the basis of artifacts and site types that date back some 12,000 years. Currently, the chronology most frequently applied in the Mojave Desert divides the region's prehistory into five periods marked by changes in archaeological remains, reflecting different ways in which Native peoples adapted to their surroundings. According to Warren (1984) and Warren and Crabtree (1986), the five periods are as follows: the Lake Mojave Period, 12,000 years to 7,000 years ago; the Pinto Period, 7,000 years to 4,000 years ago; the Gypsum Period, 4,000 years to 1,500 years ago; the Saratoga Springs Period, 1,500 years to 800 years ago; and the Protohistoric Period, 800 years ago to European contact.

More recently, Hall (2000) presented a slightly different chronology for the region, also with five periods: Lake Mojave (ca. 8000-5500 B.C.), Pinto (ca. 5500-2500 B.C.), Newberry (ca. 1500 B.C.-500 A.D.), Saratoga (ca. 500-1200 A.D.), and Tecopa (ca. 1200-1770s A.D.). According to Hall (*ibid*.:14), small mobile groups of hunters and gatherers inhabited the Mojave Desert during the Lake Mojave sequence. Their material culture is represented by the Great Basin Stemmed points and flaked stone crescents. These small, highly mobile groups continued to inhabit the region during the Pinto Period, which saw an increased reliance on ground foods, small and large game animals, and the collection of vegetal resources, suggesting that "subsistence patterns were those of broad-based foragers" (*ibid*.:15). Artifact types found in association with this period include the Pinto points and *Olivella* sp. spire-lopped beads.

Distinct cultural changes occurred during the Newberry Period, in comparison to the earlier periods, including "geographically expansive land-use pattern...involving small residential groups moving between select localities," long-distance trade, and diffusion of trait characteristics (Hall 2000:16). Typical artifacts from this period are the Elko and Gypsum Contracting Stem points and Split Oval beads. The two ensuing periods, Saratoga and Tecopa, are characterized by seasonal group settlements near accessible food resources and the intensification of the exploitation of plant foods, as evidenced by groundstone artifacts (*ibid*.:16).

Hall (2000:16) states that "late prehistoric foraging patterns were more restricted in geographic routine and range, a consequence of increasing population density" and other variables. Saratoga Period artifact types include Rose Spring and Eastgate points as well as Anasazi grayware pottery. Artifacts from the Tecopa Period include Desert Side-notched and Cottonwood Triangular points, buffware and brownware pottery, and beads of the Thin Lipped, Tiny Saucer, Cupped, Cylinder, steatite, and glass types (*ibid*.:16).

Ethnohistoric Context

The Native American groups living near the project location in recent centuries were the Serrano and the Chemehuevi. The Serrano's homeland was centered in the nearby San Bernardino Mountains but also included lowlands along both flanks of the mountain range. The Chemehuevi, a subgroup of the Southern Paiute, traditionally occupied the portion of the Mojave Desert extending east to the

Colorado River. Both groups belong to the larger Shoshonean language stock, which in turn is part of the Uto-Aztecan linguistic family. The leading anthropological works on the Chemehuevi include Kroeber (1925), Laird (1976), and Kelly and Fowler (1986), while the basic references on the Serrano are Kroeber (1925), Strong (1929), and Bean and Smith (1978). The following ethnohistoric discussion is based primarily on these sources.

Prior to European contact, native subsistence practices were defined by the surrounding landscape and were based primarily on the cultivating and gathering of wild foods and hunting, exploiting nearly all of the resources available. The Serrano settled mostly on elevated terraces, hills, and finger ridges near where flowing water emerged from the mountains, while the Chemehuevi, with fewer people spread over a much wider area, cultivated, gathered, and hunted in the open deserts, but were also known for their agricultural practices, in particular the cultivation of corn, beans, squash, and melons. In the vicinity of the project area, the Serrano and the Chemehuevi relied on the waters of a desert oasis located roughly a mile to the southeast of the project location. The oasis was first settled by the Serrano, who named it Mara, "the place of little springs and much grass" (NPS n.d.). The Serrano moved to the oasis on the advice of a medicine man and were told to plant a palm tree each time a boy was born. In the first year, the Serrano planted 29 palms at the oasis, providing food as well as materials for clothing, cooking implements, and housing (ibid.). The Chemehuevi began to settle around the oasis in the mid-19th century (ibid.). Social customs brought members of each tribe together at important base camps or villages for annual ceremonies and tribal interaction with neighboring groups.

