

Appendix B.1

Cultural Resources Memo

August 18, 2015

Ms. Nancy M. Ferguson
Environmental Planning Manager
The Altum Group
73-710 Fred Waring Drive, Suite 219
Palm Desert, CA 92260

RE: Technical Review of the Cultural Resources Assessment Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly City of Colton, San Bernardino County, California in Support of the Medical School Parcels Project in the City of Colton, San Bernardino County, California

Dear Ms. Ferguson:

At the request of The Altum Group, Applied EarthWorks, Inc. (Æ) performed a technical review of the Cultural Resources Assessment Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly City of Colton, San Bernardino County, California prepared by Atkins on January 29, 2013 in support of the Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly Project. This letter serves as a third party review of the recommendations presented by Atkins and was performed in support of the Medical School Parcels Project (Project) in the City of Colton, San Bernardino County, California. Herein Æ provides concurrence with the existing recommendations for archaeological resource management of the Project area as outlined in the Cultural Resources Assessment Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly City of Colton, San Bernardino County, California. Æ also provides recommendations for built-environment resource management as the Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly Project did not entail physical impacts (horizontal or vertical) to the area in question; therefore, indirect impacts to built-environment resources were not analyzed.

According to the Project's approved Mitigation Monitoring and Reporting Program, specifically mitigation measures CR-1 and CR-2, a site-specific records search and a Phase I cultural resource study, including an archaeological resource survey as well as a built-environment resource survey, must be completed by a qualified cultural resource professional prior to initiating any ground-disturbing activity. The aforementioned cultural resource assessment serves as compliance with mitigation measures CR-1 and part of CR-2 as the proposed medical school parcels were included in the assessment for the Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly Project. The records search conducted by Atkins in 2012 indicated that no previously recorded cultural resources are located within the proposed medical school parcels. In addition, Atkins performed a Phase I pedestrian survey which served to verify that there are no cultural resources located within the proposed medical school parcels. Æ confirms that the Phase I pedestrian survey was conducted in a systematic manner using a block-transect technique, with 15-meter spacing and photographs and notes taken to document existing conditions. The lead Atkins archaeologist for the Habitat Conservation Plan for the Federally



Endangered Delhi Sands Flower-Loving Fly Project, Ms. Jennifer M. Sanka, meets the Secretary of the Interior's Professional Qualifications Standard for Archaeology and is, therefore, considered a qualified cultural resource professional.

As stated above, the cultural resource assessment conducted for the Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly Project did not involve any impacts to the Project area. As such, the assessment only identified and characterized the cultural resources located within the Project property boundaries. The cultural assessment did not analyze indirect impacts to potential built-environment resources that are located adjacent to the Project area. Mitigation measure CR-2 stipulates that impacts (direct or indirect) to built-environment resources shall be assessed and evaluated by a cultural resource professional who minimally meets the Secretary of the Interior's Professional Qualifications Standard for Architectural History.

At this time, no further archaeological resource management of the Project area is recommended. Additional survey and research efforts for archaeological resources may be required if the Project is revised to include areas that were not originally investigated by Atkins in the 2013 cultural assessment in support of the Habitat Conservation Plan for the Federally Endangered Delhi Sands Flower-Loving Fly Project.

In order to fully comply with mitigation measure CR-2, AECOM recommends that the parcels adjacent to the Project area (with a minimum buffer of one parcel) be assessed for built-environment resources. If any buildings or structures are identified that are 45 years or older, AECOM recommends that those resources be evaluated for significance and indirect impacts to those resources should be assessed by a qualified architectural historian (who minimally meets the Secretary of the Interior's Professional Qualifications Standard for Architectural History) to determine if the Project will affect the historic setting of the resources.

It is a pleasure assisting you with this project. If you have any questions, please do not hesitate to contact me at rthomas@appliedearthworks.com or (626) 578-0119.

Sincerely,

Roberta Thomas
Associate Archaeologist
Applied EarthWorks, Inc.