Appendix E. Cultural and Tribal Cultural Resources Technical Report
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Cultural and Tribal Cultural Resources Technical Report for the Land Use, Mobility, and Environmental Justice Elements for the City of El Centro General Plan, Environmental Impact Report, El Centro, California

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February 2021
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NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION

Authors: Shelby Castells, M.A., RPA, and Spencer Bietz

Firm: Red Tail Environmental

Client: Harris and Associates

Submitted to: City of El Centro

Report Date: February 2021

Report Title: Cultural and Tribal Cultural Resources Technical Report for the Land Use, Mobility, and Environmental Justice Elements for the City of El Centro General Plan, Environmental Impact Report, El Centro, California

Type of Study: Record Search Summary and Constraints and Resources Sensitivity Analysis

New Sites: N/A

Updated Sites: N/A

USGS Quads: El Centro, California and Heber, California 7.5’ Quadrangles

Acreage: Approximately 15,040 acres (23.5 square miles)

Key Words: City of El Centro, Imperial County, Constraints Analyses, prehistoric archaeology, historic archaeology, built environment resources
EXECUTIVE SUMMARY

Red Tail Environmental (Red Tail) was contracted by Harris and Associates to conduct a cultural resources and Tribal Cultural Resources study in support of the Environmental Impact Report (EIR) in order to evaluate if the City of El Centro Land Use, Mobility, and Environmental Justice Elements Project (project) will cause an adverse effect on significant historical resources or Tribal Cultural Resources; to identify areas which may be sensitive for cultural resources; make recommendations for mitigation measures and make recommendations for future archaeological work that may be required in compliance with the California Environmental Quality Act (CEQA). The City of El Centro (City) is the lead agency. The project area includes the City’s corporate limits and its Sphere of Influence (SOI).

The following cultural resources study includes a review of relevant site records and reports on file with the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS), a review of the Built Environment Resource Directory (BERD) held by the Office of Historic Preservation (OHP), historical and archival research and literature review, a review of the Sacred Lands File (SLF) held by the Native American Heritage Commission (NAHC), and Native American outreach.

The record search of the CHRIS held at the SCIC identified that 79 previously conducted cultural resources studies have taken place within the Project area. One hundred percent of Project area has been included in a previously conducted cultural resource study. The record search indicated that 47 previously recorded cultural resources are located within the Project area. Thirty of the resources are located entirely within the City’s boundaries, seven resources are present within both the City’s boundaries and the SOI and ten resources were located solely within the SOI. The previously recorded resources include: four railroad grades or railroad features, three historic structures or structure foundations, two historic wall or gate features, one civic auditorium, one community center/social hall, three government buildings, two educational buildings, two single family residences/properties, eleven canals/aqueducts, one highway, one women’s property, one political building, three transmission lines, one ancillary structure, one hotel/motel, three 1-3 story commercial buildings, one industrial building, one public utility building, and eleven historic refuse isolates, such as isolated bottles or other refuse that is 50 years old or older. A review of the BERD identified 38 resources that have been evaluated to be listed on the NRHP or CRHR, many of these resources were also recorded as cultural resources by the SCIC. The BERD identified two resources that have been listed or eligible to be listed on the NRHP or the CRHR: P-13-008051, El Centro Main Post Office; and the Imperial County Courthouse at 939 W Main St. Also, a review of California Historical Resources List held by OHP identified three resources within the Project area: Townsite of Silsbee and Indian Well; Hotel Barbara Worth Site; and the El Centro Main Post Office.

In total, record searches and archival research have identified 11 resources that are significant at the local, state, or federal level. Four of the resources (Imperial County Courthouse; P-13-008051, El Centro Main Post Office; P-13-008319, Women’s 10,000 Club House; and P-13-009302, San Diego and Arizona Eastern Railroad) have been listed or recommended eligible to be listed on the NRHP or the CRHR. Two of the resources (Townsite of Silsbee and Indian Well; P-37-008579, Hotel Barbara Worth Site) are listed as California Points of Interest. Five resources (Single Family Overlay Area 1, 2, and 3; Downtown Arcades; El Centro Public Library; P-13-008322, Historic Railroad Stop, Ancillary Structures, and Platform; P-13-008682, Niland to Calexico Railroad; P-13-015759, Old El Centro Maintenance Station Historic District) have been recommended as locally significant. No prehistoric archaeological sites or isolates have been previously recorded within the project area.

A search of the SLF held by the NAHC was negative. The NAHC provided a list of 18 tribal organizations and individuals to contact for additional information. Red Tail sent information request letters to the 18
Executive Summary

tribal organizations and individuals. To date only one response from Viejas Band of Kumeyaay Indians has been received.

In order to assess the cultural resources sensitivity of the project area Red Tail combined the results of the record searches, Native American outreach, environmental factors, impacts of modern development and archival research to identify areas of the project as high, medium, and low for cultural resources sensitivity. A portion of the City of El Centro, which was developed prior to the mid-1970s was identified as having a high sensitivity for cultural resources which could include prehistoric and/or historic archaeological resources as well as built environment resources, historic districts, and Tribal Cultural Resources. While the remainder of the Project area was identified as having a low sensitivity this area was still a prehistorically and historically active environment and may contain previously unrecorded cultural resources including archaeological resources, built environment resources, historic districts, and Tribal Cultural Resources.

Prior to any future projects within the project area that could directly affect cultural resources, steps should be taken to determine the presence of cultural resources and the appropriate mitigation for any significant resources that may be impacted. CEQA requires that before approving discretionary projects the Lead Agency must identify and examine the significant adverse environmental impacts which may result from that project. 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 (Sections 15064.5(b) and 21084). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities which would impair historical significance (Sections 15064.5(b)(1) and 5020.1). Any historical resource listed in or eligible to be listed in the California Register of Historical Resources, is considered to be historically or culturally significant. Resources which are listed in a local historic register or deemed significant in a historical resource survey as provided under Section 5024.1(g) are presumed historically or culturally significant unless "the preponderance of evidence" demonstrates they are not. Finally, a resource that is not listed in, or determined to be eligible for listing in, the California Register of Historic Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant, pursuant to Section 21084.1.

Four main impacts to cultural resources may occur through the implementation of the Project: the destruction of known or unknown prehistoric and historical archaeological resources; the potential to disturb Native American human remains; the destruction or adverse changes to built environment resources, including adverse changes in the elements of historical structures, buildings, features, districts, or landscapes that make them significant resources; and the destruction or adverse changes to Tribal Cultural Resources. Therefore, the Project has the potential to adversely impact known or previously unrecorded cultural resources.

Implementation of the following six recommended mitigation measures would reduce potentially significant impacts. The six recommended mitigation measures include: CULT-1: Site Specific Cultural Resources Study and Evaluation of Resources; CULT-2: Avoidance and Preservation of Cultural Resources; CULT-3: Archaeological and Native American Monitoring Program; CULT-4: Identification and Treatment of Human Remains; CULT-5: Identification and Evaluation of Built Environment Resources; CULT-6: Additional Mitigation for Built Environment Resources.
1. INTRODUCTION

1.1 PURPOSE OF STUDY

Red Tail Environmental (Red Tail) was contracted by Harris and Associates to conduct a cultural resources and Tribal Cultural Resources study in support of the Environmental Impact Report (EIR) for the City of El Centro’s update to their Land Use and Mobility Elements and establishment of their new Environmental Justice Element Project (project). The cultural resources study will identify the cultural resources existing conditions within the project area and will evaluate if the project will cause adverse effects on significant historical resources or Tribal Cultural Resources. The study was conducted in compliance with the California Environmental Quality Act (CEQA). The City of El Centro (City) is the lead agency for the Project. The City must comply with applicable Federal, State, and Local regulations designed to protect cultural resources and Tribal Cultural Resources.

1.2 REGULATORY FRAMEWORK

1.2.1 Federal Regulations

National Environmental Policy Act (NEPA)

NEPA (42 United States Code [USC] 4321 et seq.) establishes the federal policy of protecting important historic, cultural, and natural aspects of our national heritage during federal project planning. NEPA also obligates federal agencies to consider the environmental consequences and costs of their projects and programs as part of the planning process. All federal or federally assisted projects requiring action pursuant to Section 102 of NEPA must take into account the effects on cultural resources.

According to the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR §1500-1508), in considering whether an action may “significantly affect the quality of the human environment,” an agency must consider, among other things, the context and intensity of the impact, including “unique characteristics of the geographic area, such as proximity to historic or cultural resources” (40 CFR §1508.27(b)(3)) and “the degree to which the action may adversely affect districts, sites, highway, structures, or objects listed in or eligible for listing in the National Register of Historic Places” (40 CFR §1508.27(b)(8)).

National Historic Preservation Act (NHPA)

Section 106 of the NHPA is the primary directive for cultural resource preservation. Section 106 requires federal agencies with either direct or indirect jurisdiction over a proposed action to take into account the effect of their actions on historic properties. Section 110 also requires federal agencies to assume responsibility for the preservation of historic properties under their jurisdiction or control.

Section 106 requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, cultural resources must be identified and evaluated; effects to historic properties are reduced to acceptable levels through mitigation measures or agreements among consulting and interested parties. Historic properties are those resources that are listed in or are eligible for the NRHP per the criteria listed below (36 CFR 60.4).

Impacts of an undertaking that affect contributing elements of a historic property are considered a significant effect on the environment. Under 36 CFR 800.5(a)(2), adverse effects on historic properties include, but are not limited to:
1. Introduction

- physical destruction of or damage to all or part of the property;
- alteration of a property;
- removal of the property from its historic location;
- change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;
- introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features;
- neglect of a property which causes its deterioration; or
- transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance.

Recent revisions to Section 106 in 1999 emphasized the importance of Native American consultation. 36 CFR §800.16(I)(1) states:

Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization that meet the NRHP criteria.

Section 106 of the NHPA also requires federal agencies, and those they fund or over which they have approval authority, to allow the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on undertakings on historic properties, following 36 CFR Part 800. To determine whether an undertaking could affect NRHP-eligible properties, cultural resources (including archaeological, historical, and architectural properties) must be inventoried and evaluated for listing in the NRHP. Although compliance with Section 106 is the responsibility of the lead federal agency, others can undertake the work necessary to comply with Section 106.

National Register of Historic Places (NRHP)

The NRHP was established by the NHPA of 1966 as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 CFR 60.2. The NRHP recognizes properties that are significant at the national, state, and local levels. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, craftsmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons who are significant in our past;
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.
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In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the “ability of a property to convey its significance” (National Park Service 2002). In order to assess integrity, the National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities:

1. **Location**: the place where the historic property was constructed or the place where the historic event occurred;
2. **Design**: the combination of elements that create the form, plan, space, structure, and style of a property;
3. **Setting**: the physical environment of a historic property;
4. **Materials**: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
5. **Workmanship**: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. **Feeling**: a property’s expression of the aesthetic or historic sense of a particular period of time; and
7. **Association**: the direct link between an important historic event or person and a historic property.

**Native American Graves Protection and Repatriation Act (NAGPRA)**

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (25 USC 3001 et seq.) protects human remains, funerary objects, sacred objects, and items of cultural patrimony of indigenous peoples on federal lands. NAGPRA stipulates priorities for assigning ownership or control of such cultural items excavated or discovered on federal or tribal lands, or in the possession and control of an agency that has received federal funding. Thus NAGPRA may apply to the City of El Centro if it receives federal funding and takes possession and control of the items described above.

NAGPRA also provides for the repatriation of human remains and associated items previously collected from federal lands and in the possession or control of a federal agency or federally funded repository. Implementing regulations are codified in 43 CFR Part 10. In addition to defining procedures for dealing with previously collected human remains and associated items, these regulations outline procedures for negotiating plans of action or comprehensive agreements for treatment of human remains and associated items encountered in intentional excavations, or inadvertent discoveries on federal or tribal lands.

**National Historic Landmarks Program**

The National Historic Landmarks Program (NHLP) was established to preserve, protect, and maintain U.S. National Historic Landmarks (NHLs). The NHLP is “a list of nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage” (National Park Service [NPS] 2018) of the U.S. The difference between the NHLP and the NRHP is that the NHLP contains properties that are important to the entire nation, rather than properties that can be important to local, state, or federal levels.

**American Antiquities Act**

The Antiquities Act of 1906 (PL 59-209; 34 Statute 225; 16 USC 431-433) was the first federal law to provide protection of historic and prehistoric resources located on federal land. This act prohibits any excavation on public land without permission of the appropriate department secretary. The Antiquities Act authorizes the Secretaries of the Interior, Agriculture, and Army to grant permission to reputable institutions to conduct research (including excavation) to increase knowledge and the permanent preservation of antiquities in public museums. This act authorizes the President to declare areas of federal lands as national...
monuments. Preservation of American Antiquities (43 CFR Part 3) implements the Antiquities Act, defining jurisdiction over cultural resources on federal land and the permit process for excavations.

1.2.2 State Regulations

CEQA and California Register of Historical Resources

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

Lead agencies have a responsibility to evaluate historical resources against the California Register of Historical Resources (CRHR) criteria prior to making a finding as to a proposed project’s impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource’s significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, the NRHP and some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory, may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852), which consist of the following:

- Criteria 1: it is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- Criteria 2: it is associated with the lives of persons important to local, California, or national history; or
- Criteria 3: it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
- Criteria 4: it has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

California State Assembly Bill 52

California State Assembly Bill No. 52 (AB 52) amends CEQA by creating a new category of cultural resources, Tribal Cultural Resources, and new requirements for consultation with Native American Tribes. AB 52 came into effect July 1, 2015. Lead agencies are required to offer Native American tribes with an interest in tribal cultural resources located within its jurisdiction the opportunity to consult on CEQA documents. The procedures under AB 52 offer the tribes an opportunity to take an active role in the CEQA
1. Introduction

process in order to protect tribal cultural resources. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe.

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and may be considered significant if it is (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources; or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1.

California State Senate Bill 18

California State Senate Bill 18 (SB 18) requires local city and county governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places ("cultural places") through local land use planning. SB 18 also requires the Governor's Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 refers to Public Resources Code §5097.9 and 5097.995 to define cultural places:

Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (Public Resources Code §5097.9).

Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (Public Resources Code §5097.995)

California Public Resource Code Section 5097.98

In the fall of 2006, AB 2641 was signed into law by Governor Schwarzenegger. This bill amended PRC 5097.98 to revise the process for the discovery of Native American remains during land development. The purposes of the revisions are to encourage culturally sensitive treatment of Native American remains and to require meaningful discussions and agreements concerning treatment of the remains at the earliest possible time. The intent is to foster the preservation and avoidance of human remains during development. The law now requires that the following process be followed if human remains are discovered.

A. Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 48 hours of their notification by the Native American Heritage
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Commission. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

B. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

1. The descendant’s preferences for treatment may include the following:
   a. The nondestructive removal and analysis of human remains and items associated with Native American human remains.
   b. Preservation of Native American human remains and associated items in place.
   c. Relinquishment of Native American human remains and associated items to the descendants for treatment.
   d. Other culturally appropriate treatment.

2. The parties may also mutually agree to extend discussions, taking into account the possibility that additional or multiple Native American human remains, as defined in this section, are located in the project area providing a basis for additional treatment measures.

C. For the purposes of this section, "conferral" or "discuss and confer" means the meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties' cultural values, and where feasible, seeking agreement. Each party shall recognize the other's needs and concerns for confidentiality of information provided to the other.

D. 1. Human remains of a Native American may be an inhumation or cremation, and in any state of decomposition or skeletal completeness.

2. Any items associated with human remains that are placed or buried with Native American human remains are to be treated in the same manner as the remains, but do not by themselves constitute human remains.

E. Whenever the commission is unable to identify a descendant, or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. To protect these sites, that landowner shall do one or more of the following:

   1. Record the site with the commission or the appropriate Information Center.

   2. Utilize an open-space or conservation zoning designation or easement.

   3. Record a document with the county in which the property is located.

F. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to subdivision (e).

G. Notwithstanding the provisions of Section 5097.9, this section, including those actions taken by the landowner or his or her authorized representative to implement this section and any action taken to implement an agreement developed pursuant to subdivision (1) of Section 5097.94 shall be exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000)).
H. Notwithstanding the provisions of Section 30244, this section, includes those actions taken by the landowner or his or her authorized representative to implement this section, and any action taken to implement an agreement developed pursuant to subdivision (1) of Section 5097.94 shall be exempt from the requirements of the California Coastal Act of 1976 (Division 20 (commencing with Section 30000)).

California Health and Safety Code Section 7050.5
California Health and Safety Code §7050.5 states that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease and the county coroner must be notified. If the remains are found to be Native American then the County Coroner must contact the Native American Heritage Commission within 24-hours.

1.2.3 Imperial County Regulations
The Imperial County General Plan County General Plan provides goals, objectives, policies and/or programs for the identification and protection of significant cultural resources. The Conservation and Open Space Element (Imperial County 2016) stresses the preservation of cultural resources as “Goal 3”, which states:

- **Goal 3: Preserve the spiritual and cultural heritage of the diverse communities of Imperial County.**
  - Objective 3.1: Protect and preserve sites of archaeological, ecological, historical, and scientific value, and/or cultural significance.
  - Objective 3.2: Develop management strategies to preserve the memory of important historic periods, including Spanish, Mexican, and early American settlements of Imperial County.
  - Objective 3.3: Engage all local Native American Tribes in the protection of tribal cultural resources, including prehistoric trails and burial sites.

It is Imperial County’s policy to: “Identify and document significant historic and prehistoric resources, and provide for the preservation of representative and worthy examples; and recognize the value of historic and prehistoric resources, and assess current and proposed land uses for impacts upon these resources.” (Imperial County 2016). The following programs will be used to support this policy:

- The County will use the CEQA process to conserve cultural resources and conform to Senate Bill 18 “Consultation with Tribal Governments” and Assembly Bill 52 “Consultation with Tribal Governments”. Public awareness of cultural heritage will be stressed. All information and artifacts recovered in this process will be stored in an appropriate institution and made available for public exhibit and scientific review.
- Encourage the use of open space easements in the conservation of high value cultural resources.
- Consider measures which would provide incentives to report archeological discoveries immediately to the Imperial Valley Desert Museum.
- Coordinate with appropriate Federal, State, local and tribal agencies to provide regular updates to the "Sensitivity Map for Cultural Resources".
- Discourage vandalism of cultural resources and excavation by persons other than qualified archaeologists. The County shall study the feasibility of implementing policies and enacting ordinances toward the protection of cultural resources such as can be found in California Penal Code, Title 14, Point 1, Section 622-1/2. The County should maintain confidentiality of specific resource locations to prevent vandalism and desecration of sensitive cultural resources.
1.2.4. City of El Centro Regulations

The City of El Centro General Plan, Conservation/Open Space Element identified Community and Historic Resources as one of the eight major issues addressed within the Conservation/Open Space Element (El Centro 2004).

The Conservation/Open Space Element states that the City preserves structures and places with historic or community value including the post office, County Courthouse, downtown arcades, library, and the railroad buildings. The City continues to maintain local historic structures and places that provide a sense of continuity and unique character to El Centro. The City will also enhance and protect the downtown area as the City’s center of activity and community life through the continued implementation of recommendations made by the Downtown Business District Study. The City has identified some of the older residential single-family neighborhoods for protection to maintain their existing historical character. Through CEQA the City will assess new development that has the potential to impact archaeological resources and will be required to mitigate impacts to these resources. In addition, the City will foster local awareness of El Centro’s rich heritage through a variety of programs including the placement of plaques or markers to highlight the significance of buildings or places and the designation of historic landmarks by the City Council.