Both tribal groups had a variety of technological skills that they used to acquire subsistence, shelter, and medicine or to create ornaments and decorations. Common tools included manos and metates, mortars and pestles, hammerstones, fire drills, awls, arrow straighteners, and stone knives and scrapers. These lithic tools were made from locally sourced material as well as materials procured through trade or travel. They also used wood, horn, and bone spoons and stirrers; baskets for winnowing, leaching, grinding, transporting, parching, storing, and cooking; and pottery vessels for carrying water, storage, cooking, and serving food and drink. Much of this material cultural, elaborately decorated, does not survive in the archaeological record. As usual, the main items found archaeologically relate to subsistence activities.

Although contact with Europeans may have occurred as early as 1771 or 1772, direct European influence on Serrano and Chemehuevi lifeways began in the 1810s, when the mission system expanded to the edge of Serrano territory. Between then and the end of the mission era in 1834, most of the Serrano were removed to the nearby missions. While less affected by Spanish and Mexican policies due to their more remote location, the Chemehuevi experienced increasing conflict with encroaching Euroamerican prospectors and settlers during the late 19th century. By the early 20th century, the majority of Serrano and Chemehuevi population was incorporated into the reservation system. Today, most Serrano descendants are found on the San Manuel and the Morongo Indian Reservations, while the Chemehuevi are divided among the Chemehuevi, the Colorado River, and the Morongo Reservations.

Historic Context

Because of its harsh, unforgiving environment, non-Native settlement in the Mojave Desert was late to start and slow in subsequent development. Although the Mojave Desert received its first

European visitor, the famed Spanish explorer Francisco Garcés, as early as 1776 (Beck and Haase 1974:15), for the next 70 years the inland regions of Alta California were largely ignored by the Spanish and Mexican authorities in their colonization schemes. During that period, the presence of non-Natives in the Mojave Desert was essentially confined to a few trails that were established over the years, most notably the Old Spanish Trail, a pack-train road established between southern California and Santa Fe, New Mexico, in the 1830s (Warren 2004).

Beginning in the early 1860s, as the gold mines in the Mother Lode country of the Sierra Nevada declined in production, groups of former forty-niners embarked on fresh explorations into the desert between California, Nevada, and Arizona. Before long, new mining districts sprang up throughout the Mojave Desert. However, the discovery of these early bonanzas was frequently incidental to travel across the desert to richer diggings elsewhere, as in the case of the La Paz gold rush in Arizona (Warren et al. 1981:96). A few renowned mining towns, such as Ivanpah and Calico, boomed in the 1870s and 1880s, but the first major strike in the Mojave Desert did not occur until the Old Woman Mountains boom of 1898-1901 (Gallegos et al. 1980:133).

In the mid-19th century, a few new trails were developed on the basis of the Old Spanish Trail, such as the Mormon Trail and the Mojave Road, by which many of the legendary wagon trains from the eastern U.S. entered California. Since the 1870s, the Mojave Desert has seen the establishment of a number of modern transportation thoroughfares across its vast reaches, including the Southern Pacific, the Santa Fe, and the Union Pacific Railroads; the fabled U.S. Route 66; and today's Interstate Highways 15 and 40. Several urban centers have gradually emerged along these arteries, mostly along the western and southern rims of the Mojave Desert. The bulk of the region, however, remains sparsely populated and rarely touched by human activities, even to the present time.

On the history of what is now the City of Twentynine Palms, a local history source (DesertUSA n.d.) offers the following summary:

Twentynine Palms derives its name from the life-giving waters of the lush oasis where 29 native California Fan Palms grew along the Pinto Mountain fault... By the late 1800s, prospectors bivouacked here while seeking their fortunes in nearby gold camps, the most famous of which was the Dirty Sock Camp.

In 1910, Bill and Frances Keys, among the first pioneer homesteaders, settled at the Desert Queen Ranch in what is now Joshua Tree National Park. Dr. James B. Luckie is credited with populating the community after World War I ended in 1918, by sending veterans suffering from the effects of mustard gas here for the pure, healing desert air. This Pasadena doctor became a prominent citizen and a founding father of the city.

One WWI veteran, William Campbell, arrived with his wife Elizabeth in 1924 and began homesteading 160 acres off Joe Davis Road where they built a home of native stone, now a bed and breakfast called Roughly Manor at Campbell Branch. Aligned with the Southwest Museum of Los Angeles, the Campbells discovered thousands of archaeological sites and donated land for the first schoolhouse here, and for Luckie Park.

In 1952, the U.S. Defense Department established a marine base north of the oasis for glider training. Now known as the U.S. Marine Corps Air Ground Combat Center, this vast area of the Mojave

Desert encompasses the world's largest marine base, housing 18-20,000 military personnel. The city of Twentynine Palms was incorporated March 23, 1987.

RESEARCH METHODS

CULTURAL RESOURCES RECORDS SEARCH

The historical/archaeological resources records search for this study was provided by the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System on October 13, 2022. Located on the campus of California State University, Fullerton, the SCCIC is the State of California's official cultural resource records repository for the County of San Bernardino. The records search entailed a systematic examination of the SCCIC's digital maps, records, and databases for previously identified cultural resources and existing cultural resources reports within a one-mile radius of the project area.