The Conservation/Open Space Element Goal 5: Maintain local historic structures and places that provide a sense of continuity and unique character to El Centro.

The City developed two policies in support of Goal 5:

- Policy 5.1: Encourage the preservation of structures and places with historic or community value, including the post office, library, County Courthouse, arcades in the downtown, and the railroad buildings.
- Policy 5.2: Protect and enhance the downtown area as the City’s center of activity and community life.

The Conservation/Open Space element Implementation Program lists three actions relevant to cultural resources and Tribal Cultural Resources:

- COS-10: California Environmental Quality Act: Continue to assess development proposals for potential impacts to sensitive historic, archaeological, and paleontological resources pursuant to the California Environmental Quality Act (CEQA). Require appropriate mitigation for all significant impacts if impact avoidance is not possible.
- COS-11: Downtown Business District: Continue to implement and update as necessary the recommendations of the Downtown Business District Study as one method of maintaining and enhancing the downtown area to retain the character of the central area, with its arcades and store fronts, and to create a more lively and vibrant city center.
- COS-12: Local Awareness of Community Heritage: Foster local awareness of El Centro’s heritage by:
  - Implementing a program of recognition, for example, the placement of plaques or markers to highlight the significance of a building or place;
  - Investigating the eligibility of local buildings for listing in the national, State, or local register of historic places;
  - Designating historic landmarks, recognizing a building, structure, site or collection of buildings or sites which are found by the City Council to have historic, cultural, or architectural significance;
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- Purchasing development rights to important buildings or property so as to provide protection from alteration or destruction; and
- Purchasing and re-selling important buildings or property with a covenant and reverter clause in the deed, restricting changes in the structure of the place.

In addition, the City of El Centro General Plan, Land Use Element, developed the Single-Family Neighborhood Overlay (El Centro 2004). The overlay identified older residential neighborhoods that were developed in the early part of the 1920s. They represent an important example of the historical character of El Centro. As infill development occurs, the character of these neighborhoods has the potential to change, as older, smaller bungalows are replaced with larger, modern homes or multiple unit housing. To help preserve these remaining neighborhoods, property designed with the Single-Family Neighborhood Overlay will need to be maintained as single family units.

1.3 PROJECT DESCRIPTION

The City of El Centro (City) is located in southeastern portion of Imperial County. The City encompasses approximately 11 square miles and is the largest city in the Imperial Valley. It is in the County of Imperial, Southern California, 11 miles north of the United States–Mexico border, is adjacent to the City of Imperial along its northern boundary, and is approximately 120 miles east of the City of San Diego. Interstate 8 provides a regional east–west connection, which leads to north–south connectivity by way of State Route 86 in the City and State Route 111 east of the City.

Two geographic areas are in the “planning area” covered by the El Centro General Plan. The City’s SOI is a plan for the probable physical boundaries and service area that a local governmental agency is expected to serve. The City includes 11 square miles plus an additional 12.5 square miles in its SOI. The City and its SOI together are referred to herein as the “Project area.”

1.3.1 Project Background

The City is undertaking updates to the Land Use Element and Mobility Element of its General Plan and the creation of a new Environmental Justice Element. The General Plan was last updated in 2004. The updates are being funded by a grant from the Sustainable Communities Program administered by the California Department of Transportation. The intent of the updates is to improve sustainability, promote public health, and anticipate future advancements in transportation technology.

1.3.2 General Plan Update Project Features

The General Plan is a State-required legal document that provides guidance to decision-makers regarding the allocation of resources and determining the future physical form and character of development in the City. It is the official statement of the City regarding the extent and types of development needed to achieve the community’s physical, economic, social, and environmental goals. Although the General Plan is composed of individual sections, or “elements,” that individually address a specific area of concern, the General Plan embodies a comprehensive and integrated planning approach for the jurisdiction. The City of El Centro General Plan Update proposes updates to the land use, mobility and the creation of a new environmental justice element as stand-alone chapters.

Land Use Element Update

The proposed update to the Land Use Element in the General Plan would be based on the City’s existing Vision 2050 Strategic Plan (El Centro 2015); Project Shape; policy direction from the City Council, Planning Commission, and staff; and input from the Community Advisory Committee and the public. The update would designate the proposed general distribution and extent of land uses in the City, focusing on preserving established land uses and accommodating future growth and physical development of the
community. It would incorporate policies that integrate land use and transportation strategies to increase the share of bicycle, transit, and pedestrian trips, reducing greenhouse gas emissions. Specific topics to be incorporated into the Land Use Element update include equity, health, sustainability, economy, and the environment. An overarching objective of the update would be to promote infill development and encourage efficient development patterns to spur economic revitalization, provide opportunities for innovative lifestyles envisioned by the Vision 2050 Strategic Plan (El Centro 2015), and promote environmental justice.

The overall goal of the Land Use Element update would be to create a land use plan that would promote quality of life, health, and safety; meet the needs of the City’s residents; support multiple modes of transportation; foster economic prosperity; provide a range of affordable housing options; be sustainable and environmentally responsible; encourage social cohesion and equity; and reflect and celebrate the City’s unique character, culture, identity, and traditions.

**Mobility Element Update**

The California Complete Streets Act of 2008 requires the General Plan to demonstrate how the County will provide for the routine accommodation of all users of a road or street, including pedestrians, bicyclists, users of public transit, motorists, children, seniors, and the disabled. The Mobility Element addresses this requirement with policies and programs that consider all modes of travel, with the goal of making streets safer, accessible and more convenient to walk, ride a bicycle, or take transit. The proposed update to the Mobility Element in the General Plan would be based on the current Circulation Element in the General Plan (2004), Bicycle Master Plan (2010), Vision 2050 Strategic Plan (2015), and Active Transportation and Safe Routes to School Plan (2019). Specific objectives of the Mobility Element update would include adopting Complete Streets policies that are accessible to all ages, supporting a safe pedestrian and bicycle transportation network, promoting a public transportation network that allows convenient access to major destinations, offering appropriate vehicle circulation, and providing a safe and efficient mobility system.

The overall goal of the Mobility Element update would be a balanced, interconnected, multimodal transportation network that provides for the efficient and safe movement of people and goods; promotes walking, bicycling, and healthy living; reduces vehicle miles traveled and greenhouse gas emissions; and accommodates future growth for the City.

**Environmental Justice Element**

A new Environmental Justice Element is being prepared as a chapter of the General Plan. The Environmental Justice Element is a new state requirement for jurisdictions with disadvantaged communities and represents an opportunity to develop new goals and policies that reduce the unique or compounded health risks in the community. While state requirements specify the topic areas that must be included in the Environmental Justice Element, the specific policies would be customized to the City. The Environmental Justice Element would critically examine the disproportionate impact negative environmental factors have on disadvantaged communities in the City. Particular concerns to be addressed include pollution exposure, improvement of air quality, land use incompatibility, food access, safe and sanitary homes, and physical activity. The Environmental Justice Element would address these topics and ensure the City’s long-term commitment to seeking out and implementing solutions to environmental justice issues. Potential solutions and opportunities for improvement to be explored in the Environmental Justice Element include expanding efforts to involve residents in civic affairs, increasing collaboration with associated public agencies and organizations, promoting food security and healthy eating, increasing opportunities for physical activity, addressing housing affordability and homelessness, and incorporating plans for new public facilities in strategic locations.
1. Introduction

Opportunity Areas

Five potential opportunity areas were identified throughout the City. These are larger, specific areas where targeted change is anticipated or desired in the following decades that would be identified in the updated General Plan.

Opportunity Area 1

Situated along the Adams Avenue corridor, this opportunity area is identified as a potential location for mixed-use development in the Vision 2050 Strategic Plan (2015). Under the draft proposal, the land use would change to a neighborhood-focused mixed-use designation, which would allow a combination of residential and commercial uses along the corridor at a density of 15 to 30 residences per acre. In this opportunity area, outdoor uses would be encouraged, and creating a pleasant, walkable streetscape would be the focus, with stores and residences oriented toward Adams Avenue and parking taking access from the alley.

Opportunity Area 2

This opportunity area is the City’s downtown. The focus of this opportunity area would be on small-scale, artisanal, entertainment, restaurant, and retail uses that celebrate the culture and heritage of the City. Ideas include pop-up retail, festivals, markets, food trucks, a kitchen incubator for small food businesses, and the addition of murals and other public art. Small “parklets,” outdoor seating for restaurants, activation of vacant buildings, and evening uses could also be a focus of this opportunity area.

Opportunity Area 3

This existing industrial area is north of Interstate 8, along the eastern border of the City. Although the existing General Plan currently designates this opportunity area for general industrial use, the area is mostly undeveloped. Two options for the opportunity area would be to expand the commercial land use while allowing some light industrial use, such as business parks, to remain or to make the entire area tourist commercial use, which could include hotels, restaurants, RV parks, active senior living communities, and other entertainment uses aimed at attracting visitors to the City. Infrastructure improvements for water, sewer, transportation, and streetscape features would be recommended with either option.

Opportunity Area 4

This opportunity area is south of Opportunity Area 3, on the southern side of Interstate 8 along the eastern border of the City. It currently includes large retail uses, including the Imperial Valley Mall, and some property zoned general industrial. Two options for the area include replacing the industrial area with commercial uses and allowing mixed-use/master-planned projects. Alternatively, the area could be developed with more tourist commercial uses and incorporate multi-family residential uses near the mall retail stores designed to be easily walkable and to create a live/work/shop destination. In either option, pedestrian and bicycle connections, landscape, and streetscapes would be improved.

Opportunity Area 5

This opportunity area is south of Interstate 8 along the future extension of Imperial Avenue in the southwestern part of the City. Two options exist for this opportunity area. Option A would extend commercial use along the Imperial Avenue frontage, with single-family residential behind the commercial uses. Option B would transform the area into a village-style master-planned community with residential and commercial uses and possibly schools, hotels/motels, and small-scale agriculture. Both options would include a focus on bicycle and pedestrian connections, improved streetscapes, and landscaping.
1.4 PROJECT LOCATION

The City and SOI make up the project area and are in the southern portion of Imperial County (County), approximately 113 miles east of San Diego and 62 miles west of Yuma, Arizona (Figures 1 and 2). The project area is in a wide basin framed by mountains to the west, northeast, northwest, and south.

The City is defined in the County by its transportation infrastructure. Three major freeways and two railroads transect the City. Kumeyaay Freeway (Interstate 8) runs east–west through El Centro as it progresses from Yuma, Arizona to San Diego, while Highway 111 runs north–south along the City's eastern flank heading north towards the City of Brawley from Calexico. Highway 86 progresses north-south through the central portion of the City, heading north from Heber towards the City of Imperial. The San Diego and Arizona Eastern Railroad intersects the northern portions of the City limits as the railroad progresses east to join with the Southern Pacific Railroad, which intersects the eastern portions of El Centro as it progresses north-northwest from the US/Mexico Border.

The Project area is shown on the USGS 7.5’ El Centro and Heber Quad Maps (Figures 3-6). The Project area consists of approximately 15,040 acres (23.5 square miles) and includes the boundaries of the City of El Centro as well as the City’s SOI.

1.5 PROJECT PERSONNEL

Red Tail Principal Investigator Shelby Castells, M.A., RPA served as the primary author of this report, and managed the study. Red Tail Senior Archaeologist Spencer Bietz contributed to the report and prepared the report figures. Resumes of key personnel are included in Appendix A.
1. Introduction

Figure 1. Project vicinity map.
Figure 2. Project area, aerial photograph.
Figure 3. Project area map, shown on USGS 7.5’ topographic map (1 of 4).
Figure 4. Project area map, shown on USGS 7.5’ topographic map (2 of 4).
Figure 5. Project area map, shown on USGS 7.5' topographic map (3 of 4).
Figure 6. Project area map, shown on USGS 7.5' topographic map (4 of 4).
2. SETTING

2.1 NATURAL SETTING

2.1.1 Current Environmental Conditions

The Project area lies within the Colorado Desert region, a sub-region of the Sonoran Desert (Sharp 1972:34-41). Current climatic conditions provide for mild winters and dry, hot summers. El Centro has a mean winter low of 44°F and mean summer temperature of 104°F, with record highs of 120°F. Precipitation in the region is less than 3.0 inches annually and is provided by sporadic winter rains and a few, often violent summer thunderstorms (NOAA 2020). Within the Project area, elevations range from -29 ft. (-9 m) above mean sea level (amsl) in the eastern and western portions of the area to -45 ft. (-14 m) amsl in the central and southern portions.

The only nearby permanent water source is the Salton Sea, approximately 20 miles to the north, and the Colorado River, approximately 60 miles to the east. The New and Alamo Rivers, located to the west and east of El Centro, respectively, flow during seasonal spring time overflows of the Colorado River. The current alignment of both rivers were created after flooding of the Colorado River created the Salton Sea at the beginning of the 1900s, and do not represent the river alignment that was present during the Prehistoric Period (Dowd 1956), however both rivers existed since the final infilling of Lake Cahuilla (Schaefer 2002).

Permanent springs and creeks can exist in the canyons that come out of the Peninsular Ranges, but vast the lowland area containing the Project area are dry except during mild winter storms or occasional localized summer monsoon thunderstorms. San Felipe Creek, a seasonal drainage originating in the eastern slopes of the Peninsular Ranges near Julian, was part of a sufficiently large catchment area that formerly could sustain surface water throughout the year within the drainage’s lower elevations (Lebo et al. 1982). The creek is one of the few perennial streams in the region, although water flow is most robust in the spring and diminishes during the summer-fall months. San Sebastian Marsh is one of the largest of the low-elevation spring sources and is located at the confluence of San Felipe Creek and Fish Creek at an elevation of approximately 120 ft below sea level, located approximately 25 miles north of the Project area along the western shore of the Salton Sea.

The majority of the project site is urban/developed land surrounded by agricultural land. The urban/developed land consists of residential, commercial, and industrial land uses. Natural plant and animal life in the Colorado Desert is characteristic of the Lower Sonoran life zone. Major vegetation communities include creosote bush scrub and saltbush scrub. Individual plants in these vegetation communities are widely spaced and provide little ground cover. Some portions of the desert have no visible plants and consist of shifting sand dunes or nearly sterile salt flats. Depending on the duration and intensity of rainfall, perennial and annual species will vary. The most common low-desert animals of economic importance to native peoples were black-tailed jackrabbits (Lepus californicus), cottontails (Sylvilagus audubonii), ground squirrels and other rodents, various lizards, pronghorn antelope (Antilocapra americana), and mule deer (Odocoileus hemionus). During stands of Lake Cahuilla, prehistoric people were especially attracted to the western Colorado Desert because of the availability of various Colorado River fish species such as bonytail chub (Gila elegans), razorback sucker (Xyrauchen texanus), Colorado pike minnow (Ptychocheilus lucius), and striped mullet (Mugil cephalus). Various migratory waterfowl were also caught, including coots (Fulica americana) and ducks (Jaeger 1965).

2.1.2 Salton Basin Geology and Past Environmental Conditions

The Project area lies along the eastern periphery of the Salton Basin, which is a large fault-framed graben formed at the interface of the North American and Pacific tectonic plates. The trough has been filled by
2. Setting

Immense quantities of colluvial and alluvial sediments that are in some places up to 20,000 ft. (6,000 m) deep (Morton 1977; Schaefer 2018). Natural northward diversions of the Colorado River into the Salton Trough during the Holocene resulted in the periodic formation of an extensive freshwater lake known as Lake Cahuilla which submerged the project area. Erosion from the Peninsular Range to the west and the Chocolate and Cargo Muchacho mountains to the east have left large amounts of sediment within the Salton Basin.

While the current climatic conditions within the Project area are well known, much less is known about earlier environmental conditions in the Colorado Desert. The best information comes from investigations of plant microflora in fossil packrat (Neotoma sp.) middens along the Colorado and Gila Rivers and extending across the Sonoran Desert to the east (King and Van Devender 1977; Van Devender 1990; Van Devender and Spaulding 1979, 1983). Van Devender (1990) provided an authoritative review and reconstruction of climate and vegetation over the last 14,000 years from these investigations, summarized below. The focus here is on data that are specific to the lower Sonoran Desert. The data from below 1,000 ft. (300 m) indicate that the lower Colorado River valley, and presumably the Salton Trough as well, may have been a refugium for Lower Sonoran creosote scrub habitat during the Pleistocene, but also containing the frost-resistant Mojavean species (Cole 1986). The region would have resembled Joshua Tree National Monument until 10,000-9000 B.P., when the Colorado-Mojave Desert boundary moved north to its present location. Mojavean species persisted at some locations in the early Holocene and indicate a transitional period from colder and wetter to dryer conditions. The level of variation between El Niño and La Niña weather patterns during this period is unknown, but it is thought that water sources remained relatively stable due to the Colorado River and Lake Cahuilla. The same may be true of late Holocene climatic fluctuations such as the Medieval Climatic Anomaly, which lasted from around A.D. 800 through the great drought of A.D. 1209-1350 (Jones et al. 1999). Evidence of the effects of the drought are present throughout Southern California and it likely affected residents of the Project area as well. Episodes of cooler and wetter conditions are also documented through a number of paleoenvironmental indices and in historical accounts. The most recent episode was the Little Ice Age, the effects of which were felt between about A.D. 1450 and 1850 (Schaefer 2018).

Surrounding the Project area at higher elevations, between 1,000 and 2,000 ft. (300-600 m), packrat midden analyses indicate a juniper woodland habitat in the Late Pleistocene between 22,000 and 11,000 B.P. These xeric woodlands continued through the early Holocene, finally ascending to higher elevations during the middle Holocene. They were replaced with the current creosote scrub and desert riparian habitat at that time. The Salton Trough, when not filled by Lake Cahuilla, probably contained much the same alkali sink habitat it has had recently throughout the Holocene and Pleistocene, although no paleoenvironmental data are available to directly confirm this (Schaefer 2018).

2.1.3 Lake Cahuilla

Lake Cahuilla was formed due to the buildup of sediments along the Colorado River delta, as the river flowed into the Gulf of California. As the sediments within the delta accumulated the height of the delta grew, and under certain conditions caused the path of the river to be blocked and for the river to flow into the Salton Trough, forming a vast freshwater lake, now called Lake Cahuilla. The Colorado River would continue to fill Lake Cahuilla until it spilled over the delta, forcing the river to flow back into the Gulf of California, until the process repeated itself (Schaefer 2018). There were at least six Late Pleistocene infillings of Lake Cahuilla and the remaining shorelines are visible between 52 and 31 m above sea level. The earliest and lowest of these shorelines is tentatively radiocarbon dated at 26,000 B.P. No evidence of prehistoric use has been identified along the shorelines of the lake during the Pleistocene period. Lake Cahuilla may have continued to form and then recede throughout the middle Holocene; archaeological remains are found in association with the lake as far back as 5000 B.P. (Schaefer 1994).
During the Late Holocene stands of Lake Cahuilla are somewhat better documented. The lake was present several times, although not continuously during the last 2000 years (Love and Dahdul 2002; Waters 1983; Wilke 1978). Various studies show that Lake Cahuilla was filled at least three times between ca. A.D. 1200 and 1700 (Laylander 1997). When present, the lake offered a range of resources, including freshwater fish, aquatic birds, freshwater mollusks, and shoreline plants. Its rises and falls, extending over decades, radically transforming the region’s resource potential, created a uniquely unstable human environment (Schaefer 2018). During times when Lake Cahuilla was full the Project area and immediate vicinity was submerged. Figure 7 shows the project area in relation to the approximate Lake Cahuilla shoreline.
Figure 7. Lake Cahuilla Shoreline in relation to the Project area.
2.2 CULTURAL SETTING

2.2.1 Prehistoric Period

While no single chronology is agreed upon, archaeologists generally concur that human occupation within Southern California spans at least the last 14,000 years. It was previously believed that people first came to North and South America over the Bering Land Bridge, however recent studies have identified that this ice-free corridor was not passable until 13,000 years ago and an alternate coastal route has been proposed. The Pacific Northwest coast was deglaciated by approximately 14,000 B.C. and travel along the Pacific Coast in boats would have been possible during this period. A widespread kelp forest could have created a “kelp highway” with enough resources to support people entering North America (Erlandson et al. 2007, Masters and Aiello 2007, Gallegos 2017). Erlandson (2007:56) contends that “it seems most likely that the peopling of the Americas included both coastal and interior migrations of peoples from northeastern Asia and Beringia, with an earlier migration possibly following the northern Pacific coast”.

In Imperial County and the surrounding area, there is no consensus on times or terms in which human occupation started. It is unknown if the first people arrived in Imperial County via the coast or from the pluvial lakes within the Great Basin to the east, as both locations contain archaeological sites with early dates (Gallegos 2017). Schaefer (2018) states that several different archaeological chronologies with different cultural elements and periods have been created for the area surrounding the Project area, starting with the work of Malcom Rogers in the 1920s and 1930s. In general, Schaefer (2018) has these different chronologies into four periods: Early Man Period; Paleoindian Period; Archaic Period; and Late Prehistoric Period.

Early Man Period, Prior to 10,000 B.C.

The Early Man Period was originally called the Malpais Pattern and subsequently the San Dieguito I Period by Rogers and consisted of lithic artifacts such as choppers and scrapers identified on the desert pavements within the Colorado, Mojave, and Sonoran Deserts. However, such artifacts are difficult to date, and modernly they have been attributed to later period. No reliably dated archaeological deposits have been dated to this period (Schaefer 2018).

Paleo-Indian Period, 10,000 to 5,000 B.C.

As in most of North America, the Paleo-Indian Period is the earliest recognized period of California prehistory and coincides with the end of the late Pleistocene, circa 10,000 B.C. During this period the environment was cool and moist, with deep pluvial lakes in the desert and basin lands (Moratto 1984). However, by the end of the late Pleistocene, the climate became warmer, causing glaciers to melt and sea levels to rise. Inland lakes began to recede and evaporate and there was a great deal of erosion in the coastal areas. The warmer climate also resulted in major vegetation changes and the extinction of Pleistocene megafauna (Moratto 1984, Martin 1967, Martin 1973, Fagan 1991).

Paleo-Indian sites have been identified across most of North American, often referred to as the Clovis Complex. The Clovis Complex is defined by the use of large fluted projectile points and other large bifacial stone tools. Within Southern California and the Colorado Desert the Clovis Complex is referred to as the Western Stemmed Point Tradition (WSPT) or the San Dieguito Complex, as named by Rogers (Schaefer 2018) and was characterized by leaf shaped and large stemmed projectile points, scrapers and other stone tools. Archaeological evidence of the WSPT has been found across the western interior of North America with small regional variations (Gallegos 2017, Sutton 2016, Warren 1968). Overall, ground stone use was infrequent during this period, leading to the belief that the San Dieguito were highly mobile groups and their subsistence practices focused on the hunting of large game. Rogers further broke down this period into San Dieguito I, II, and III, as tools became more sophisticated. Archaeological remains from the San Dieguito I and II Periods are characterized by bifacially and unifacially choppers and scrapers. San
Dieguito III lithic artifacts was more diverse and included pressure flakes bifaces, leaf-shaped projectile points, bifacial knives, additional scrapers and crescentic (Schaefer 2018). While Rogers originally separated these three periods, modern dating techniques have not found a reliable difference between them and generally they are considered a single archaeological period (Schaefer 2018). There is a lack of ground stone artifacts from this period. There was a greater concentration of archaeological sites near the coast and along the Colorado River floodplain during this period. Schaefer (2018) states that research has shown that human occupation during this period was focused around the eastern Colorado Desert and that the surrounding desert areas were used as special resource procurement and foraging areas, but could not sustain long term use.

**Archaic Period, 5,000 B.C. to A.D. 500**

The Archaic Period within Southern California is defined by a lengthy time period with little change within the archaeological record. In contrast to the Paleoindian Period the archaeological record within the Archaic Period consisted of a tool kit that focused on collection and processing of small plant seeds and hunting of a variety of medium and small game animals (Byrd and Raab 2007, Hale 2009, Rogers 1945, Warren 1968). Artifacts consisted of grinding implements (manos and metates), atlatl or dart projectile points, quarry-based tools, as well as lithic choppers and scrapers that indicate the focus was on collection and processing of small plant seeds and hunting of a variety of medium and small game animals (Byrd & Raab 2007, Hale 2009, Rogers 1945, Warren 1968). Interior archaeological sites from this period were thought to have been left by seasonally mobile groups with small settlements, based on the availability of food resources. There is little archaeological evidence for group size and type and use of habitation structures within the vicinity of the Project area during this Period. Mortuary practices consist of flexed inhumations which are often accompanied by grave goods of milling stones and other artifacts. This seems to represent a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources than identified during the Paleoindian Period. Research indicates that residential bases or camps were moved in a seasonal round (de Barros 1996, Mason 1997, Koerper 2002), with some sites occupied year-round, with portions of the village population leaving at certain times of the year to exploit seasonally available resources.

Across Southern California this period is often referred to as the Millingstone Horizon, and is often divided into the Early, Middle, and Late Archaic Period. More specifically the Archaic Period has been referred to as the Pinto and Amargosa Complexes within the Great Bain, Mojave Desert, and the Sonoran Desert east of the Colorado River. However, little evidence of these complexes have been found in the Colorado Desert. During this period the desert became more arid and there was an increase in the use of the inland valleys to the west of the Project area (Byrd and Raab 2007, Gallegos 2007, Masters and Aiello 2007). Schaefer (2018) states that the Colorado Desert within this period was largely inhospitable. Archaeological remains from the Archaic Period within the vicinity of the Project area have been identified at the base of the Peninsular Ranges, one of which is Indian Hill Rockshelter in Anza-Borrego Desert State Park which contained dart points, flaked stone and milling tools and three inhumations dated to the Archaic Period (Schaefer 2018). Archaic period archaeological sites have also been identified within a rockshelter in Tahquitz Canyon near Palm Springs and buried beneath alluvial deposits along the northern shoreline of Lake Cahuilla. Schaefer (2018) speculates that while Archaic Period sites are sparse they are likely buried beneath alluvial fans, wash deposits, sand dunes and Lake Cahuilla sediments (Schaefer 2018).

**Late Prehistoric Period, A.D. 500-1900**

There are differing opinions between researchers as to whether the shift to the Late Prehistoric Period was caused by new technologies developed by people already living in the area, spurred by changing environmental conditions, or if it was brought in by a migration of people into Southern California. Either way the transition into the Late Prehistoric Period from the Archaic Period is identified by the use of ceramic
vessels made with the paddle-and-anvil technique, bow and arrows, and floodplain agriculture. The Late Prehistoric Period is identified as a continuation of the cultural practices that were present during the initial Euro-American exploration of Southern California and that were recorded during the Ethno-Historic Period (Byrd and Raab 2007). Within the Colorado Desert and western Arizona this period is called the Patayan (Schaefer 2002). Near the Colorado River floodplain habitation sites were larger and used year-round. However, in areas away from permanent water sources, such as the vicinity of the Project area, hunting and gathering with specialized resource collecting sites continued as the subsistence pattern (Schaefer 2002).

Use of the bow and arrow began in the region approximately 1,500 years ago (Meighan 1954, Warren 1961). Also, during this time mortuary practices changed from inhumations to cremations. It is thought that this practice came from the north or east, and it is unknown if the transition from inhumations to cremations was adopted for religious or population reasons, or to control the spread of disease (Byrd and Raab 2007, Lightfoot and Parrish 2009, Gallegos 2017). Other hallmarks of the Late Prehistoric Period include an increase in the reliance on plant food sources, small projectile points, increase use of mortars and pestles, the use of obsidian from the Obsidian Butte source and overall an increase in the complexity and diversity of material cultural.

Ceramic use included a variety of vessel types as well as clay smoking pipes. Introduction of ceramics into the region began between 1,200 to 800 years before the present (Shackley 2004; Schaefer 2002). There were at least five ceramic types present in the desert (Shackley 2004). Approximately the same time period as the introduction of ceramics was the beginning of floodplain agriculture along the Colorado River. There was a higher concentration of archaeological sites identified between the Colorado River floodplain and the eastern shoreline of Lake Cahuilla. Trails to specialized resource collecting zones and trade route bisected the Colorado Desert, but fewer archaeological sites have been identified within the vicinity of the Project area (Schaefer 2002).

As Lake Cahuilla receded floodplain agriculture expanded to the New and Alamo River floodplains, and prehistoric people living in the vicinity of the Project used a combination of hunter-gatherer strategies and horticulture. Residential bases were found around springs and hand dug wells. Groups that were previously focused around the Peninsular Ranges extended into the western side of the Colorado Desert. Agriculture was in use along the Colorado River, east of the Project Area as early as A.D. 700 (Schaefer and Laylander 2007).

Changes in lithic artifacts show a greater number of small, finely chipped projectile points, usually stemless with convex or concave bases, suggesting an increased utilization of the bow and arrow rather than the atlatl and dart for hunting. Common lithic materials for formed tools, primarily projectile points include chert, jasper, agate, silicified wood, rhyolite, wonderstone, quartz, obsidian from Obsidian Butte, and Santiago Peak metavolcanics (Shackley 2004, Lightfoot and Parrish 2009). Other items include steatite cooking vessels and containers, the increased presence of smaller bone and shell circular fishhooks, perforated stones, arrow shaft straighteners made of steatite, a variety of bone tools, and personal ornaments made from shell, bone, and stone.

### 2.2.2 Ethnohistoric Period

At the time of European contact, the Project area was occupied by the Kamia (also known as Kumeyaay, Tipai, and Diegueño). The Kumeyaay territory ranged from between Agua Hedionda Lagoon and Batiquitos Lagoon in the north west, east through present day Escondido to the southern end of the Salton Sea and then southeast through the Sonoran Desert into Mexico, and the southwestern boundary was around Todos Santos Bay in Baja California, Mexico, south of Ensenada (Luomala 1978). The Kamia were considered the eastern or desert branch of the Kumeyaay and were directly related by language and culture to the western Ipai, Kumeyaay, and Tipai groups of the mountains and coastal areas of San Diego County and...
northern Baja California, and to the Cocopa and other Yuman speaking groups in the Colorado River’s delta. The Kamia occupied areas along the New and Alamo rivers, and at springs and other water sources within the Imperial Valley. During the ethnohistoric period, they were politically and militarily associated with the Quechan-Mohave alliance in opposition to the Cocopa in the Colorado River delta and the Halchidhoma in the Palo Verde Valley portion of the lower Colorado River. They maintained particularly close relations with the Quechan at the confluence of the Colorado and Gila rivers (Schaefer 2018).

Gifford (1931) writes that the Kamia’s territory extended from the north end of the Imperial Valley at the Salton Sink to the eastern side of the Peninsular Ranges, to the western bank of the Colorado River. Several early Spanish accounts reference this area including: Garcés in 1775; the second Anza expedition from 1775-1776; Fages in 1781; Whipple in 1849; and several other sources through the early 1900s. Ethnographic accounts of the Kamia are from Harrington in 1908, Waterman in 1909, and Gifford from 1916 through 1930 (Hedges 1975). Hedges argues that the Kamia are a group of Kumeyaay who over the last century prior to European uses of the Imperial Valley, adopted some cultural traits of the Quechan, as environmental conductions forced them out of the Imperial Valley and to utilize the Colorado River (Hedges 1975).

Ethnographic and archaeological sources show the Kumeyaay using the following plant sources: California Buckwheat, Blue Dicks, Canary grasses, Chia, Native Barley, Pitseed Goosefoot, Tarweeds, wild cucumber, Blue Elderberry, California juniper berries, jojoba, Holly-leaved Cherry, Leomonadeberry, Manzanitas, Oaks, Pinyon, Yucca, Prickly-pears, and others (Lightfoot and Parrish 2009). Meat sources included rodents, lizards, some snakes, insects, larvae, deer, and birds. Most hunting was performed by men, either alone or in informal parties (Luomala 1978). Rabbit was the most abundant source of meat, and was often caught in communal drives using nets, fences, or fires along with rabbit sticks or bows and arrows (Lightfoot and Parrish 2009). Fishing was utilized (Schaefer 2018). Salt was procured from the Salton Sink and the Kamia dug wells in the Imperial Valley, water was then poured into ollas and used for drinking and cooking (Gifford 1931). Clay for making ceramics was dug from Colorado River alluvial deposits (Gifford 1931)

The Kamia maintained settlements along the New and Alamo rivers, planting crops after major overflows from the Colorado River into the Salton Trough. Gifford states that the Kamia had no permanent villages and no separate lineage ownership of lands. They planted their crops in three main locations: the western side of the Imperial Valley near Indian Wells; the eastern side of the Imperial Valley from Brawley southward the Alamo River slough, and at Huerta in Lower California (1931). Use of the New and Alamo Rivers depended on environmental conditions as the availability of water within the rivers varied from running streams, to a series of pools, to dry riverbed.

The Kamia like the Kumeyaay to the west were loosely patrilineal, exogamous, and each group or clan was associated with a restricted locality, probably their summer home, called cimul or gentes (Luomala 1978, Spier 1923, Shackley 2004). Often several lineages lived together in a residential base. The number of residents, both full time or seasonally, is unknown. A hereditary male chief was present in each clan (Luomala 1978).

The Kamia lived in rectangular, semi-subterranean structures of post-and-beam construction, with thatch and earthen roofs. They also built ramadas, lean-tos, and conical sweathouses. They dispersed their dwellings on or adjacent to arable alluvial terraces as close as possible to running water, hand-dug walk-in wells, or sloughs. There were no permanent villages, and their moves were conditioned by the availability of floodwater farming areas and the ripening of wild plants. The Kamia would move to higher terraces if flooding occurred. Seasonal overflow from the Colorado River that fed the New and Alamo river sloughs
periodically failed, and the Kamia would move to other locations, including the Colorado River (Schaefer 2018).

Ethnographic sources reference trade between the Kamia and the Quechan to the east, Kumeyaay to the west, the Cahuilla to the north and the Paiute to the south. Schaefer (2018) states that ceramics may have been traded or used as containers for trade items. The Kumeyaay provided wild tobacco, acorns, baked agave hearts, yucca fiber sandals, baskets, eagle feathers, and cordage carrying nets. In return the Kamia exported vegetal foods of the desert, probably mesquite cake foremost among them, and salt obtained from Imperial Valley. The Kamia also traded tobacco, an important ritual item, as well as receiving it from the Quechan. The Colorado River Yumans exchanged cultigens such as dried pumpkin and corn, as well as gourds and seeds for rattles. The Cocopa, living near the Gulf of California, traded shell beads and pendants to the Kamia (Schaefer 2018). Lithic material was also traded, including obsidian from Obsidian Butte at the southern end of the Salton Sea.

2.2.3 Historic Period

The first part of the next section provides a brief history of post-contact California up to the American period, followed by more detailed information regarding the history of El Centro. Post-Contact history for the state of California is generally divided into three specific periods: the Spanish period (1769–1821), the Mexican period (1821–1848), and the American period (1848–present).

Spanish Period (1769-1821)

Along the coast of California, Spanish explorers began making expeditions between the mid-1500s and 1700s. Juan Rodríguez Cabrillo, a Portuguese in Spanish service, explored Catalina Island, San Pedro and Santa Monica bays and also stopped in 1542 at present-day San Diego Bay (Sparkman 1908). Sebastián Vizcaíno, a Spanish naval officer spent much of the late 1500’s mapping the coast of California north into Oregon. Like Cabrillo, Vizcaíno’s crew also landed on Santa Catalina Island and at San Pedro and Santa Monica Bays, naming each location. The Spanish crown laid claim to California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1886). While none of these expeditions may have had direct contact with the vicinity of the Project area it is likely that Old World diseases and other indirect impacts reached the Native Americans living in the Project area.

The Colorado Desert region first came to the attention of Europeans in 1539-1540, when Francisco de Ulloa reached the northern limit of the Gulf of California, Hernando de Alarcón sailed up the lower Colorado River at least as far as present-day Yuma, and Melchior Díaz traveled overland from Sonora to reach and cross the river. The portions of the desert west of the Colorado River were first visited only as late as the 1770s, when Juan Bautista de Anza and Francisco Garcés pioneered a route from the Colorado River to coastal southern California (Castells et al. 2016). The Spanish attempted to establish two missions within the Colorado River region, however both were destroyed by the Quechan in 1781 (Ferrell 2014). This began a war between the Spaniards and the Quechan, which ended the Spanish attempt to develop an overland route to Alta California (Ferrell 2014).

Mexican Period (1821-1846)

After years of sporadic rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821 marking the beginning of the Mexican Period. As the ports in California were opened to foreign ships the population near the coast grew. However, the inland valleys and desert remained largely vacant of European settlers expect for use as grazing lands for cattle.

In 1825 the Mexican Government again attempted to create an overland route through the vicinity of the Project area, and they established a fort, known as Laguna Chapala, west of El Centro near the current town of Westmoreland. The fort was again attacked and the Mexican soldiers withdrew to San Diego.
The Mexican government secularized the California missions in 1833, and much of the mission lands were included in the land grants. The Native Americans which had been captured as part of the mission system became eligible for Mexican citizenship, however this period continued the physical and cultural decline of the Native American population (Heizer 1978). At their peak, the 21 California missions controlled approximately 74,000 neophytes (Bolton 1917). By 1834, the year before secularization took the institution from the missionaries, only 17,000 natives remained within their domain (Heizer 1978, Monroy 1990). After the secularization of the mission system, many neophytes escaped to the desert. Otherwise the vicinity of the Project area remained desolate and isolated (Imperial County 2016).

American Period (1848-Present)
The signing of the Treaty of Guadalupe Hidalgo in 1848, ended the Mexican American War and marks the beginning of the American period, when California became a territory of the United States. California became the 31st state in 1850 and within three years the population of California had increased to more than 300,000. During this early period two stage routes the Southern Emigrant Trail and the Alternate Eastern Route to San Diego were in use. The Southern Emigrant Trail, largely appropriated Native American trails, crossed the Colorado River and then dipped south into Mexico and re-entered California along the New River near Calexico. Cattle continued to dominate the southern California economy through the 1850s as a source of hides but for the more than 90,000 new residents lured to California by the Gold Rush beginning in 1848, cattle were now an important source of meat and other supplies. During the Gold Rush use of the trail expanded exponentially and soon the trail was also used to transport supplies to the coastal areas and northern California. Cattle and sheep were driven through the vicinity of the Project area. Local travel along the trail through the Imperial Valley continued through the 1890s and 1900s as agriculture began in the Imperial Valley (Brigandi 2010). During this period the Imperial valley attached some mining interests, however few people settled in the valley (McGinnis and Murphy 2010).