NATIVE AMERICAN PARTICIPATION

On September 27, 2022, CRM TECH submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. In the meantime, CRM TECH contacted the nearby Twenty-Nine Palms Band of Mission Indians and Morongo Band of Mission Indians by e-mail for additional information on potential Native American cultural resources in the project vicinity and to invite the Twenty-Nine Palms Band to participate in the upcoming archaeological fieldwork. Follow-up correspondence to arrange for tribal participation in the field survey were later carried out with the Twenty-Nine Palms Band between October 18 and 24, 2022.

HISTORICAL RESEARCH

Historical background research for this study was conducted by CRM TECH archaeologist Frank Raslich. Sources consulted during the research included published literature in local history, historic maps of the Twentynine Palms, and aerial photographs of the project vicinity. Among the maps consulted for this study were the U.S. General Land Office's (GLO) land survey plat maps dated 1856-1914 and the U.S. Geological Survey's (USGS) topographic maps dated 1955-1995, which are accessible at the websites of the U.S. Bureau of Land Management and the USGS. The aerial photographs, taken in 1970-2020, are available at the Nationwide Environmental Title Research (NETR) Online website and through the Google Earth software.

FIELD SURVEY

On October 25, 2022, CRM TECH archaeologist Michael D. Richards carried out the field survey of the project area. The survey was completed at an intensive level along parallel north-south transects spaced 15 meters (approximately 50 feet) apart. In this way, the entire project area was systematically and carefully examined for any evidence of human activities dating to the prehistoric or historic period (i.e., 50 years ago or older). Ground visibility was good (80%) throughout the project area due to sparse vegetation covering the ground surface.

RESULTS AND FINDINGS

CULTURAL RESOURCES RECORDS SEARCH

According to SCCIC records, the project area had not been surveyed for cultural resources prior to this study (Figure 5), and no historical/archaeological resources had been recorded within or adjacent to its boundaries. Within the one-mile scope of the records search, SCCIC records identify 15 previously recorded cultural resources, including one prehistoric site and 14 historic-period sites (Table 1). As Table 1 shows, the majority of these sites consist of segments of various roads. Two of these roads, namely Twentynine Palms Highway (Site 36-010525) and Mile Square Road (Site 36-024821), are located outside but adjacent to the project boundaries. None of the other known cultural resources were found in the immediate vicinity of the project area.

Ta	Table 1. Previously Recorded Cultural Resources within the Scope of the Records Search		
Site No.	Recorded by/Date	Description	
36-010525	Various 2000-2015	Segments of State Route 62/Twentynine Palms Highway	
36-010561	Goodman and Neves 2000	Abandoned vernacular residence, circa 1940s	
36-011303	White 2003	Scatter of prehistoric flaked-stone and groundstone artifacts	
36-013626	Robinson and Marrs 2007	Refuse scatter	
36-024817	Trampier 2011	Historical-period road (Mount Shasta Avenue)	
36-024818	Trampier 2011	Historical-period road (Mount Lassen Avenue)	
36-024819	Trampier 2011	Historical-period road (Twentynine Palms Outerhighway South)	
36-024820	Trampier 2011	Historical-period road (Old Copper Mountain Road)	
36-024821	Trampier 2011	Historical-period road (Mile Square Road)	
36-024822	Trampier 2011	Historical-period road (Copper Mesa Road)	
36-024823	Trampier 2011	Historical-period roads (Fran Lou Lane and Sierra Avenue)	
36-024824	Trampier 2011	Historical-period roads (Cascade Road)	
36-025033	Anderson et al. 2012	Historical-period road	
36-026929	Honey 2012	Structural foundation	
36-026930	Honey 2012	Refuse scatter	

NATIVE AMERICAN PARTICIPATION

In response to CRM TECH's inquiry, the NAHC replied in a letter dated November 10, 2022, that the Sacred Lands File search identified no Native American cultural resources in the project vicinity. Noting that the absence of specific information would not necessarily indicate the absence of such resources, however, the NAHC recommended that local Native American groups be consulted for further information and provided a referral list of 21 individuals affiliated with 14 tribes in the region. The NAHC's reply is attached to this report as Appendix 2 for reference by the County of San Bernardino in future government-to-government consultations with the tribal groups, if necessary.

As mentioned above, the Twenty-Nine Palms Band of Mission Indians and the Morongo Band of Mission Indians were contacted for comments and/or participation in the archaeological fieldwork. As of this time, the Morongo Band has not responded. In an e-mail dated October 24, 2022, Sarah Bliss, Director Tribal Programs EPA for the Twenty-Nine Palms Band, stated that the tribe was unable to participate in the fieldwork but requested to be advised of the results of the survey, which was provided to Ms. Bliss by e-mail on October 27.

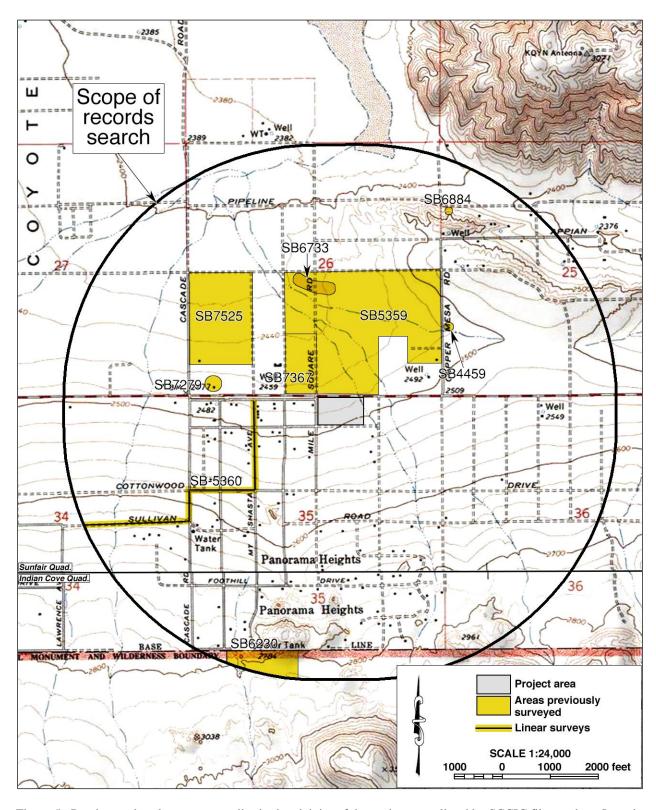


Figure 5. Previous cultural resources studies in the vicinity of the project area, listed by SCCIC file number. Locations of historical/archaeological resources are not shown as a protective measure.

HISTORICAL RESEARCH

Historical sources consulted for this study suggest that the project area is relatively low in sensitivity for cultural resources from the historic period. Throughout the 1850s-1970s era, no evidence of any settlement or development activities were observed within the project boundaries. In the mid-19th and early 20th centuries, the only man-made feature known to be present in the vicinity was a trail leading to the Oasis of Mara near present-day Twentynine Palms, which was known then as "the Palm Springs" (Figure 6). Passing a few hundred feet to the south of the project location, the trail would eventually evolve into State Route 62.

In the early 1950s, a number of scattered buildings were noted around the project location (Figure 7), evidently representing the beginning of residential development nearby. Other than Twentynine Palms Highway, the first notable human-made features in the immediate vicinity of the project area were a number of unpaved roads, including Mile Square Road (Figure 7, NETR Online 1970). While construction activities gradually accelerated in recent decades, the project area has remained vacant and undeveloped to the present time, and no substantial human alteration has occurred in its natural landscape (NETR Online 1970-2020; Google Earth 1989-2019).

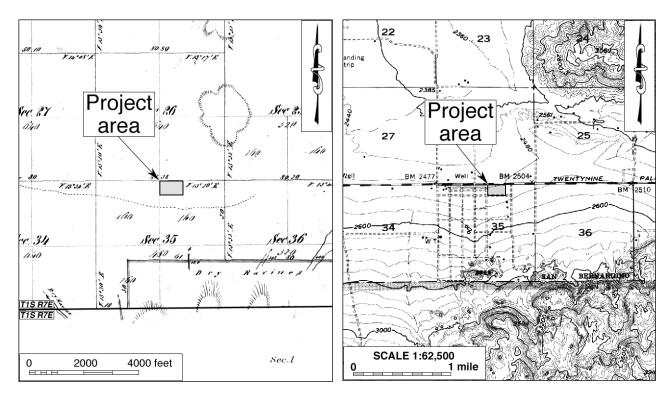


Figure 6. The project area and vicinity in 1855-1913 (source: GLO 1856; 1914).

Figure 7. The project area and vicinity in 1952 (swource: USGS 1955).

FIELD SURVEY

During the field survey, no buildings, structures, objects, sites, or features of prehistoric or historical origin were encountered in the project area, and the only artifacts more than 50 years of age found were a few domestic refuse items from the late historic period that were scattered on the ground

surface, with no indication of any substantial artifact concentration. Among these items were five beer cans and three fragmented glass bottles, all located in the northwestern portion of the project area. Four of the cans are 12-ounce flat-top sanitary sealed steel cans that are opened by two church-key perforations, and the fifth is a 12-ounce cone-top sanitary sealed steel can that is opened by a steel screwcap still attached to the can. These cans date to the late 1930s through the 1950s (Rock 1989:71-73). All the cans are rusted, and none of them have exterior markings.