In 1853, Lieutenant K. S. Williamson of the U.S. Topographic Engineers and geologist William Blake surveyed the Salton Basin for railroad routes. In the process, Blake described the character of prehistoric Lake Cahuilla and recognized the fertility of the Salton Basin. Sporadic flooding occurred at least eight times from 1824 to 1904 (Dowd 1956). Oliver Wozencraft crossed the area during the gold rush in 1849 and returned in 1853 and attempted to bring irrigation from the Colorado River to the area. The California State Legislature approved an act to grant him most of what is now Imperial and Colorado Valleys, with the condition that he would provide a permanent supply of fresh water. However, he was unsuccessful in gaining control of the land before his death in 1887 (Dowd 1956).

Between the 1870s to the 1890s several plans to bring irrigation to the Imperial Valley were proposed, but were not implemented. Then in 1892 C. R. Rockwood came to the Colorado Desert and formed the Colorado River Irrigation Company. Rockwood identified an estimated 750,000 acres within the vicinity of the Project area would be irrigatable. Circa 1900 Rockwood and associated named the area the Imperial Valley and reorganized the company as the California Development Company, referred to as the C.D. Company (Dowd 1956). However, Rockwood was not able to secure financing. In 1899 George Chaffey took control of the

The first successful irrigation within the Imperial Valley was the Imperial Water Company No. 1, in 1900, which planned to irrigated approximately 100,000 acres north of the international border and east of New River. Several companies were organized for the sale of water and land to settlers. In August 1900 the excavation of the intake canal at Hanlon Heading began along the Colorado River, it then swung into Mexico, and returned to the Imperial Valley at the old Alamo River Channel. By 1901 the first water flowed through the canals and approximately 1500 acres in the Imperial Valley was planted (Dowd 1956). The
construction of additional canals, headgates, a power plant, and additional irrigation features continued through the 1900s.

During the first decade of the 1900s the Imperial Valley remained barren, containing only several transportation routes and the Southern Pacific Railroad. However, as the construction of the irrigation system grew the population expanded exponentially. In 1901 it was estimated that only 2,000 settlers had come to the area. Further expansion was hindered by a lack of transportation. In 1904 the Southern Pacific branch from Imperial to Calexico was finished. By 1905 the population was estimated to be between 12,000 and 14,000 and by 1911 220,000 acres were irrigated and used for agriculture (Dowd 1956). In 1919 the San Diego and Arizona Eastern Railroad was completed from San Diego to El Centro, further expanding the growth of the area (Dowd 1956).

The Imperial Valley was part of San Diego County. Imperial County was organized in August of 1907, and El Centro was designated the County Seat. The newly formed Imperial County included east of the Coast Range Mountains to the Colorado River (Dowd 1956).

During the winter of 1904-1905 there were several floods which destroyed the intake at the Alamo Canal to the Colorado River. Several attempts were made to repair the channel and on December 5, 1906 a severe flood on the Gila River broke the levee and the water was diverted into the Alamo Canal (Dowd 1956). Much of the water then flowed into the New River channel and into the Salton Sea. The Salton Sea had previously been dry and by the time the levee was repaired in 1907 the Salton Sea extended approximately 500 square miles. The flood caused a large loss of crops, and the Southern Pacific main line had to be moved to higher ground.

With the improvement in transportation routes and irrigable land population of the region continued to grow. Imperial Highway, now Highway S-2, was completed in 1933. A short connector road led to Highway 80 from Imperial Highway (Wray 2004:96-97). The Imperial Valley experienced an influx of people from Mexico and in the 1930s and 1940s from residents from the dust bowl. Another population increase took place at the end of World War II. The Imperial Irrigation District office was founded in El Centro. In response to political instability in Mexico during the early 20th century, the All-American Canal was constructed entirely on United States soil, ensuring a reliable source of water to the farmers of the Imperial Valley. The All-American Canal had four tributaries: the Coachella Canal, East Highline Canal, Central Canal, and Westside Main Canal and was completed between 1948 and 1951 (McGinnis and Murphy 2010). The construction of these canals allowed for the expansion of agriculture and reclamation of the land. Agriculture continues to dominate the region’s land use. Major crops include alfalfa, lettuce, sugar beets, and carrots. Other crops grown in the Imperial Valley include salad vegetables, cauliflower, broccoli, cabbage, asparagus, onions, sweet corn, bell pepper, chili peppers, cantaloups, water melons, and other melons. A large amount of cattle are raised in the Imperial Valley as well as lambs.

City of El Centro

The Imperial Land Company established the townsites of Calexico, Heber, Imperial and Brawley. In 1904 W.F. Holt and C.A. Barker purchased the land on which El Centro was eventually built and originally named the tow Cabaker, and later renamed El Centro. El Centro incorporated on April 16, 1908 (Dowd 1956). As one historian of the Valley life put it, “in only five months, El Centro went from a barley field to a city...”. Following incorporation, El Centro grew rapidly with the city’s population reaching 1,610 by 1910, and by 1920 had more than tripled to 5,646 people (City of El Centro n.d.). By the mid-1940s, El Centro had become the second largest city in the Imperial Valley with a population of 11,000 people. El Centro had also become the principal wholesale center of the area and the location of the Imperial Irrigation District (IID) Administrative Offices. Because of its strategic location near rail lines and Highways 80 and 99, El Centro also became the shipping center for vegetables in the south end of the Valley. Many emerging principal industries within the City during the 1940s were related to agriculture, including fruit and
2. Setting

vegetable packing and shipping, ice plants, a flax fiber plant, box factories, and concrete pipe and brickyards (City of El Centro n.d.).

By the 1970s, agriculture was still an important part of the City’s economic life, and Imperial County had become one of the most agriculturally productive areas in the country. However, by the early 1980s, Government and Wholesale/Retail Trade positions grew quickly and accounted for the two largest employment sectors in the City’s labor market area.
3. METHODS

Methods used to assess the cultural resources sensitivity of the Project area include record searches from local repositories and archival and historical research. No archaeological field survey or built environment survey was conducted for this study.

3.1 RECORD SEARCHES

3.1.1 South Coastal Information Center

A record search of the CHRIS held by the South Coastal Information Center for the Project area and a one-quarter mile record search radius was conducted on October 13, 2020 and December 2, 2020 (Appendix B). The record search included a review of all records for historic and prehistoric archaeological sites, historic addresses, as well as a review of all known cultural resource reports.

3.1.2 Additional Database Searches

As part of the background research for the Project Red Tail performed a search of: the Built Environment Resource Directory (BERD) held by the California Office of Historic Preservation for the Project area; NRHP; CRHR; Imperial County Points of Historical Interest and any additional lists for historical districts and landmarks held by the City. The City does not keep a list of historical resources and was not able to provide building date records for the identification of potential historic districts. The City has created a land use overlay which identified areas containing single family homes which were constructed circa 1920s (El Centro 2004).

3.1.3 Native American Heritage Commission

A record search of the SLF held by the NAHC was requested on October 13, 2020. The NAHC responded on October 14, 2020 that the results were negative and provided a list of 18 tribal organizations and individuals to contact for additional information. Red Tail sent information request letters to the 18 contacts on October 15, 2020. All correspondence pertaining to the NAHC is included in Appendix C.

3.2 ARCHIVAL RESEARCH

Historic aerial photographs and maps, provided by historiaerials.com and USGS Historical Topographic Map Explorer, of the Project area were examined. In addition, Red Tail conducted a search of the General Land Office (GLO) maps and records provided by the Bureau of Land Management (BLM) including land patents, survey plats and field notes, land status records and other historic documents.

3.3 TRIBAL CULTURAL RESOURCES

Per AB-52 consultation with Native American Tribes and the City is ongoing.
4. RESULTS

4.1 RECORD SEARCH RESULTS

4.1.1 SCIC Record Search Results

The records search at the SCIC identified a total of 79 previously conducted cultural resources studies within the City of El Centro and the City of El Centro’s Sphere of Influence (Table 1). Thirty-seven of the 79 studies were located within the City’s boundaries, with 17 of the reports incorporating portions of both the City of El Centro and its Sphere of Influence. Twenty-five of the studies encompassed only portions of the City of El Centro’s Sphere of Influence. One hundred percent of Project area has been included in a previously conducted cultural resource study.

Table 1. Previously Conducted Cultural Resources Studies within the City of El Centro and its Sphere of Influence (SOI)

<table>
<thead>
<tr>
<th>Report</th>
<th>Author</th>
<th>Year</th>
<th>Title</th>
<th>Relation to Study Area</th>
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</thead>
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<tr>
<td>IM-00131</td>
<td>VON WERLHOF, JAY</td>
<td>1977</td>
<td>ARCHAEOLOGICAL EXAMINATIONS OF A PROPOSED MODIFICATION OF CLARK ROAD, IMPERIAL COUNTY</td>
<td>Within Study Area and SOI</td>
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<td>IM-00168</td>
<td>VON WERLHOF, JAY AND SHERILEE VON WERLHOF</td>
<td>1979</td>
<td>ARCHAEOLOGICAL EXAMINATIONS OF A PROPOSED GEOTHERMAL TEST WELL IN EL CENTRO</td>
<td>Within Study Area</td>
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<td>IM-00264</td>
<td>STUART, BOB</td>
<td>1982</td>
<td>DRAFT ENVIRONMENTAL IMPACT REPORT CURRENT LAND USE PLAN IMPERIAL PLANNING UNIT</td>
<td>Within Study Area and SOI</td>
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<tr>
<td>IM-00290</td>
<td>MSA, INC.</td>
<td>1983</td>
<td>DRAFT ENVIRONMENTAL IMPACT REPORT - SINGH PROPERTY ANNEXATION CITY OF EL CENTRO</td>
<td>Within Study Area</td>
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<tr>
<td>IM-00301</td>
<td>WELCH, PATRICK</td>
<td>1983</td>
<td>CULTURAL RESOURCE INVENTORY FOR THIRTY PROPOSED ASSET MANAGEMENT PARCELS IN IMPERIAL COUNTY, CALIFORNIA</td>
<td>Within Study Area</td>
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<tr>
<td>IM-00441</td>
<td>ENSR CONSULTING AND ENGINEERING</td>
<td>1990</td>
<td>ENVIRONMENTAL ASSESSMENT/INITIAL STUDY FOR THE PLACEMENT OF FIBER OPTIC FACILITIES BETWEEN SALTON MICROWAVE STATION AND CALExico CALIFORNIA</td>
<td>Within Study Area and SOI</td>
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<td>IM-00476</td>
<td>SINGER, CLAY A., JOHN ATWOOD, AND SHELLEY MARIE GOMES</td>
<td>1993</td>
<td>CULTURAL RESOURCE RECORDS SEARCH FOR SOUTHERN CALIFORNIA GAS COMPANY LINE 6902 SOUTH IMPERIAL COUNTY, CALIFORNIA</td>
<td>Within Study Area and SOI</td>
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<td>IM-00546</td>
<td>PETTUS, ROY</td>
<td>1979</td>
<td>PROPOSED EXTENSION OF IMPERIAL AVENUE ACROSS I-8, EL CENTRO, CA., EXTENSION OF IMPERIAL AVENUE ACROSS 11- IMP-8 TO THE SOUTH, WIDENING THE IMPERIAL AVENUE OVERCROSSING (BR.NO.58-251), AND REVISION OF RAMPS</td>
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<td>IM-00570</td>
<td>DOMINICI, DEBRA A., AND KAREN CRAFTS</td>
<td>1993</td>
<td>NEGATIVE ARCHAEOLOGICAL SURVEY REPORT FOR THE PROPOSED IMPERIAL 111 HIGHWAY PROJECT</td>
<td>Within Study Area and SOI</td>
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<td>IM-00635</td>
<td>DOMINICI, DEBRA, AND JAN KASPER</td>
<td>1993</td>
<td>NEGATIVE ARCHAEOLOGICAL SURVEY REPORT FOR THE PROPOSED IMPERIAL 86 HIGHWAY PROJECT – MCCABE ROAD CHANNELIZATION</td>
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<td>IM-00659</td>
<td>DOLAN, CHRISTY C. V.</td>
<td>1998</td>
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<td>YOST, STEPHEN W., MICHAEL MIRRO, LORI RHODES, J. DAVID ING, AND HOWARD HIGGINS</td>
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The record search indicated that 46 previously recorded cultural resources are located within the City of El Centro and its Sphere of Influence (Table 2). Twenty-nine of the resources are located entirely within the Project Area, with 7 resources present within both the Project Area and the Sphere of Influence. Ten
4. Results

resources were located solely within the Sphere of Influence. The previously recorded resources include: four railroad grades or railroad features, three historic structures or structure foundations, two historic wall or gate features, one civic auditorium, one community center/social hall, two government buildings, two educational buildings, two single family residences/properties, eleven canals/aqueducts, one highway, one women’s property, one political building, three transmission lines, one ancillary structure, one hotel/motel, three 1-3 story commercial buildings, one industrial building, one public utility building, and eleven historic refuse isolates, such as isolated bottles or other refuse that is 50 years old or older. The locations of the cultural resources are included in Confidential Appendix D. Eight of the previously recorded cultural resources are also listed as historic addresses on the historic address list compiled by the SCIC and are also shown in Table 3. P-13-008052, was previously included as a government building that was determined ineligible for listing, however the building has been demolished due to earthquake damage, and is not longer extant.

Table 2. Previously Recorded Cultural Resources within the City of El Centro and its Sphere of Influence

<table>
<thead>
<tr>
<th>Primary Number</th>
<th>Trinomial</th>
<th>Period</th>
<th>Contents</th>
<th>Recorder Date</th>
<th>Evaluation</th>
<th>Relation to Project Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>P-13-008023</td>
<td></td>
<td>Historic</td>
<td>HP6 1-3 Story Commercial Building</td>
<td>K.M. Collins (1998)</td>
<td>6Y: Determined Ineligible for Listing in the NRHP through a Consensus Determination of a Federal Agency and the State Historic Preservation Officer</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008048</td>
<td></td>
<td>Historic</td>
<td>HP6 1-3 Story Commercial Building</td>
<td>N. Way (1980)</td>
<td>7: Not Evaluated</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008050</td>
<td></td>
<td>Historic</td>
<td>HP15 Educational Building</td>
<td>E. Ramsey (1980)</td>
<td>7: Not Evaluated</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008051</td>
<td></td>
<td>Historic</td>
<td>HP14 Government Building</td>
<td>Unknown Author (n.d.)</td>
<td>3: Appears Eligible for NRHP or CRHR through Survey Evaluation</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008319</td>
<td>CA-IMP-7814</td>
<td>Historic</td>
<td>HP9 Public Utility Building, HP12 Civic Auditorium, HP15 Educational Building, HP38 Women's Property, HP39 Other (Political), HP46 Walls/Gates/Fences</td>
<td>J. von Werlhof (2000)</td>
<td>3S: Appears Eligible for Separate Listing in the NRHP</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008579</td>
<td></td>
<td>Historic</td>
<td>HP5 Hotel/Motel</td>
<td>S. Elder (2002)</td>
<td>-</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-008636</td>
<td></td>
<td>Historic</td>
<td>HP14 Government Building</td>
<td>J. Hupp (2002)</td>
<td>6: Determined Not Eligible for Listing or Designation</td>
<td>Within Study Area</td>
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<tr>
<td>P-13-008655</td>
<td></td>
<td>Historic</td>
<td>HP20 Canal/Aqueduct</td>
<td>F. Lortie (2001)</td>
<td>-</td>
<td>Within Study Area</td>
</tr>
</tbody>
</table>
### 4. Results

<table>
<thead>
<tr>
<th>Primary Number</th>
<th>Trinomial</th>
<th>Period</th>
<th>Contents</th>
<th>Recorder Date</th>
<th>Evaluation</th>
<th>Relation to Project Area</th>
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<tbody>
<tr>
<td>P-13-009083</td>
<td>-</td>
<td>Historic</td>
<td>HP20 Canal/Aqueduct</td>
<td>T. Wahoff, L. Dreibelbis (2005)</td>
<td>-</td>
<td>Within SOI</td>
</tr>
<tr>
<td>P-13-012402</td>
<td>-</td>
<td>Historic</td>
<td>HP2 Single Family Property</td>
<td>W.R. Manley (1990)</td>
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<td>Within Study Area</td>
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<td>P-13-012405</td>
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<td>Historic</td>
<td>HP6 1-3 Story Commercial Building</td>
<td>W.R. Manley (1990)</td>
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<tr>
<td>P-13-012406</td>
<td>-</td>
<td>Historic</td>
<td>HP13 Community Center/Social Hall</td>
<td>W.R. Manley (1990)</td>
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<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-014313</td>
<td>CA_IMP-12079</td>
<td>Historic</td>
<td>AH2 Foundations/Structures</td>
<td>W. Jones, B. Rockhold (2012)</td>
<td>-</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>P-13-014314</td>
<td>-</td>
<td>Historic</td>
<td>AH7 Roads/Trails/Railroad Grades</td>
<td>W. Jones, B. Rockhold (2012)</td>
<td>-</td>
<td>Within Study Area</td>
</tr>
</tbody>
</table>
4. Results

The 47 previously recorded resources are from the historic period, and are 50 years old or older. Descriptions of each resource are below. No prehistoric cultural resources have been previously recorded within the record search radius.

P-13-008023 consists of the Calipatria BR Office located at 141 W Main Street. The structure was previously determined as ineligible for the NRHP and the CRHR. No additional information was available on the resource form from the SCIC.

P-13-008048 consists of the Confucius Church and Community Center, located at 519 Broadway. The structure was originally recorded by N. Way in 1980 and has not been updated. The structure is a one-story brick building with a flat roof that is supported by five pillars. The brick structure has been covered in stucco to resemble adobe. Way noted in the recordation that the structure was originally designed with four doorways flanked by large store windows in order to house four small stores. However, the structure had since been altered to include only two doorways and the windows had been painted over for privacy.

P-13-008050 is the historic Eastside/Douglas High School located at 685 South Second Avenue. The structure was originally recorded by E. Ramsey in 1980 and consists of a one-story stucco building which was moved in 1959 to its present location. The structure sits upon a concrete foundation and appeared to have been restored at the time of original recordation. The site has not been updated since original recordation.

P-13-008051 consists of the El Centro Main Post Office located at 230 South 5th Street. The structure is listed in the NRHP and was originally constructed in 1932. The building is one-story with a full basement.
and is constructed of brick which is covered with stucco, stone, and terra cotta. The roof is tiled and contains two large skylights. Most of the structure’s architectural elements are in the Beaux Arts Classicism style which was popular between 1890-1920.

P-13-008052 is the El Centro Public Library, located at 539 State Street. The structure was originally recorded by L. Kortum in 1989 and was described as a one-story building sitting over a low basement, with narrow columns and squared pilasters flanking a wide front door, topped by a parapet which hides the roof. The structure was originally constructed in 1911, and newspaper articles from that time describe the structure exterior as consisting of red brick. Kortum noted during recordation that the structure had several visible new additions and that the original structure had been significantly altered. The site form lists the evaluation of the resource to the National Register as “5N”, while there is currently not a code 5N; code 5 identifies the resource as a property recognized as historically significant by local government. The resource has not been updated since original recordation. The resource is also included in the historic addresses list, but is given the evaluation code 6L “Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.” While this building was included in the record search results the building was demolished due to earthquake damage and is no longer extant.

P-13-008319 consists of the Women’s 10,000 Club located at 707 Olive Street. The structure was originally recorded by J. von Werlof in 2000 as a single building constructed between 1905 and 1908 by the Men’s Club of El Centro. The structure was originally designed so as to attract 10,000 residents to El Centro and was used as a gathering hall for social and political events. During original recordation, von Werlof noted that the building was unmodified from its original design. The structure is a single-story meeting hall with a gable roof and a Renaissance-themed entryway with a pillared covering. The resource has not been updated since original recordation and it is also included in the historic addresses list.