Among the bottles, one is clear glass bottle with the base and several body sections surviving. The base measures 3.5 inches in diameter and has no markings. One body segment bears a white applied ink label of "R. PIBB," indicating that it was used for Mr. Pibb, a soft drink manufactured by Coca-Cola between 1972 and 1974. The second is brown bottle base with body fragments. The base measures 3.5 inches in diameter and is embossed with "10 H- over- an- anchor 26/25/REG. US PAT OFF," manufactured by Anchor Hocking Glass Corporation from the late 1930s to the late 1960s (Toulouse 1971:46-49). The third is a clear glass bottle base with body sections. The base measures 3.5 inches in diameter and is embossed with "I- within- an- O /23 76/3," a logo used by Owens-Illinois Glass from 1954 to the 1960s (Toulouse 1971:403-408).

As mentioned above, the segments of Twentynine Palms Highway and Mile Square Road adjacent to the project boundaries were previously recorded into the California Historical Resources Inventory. Both roadways remain in use today, and their current configuration and appearance clearly reflect the results of upgrading and maintenance during the recent decades. Near the project location, Twentynine Palms Highway is now a five-lane thoroughfare, while Mile Square Road is a two-lane road with soft shoulders. Neither of them exhibits any distinctively historical characteristics.

DISCUSSION

The purpose of this study is to identify any cultural resources within the project area, and to assist the County of San Bernardino in determining whether such resources meet the official definition of "historical resources" as provided in the California Public Resources Code, in particular CEQA. According to PRC §5020.1(j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

More specifically, CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.

- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

In summary of the research results presented above, no potential "historical resources" were previously recorded within the project area, and none were encountered during the present survey. A few scattered domestic refuse items, primarily beer cans and glass bottle fragments from the late historic period, were noted on the surface within the project area during the field survey, with no indication of any substantial artifact concentration. Such isolated refuse, generally the result of incidental trash discarding, are virtually ubiquitous in populated areas and along major transportation corridors. Without any documented historical background, and in the absence of an exceptional quantity or qualify of artifacts, these refuse items demonstrate little potential for historic significance. Therefore, they are not considered potential "historical resources" and require no further study.

Outside but adjacent to the project boundaries, the segments of Twentynine Palms Highway and Mile Square Road were previously recorded into the California Historical Resources Inventory as Sites 36-010525 and 36-024821, respectively. As working components of the modern transportation infrastructure, however, these roadways do not retain sufficient historical character to be considered potential "historical resources" due to upgrading and maintenance during the modern period. Furthermore, the proposed project has no potential to affect the overall appearance and character of the roads. Therefore, they, too, require no further consideration in the CEQA compliance process for this project. Based on these findings, the present study concludes that no "historical resources" will be impacted by the proposed project.

CONCLUSION AND RECOMMENDATIONS

CEQA provides that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." The results of the present study have established that no "historical resources," as defined by CEQA and associated regulations, are present within the project area. Therefore, CRM TECH presents the following recommendations to the County of San Bernardino:

- The proposed construction of the Cactus Club Hotel within the project area will not cause a substantial adverse change to any known "historical resources."
- No further cultural resources investigation will be necessary for this project unless construction plans undergo such changes as to include areas not covered by this study.
- If buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

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 - 1914 Plat Map: Township 1 South, Range 7 East, San Bernardino Baseline and Meridian; surveyed in 1855-1913.

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1970-2020 Aerial photographs of the project vicinity; taken in 1970, 1983, 1989, 1994-1996, 2002, 2005, 2009, 2010, 2012, 2014, 2016, 2018, and 2020. http://www.historicaerials.com.

NPS (National Park Service, U.S. Department of the Interior)

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Warren, Claude N., and Robert H. Crabtree

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APPENDIX 1: PERSONNEL QUALIFICATIONS

PRINCIPAL INVESTIGATOR/HISTORIAN Bai "Tom" Tang, M.A.

Education

1988-1993	Graduate Program in Public History/Historic Preservation, University of California, Riverside.
1987	M.A., American History, Yale University, New Haven, Connecticut.
1982	B.A., History, Northwestern University, Xi'an, China.
2000	"Introduction to Section 106 Review," presented by the Advisory Council on Historic
	Preservation and the University of Nevada, Reno.
1994	"Assessing the Significance of Historic Archaeological Sites," presented by the
	Historic Preservation Program, University of Nevada, Reno.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1993-2002	Project Historian/Architectural Historian, CRM TECH, Riverside, California.
1993-1997	Project Historian, Greenwood and Associates, Pacific Palisades, California.
1991-1993	Project Historian, Archaeological Research Unit, University of California, Riverside.
1990	Intern Researcher, California State Office of Historic Preservation, Sacramento.
1990-1992	Teaching Assistant, History of Modern World, University of California, Riverside.
1988-1993	Research Assistant, American Social History, University of California, Riverside.
1985-1988	Research Assistant, Modern Chinese History, Yale University.
1985-1986	Teaching Assistant, Modern Chinese History, Yale University.
1982-1985	Lecturer, History, Xi'an Foreign Languages Institute, Xi'an, China.

Cultural Resources Management Reports

Preliminary Analyses and Recommendations Regarding California's Cultural Resources Inventory System (with Special Reference to Condition 14 of NPS 1990 Program Review Report). California State Office of Historic Preservation working paper, Sacramento, September 1990.

Numerous cultural resources management reports with the Archaeological Research Unit, Greenwood and Associates, and CRM TECH, since October 1991.

PRINCIPAL INVESTIGATOR/ARCHAEOLOGIST Michael Hogan, Ph.D., RPA (Registered Professional Archaeologist)

Education

1991	Ph.D., Anthropology, University of California, Riverside.
1981	B.S., Anthropology, University of California, Riverside; with honors.
1980-1981	Education Abroad Program, Lima, Peru.
2002	"Section 106—National Historic Preservation Act: Federal Law at the Local Level,"
	UCLA Extension Course #888.
2002	"Recognizing Historic Artifacts," workshop presented by Richard Norwood,
	Historical Archaeologist.
2002	"Wending Your Way through the Regulatory Maze," symposium presented by the
	Association of Environmental Professionals.
1992	"Southern California Ceramics Workshop," presented by Jerry Schaefer.
1992	"Historic Artifact Workshop," presented by Anne Duffield-Stoll.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1999-2002	Project Archaeologist/Field Director, CRM TECH, Riverside, California.
1996-1998	Project Director and Ethnographer, Statistical Research, Inc., Redlands, California.
1992-1998	Assistant Research Anthropologist, University of California, Riverside.
1992-1995	Project Director, Archaeological Research Unit, U.C. Riverside.
1993-1994	Adjunct Professor, Riverside Community College, Mt. San Jacinto College, U.C.
	Riverside, Chapman University, and San Bernardino Valley College.
1991-1992	Crew Chief, Archaeological Research Unit, U.C. Riverside.
1984-1998	Project Director, Field Director, Crew Chief, and Archaeological Technician for
	various southern California cultural resources management firms.

Research Interests

Cultural Resource Management, Southern Californian Archaeology, Settlement and Exchange Patterns, Specialization and Stratification, Culture Change, Native American Culture, Cultural Diversity.

Cultural Resources Management Reports

Principal investigator for, author or co-author of, and contributor to numerous cultural resources management study reports since 1986.

Memberships

Society for American Archaeology; Society for California Archaeology; Pacific Coast Archaeological Society; Coachella Valley Archaeological Society.

PROJECT ARCHAEOLOGIST Michael D. Richards, M.A., Registered Professional Archaeologist

Education

2002	M.A., Anthropology, California State University, Northridge (CSUN).
1986	B.A., Anthropology: University of California, Los Angeles (UCLA).
1982	A.A., Los Angeles Valley College, Los Angeles, California.
2015	Section 106 workshop.
2000	CSUN "Olmec" field excavation and lab analysis; La Venta, Mexico.
1999	Rock art recording, UCLA Extension; Little Lake, California.
1998	Rock art symposium, UCLA Extension.

Professional Experience

2018-	Project Archaeologist/Paleontologist, CRM TECH, Colton, Calif.
2016-2018	Co-Principal Investigator/Archaeologist, LSA Associates Inc.
2012-2016	Co-Principal Investigator/Archaeologist, ICF International (Jones & Stokes).
2010-2012	Co-Principal Investigator/Archaeologist, various CRM firms (on call).
2007-2010	Principal Investigator/Field Director/Crew Chief, ASM Affiliates, Inc.
2004-2007	Project Manager/Co-Principal Investigator, ArchaeoPaleo Resource Management, Inc.
2003-2004	Staff Archaeologist/Crew Chief, SRI, Inc.
2000-2003	Project Archaeologist/Field Director, Ancient Enterprises (Clewlow, Jr.).
1999-2000	Staff Archaeologist/Lab Crew Chief, CSC/Edwards Air Force Base.

Research Interests

Pottery and rock art analysis; prehistory the American southwest; Mesoamerica; Japan.

Cultural Resources Management Reports

Author and co-author of, contributor to, and principal investigator for numerous cultural resources management study reports since 1999.