P-13-008322 consists of a historic railroad stop containing three ancillary structures and an associated platform. The resource was originally recorded by R. Bark, M. Caldwell, and D. James in 1999. The three structures consist of a square two-story building with an attached modern warehouse and loading dock, a smaller one-story building that may have been the former ticket office, and a long one-story building containing 18 pillars for support of the roof and an overhang. On the south end of the long structure the words “El Centro” and painted just below the roofline, and “Southern Pacific” is painted on the west side in similar fashion. The loading dock consisted of a rectangular platform containing a square on its northern end. The dock is bordered by a rail spur on each of its long sides, with both spurs meeting together near the square on the dock, with the northern end of the square turning into a ramp. The resource has not been updated since original recordation.

P-13-008418 consists of US Highway 80, a major two-lane paved road with modern striping and signage that runs through Imperial County. The resource was originally recorded by D. Pallette in 2001, and has been updated by J. Steely in 2007, J. McKenna in 2007, B. Williams in 2009, URS Corporation in 2009, M. Pumphrey in 2009, J. Krintz in 2011, and AECOM in 2011. US Highway 80 is a 2,671-mile-long highway that begins in Savannah, Georgia, and ends in San Diego. Highway construction began in 1926 as a part of the United States Highway System. The Federal Aid Highway Act of 1925 created the US Highway System as a response to the confusion created by the more than 250 named highways. The highway is a two-lane road measuring 20 feet wide and contains modern asphalt shoulders in multiple areas. The highway is a mix of poured-concrete and paved asphalt roadbeds along its length. The roadway is still in current use and has been modernized and maintained by Caltrans.
4. Results

P-13-008579 is the site of the former historic Hotel Barbara Worth, located at 710 West Main Street. The hotel was constructed between 1914 and 1915 and was built in the Spanish Renaissance style of architecture in solid reinforced concrete. The hotel had a spacious vaulted lobby that contained a skylight that shown through down from the roof of the building. In 1926, a six-story addition was added, and its accommodations were updated to be the most luxurious for the time. The hotel was owned and constructed by the Bell Development Company, of which W.F. Holt was one of the stockholders. Holt is considered one of the founding entrepreneurs of the Imperial Valley, and was involved in the laying out of the townsite of Holtville in 1903 and the purchasing of the land tract in 1904 which would later become the town of El Centro. The hotel was destroyed during a fire in 1962 and was later redeveloped for modern commercial use. The site of the former hotel was nominated and approved as California Point of Historical Interest No. IMP-005 in 2001, and was last updated in 2002 by S. Elder.

P-13-008636 consists of the El Centro Maintenance Station, located at 1605 West Adams Avenue. The station is an approximately 5-acre site containing nine core buildings, three of which were constructed in the mid-19th century: an Engineer’s Office (1947), a warehouse (1948), and a Region Office (1955). The remaining six structures are either modern in construction or have been modified or modernized significantly. The resource was originally recorded by J. Hupp in 2002 and has not been updated since original recordation.

P-13-008655 was originally recorded by F. Lortie in 2001 as a segment of the Date Drain, an earthen-lined drainage which is located south of Interstate 8 between 8th Street and the present-day Imperial Avenue/Interstate 8 interchange. The drain is part of the Imperial Irrigation District (IID). The portion of the Date Drain recorded by Lortie parallels the freeway for approximately 0.25 miles west of 8th Street, and then turns west-southwest for approximately 1,000 feet until it goes underground near the east-bound on-ramp of the interchange, re-emerging as an open ditch approximately 100 feet west of the interchange, proceeding west approximately 100 feet, and then turns southward as an open ditch. The Date Drain measures between 25 and 30 feet wide and averages between 15 and 20 feet in depth. Lortie noted that the drainage was one of several ditches that were installed between the mid to late-1920s in an effort to save saturated sediments that were spreading throughout the district. Lortie also notes that the Date Drain appears to have been significantly altered from widening and deepening efforts between 1950 and 1970, as well as being modified during the construction of Interstate 8 in the 1960s. The resource has not been updated since original recordation.

P-13-008682 consists of the Niland to Calexico Railroad, which was constructed between 1902 and 1904 by the Southern Pacific Company. The railroad was originally recorded by K. Collins in 2003 and has been updated by A. Croft and M. Wise in 2005 and by C. Ehringer in 2011. The railroad runs 65 miles from Niland to Calexico and is currently still in use.

P-13-008687 is a 2,900-foot segment of the Dogwood Ditch, an open, unlined irrigation canal in the IID. The resource was originally recorded by C. Dolan and J. Toenjes in 2005 and was updated by S. Jordan in the same year. Jordan noted that portions of the canal that bordered railroad crossings had been upgraded with cement drainages, some of which display date stamps that indicate a construction date of 1951. The canal is dug into the soil at grade level and draws water from the Central Main Canal. The Dogwood Ditch was in use prior to 1908 and is one of the earliest canals in the IID. The portion of the canal that was recorded by Jordan runs adjacent to Dogwood Road, south of Interstate 8, north of Highway 99, and crosses the Southern Pacific Railroad’s Imperial and Gulf Branch line.

P-13-009015 consists of the Alder Canal, a large concrete-lined canal with shallow sloping sides that parallels the east side of Dogwood Road. The resource was originally recorded by C. Dolan and J. Toenjes in 2005 and has not been updated. The canal has an average width of 8 feet 3 inches and has a wood-framed
4. Results

chute for water-level control near the intersection of Cooley Road and East Villa Road. The canal’s concrete lining contains a date stamp of 1958.

P-13-009016 is a historic electrical transmission line that was originally recorded by C. Dolan and J. Toenjes in 2005. The resource includes two intersecting points and two segments of a transmission line that leads to the IID’s steam plant on Dogwood Road. The transmission towers are constructed from metal A-frames, and the line parallels several canals and ditches through agricultural fields. The resource was updated in 2012 by W. Jones and B. Rockhold.

P-13-009017 is an unlined earthen drain that trends north to south, with the south end of the drain intersecting East Villa Road. The drain was originally recorded by T. Wahoff and C. Tuthill in 2006 and no updates to the resource have occurred. The earthen drain is approximately 30 feet wide at the crown and about 15 feet wide at the base, with a depth of approximately 10 feet.

P-13-009023 consists of an electrical transmission line which parallels Cannon Road at the intersection of Cannon Road and East Villa Road. The utility line contains several single wood poles each carrying a single set of crossarms. Each pole carries four overhead electrical lines. The transmission line ends at Pole 64778, located approximately 155 feet south of the intersection of Cannon and East Villa Roads. Pole 64777, located nearly 10 feet north of Pole 64778 contains a metal disc with an inscription “J.H. Barter/FPA/3.45/LONG BEACH, CAL.” The resource was originally recorded in 2005 by C. Dolan and J. Toenjes and has not been updated.

P-13-009024 consists of a segment of an electrical transmission line that provides residential service to residences on the north side of Holton Road. The transmission line contains single wood poles and was installed between Evan Hewes Highway to the south, Holton Road to the north, Highway 111 to the west, and Parker Road to the east, paralleling the Holton Interurban Railroad line. The recorded segment of the line measured approximately 0.5 miles in total length. Each pole contains a single set of crossbars. Several poles contained stamped date nails with “14” and “35”, and the last pole within the line contains a metal disc with the inscription “J.H. BAXTER/DFP/5.35/LONG BEACH/CAL.” The transmission line was recorded by C. Dolan and J. Toenjes in 2005 and has not been updated since original recordation.

P-13-009037 is a railroad composed of a single track and was originally recorded by C. Dolan and J. Toenjes in 2005. The railroad line was in poor condition at time of recordation with most of the ties and plates either missing or buried. Several of the rails contained writing which was illegible. Two plates contained legible inscriptions, within one reading “CANTED R.R.S.CO” and the other reading “PATD 22403.” The railroad line appeared to be a remnant of the Holton Interurban Railroad line, which provided service between El Centro and Holtville, and is paralleled by an old telephone line along its course. The resource has not been updated since original recordation.

P-13-009083 is the Acacia Lateral 6A Canal, an east-west trending concrete-lined canal that runs along the northern edge of an agricultural field, perpendicular to Parker Road. The canal was originally recorded by T. Wahoff and L Dreibelbis in 2005 and has not been updated. The canal measured 17 feet 4 inches wide at the crown, approximately 2 feet wide at the base, and was approximately 2 feet deep. At the time of recordation, the concrete lining exhibited minor cracking but no other integrity impacts were observed.

P-13-009091 consists of the Central 3 Drain, a north-south trending unlined earthen drain which is bisected by East Villa Road. The drain was originally recorded by T. Wahoff and L. Dreibelbis in 2005 and has not been updated. The drain contains formed cement channels where the drain submerges beneath East Villa Road. The drain measured 45 feet 9 inches wide at the crown, 16 feet wide within the base, and was
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approximately 16 feet deep. Several slabs of concrete were present upon the slopes, and dense vegetation were observed along the walls at the time of recordation.

P-13-009092 is a segment of an east-west trending drainage canal located north of East Villa Road. The canal contained a metal headgate at its west end, and several smaller metal gates were flush along the north wall of the canal, each of which opened into an agricultural field. The canal is lined with concrete, and a date “1951” is stamped into the cement at the west end of the canal. Overall, the canal measured 6 feet 9 inches wide at the crown, nearly 2 feet wide within the base, and was approximately 3.5 feet deep. The canal was recorded by T. Wahoff and L. Dreibelbis in 2005. No updates to the resource have occurred.

P-13-009302 is the San Diego and Arizona Eastern Railroad, which is present in both San Diego and Imperial counties. The railroad alignment totals 146 linear miles and was originally recorded by J. McKenna in 2007. The railroad was constructed between 1907 and 1919 with service to El Centro being added near 1920. The original alignment provided service from San Diego to El Centro before connecting to a larger grid and providing service to Yuma, Arizona. Portions of the original alignment remain between El Centro and Plaster City. The line is still being used in the present-day and has been modified to modernize the track and associated elements with modern elements. The resource has been recommended eligible for the NRHP and CRHR based on the railroad’s role in the development of Imperial County. The resource was updated in 2007 (A. Wesson, J. Schrieve, M. Hares, K. McLean, G. Connell, and J. Burkard), 2010 (P. McGinnis), 2009 (M. Dalope, S. Gunderman), 2009 (URS Corporation), 2010 (C. Bowden-Renna), and 2011 by both J. Krintz and AECOM.

P-13-009307 consists of a single story, ten-room residence with an extensive overhanging roof and three ancillary structures. The structures were originally recorded by A. Craft and J. Patterson in 2006 and has not been updated. The three ancillary structures consist of a 13 ft by 30 ft structure with an additional 13 ft overhand located north of the main residence, an irregularly shaped 40 ft by 19 ft structure also north of the main residence, and a 100 ft by 60 ft steel barn. Construction records indicated that the residence was constructed in 1950 although the construction dates of the ancillary structures are unknown.

P-13-011280 consists of an intersecting point of the Alder Lateral 7 canal and a segment of the Central Drain 6 canal, located at the intersection of Cannon Road and East Villa Road. The resource was recorded in 2005 by C. Dolan and J. Toenjes and has not been updated since. The Alder Lateral 7 canal is both concrete and earthen-lined with the lining beginning where a manually operated metal gate leads to the Central Drain 6. A concrete stamp reading “1949” was observed within the concrete-lined portion. The Central Drain 6 canal was unlined except where it turns from north to west coming out of the Alder Lateral.

P-13-012256 consists of a section of a canal and an associated headgate and was originally recorded by H. Price in 2008. The headgate lies approximately 20 feet east of the southern headgate of the main underground canal and consists of a rectangular box with a precast concrete cover. The gate’s opening and closing mechanism has been removed. The downstream canal measures approximately 180 linear feet and contains sloped, tapering sides with a top width of 54 inches and a depth of approximately 16 inches. The resource has not been updated since original recordation.

P-13-014312 was originally recorded by W. Jones and B. Rockhold in 2012 as a group of foundation pads that appear on the 1957 El Centro, California USGS 7.5-minute quadrangle. The map displayed the location as containing nine structures as of 1957, labelling the group as a labor camp. Upon visiting the site in 2012 Jones and Rockhold were only able to inspect three concrete foundations. The resource was revisited in 2012 by K. Lindgren and B. Rockhold and was tested for evaluation. The testing program included a second survey of the resource, in which two additional features, a concrete reservoir with several associated circular wells and a large grove of tamarisk trees, were identified. The survey also resulted in the identification of
two of the concrete foundations as being constructed in the modern era. The resource has not been updated since 2012.

P-13-014313 consists of a rectangular foundation constructed with metal rails and outlined by embedded concrete. The resource was originally recorded in 2012 by W. Jones and B. Rockhold and has not been updated since. The foundation is aligned north-south and measures approximately 42 feet long by 10 feet wide. The area within the rectangular foundation frame is filled with sediments and was not filled using concrete. The foundation is located north of a railroad yard and the feature’s function is unknown.

P-13-014314 is Villa Road, an east-west trending road that is visible upon the El Centro, California USGS 7.5-minute quadrangles dating to 1955 and 1957. The road was originally recorded in 2012 by W. Jones and B. Rockhold. Villa Road is divided into two sections: West Villa Road, a paved street that runs south from the Southern Pacific Railroad Tracks to the El Centro Central Drain; and East Villa Avenue, the continuation of the street east from the El Centro Central Drain for approximately 1.5 miles until terminating at Cooley Road.

P-13-014315 consists of a portion of the El Centro Central Drain, and was originally recorded by W. Jones and B. Rockhold in 2012. A 1.4-mile segment of the earthen drain between Cross Road and Dogwood Road was recorded, measuring approximately 30 feet wide with unpaved access roads paralleling it upon each side. The Central Dam is visible on the 1957 El Centro, California USGS quadrangle but does not appear on the 1940 Brawley, California USGS 16-minute quadrangle. The resource was updated in 2012 by K. Lindgren and B. Rockhold, who added archival information confirmed a construction date of 1951 with several channel modifications being completed by 1956.

P-13-014951 consists of the El Centro Telephone Building located at 763 State Street. The resource was originally recorded by S. Loftus in 2010 and consists of a two-story commercial structure with reinforced masonry siding. The overall form of the structure is of two intersecting triangles, and appears to represent post-World War II form of the commercial Vernacular Block executed in Modern style. The structure was originally constructed in 1954 and was later modified to remove the windows and replace them with steel louvered ventilation intakes. The structure was also modified to house late 20th century telecommunications equipment including an antenna and self-supporting steel lattice tower upon the rooftop. The structure was recommended ineligible for listing in the NRHP and CRHR due to lack of integrity.

P-13-015759 is the Old El Centro Maintenance Station Historic District, which was originally established in 1935 and currently consists of several structures upon 3.8 acres of land. The structures consist of six core buildings: Region Office, Engineer’s Office, Warehouse, Equipment Repair Shop, Crew Building, and Sign Shop. The resource was originally recorded by K. Tsunoda in 2017. Since its initial establishment, the resource has been expanded and structures within have been continually upgraded or demolished. The Maintenance Station was used by Caltrans until 2017, at which time it was vacated and transferred to a local agency. The resource was evaluated as a whole and as individual structures for listing in the NRHP and CRHR and was determined to be ineligible for listing in either due to loss of historical integrity.

P-13-017171 consists of the Dahlia Canal Lateral 1 drainage, a concrete-lined ditch that extends from the south side of West McCabe Road north to Valleyview Road, where it has been relocated and undergrounded. The resource was originally recorded in 2017 by R. Schultz. Schultz notes that the later returns to its previous course from just north of Manuel Ortiz Avenue, proceeding north to Danenberg Drive, where it terminates. The drainage lateral is approximately 10 feet wide but varies at various checks, underpasses, and turnouts. Several concrete gate headworks contained date stamps between 1952 and 1989.
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with the majority of the stamps dating closer to the earlier date. Research of aerial imagery suggested that the lateral was relined with concrete after 1953 and before 1996.

Eleven resources consist of historic-era refuse isolates (see Table 2). These resources are typically one to three fragments of common items such as glass bottles or jars, kitchen and tableware, glass insulators, and metal food and juice cans.

The record search also indicated that eight built environment resources have also been previously recorded as historic addresses by the SCIC (Table 3). All but one of these built environment resources have been assigned primary numbers by the SCIC and therefore are also included in Table 2 above. Seven of the built environment resources are located within the City of El Centro, with the eighth resource existing within the Sphere of Influence.

Table 3. Previously Recorded Historic Addresses within the City of El Centro and its Sphere of Influence

<table>
<thead>
<tr>
<th>Primary Number</th>
<th>Trinomial</th>
<th>Address</th>
<th>Evaluation</th>
<th>Recorder and Date</th>
<th>Relation to the Study Area</th>
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<tbody>
<tr>
<td>P-13-008051</td>
<td>-</td>
<td>230 SOUTH 5TH STREET</td>
<td>3: Appears Eligible for NRHP or CRHR through Survey Evaluation</td>
<td>Unknown Author (n.d.)</td>
<td>Within Study Area</td>
</tr>
<tr>
<td>-</td>
<td>-</td>
<td>707 OLIVE STREET</td>
<td>3S: Appears Eligible for NRHP as an Individual Property through Survey Evaluation</td>
<td>-</td>
<td>Within Study Area</td>
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</tbody>
</table>

4.1.2 Additional Database Searches

The El Centro General Plan Land Use Element identified a Single-Family Neighborhood Overlay (Figure 8) which has identified older residential neighborhoods that were developed in the early part of the 1920s and represent an important example of the historical character of El Centro (El Centro 2004). The intent of the Overlay zone is to protect these existing neighborhoods from development that is out of character, scale, and architectural style with the existing development (El Centro 2004). Single-Family Neighborhood Overlay, includes three separate areas. Area 1, the northwest area, is bounded by W. Brighton Avenue on the south, S. Imperial Avenue on the west, the alley between W. Olive Avenue and W. State Street on the north, and one parcel west of 8th Street on the east. Area 2, the southwest area, is bounded by Ross Avenue on the south, S. Imperial Avenue on the west, Vine Street on the north, and S. 10th Street on the east. Area
4. Results

3, the eastern area, is bounded by Ross Avenue on the south, S. 8th Street and S. 7th Street on the east, Wensley Avenue and the alley between Wensley Avenue and Vine Street on the north, and 4th Street on the east.

The City’s Conservation/Open Space Element has identified the post office, County Courthouse, downtown arcades, library, and the railroad buildings as structures or places with historic or community value (El Centro 2004).
Figure 8. Single-Family Neighborhood Overlay from the El Centro General Plan Land Use Element (2004)
A review of Built Environment Resource Directory (BERD) held by the Office of Historic Preservation (OHP) includes resources that are listed on the NRHP or CRHR or have been evaluated for eligibility. The Directory provides information, organized by county, regarding non-archaeological resources that have been processed through the OHP. The list identified thirty-seven resources within the City (Table 4). Resources that also have a Primary Number are also included in Tables 2 and 3, above. Two resources have been listed or eligible to be listed on the NRHP or the CRHR: P-13-008051, El Centro Main Post Office; and the Imperial County Courthouse at 939 W Main St.