Memberships

Society for American Archaeology; Society for California Archaeology; Archaeological Institute of America; Conejo Open Space Trails Advisory Committee; Conejo Valley Historical Society.

PROJECT ARCHAEOLOGIST/REPORT WRITER Frank J. Raslich, M.A.

Education

2016- 2010 2005	Ph.D. candidate, Michigan State University, East Lansing. M.A., Anthropology, Michigan State University, East Lansing. B.A., Anthropology, University of Michigan, Flint.
2019 2014	Grant and Research Proposal Writing for Archaeologists; SAA Online Seminar. Bruker Industries Tracer S1800 pXRF Training; presented by Dr. Bruce Kaiser, Bruker Scientific.

Professional Experience

2022- 2022	Project Archaeologist/Report Writer, CRM TECH, Colton, California.
2022	Archaeological Monitor, Agua Caliente Band of Cahuilla Indians, Palm Springs, California.
2014 2022	
2014-2022	Board of Directors, Ziibiwing Center of Anishinabe Culture and Lifeways, Saginaw
	Chippewa Indian Tribe of Michigan.
2008-2021	Archaeological Consultant, Saginaw Chippewa Indian Tribe of Michigan.
2019	Archaeologist, Sault Tribe of Chippewa Indians and Little Traverse Bay Band of
	Odawa Indians.
2016-2018	Adjunct Lecturer, Michigan State University, East Lansing.
2017-2018	Adjunct Lecturer, University of Michigan, Flint.
2009-2017	Teaching Assistant, Michigan State University, East Lansing.
2008-2014	Research Assistant, Intellectual Property Issues in Cultural Heritage, Simon Fraser
	University, British Columbia, Canada.
2010-2013	Research Assistant, Michigan State University, East Lansing.
2009-2011	Archaeologist/Crew Chief, Saginaw Chippewa Indian Tribe of Michigan.

Publications

2017	Preliminary Results of a Handheld X-Ray Fluorescence (pXRF) Analysis on a Marble
	Head Sarcophagus Sculpture from the Collection of the Kresge Art Center, Michigan
	State University. Submitted to Jon M. Frey, Department of Art, Art History, and
	Design, Michigan State University, East Lansing.
2013	Geochemical Analysis of the Dickenson Group of the Upper Peninsula, Michigan: A
	study of an Accreted Terrane of the Superior Province. Geological Society of
	America Abstracts with Programs 45:4(53).

APPENDIX 2 SACRED LANDS FILE SEARCH RESULTS

NATIVE AMERICAN HERITAGE COMMISSION

November 10, 2022

Nina Gallardo **CRM TECH**

CHAIRPERSON Laura Miranda Luiseño

Via Email to: ngallardo@crmtech.us

VICE CHAIRPERSON **Reginald Pagaling** Chumash

Re: Proposed Cactus Club Hotel Project on Assessor's Parcel Numbers 0608-051-02, -03, & -04 (CRM TECH No. 3954A), San Bernardino County

SECRETARY Sara Dutschke Miwok

COMMISSIONER Isaac Bojorquez Ohlone-Costanoan

COMMISSIONER **Buffy McQuillen** Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER Wayne Nelson Luiseño

COMMISSIONER Stanley Rodriguez Kumeyaay

COMMISSIONER [Vacant]

Commissioner [Vacant]

EXECUTIVE SECRETARY Raymond C. Hitchcock Miwok/Nisenan

NAHC HEADQUARTERS 1550 Harbor Boulevard

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

Dear Ms. Gallardo:

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

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

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

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

Sincerely,

Cameron Vela

Cameron Vela Cultural Resources Analyst

Attachment

Native American Heritage Commission Native American Contact List San Bernardino County 11/10/2022