Table 4. Resources Listed in the BERD within 0.25-Miles of the Project Area

<table>
<thead>
<tr>
<th>PRIMARY NUMBER</th>
<th>ADDRESS</th>
<th>HISTORIC / COMMON NAME</th>
<th>EVALUATION</th>
<th>RELATION TO THE PROJECT AREA</th>
</tr>
</thead>
<tbody>
<tr>
<td>13-008048</td>
<td>519 BROADWAY</td>
<td>CONFUCIUS CHURCH AND COMMUNITY CENTER</td>
<td>7R: NOT EVALUATED, IDENTIFIED IN RECONNAISSANCE LEVEL SURVEY</td>
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<tr>
<td>13-008319</td>
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<td>7W: SUBMITTED TO OHP FOR ACTION - WITHDRAWN</td>
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<td>13-008636</td>
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<tr>
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<td>552 AURORA DR</td>
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<tr>
<td></td>
<td>1215 COTTONWOOD DR</td>
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### 4. Results

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<tr>
<th>PRIMARY NUMBER</th>
<th>ADDRESS</th>
<th>HISTORIC / COMMON NAME</th>
<th>EVALUATION</th>
<th>RELATION TO THE PROJECT AREA</th>
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<td>1304 DOGWOOD RD</td>
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<tr>
<td>-</td>
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<tr>
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<td>193 E HOLT AVE</td>
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<tr>
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<tr>
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<tr>
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<tr>
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<tr>
<td>-</td>
<td>505 MAIN ST</td>
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<td>-</td>
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<td>13-015759</td>
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<tr>
<td>-</td>
<td>129 W HOLT AVE</td>
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4. Results

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<tr>
<th>PRIMARY NUMBER</th>
<th>ADDRESS</th>
<th>HISTORIC / COMMON NAME</th>
<th>EVALUATION</th>
<th>RELATION TO THE PROJECT AREA</th>
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<td>939 W MAIN ST</td>
<td>IMPERIAL COUNTY COURTHOUSE</td>
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<tr>
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<tr>
<td>-</td>
<td>626 WOODWARD AVE</td>
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<td>6Y: DETERMINED INELIGIBLE FOR NRHP THROUGH SECTION 106 PROCESS, NOT EVALUATED FOR CRHR OR LOCAL LISTING</td>
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<tr>
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<td>224 E BRIGHTON AVE</td>
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<td>6Y: DETERMINED INELIGIBLE FOR NRHP THROUGH SECTION 106 PROCESS, NOT EVALUATED FOR CRHR OR LOCAL LISTING</td>
<td>WITHIN</td>
</tr>
</tbody>
</table>

A review of California Historical Resources List held by the Office of Historic Preservation includes resources that are listed on the NRHP or CRHR or listed as a State of California Landmark or Point of Interest. The list identified three resources within the City: Townsite of Silsbee and Indian Well; Hotel Barbara Worth Site; and the El Centro Main Post Office. In addition, the Imperial County Courthouse was included on the BERD as listed in the CRHR:

- The Townsite of Silsbee and Indian Well, was registered as a California Point of Interest on June 12, 1981 (Landmark Plaque Number P569). The Point of Interest consists of two plaques, one memorializing the original townsite of Silsbee and the second Indian Well, a Kamia village located approximately two miles to the south, which was later a stage stop for the Butterfield Overland Main route, both of which were destroyed by floods in 1905 and 1907 (Little 1982).

- The Hotel Barbara Worth Site, was registered as a California Point of Historical Interest No. IMP-005 on May 17, 2001 (Landmark Plaque Number P842), and is also recorded as P-13-008579, discussed above.

- The El Centro Main Post Office was listed on the NRHP on January 11, 1985 (Plaque Number N1323), and is also recorded as P-13-008051, discussed above. The El Centro Post Office was identified as significant on the local level as one of the most monumental and sophisticated structures in El Centro, on the state level as an example of a heavily ornamented small post office and an aesthetically successful piece of architecture (Robertson 1984).

- The BERD lists the Imperial County Courthouse, at 939 W. Main Street, as eligible for and listed on the CRHR. However, no record of the Imperial County Courthouse is found on the CRHR. Red Tail sent a follow up request to the SCIC and the California State Historic Preservation Officer (SHPO) for further information. The SCIC responded that they had no documents or records on the Imperial County Courthouse. The SHPO responded that the Imperial County Courthouse was found eligible for listing in the NRHP, under Criteria B and C, through a consensus determination of...
eligibility during the Section 106 review for a Federal Emergency Management Agency project (Saunders 2012). The Imperial County Courthouse was recorded as a three-story building in the “Beaux Arts” style in 1924. It was found eligible to the NRHP based on its association with the Honorable Philip David Swing, a prominent figure in the development of El Centro, and on its distinctive characteristics of a particular type period or method of construction.

4.1.3 NAHC Record Search Results

A record search of the SLF held by the NAHC was requested on October 13, 2020. On October 14, 2020 the NAHC responded that the record search of the SLF was negative. The NAHC provided a list of 18 Native American tribal organizations and individuals that might have additional knowledge of cultural resources in the Project area. On October 15, 2020 Red Tail Environmental sent letters to the 18 Native American tribal organizations and individuals requesting any information they may have on cultural resources in the Project area. The contacts provided by the NAHC are from the following 15 Native American groups:

- Barona Group of the Capitan Grande
- Campo Band of Diegueno Mission Indians
- Cocopah Indian Reservation
- Ewiaapaayp Band of Kumeyaay Indians
- Iipay Nation of Santa Ysabel
- Inaja-Cosmit Band of Indians
- Jamul Indian Village
- Kwaaymii Laguna Band of Mission Indians
- La Posta Band of Diegueno Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueno Mission Indians
- Quechan Tribe of the Fort Yuma Reservation
- San Pasqual Band of Diegueno Mission Indians
- Sycuan Band of the Kumeyaay Nation
- Viejas Band of Kumeyaay Indians

On October 23, 2020, Ray Teran, Viejas Tribal Government Resource Management Director, responded that the project site has cultural significance or ties to Viejas, and cultural resources have been located within or adjacent to the APE-DE. Viejas requests that a Kumeyaay Cultural Monitor be on site for ground disturbing activities. To date no additional responses have been received. All correspondence pertaining to the NAHC is included in Appendix C.

4.2 ARCHIVAL RESEARCH RESULTS

USGS topographic maps from 1955 show the City of El Centro as having been mostly developed as a mix of residential and commercial zones, with the City limits defined as the western leg of Highway 99 to the west, Ross Avenue to the south, Hope Street to the east, and Woodward Avenue to the north. The City is bisected laterally by Highway 80 and is bordered by the Southern Pacific Railroad line just east of the eastern leg of Highway 99. The 1958 topographic map shows the City limits expanding slightly in all four cardinal directions with the most growth occurring between Ross Avenue and present-day Interstate 8 south of the City center. The SOI has been primarily developed for agriculture. Topographic maps from 1958, 1961, and 1973 display several new schools including Imperial Valley College, a hospital, and City Hall. The topo map from 1980 shows extensive new developments north and south of the City with moderate amounts of development occurring to the east, replacing previous agricultural use. Interstate 8 is now visible, and Highway 80 is no longer labelled. Topographic maps from 2012, 2015, and 2018 show
4. Results

continued urbanization within the limits of the City with small to moderate new developments occurring outside. Highway 80 is now labeled as Old Highway 80 or Evan Hughes Highway. The visible City limits and infrastructure visible within these maps largely comply with present day alignments.

Aerial photographs of the study area begin in 1953 and shows the City as a mix of commercial, industrial, and residential developments. Streets and neighborhoods are well developed and paved, and central routes such as Highways 80 and 99 are lined primarily with commercial and light industrial developments, with the majority of residential developments established within areas removed from the central routes. Outside of the developed areas of the City and in the SOI, land-use is primarily agricultural with most of the parcels being in use and not lying fallow. No aerial photography of the study area was available from 1954 to 1995. Imagery from 1996 shows new commercial and residential developments as the City limits have been expanded in all directions. Similar to images in 1953, primary land-use around the high-use transportation routes is a mix of light industrial and commercial developments, with residential land-use expanding within low-traffic areas. Agriculture also remains the primary land-use type within areas located outside of the developed City limits within the SOI. All of the developments visible in the 1996 aerial, including those visible in the 1953 aerial, conform with present-day locations and alignments. Aerial imagery from 2002, 2005, 2009, 2010, 2012, 2014, and 2016 show only minor amounts of development occurring within the City limits, much of which occurs within areas previously developed between 1953 and 1996. No expansion of commercial and industrial land-use areas or of residential areas can be seen, and all infrastructure such as roads, highways, water conveyance features, and electrical transmission lines are within present-day locations and alignments.

The GLO maps and records provided by the BLM show historic use of the study area starting in the mid-19th century. The Project area encompasses portions of four plat maps: Township 15 South Range 13 East, Township 15 South Range 14 East, Township 16 South Range 13 East, Township 16 South Range 14 East. The plat maps from 1857 are compiled in Figure 9.

Within the Plat Survey map for Township 15 South Range 13 East dated 1857, no structures or roads are plotted. However, the Dry Bed of New River is shown with the river course present in the north ½ of Section 2, all of Section 3, the south ½ of Section 4, the southeast ¼ of Section 5, the northwest ¼ of Section 8, all of Section 7, and the northwest ¼ of Section 18.

The 1856 plat map for Township 15 South Range 14 East also displays no structures or roads. The figure shows the lone mapped object, an Arroyo, present within the northeast ¼ of Section 2 and the southeast ¼ of Section 1.

The plat map for Township 16 South Range 13 East dated 1857 also does not depict any structures. The Dry Bed of New River is present, trending south through the south ½ of Section 19, the southwest ¼ of the southwest ¼ of Section 20, the north ½ of Section 29, all of Section 28, the northeast ¼ of Section 33, and the west ½ and southeast ¼ of Section 34. A small offshoot dry branch of the New River is also plotted within the northeast ¼ of the northeast ¼ of Section 32 and the west ½ of the northwest ¼ of Section 33. The Wagon Road from Warner’s Rancho to Fort Yuma is also depicted, paralleling the New River course, and is present within the south ½ of Section 19, the southwest ¼ of the southwest ¼ of Section 20, the southern ½ of Section 28, the southwest ¼ of the southwest ¼ of Section 27, the north ½ of Section 34, and the southwest ¼ of Section 35. Also depicted on the 1857 map are Indian Wells within the southeast ¼ of the southeast ¼ of Section 19. A portion of Indian wells Road is also shown trending southeast from the well, and is visible in the southeast ¼ of the southeast ¼ of Section 19, the southwest ¼ of the southwest ¼ of Section 20, and the northwest ¼ of the northwest ¼ of Section 29.
4. Results

Within the Plat Survey map for Township 16 South Range 14 East dated 1857 no structures, roads, features, or terrain are plotted.

Additional plat survey maps for Township 15 South Range 13 East, Township 15 South Range 14 East, Township 16 South Range 13 East, and Township 16 South Range 14 East dating to 1909 and 1910 show that all of the sections within each map have been heavily subdivided in anticipation of future development. No structures, roads, features, or terrain are plotted, however each subdivided parcel and land tract is labeled with Tract Number and acreage.
4. Results

Figure 9. Project area shown on the 1857 Plat Maps.
4. Results

4.3 TRIBAL CULTURAL RESOURCES RESULTS

A Scared Lands File search conducted by the Native American Heritage Commission (NAHC) for the project site. The NAHC identified 18 Native American representatives from the following 15 Native American groups as potentially having local knowledge of Tribal Cultural Resources:

- Barona Group of the Capitan Grande
- Campo Band of Diegueno Mission Indians
- Cocopah Indian Reservation
- Ewiaapaayp Band of Kumeyaay Indians
- Iipay Nation of Santa Ysabel
- Inaja-Cosmit Band of Indians
- Jamul Indian Village
- Kwaaymii Laguna Band of Mission Indians
- La Posta Band of Diegueno Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueno Mission Indians
- Quechan Tribe of the Fort Yuma Reservation
- San Pasqual Band of Diegueno Mission Indians
- Sycuan Band of the Kumeyaay Nation
- Viejas Band of Kumeyaay Indians

The City is conducting the Tribal Cultural Resources consultation.
5. CULTURAL RESOURCE CONSTRAINTS ANALYSIS

This section discusses the cultural resources constraints identified during the study. In addition to the known cultural resources identified during the record searches and archival research the constraints analysis also categorized the Project area into two cultural resource sensitivity levels rated low or high. The sensitivity level is based on previously recorded cultural resources and the potential for the area to contain cultural resources that have not yet been recorded.

The record search indicated that 46 previously recorded cultural resources are located within the Project area, specifically 29 resources within the City boundaries, seven resources within the City boundaries and SOI, and ten resources in the SOI. The previously recorded resources include: four railroad grades or railroad features, three historic structures or structure foundations, two historic wall or gate features, one civic auditorium, one community center/social hall, two government buildings, two educational buildings, two single family residences/properties, eleven canals/aqueducts, one highway, one women’s property, one political building, three transmission lines, one ancillary structure, one hotel/motel, three 1-3 story commercial buildings, one industrial building, one public utility building, and eleven historic refuse isolates, such as isolated bottles or other refuse that is 50 years old or older. In addition to the record search from the SCIC the El Centro General Plan Land Use Element identified a Single-Family Neighborhood Overlay that contained three neighborhoods which were developed in the early 1920s; the City’s Conservation/Open Space Element has identified the post office, County Courthouse, downtown arcades, library, and the railroad buildings as structures or places with historic or community value; a record search of the BERD identified thirty-eight non-archaeological resources within the City, many of which were also included in the SCIC record search data; and a review of California Historical Resources List held by the Office of Historic Preservation included three resources within the City: Townsite of Silsbee and Indian Well; Hotel Barbara Worth Site; and the El Centro Main Post Office.

The record searches and archival research have identified 11 resources that are significant at the local, state, or federal level. Four of the resources have been listed or recommended eligible to be listed on the NRHP or the CRHR, two of the resources are listed as California Points of Interest, and the remaining five resources have been recommended as locally significant.

Table 5. Cultural Resources Eligible for or Listed on the NRHP, CRHR, California Point of Interest, or Local Importance within the Project Area

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<th>PRIMARY NUMBER</th>
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<th>NATIONAL REGISTER OF HISTORIC PLACES</th>
<th>CALIFORNIA REGISTER OF HISTORICAL RESOURCES</th>
<th>CALIFORNIA POINT OF INTEREST</th>
<th>LOCAL CITY OF EL CENTRO IMPORTANCE</th>
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<td></td>
<td>Townsite of Silsbee and Indian Well</td>
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<td>X</td>
<td>X</td>
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<td></td>
<td>Single Family Overlay Area 1, 2, and 3</td>
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<tr>
<td></td>
<td>Imperial County Courthouse</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td>Downtown Arcades</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P-13-008051</td>
<td>El Centro Main Post Office</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
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<tr>
<td>P-13-008319</td>
<td>Women’s 10,000 Club House</td>
<td>X</td>
<td>X</td>
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<td></td>
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<tr>
<td>P-13-008322</td>
<td>Historic Railroad Stop, Ancillary Structures, and Platform</td>
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<td>Hotel Barbara Worth Site</td>
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<tr>
<td>P-13-008682</td>
<td>Niland to Calexico Railroad</td>
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<td>San Diego and Arizona Eastern Railroad</td>
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<td>X</td>
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<tr>
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<td>Old El Centro Maintenance Station Historic District</td>
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The constraints analysis also categorized the Project area into two cultural resource sensitivity levels rated low or high based on the results of the archival research, the NAHC Sacred Lands File record search,
5. Constraints Analysis

regional environmental factors, and historic and modern development (Figure 10 and Confidential Appendix D). Much of the Project area has been identified as having a low sensitivity for cultural resources. However, a portion of the Project area, bounded by Highway 80 and Ross Avenue on the south, Dogwood Road and the Niland to Calexico Railroad on the east, Commercial Avenue and the San Diego and Arizona Eastern Railroad on the north, and N. La Brucherie Road and Imperial Avenue on the south has been identified as having a high sensitivity for cultural resources. This area was developed during the first several decades of the City’s history and contains the neighborhoods developed during the 1920s the City previously identified as the Single-Family Neighborhood Overlay (El Centro 2004). This area also contains a high concentration of the historic and built environment resources identified in the record searches of the SCIC and BERD. The high sensitivity area has a higher potential to contain resources that meet the 50-year age threshold for eligibility to the NRHP or CRHR, including: buildings and structures; historic and prehistoric archaeological remains, including prehistoric use areas, and historic trash scatters and structure remains; features and structures associated with irrigation; features and structures associated with early roadway and railroads; and historic districts. The City has a long history of development dating back to the early 1900s. It is likely that there are many properties within the Project area that meet the 50-year age threshold for eligibility to the CRHR and/or the NRHP that have not been previously evaluated. Based on the historic and archival research conducted historic archaeological resources may include archaeological deposits and features associated with agriculture, as well as early development, such as trash scatters, wells and privy pits, and built environment resources. While these areas were subject to early development, they may not have been impacted by mass grading and buildings, roads, and hardscapes may have preserved intact subsurface archaeological deposits and features which could be eligible to the CRHR. In addition, features related to early transportation, irrigation, and agriculture may remain within the Project area.

No prehistoric cultural resources have been previously recorded within the Project area. During the prehistoric period the Project area was often submerged beneath Lake Cahuilla. However, there is still a potential for prehistoric cultural resources to be identified within the Project area. As Lake Cahuilla filled and dissipated over time large layers of alluvium filled the Project area, and there is the possibility of subsurface cultural resources preserved under layers of alluvium. In addition, early agricultural use of the Project may have obscured the ground surface and displaced surface and subsurface prehistoric cultural resources, which may be present at depth. Finally, as much of the Project area was originally developed prior to the implementation of CEQA prehistoric cultural resources may be present but have not yet been recorded in areas developed prior to the requirement of environmental studies.

Prehistoric cultural resources are often identified in proximity to known water sources such as Lake Cahuilla. While the current alignments of the New and Alamo Rivers were created during flooding of the Colorado River, which formed the Salton Sea, between 1904 and 1907, these water sources were present within the vicinity of the Project area during the prehistoric period. Addition water sources, such as springs and seasonal drainages, which may have been present within the prehistoric period, could have been obscured or destroyed by modern development and agricultural use. While much of the Project area has been identified as low sensitivity, or high sensitivity for historic resources, there is still a potential for prehistoric cultural resources as the Project area is located in a prehistorically active environment.
Figure 10. Cultural Resource Sensitivity within the Project area, also showing the Single-Family Neighborhood Overlay area.
6. POTENTIAL IMPACTS TO CULTURAL RESOURCES

In this chapter, the potential impacts to cultural resources within the Project area are reviewed. As the Land Use Element, Mobility Element, and Environmental Justice Element do not address specific projects proposed by the City, these impacts are described generically. Four main impacts to cultural resources may occur through the implementation of the Project: the destruction of known or unknown prehistoric and historical archaeological resources; the potential to disturb Native American human remains; the destruction or adverse changes to built environment resources, including adverse changes in the elements of historical structures, buildings, features, districts, or landscapes that make them significant resources; and the destruction or adverse changes to Tribal Cultural Resources. Each of these impacts are described more fully below.

6.1 ARCHAEOLOGICAL RESOURCES IMPACT ANALYSIS

The record searches and archaeological research identified historical archaeological sites within the Project area. While no prehistoric archaeological sites have been previously recorded within the Project area, archaeological and ethnographic research have shown that the Project area was a prehistorically active environment and prehistoric archaeological sites could be located within the Project area.

6.1.1 Thresholds of Significance for Archaeological Resources

Under CEQA, archaeological resources may meet the definition of a historical resource or unique archaeological resource. Any project that may cause a substantial adverse change in the significance of a historical resource would also have a significant effect on the environment. Substantial adverse change to the significance of a historical resource is defined as physical demolition, destruction, alteration, or relocation of the resource or immediate surroundings such that its significance would be materially impaired. CEQA states that when a project would cause damage to a unique archaeological resource, reasonable efforts must be made to preserve the resource in place or leave it in an undisturbed state.

6.1.2 Impacts to Archaeological Resources

Development in accordance with the proposed Project could adversely impact known or previously unrecorded cultural resources that may be eligible to the CRHR. Potential impacts to cultural/archaeological resources could result from clearing, trenching, grading or other ground disturbing activities associated with the implementation of the Project. Impacts to resources that are determined to be important under criteria provided in CEQA (Section 15064.5) would be considered significant. The precise extent and nature of impacts that could result from the implementation of the Project would be determined when specific project details are developed. Therefore, all potential impacts are assumed to be significant for this analysis. Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 are recommended to minimize the potential for disturbance of archaeological resources. Indirect adverse effects may result from increased accessibility to archaeological resources (such as artifacts) that could lead to resource looting or vandalism activities. This is considered a significant impact. Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 are recommended to mitigate this potential indirect impact.

6.2 NATIVE AMERICAN HUMAN REMAINS IMPACT ANALYSIS

There is a potential to identify unexpected human remains during implementation of the Project.

6.2.1 Thresholds of Significance for Human Remains

CEQA Guidelines § 15064.5(c) assigns special importance to human remains and establishes procedures to be used when Native American remains are discovered, requiring that excavation activities be stopped
whenever human remains are uncovered and that the County Coroner be called in to assess the remains. If the County Coroner determines that the remains are those of Native Americans, the NAHC must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as timely identified by the NAHC. CEQA Guidelines § 15064.5 directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

6.2.2 Impacts to Human Remains

Ground disturbance associated with the implementation of the Project could have the potential to disturb or destroy Native American human remains, including those interred outside of formal cemeteries. Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 are recommended to reduce these potential impacts to the unexpected discovery of human remains.

6.3 BUILT ENVIRONMENT RESOURCES IMPACT ANALYSIS

The record search and archival research has identified built environment resources within the Project area, including historic districts, buildings, structures, irrigation and agricultural features, roads, railroad grades and railroad infrastructure, and others. Furthermore, it is unknown how many parcels contain properties which were constructed prior to 1970 and therefore are at least 50 years old or built environmental resources which may meet the age threshold for eligibility when the Project is implemented.

6.3.1 Thresholds of Significance for Built Environment Resources

Under CEQA, any project that may cause a substantial adverse change in the significance of a historical resource would also have a significant effect on the environment. Substantial adverse change to the significance of a historical resource is defined as physical demolition, destruction, alteration, or relocation of the resource or immediate surroundings such that its significance would be materially impaired. CEQA states that when a project will cause damage to a historical resource, reasonable efforts must be made to preserve the resource in place or leave it in an undisturbed state.

6.3.2 Impacts to Built Environment Resources

Future City development will undoubtedly occur in areas that may contain significant historical districts, structures, buildings, and/or features. Therefore, the potential exists for significant impacts to these resources to occur as a result implementation of the Project. Effects on a historical district, building, structure, or feature deemed to be significant could be considered adverse if they involve physical demolition, destruction, relocation, or alteration of the historical resource or its immediate surroundings such that the significance of the resource would be materially impaired. Thus, significant historical resources must be considered in the City’s project planning and development process. All potential impacts are assumed to be significant for this analysis. Mitigation Measures CULT-1, CULT-2, CULT-5 and CULT-6 are recommended to minimize the potential for adverse effects to built environment resources. Projects that follow the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards) are typically mitigated below the level of significance.
6. Potential Impacts

6.4 TRIBAL CULTURAL RESOURCES IMPACT ANALYSIS

The record search of the SLF held by the NAHC was negative. The NAHC identified 18 Native American Tribal organizations and individuals which may wish to consult with the City regarding Tribal Cultural Resources. Consultation with tribal organizations is ongoing.

6.4.1 Thresholds of Significance for Tribal Cultural Resources

In addition to the questions in Section V of Appendix G of the CEQA Guidelines, on September 27, 2016, the California Office of Administrative Law officially adopted new Appendix G questions pertaining to impacts on Tribal Cultural Resources pursuant to the provisions of AB 52. Based on these questions the project would result in a significant impact if the Project would cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

6.4.2 Impacts to Tribal Cultural Resources

Implementation of the Project may involve ground disturbing construction activities that could cause an adverse effect to significant known or unknown Tribal Cultural Resources. Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 are recommended to mitigate impacts to Tribal Cultural Resources. Indirect adverse effects may result from increased accessibility Tribal Cultural Resources that could lead to resource looting or vandalism activities. This is considered a significant impact. Mitigation Measures Mitigation Measures CULT-1, CULT-2, CULT-3, and CULT-4 are recommended to mitigate this potential indirect impact.
7. RECOMMENDATIONS

7.1 RESOURCE MANAGEMENT

As part of the existing General Plan (2004) the City of El Centro has already developed several goals and policies with the intent of preserving cultural resources. The Conservation/Open Space Element Goal 5 states: Maintain local historic structures and places that provide a sense of continuity and unique character to El Centro. The City developed two policies in support of Goal 5: Policy 5.1, encourage the preservation of structures and places with historic or community value, including the post office, library, County Courthouse, arcades in the downtown, and the railroad buildings; and Policy 5.2, protect and enhance the downtown area as the City’s center of activity and community life. In addition, the City’s Conservation/Open Space Element Implementation Program lists three actions relevant to cultural resources and Tribal Cultural Resources:

- COS-10: California Environmental Quality Act: Continue to assess development proposals for potential impacts to sensitive historic, archaeological, and paleontological resources pursuant to the CEQA. Require appropriate mitigation for all significant impacts if impact avoidance is not possible.
- COS-11: Downtown Business District: Continue to implement and update as necessary the recommendations of the Downtown Business District Study as one method of maintaining and enhancing the downtown area to retain the character of the central area, with its arcades and store fronts, and to create a more lively and vibrant city center.
- COS-12: Local Awareness of Community Heritage: Foster local awareness of El Centro’s heritage by:
  - Implementing a program of recognition, for example, the placement of plaques or markers to highlight the significance of a building or place;
  - Investigating the eligibility of local buildings for listing in the national, State, or local register of historic places;
  - Designating historic landmarks, recognizing a building, structure, site or collection of buildings or sites which are found by the City Council to have historic, cultural, or architectural significance;
  - Purchasing development rights to important buildings or property so as to provide protection from alteration or destruction; and
  - Purchasing and re-selling important buildings or property with a covenant and reverter clause in the deed, restricting changes in the structure of the place.

In addition to the City’s current goals and policy the following mitigation measures are recommended to reduce impacts to cultural resources which may be adversely affected by the implementation of the Project. The recommended mitigation measures outline a series of assessments and actions, which provide guidance for evaluating potential impacts and incorporating appropriate means to avoid, minimize, and/or mitigate impacts in compliance with CEQA.

7.2 MITIGATION MEASURES

Implementation of the following recommended mitigation measures would reduce potentially significant impacts. The City is the lead agency implementing cultural resource mitigation measures.
7. Recommendations

7.2.1 Mitigation Measure CULT-1: Site Specific Cultural Resources Study and Evaluation of Resources

Cultural resource assessments shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards (PQS). Assessments shall include a CHRIIS records search at the SCIC and a search of the SLF maintained by the NAHC. A Phase I pedestrian survey shall be undertaken in areas that are undeveloped to locate any surface cultural materials and/or a built environment resources survey shall be conducted. If resources are identified during the site-specific archaeological survey then a Phase II evaluation of the resources to the CRHR should be conducted to determine if the resource is significant under CEQA, and would be adversely impacted by the project. A Native American monitor from a culturally affiliated Tribe should be present during any archaeological excavations involving prehistoric cultural resources. The evaluation of built environment resources shall be performed by an architectural historian or historian who meets the PQS in architectural history or history. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. All resources should be documented on the appropriate Department of Parks and Recreation (DPR) site forms and results of all assessments should be documented in a technical report.

If potentially significant archaeological resources are identified during the Phase I or Phase II assessments, and impacts to these resources cannot be avoided, as described in Mitigation Measure CULT-2, then appropriate site-specific mitigation measures shall be established and undertaken. These might include a Phase III data recovery program that would be implemented by a qualified archaeologist and shall be performed in accordance with the Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR): Recommended Contents and Format (1990) and Guidelines for Archaeological Research Designs (1991).

If potentially significant built environment resources are identified and impacts to these resources cannot be avoided then appropriate site-specific mitigation measures shall be established and undertaken, as discussed in Mitigation Measures CULT-5 and 6.

If no significant resources are found, but if there is a potential for unknown archaeological resources, or Tribal Cultural Resources to be uncovered during specific project activities then Mitigation Measure CULT-3, an archaeological and Native American monitoring program, is recommended.

7.2.2 Mitigation Measure CULT-2: Avoidance and Preservation of Cultural Resources

The preferred alternative for mitigating impacts to cultural resources and Tribal Cultural Resources is avoidance or preservation in place. If avoidance or preservation is demonstrated to be infeasible, then alternative measures would be required. Avoidance of cultural resources and Tribal Cultural Resources can be accomplished through a project redesign. Preservation in place can include: planning construction to avoid significant resources; planning parks, green space, or other open space to preserve cultural resources; or "capping" or covering archaeological sites with a layer of soil before building.

7.2.3 Mitigation Measure CULT-3: Archaeological and Native American Monitoring Program

As there is always a potential for encountering cultural resources during excavation, therefore the creation of an archaeological and Native American monitoring program is recommended for future development which will conduct new ground disturbance in areas identified as having a potential for unknown archaeological resources, or Tribal Cultural Resources. The archaeological and Native American
monitoring program shall consist of the full-time presence of a qualified archaeologist and traditionally and culturally affiliated Native American monitor during ground disturbing activities. The archaeological and Native American monitoring program should include the following:

1. The requirement for the archaeological and Native American monitoring to be noted on applicable construction documents, including plans;
2. The archaeologist and Native American monitor should attend the preconstruction meeting with the contractor and/or the City;
3. The archaeologist shall maintain ongoing collaborative consultation with the Native American Monitor during all ground disturbing or altering activities, as identified above;
4. The archaeologist and/or Native American Monitor may halt ground disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, ground-disturbing activities shall be directed away from these deposits for a short time to allow a determination of potential significance, the subject of which shall be determined by the archaeologist and the Native American Monitor. Ground disturbing activities shall not resume until the archaeologist, in consultation with the Native American Monitor and the City, deems the cultural resource or feature has been appropriately documented and/or protected;
5. Archaeological isolates and non-significant materials will be minimally documented in the field and ground disturbance will be allowed to resume;
6. The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible, a Data Recovery Plan may be authorized by the City as the Lead Agency under CEQA; and
7. Prior to the completion of any projects a Monitoring Report and/or Evaluation Report, which describes the results, analysis and conclusions of the archaeological and Native American monitoring program (such as, but not limited to, a Data Recovery Program) shall be submitted by the archaeologist, along with the Native American monitor’s notes and comments, to the City for approval.

7.2.4 Mitigation Measure CULT-4: Identification and Treatment of Human Remains

In the event that human remains or possible human remains are encountered all ground disturbance within 100 ft of the remains shall halt and CEQA Guidelines Section 15064.5, subdivision (e), California Public Resource Code Section 5097.98, and California Health and Safety Code §7050.5 should be followed, including informing the County Medical Examiner and City. If human remains are determined to be of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The Medical Examiner shall contact the NAHC to determine the most likely descendant(s). The MLD shall inspect the site as needed and make recommendations or preferences for treatment of the remains within 48 hours of being granted access to the site. The disposition of the remains shall be overseen by the MLD to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. If Native American remains are discovered, the remains shall be kept in situ (in place), or in a secure location, as approved by the Most Likely Descendant (MLD) until the repatriation process can be completed. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony.
7. Recommendations

7.2.5 Mitigation Measure CULT-5: Identification and Evaluation of Built Environment Resources

Future development projects may need to prepare an evaluation of built environment resources, if built environment resources that meet the age-threshold for eligibility are located within the project area. If needed, the resource will be evaluated in accordance with the California Office of Historic Preservation guidelines, in order to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under the California Environmental Quality Act, potential historical resources shall be evaluated under a developed historical context.

7.2.6 Mitigation Measure CULT-6: Additional Mitigation for Built Environment Resources

If avoidance or preservation in place of a built environment resource is not possible then appropriate site-specific mitigation measures shall be established and undertaken. To ensure that projects requiring the relocation, rehabilitation, or alteration of a historical resource not impair its significance, the Secretary of the Interior’s Standards for the Treatments of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. Prior to any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City.

If a proposed project would result in the demolition or significant alteration of a historical resource, it cannot be mitigated to a less than significant level. However, recordation of the resource prior to construction activities will assist in reducing adverse impacts to the resource to the greatest extent possible. Recordation shall take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and shall be performed by an architectural historian or historian who meets the PQS. Documentation shall include an architectural and historical narrative; photographs; and supplementary information such as building plans and elevations, and/or historic photographs. Documentation shall be reproduced on archival paper and placed in appropriate local, state, or federal institutions. The specific scope and details of documentation would be developed at the project level.
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APPENDICES
APPENDIX A: RESUMES
Professional Profile

Ms. Castells is the Director of Archaeology for Red Tail Environmental and acts as the Project Manager and Principal Investigator for all cultural resource studies. She has over fourteen years of experience in archaeology and cultural resource management in Southern California. She has been the Principal Investigator and Project Manager for numerous survey, monitoring, testing, and data recovery projects within the counties of San Diego, Imperial, Orange, Riverside, San Bernardino, and Kern. Ms. Castells has extensive experience providing regulatory compliance for CEQA, NEPA, NHPA, NAGPRA, and local guidelines and regulations. Ms. Castells is a Registered Professional Archaeologist, and exceeds the Secretary of the Interior Professional Qualifications Standards for Archaeology. Her interests focus on historical archaeology and the regional history and prehistory of Southern California.

Education

M.A., Anthropology, San Diego State University
B.A., Anthropology, University of California, San Diego

Registrations

Register of Professional Archaeologists (3748180)
San Diego County CEQA Consultant List for Archaeological Resources
Orange County’s Reference List for Certified Archaeologists
Riverside County Cultural Resources Consultants List

Selected Archaeological Experience

City of San Diego Cultural and Paleontological Resources On-Call As-Needed Environmental Consulting Agreement (R-309919/H146284), San Diego, CA
Principal Investigator / Project Manager | San Diego County, CA
Provides cultural resources and paleontological support of the City of San Diego’s utilities undergrounding program. Conducts cultural resources inventories including record searches and archaeological surveys to identify project areas which may contain cultural resources in support of multiple MNDs and a programmatic EIR. Recommends mitigation measures including resource testing and evaluation, avoidance, and construction monitoring. Works with the City and contractors to fulfill mitigation measures including construction monitoring, resource identification, recordation, and evaluation. City of San Diego, Transportation and Storm Water Department is the lead agency.

University of California, San Diego, Hillcrest Campus Long Range Development Plan EIR Project
Principal Investigator / Project Manager | San Diego, CA
Conducted a cultural resources survey and prepared a technical report in support of the project’s EIR. Identified a cultural resource with human remains within the project area. Recommended mitigation measures for the resource to avoid adverse effects. Assisted UCSD with their AB-52 tribal consultation, including organizing, scheduling, facilitating, and reporting on tribal consultation meetings. UCSD was the lead agency.

SANDAG Bayshore Bikeway – Segment 8B Project
Principal Investigator / Project Manager | San Diego and National Cities
Conducted a cultural resource study for the Project including: delineating and mapping the area of potential effect, conducting a record search and an archaeological survey of the APE, preparing the Historic Property Survey Report,
Heritage Road Bridge Replacement Project  
**Principal Investigator / Project Manager | City of Chula Vista, CA**  
Conducted a cultural resource study for the Project including: delineating and mapping the area of potential effect (APE), conducting a record search and an archaeological survey of the APE, preparing the Historic Property Survey Report and the Archaeology Survey Report, and creating mitigation measures. City of Chula Vista and Caltrans were the lead agencies.

North County Transit District Advanced Train Control and Positive Train Control Antennas at Five Locations for the Elvira to Morena Double Track Project  
**Principal Investigator / Project Manager | San Diego, CA**  
Conducted a cultural resources survey of the five areas of potential effect and prepared the associated Archaeological Resources Management Reports. Prepared the Federal Communications Commission’s Form 620, public outreach and Tower Construction Notification System for each antenna. Consulted with the California State Historic Preservation. Federal Communication Commission was the lead agency.

Harbor View Hotel Project,  
**Principal Investigator / Project Manager | San Diego, CA**  
Prepared an archaeological assessment of the Project area and a construction monitoring plan in compliance with the City of San Diego’s Mitigation Monitoring requirements. Managed the archaeological monitoring of the Project’s construction during the initial ground disturbance and grading of the Project area. Identified, documented, and evaluated for significance under CEQA, to the CRHR, and to the City of San Diego Historical Resources Register a feature containing the remains of a historic boat. Documented the boat feature on DPR 523 forms. Provided a technical report with the results of the monitoring, testing, evaluation and data recovery, including an artifact analysis and historic research. City of San Diego was the lead agency.

Machado Smith Excavation, Old Town San Diego State of California Historic Park  
**Principal Investigator / Project Manager | San Diego, CA**  
Prepared a work plan and California State Parks permit application for the excavation in order to identify the location of two 19th century structures, evaluate the archaeological remains for eligibility to the CRHR and significance under CEQA, and to assist in the recreation of the buildings in Old Town San Diego State of California Historic Park. Directed excavations including mechanical trenching and hand excavations. Excavated 19th century features. Directed laboratory work associated with the excavations, cataloged the artifacts, performed the artifact analysis, and prepared the artifact collection for curation. Evaluated the cultural resource for eligibility to the NRHP and CRHR, and for significance under CEQA. Prepared a technical report providing the results of the excavation, artifact analysis, evaluation of the resources to the CRHR, provided mitigation measures, and guidance to the building recreation process. Prepared DPR 523 forms for the cultural resource. California State Parks was the lead agency.

San Diego County Administration Center Parking Garage, Cedar and Ketter Project  
**Principal Investigator / Project Manager | San Diego, CA**  
Prepared an archaeological assessment of the project area and a construction monitoring plan in compliance with CEQA and the City of San Diego’s Mitigation Monitoring requirements. Managed the archaeological monitoring of the project’s construction during the initial ground disturbance and grading of the Project area. Identified, documented, and evaluated...
for significance under CEQA, to the CRHR, and to the City of San Diego Historical Resources Register a historic well. Performed a data recovery on the well feature. Provided a technical report with the results of the monitoring, testing, evaluation and data recovery, including an artifact analysis and historic research. Documented cultural resources on DPR 523 forms. Prepared the artifact collection, artifact analysis, and historic research to be incorporated into a display to be placed in the parking garage and the County Administration Center. City of San Diego was the lead agency.

Archaeological Survey for the County of San Diego Fuel Reduction Parcel Preparation Program in Julian, Whispering Pines, and Along State Route 78/79
Principal Investigator / Project Manager | San Diego County, CA
Conducted a cultural resources survey of the project area in compliance with CEQA and San Diego County Guidelines. Prepared a technical report and created avoidance measures in consultation with the County of San Diego to avoid all impacts to cultural resources and prepared a technical report. Documented cultural resources on DPR 523 Forms. San Diego County was the lead agency.