Agua Caliente Band of Cahuilla Indians

Patricia Garcia-Plotkin, Director 5401 Dinah Shore Drive

Cahuilla

Cahuilla

Cahuilla

Cahuilla

Cahuilla

Palm Springs, CA, 92264 Phone: (760) 699 - 6907 Fax: (760) 699-6924

ACBCI-THPO@aguacaliente.net

Agua Caliente Band of Cahuilla Indians

Reid Milanovich, Chairperson 5401 Dinah Shore Drive

Palm Springs, CA, 92264

Phone: (760) 699 - 6800 Fax: (760) 699-6919

laviles@aguacaliente.net

Augustine Band of Cahuilla Mission Indians

Amanda Vance, Chairperson 84-001 Avenue 54

Coachella, CA, 92236 Phone: (760) 398 - 4722 Fax: (760) 369-7161

hhaines@augustinetribe.com

Cabazon Band of Mission Indians

Doug Welmas, Chairperson 84-245 Indio Springs Parkway

Indio, CA, 92203

Phone: (760) 342 - 2593 Fax: (760) 347-7880

jstapp@cabazonindians-nsn.gov

Cahuilla Band of Indians

Daniel Salgado, Chairperson 52701 U.S. Highway 371

Anza, CA, 92539

Phone: (951) 763 - 5549 Fax: (951) 763-2808 Chairman@cahuilla.net

Los Covotes Band of Cahuilla and Cupeño Indians

Ray Chapparosa, Chairperson

P.O. Box 189

Cahuilla

Quechan

Warner Springs, CA, 92086-0189

Phone: (760) 782 - 0711 Fax: (760) 782-0712

Morongo Band of Mission Indians

Robert Martin, Chairperson 12700 Pumarra Road

Cahuilla Banning, CA, 92220 Serrano

Phone: (951) 755 - 5110 Fax: (951) 755-5177 abrierty@morongo-nsn.gov

Morongo Band of Mission Indians

Ann Brierty, THPO 12700 Pumarra Road

Cahuilla Banning, CA, 92220 Serrano

Phone: (951) 755 - 5259 Fax: (951) 572-6004 abrierty@morongo-nsn.gov

Quechan Tribe of the Fort Yuma Reservation

Manfred Scott, Acting Chairman Kw'ts'an Cultural Committee

P.O. Box 1899 Quechan Yuma, AZ, 85366

Phone: (928) 750 - 2516 scottmanfred@yahoo.com

Quechan Tribe of the Fort Yuma Reservation

Jill McCormick, Historic Preservation Officer

P.O. Box 1899

Yuma, AZ, 85366

Phone: (760) 572 - 2423

historicpreservation@quechantrib

e.com

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Proposed Cactus Club Hotel Project on Assessor's Parcel Numbers 0608-051-02, -03, & -04 (CRM TECH No. 3954A), San Bernardino County.

Native American Heritage Commission Native American Contact List San Bernardino County 11/10/2022

Ramona Band of Cahuilla

John Gomez, Environmental

Coordinator

P. O. Box 391670

Anza. CA. 92539

Phone: (951) 763 - 4105 Fax: (951) 763-4325 igomez@ramona-nsn.gov Cahuilla

Ramona Band of Cahuilla

Joseph Hamilton, Chairperson

P.O. Box 391670 Anza, CA, 92539

Phone: (951) 763 - 4105 Fax: (951) 763-4325 admin@ramona-nsn.gov Cahuilla

Serrano

Cahuilla

Serrano

Serrano

San Manuel Band of Mission Indians

Jessica Mauck, Director of

Cultural Resources

26569 Community Center Drive

Highland, CA, 92346 Phone: (909) 864 - 8933 Jessica.Mauck@sanmanuel-

nsn.gov

Santa Rosa Band of Cahuilla Indians

Lovina Redner, Tribal Chair

P.O. Box 391820 Anza, CA, 92539

Phone: (951) 659 - 2700 Fax: (951) 659-2228

Isaul@santarosa-nsn.gov

Serrano Nation of Mission Indians

Wayne Walker, Co-Chairperson P. O. Box 343

Patton, CA, 92369

Phone: (253) 370 - 0167 serranonation1@gmail.com

Serrano Nation of Mission Indians

Mark Cochrane, Co-Chairperson

P. O. Box 343

Patton, CA, 92369 Phone: (909) 528 - 9032

serranonation1@gmail.com

Soboba Band of Luiseno Indians

Joseph Ontiveros, Cultural Resource Department

P.O. BOX 487 San Jacinto, CA, 92581

Phone: (951) 663 - 5279 Fax: (951) 654-4198 jontiveros@soboba-nsn.gov Cahuilla Luiseno

Cahuilla

Chemehuevi

Soboba Band of Luiseno Indians

Isaiah Vivanco, Chairperson

P. O. Box 487 Cahuilla San Jacinto, CA, 92581 Luiseno

Phone: (951) 654 - 5544 Fax: (951) 654-4198 ivivanco@soboba-nsn.gov

Torres-Martinez Desert Cahuilla Indians

Cultural Committee,

P.O. Box 1160 Thermal, CA, 92274

Phone: (760) 397 - 0300 Fax: (760) 397-8146

Cultural-

Committee@torresmartinez-

nsn.gov

Twenty-Nine Palms Band of

Mission Indians

Darrell Mike, Chairperson 46-200 Harrison Place Chemehuevi

Coachella, CA, 92236 Phone: (760) 863 - 2444 Fax: (760) 863-2449

29chairman@29palmsbomi-

nsn.gov

Twenty-Nine Palms Band of Mission Indians

Anthony Madrigal, Tribal Historic

Preservation Officer

46-200 Harrison Place

Coachella, CA, 92236 Phone: (760) 775 - 3259

amadrigal@29palmsbomi-nsn.gov

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