Pacifica Vista Self Storage Project
Principal Investigator / Project Manager | Vista, CA
Conducted a cultural resource survey of the project area and prepared technical report in compliance with CEQA and City of Vista Guidelines. Identified two cultural resources within the Project area, evaluated one cultural resource and created avoidance measures to avoid the second resource. Documented cultural resources on DPR 523 Forms. City of Vista was the lead agency.

Broadway Earthen Channel Repairs Project
Principal Investigator / Project Manager | El Cajon, CA
Conducted a cultural resource survey of the project area and prepared a technical report in support of the project’s environmental documents. The project is subject to CEQA-Plus and was conducted in compliance with City of EL Cajon, County of San Diego and Section 106 of the NHPA requirements. Identified, documented, and evaluated a cultural resource within the project area. City of El Cajon, County of San Diego, and California Clean Water State Revolving Fund Program were the lead agencies.

Rancho Del Rio Biological Mitigation Parcel Project
Principal Investigator / Project Manager | San Diego, CA
Conducted a cultural resource survey of the project area and prepared a technical report in compliance with the City of San Diego CEQA Guidelines. Identified a cultural resource within the project area and documented the resource on DPR 523 Forms recommended avoidance measures or evaluation of the resource to the CRHR and City Register. City of San Diego was the lead agency.

India and Date Project at 1703 India Street for H.G. Fenton
Principal Investigator / Project Manager | San Diego, CA
Prepared an archaeological assessment of the Project area and a construction monitoring plan in compliance with the City of San Diego’s Mitigation Monitoring requirements. Conducted a pre-testing program within the Project area using mechanically excavated trenches to identify possible archaeological deposits. Identified a layer of fill soil that did not need to be monitored. Managed the archaeological monitoring of the Project’s construction during the initial ground disturbance and grading of the Project area. Identified, documented, and evaluated for significance under CEQA, to the CRHR, and to the City of San Diego Historical Resources Register two historic trash scatters. Performed evaluation testing on the archaeological deposits. Documented cultural resources on DPR 523 forms. Provided a technical report with the results of the monitoring, testing, and evaluation, including an artifact analysis and historic research. City of San Diego was the lead agency.
Mr. Spencer Bietz is the Archaeological Field Director at Red Tail Environmental and has worked as a qualified archaeologist in California for the past 15 years. Mr. Bietz has completed a wide variety of cultural resource management projects and is a qualified archaeological monitor for the City of San Diego and County of San Diego. Mr. Bietz has worked on cultural resource projects throughout San Diego, Imperial, Orange, Riverside, San Bernardino, Inyo, Kern, Mono, Los Angeles, and Tulare Counties in California. Mr. Bietz has participated in projects for federal agencies such as the Bureau of Land Management and U.S. Forest Service; state agencies, including California State Parks and Caltrans; local governments, including the City and County of San Diego; and private clients. As an archaeologist and paleontologist, Mr. Bietz has experience with construction monitoring, geotechnical sampling, GIS mapping and data management, technical writing, soil screening, field survey and site recordation, resource evaluation, and artifact cataloging and preparation for curation. Mr. Bietz’s personal research interests include historical archaeology and the regional history and prehistory of Southern California, GIS data management, modeling, and cartography.

Education

Certificate of Performance as Geographic Information Systems Specialist, San Diego Mesa College
B.A., Anthropology with Concentration in Archaeology, University of California, San Diego

Selected Archaeology Experience

City of San Diego Cultural and Paleontological Resources On-Call As-Needed Environmental Consulting Agreement (R-309919/H146284), San Diego, CA
Senior Archaeologist | San Diego County, CA
Conducts cultural resources inventories including record searches and archaeological surveys to identify project areas which may contain cultural resources in support of multiple MNDs and a programmatic EIR. Recommends mitigation measures including resource testing and evaluation, avoidance, and construction monitoring. Performs archaeological construction monitoring, resource identification, recordation, and evaluation. Also acts as the GIS Specialist to produce report maps and record resources identified during construction monitoring. City of San Diego, Transportation and Storm Water Department is the lead agency.

Archaeological Survey and Monitoring for the Tenaja Fire State and Campground and the Upper San Juan Campground Contract Areas, Trabuco Ranger District
Field Archaeologist | Cleveland National Forest, CA (2018-ongoing)
Conducted cultural resource monitoring and documentation of planned structure demolition within the Upper San Juan Campground Contract Area. Will be performing archaeological monitoring during ground disturbance in 2019. Contributed to technical report and created cartographic figures and digital GIS database. United States Forest Service is the lead agency.

Archaeological and Native American Monitoring for UU525 Block 4J1 Project
Field Director/Archaeological Monitor | San Diego, CA (2018-ongoing)
Field Director and archaeological monitor for the archaeological monitoring for the utility undergrounding project. Worked with construction crews to provide updated schedules. Reviewed notes, created monitoring schedule and archaeological discovery database. Created cartographic figures and digital GIS database. Collected, cleaned, and cataloged artifacts recovered during cultural resource monitoring efforts. City of San Diego is the lead agency.
Ives Residential at 1874 Spindrift Project
Field Director | San Diego, CA (2018-ongoing)
Conducted extended Phase I testing of the project area. Identified, recorded, and evaluated a prehistoric archaeological deposit. Contributed to data recovery technical report and created cartographic figures and GIS digital database. City of San Diego is the lead agency.

Mission Bay Geo-Archaeological Testing
Cultural Resource Monitor | San Diego, CA (2018)
Contributed as the primary cultural resource monitor, assisting in the collection of subsurface core samples for geo-archaeological analysis. Performed subsurface geotechnical bore sampling, photo documentation, sample documentation, GIS map creation and data management, and technical writing. City of San Diego was lead agency.

Crown Point Sewer and Water Group Monitoring, San Diego, California
Cultural Resource Monitor | San Diego, California (2016-2018)
Contributed as a cultural resource monitor during the excavation of trenches and manhole vaults in the community of Crown Point in Pacific Beach, California. City of San Diego was the lead agency.

Pio Pico North Development Project
Field Director | Carlsbad, CA (2016-2017)
Contributed as field director for subsurface testing of multiple resources within a parcel proposed for residential development. Assisted in the creation of the testing protocol and with technical report writing, and directed the excavation of more than 50 mechanically-excavated trenches and 20 TEUs. Additional activities included site recordation and evaluation, historical archival research, recordation and evaluation of a historic-era linear feature (water pipeline), artifact cataloging, shell speciation, GIS data creation and management, and figure creation.

Administration of Courts (AOC) California, San Diego County Courthouse Monitoring
Lead Cultural Resource Monitor | San Diego, CA (2014)
Contributed as the primary cultural resource monitor, assisting in the recording of cultural deposits and features during footing excavation. Oversaw the recording of cultural discoveries, photo documentation, artifact collection, testing of historic features, and site recordation using Trimble GeoXH devices. Assisted in GIS map creation and data management, and artifact preparation.

San Diego Gas and Electric Cultural Resources On-Call, San Diego County, California
Field Archaeologist | Cultural Resource Monitor | San Diego, CA (2014)
Contributed as a field archaeologist assisting in a variety of projects including cultural resource monitoring, deteriorated pole survey, FiRM infrastructure survey, resource testing and evaluation, technical report and summary letter writing, GIS data creation and management, and figure creation.

Sunrise Powerlink Monitoring, San Diego County, California
Cultural Resource Monitor | San Diego, CA (2008-2009)
Contributed as a cultural resource monitor accompanying survey and geo-technical testing crews in the survey and placement of proposed electrical tower locations and their respective access areas along the Sunrise Powerlink. Assisted in site recording, photo documentation, and the identification and marking of sensitive cultural areas for future avoidance by work crews. Additional tasks included writing and compiling of tower cultural data for the final summary report.
APPENDIX B: SCIC RECORD SEARCH CONFIRMATION
CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM
CLIENT IN-HOUSE RECORDS SEARCH

Company: Red Tail Environmental
Company Representative: Shelby Castells
Date: 10/13/2020
Project Identification: City of El Centro

Search Radius: 1/4 mile

Historical Resources:
Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

Previous Survey Report Boundaries:
Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

Historic Addresses:
A map and database of historic properties (formerly Geofinder) has been included.

Historic Maps:
The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

Copies: 328
Hours: 2.5 - JL +117 excel lines

This is not an invoice. Please pay from the monthly billing statement
Company: Red Tail Environmental
Company Representative: Shelby Castells
Date: 12/2/2020
Project Identification: City of El Centro (expanded search)

Search Radius: within designated boundaries

Historical Resources:
Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

Previous Survey Report Boundaries:
Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

Historic Addresses:
A map and database of historic properties (formerly Geofinder) has been included.

Historic Maps:
The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

Copies: 179
Hours: 1 - JL +49 excel lines

This is not an invoice. Please pay from the monthly billing statement
APPENDIX C: NAHC CORRESPONDENCE
October 13, 2020

California Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
nahc@nahc.ca.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear NAHC,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The project area includes the entire city of El Centro. The project is subject to the California Environmental Quality Act (CEQA) and will assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area.

Red Tail is currently conducting a records search with the South Coastal Information Center. I am writing to request a record search of the Sacred Lands File to determine if you have registered any cultural resources, tribal cultural resources, traditional cultural properties, or areas of heritage sensitivity within the proposed project area. The project area is shown on the following USGS 7.5’ Quad Maps:

El Centro Quad:
T15S R13E Sections, 25, 26, 36
T15S R14E Sections 30, 31, 32, 33, 34
T16S R13E Sections 1, 2, 11, 12, 13
T16S R14E Sections 3, 4, 5, 6, 7, 8, 9, 16, 17, 18, 19

Heber Quad:
T16S R14E Section 19

Our investigation will include direct contact with local tribal entities. Please include a list of the appropriate individuals to contact related to this project. Please submit your response via email to Shelby@redtailenvironmental.com.

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology

Attachments: Project Area Maps (1-4)
October 14, 2020

Shelby Castells
Red Tail Environmental

Via Email to: shelby@redtailenvironmental.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, City of El Centro’s Land Use and Mobility Element Project, Imperial County

Dear Ms. Castells:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) (“Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.”)

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe’s areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
   - A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:
   - Any report that may contain site forms, site significance, and suggested mitigation measures.

   All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

Steven Quinn
Cultural Resources Analyst

Attachment
Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
cloyd@barona-nsn.gov

Inaja-Cosmit Band of Indians
Rebecca Osuna, Chairperson
2005 S. Escondido Blvd.
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Campo Band of Diegueno Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Jamul Indian Village
Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Cocopah Indian Reservation
Jill McCormick, Cultural Resources Manager
14515 S. Veterans Drive
Sommerton, AZ, 85350
Phone: (928) 722 - 7521
mccormickj@cocopah.com

Diegueno
Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
4054 Willows Road
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
michaelg@leaningrock.net

Diegueno
Kwaaymii Laguna Band of Mission Indians
Carmen Lucas,
P.O. Box 775
Pine Valley, CA, 91962
Phone: (619) 709 - 4207

Diegueno
La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

Diegueno
La Posta Band of Diegueno Mission Indians
Javaughn Miller, Tribal Administrator
8 Crestwood Road
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

Diegueno
Ipai Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130
Santa Ysabel, CA, 92070
Phone: (760) 765 - 0845
Fax: (760) 765-0320

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed City of El Centro’s Land Use and Mobility Element Project, Imperial County.

PROJ-2020-005544 10/14/2020 09:51 AM 1 of 2
Manzanita Band of Kumeyaay Nation
Angela Elliott Santos, Chairperson
P.O. Box 1302
Boulevard, CA, 91905
Phone: (619) 766-4930
Fax: (619) 766-4957

Diegueno

Mesa Grande Band of Diegueno Mission Indians
Michael Linton, Chairperson
P.O Box 270
Santa Ysabel, CA, 92070
Phone: (760) 782-3818
Fax: (760) 782-9092
mesagrandeband@msn.com

Diegueno

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

Quechan

San Pasqual Band of Diegueno Mission Indians
Allen Lawson, Chairperson
P.O. Box 365
Valley Center, CA, 92082
Phone: (760) 749-3200
Fax: (760) 749-3876
allenl@sanpasqualtribe.org

Diegueno

Sycuan Band of the Kumeyaay Nation
Cody Martinez, Chairperson
1 Kwaaypaay Court
El Cajon, CA, 92019
Phone: (619) 445-2613
Fax: (619) 445-1927
ssiwa@sycuan-nsn.gov

Kumeyaay

Viejas Band of Kumeyaay Indians
John Christman, Chairperson
1 Viejas Grade Road
Alpine, CA, 91901
Phone: (619) 445-3810
Fax: (619) 445-5337

Diegueno

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed City of El Centro’s Land Use and Mobility Element Project, Imperial County.
October 15, 2020

Ms. Angela Elliott Santos  
Chairperson  
Manzanita Band of Kumeyaay Nation  
PO Box 1302, Boulevard, CA, 91905  
619-766-4930

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Elliott Santos,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

El Centro Quad:
T15S R13E Sections 25, 26, 36
T15S R14E Sections 30, 31, 32, 33, 34
T16S R13E Sections 1, 2, 11, 12, 13
T16S R14E Sections 3, 4, 5, 6, 7, 8, 9, 16, 17, 18, 19

Heber Quad:
T16S R14E Section 19

A record search of the Sacred Lands File with the California Native American Heritage Commission was negative. Red Tail also conducted a record search at the South Coastal Information Center.

We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.
October 15, 2020  
Cultural Resources Analysis Study for the  
City of El Centro’s Land Use and Mobility Element Project  
Page 2 of 2

Sincerely,

[Signature]

Shelby Castells, M.A., RPA  
Director of Archaeology  
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Allen Lawson  
Chairperson  
San Pasqual Band of Diegueno Mission Indians  
PO Box 365, Valley Center, CA, 92082  
760-749-3200  
allenl@sanpasqualtribe.org

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Lawson,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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A record search of the Sacred Lands File with the California Native American Heritage Commission was negative. Red Tail also conducted a record search at the South Coastal Information Center.

We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.
October 15, 2020
Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Carmen Lucas
Kwaaymii Laguna Band of Mission Indians
PO Box 775, Pine Valley, CA, 91962
619-709-4207

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Lucas,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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T16S R14E Section 19

A record search of the Sacred Lands File with the California Native American Heritage Commission was negative. Red Tail also conducted a record search at the South Coastal Information Center.

We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.

Sincerely,

1529 Simpson Way, Escondido, CA 92029 ● 760-294-3100
www.redtailenvironmental.com
October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Cody Martinez
Chairperson
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court, El Cajon, CA, 92019
619-445-2613
ssilva@sycuan-nsn.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Martinez,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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T16S R14E Section 19

A record search of the Sacred Lands File with the California Native American Heritage Commission was negative. Red Tail also conducted a record search at the South Coastal Information Center.

We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.
Sincerely,

[Signature]

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Jill McCormick
Cultural Resources Manager
Cocopah Indian Reservation
14515 S. Veterans Drive, Sommerton, AZ, 85350
928-722-7251
mccormickj@cocopah.com

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. McCormick,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.
October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

[Signature]

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Erica Pinto
Chairperson
Jamul Indian Village
PO Box 612, Jamul, CA, 91935
619-669-4785
epinto@jiv-nsn.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Pinto,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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T16S R14E Sections 3, 4, 5, 6, 7, 8, 9, 16, 17, 18, 19

Heber Quad:
T16S R14E Section 19

A record search of the Sacred Lands File with the California Native American Heritage Commission was negative. Red Tail also conducted a record search at the South Coastal Information Center.

We are contacting you to request additional information regarding the Project area, if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Traditional Cultural Properties, Sacred Sites, Tribal Cultural Resources, resource collecting areas, or any other areas of concern of which you would wish us to be aware. If you have any questions or concerns regarding the proposed Project, please contact me at the address or phone number listed below, or via email at Shelby@redtailenvironmental.com. We appreciate any input you may have on this project.
October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Edwin Romero  
Chairperson  
Barona Group of the Capitan Grande  
1095 Barona Road, Lakeside, CA, 92040  
619-443-6612  
cloyd@barona-nsn.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Romero,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Gwendolyn Parada
Chairperson
La Posta Band of Diegueno Mission Indians
8 Crestwood Road, Boulevard, CA, 91905
619-478-2113
LP13boots@aol.com

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Parada,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area.

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. John Christman  
Chairperson  
Viejas Band of Kumeyaay Indians  
1 Viejas Grade Road, Alpine, CA, 91901  
619-445-3810

Re:  Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Christman,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Javaughn Miller  
Tribal Administrator  
La Posta Band of Diegueno Mission Indians  
8 Crestwood Road, Boulevard, CA, 91905  
619-478-2113  
jmiller@lptribe.net

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Miller,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
Legend

- Study Area
- 7.5' USGS Quads

El Centro

Map showing El Centro with study area highlighted.
October 15, 2020

Ms. Lisa Cumper
Tribal Historic Preservation Officer
Jamul Indian Village
PO Box 612, Jamul, CA, 91935
619-669-4855
lcumper@jiv-nsn.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Cumper,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Michael Garcia  
Vice Chairperson  
Ewiaapaayp Tribe of Kumeyaay Indians  
4054 Willows Road, Alpine, CA, 91901  
619-445-6315  
michaelg@leaningrock.net

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Garcia,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Michael Linton  
Chairperson  
Mesa Grande Band of Diegueno Mission Indians  
PO Box 270, Santa Ysabel, CA, 92070  
760-782-3818  
mesagrandeband@msn.com

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Linton,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

[Signature]

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Jill McCormick  
Historic Preservation Officer  
Quechan Tribe of the Fort Yuma Reservation  
PO Box 1889, Yuma, AZ, 85366  
760-572-2423  
historicpreservation@quechantribe.com  

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. McCormick,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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Sincerely,

[Signature]

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Ralph Goff  
Chairperson  
Campo Band of Diegueno Mission Indians  
36190 Church Road, Suite 1, Campo, CA, 91906  
619-478-9046  
rgoff@campo-nsn.gov

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Goff,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Ms. Rebecca Osuna  
Chairperson  
Inaja-Cosmit Band of Indians  
2005 S. Escondido Blvd., Escondido, CA, 92025  
760-737-7628

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Ms. Osuna,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Robert Pinto  
Chairperson  
Ewiaapaayp Tribe of Kumeyaay Indians  
4054 Willows Road, Alpine, CA, 91901  
619-445-6315  
wmicklin@leaningrock.net

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Pinto,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
October 15, 2020

Mr. Virgil Perez  
Chairperson  
Iipay Nation of Santa Ysabel  
PO Box 130, Santa Ysabel, CA, 92070  
760-765-0845

Re: Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element, El Centro, Imperial County, California

Dear Mr. Perez,

Red Tail Environmental (Red Tail) is conducting an archaeological study for the Cultural Resources Analysis Study for the City of El Centro’s Land Use and Mobility Element Update Project (project), located within the City of El Centro, Imperial County, California. The proposed project intends to assess the potential impacts to cultural resources, historic resources, and tribal cultural resources within the study area. The project area is shown on the following USGS 7.5’ Quad Maps:

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October 15, 2020
Cultural Resources Analysis Study for the
City of El Centro’s Land Use and Mobility Element Project
Page 2 of 2

Sincerely,

Shelby Castells, M.A., RPA
Director of Archaeology
Attachments: Project Area Maps (1-4)
Legend

- Study Area
- 7.5' USGS Quads

El Centro

[Map details with study area highlighted]
The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed projects and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors, please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

Ray Teran
Viejas Tribal Government
Resource Management Director
619-659-2312
rteran@viejas-nsn.gov
APPENDIX D: CONFIDENTIAL MAPS, CULTURAL RESOURCE LOCATIONS  
(provided separately)