

## Attachment L



**To:** City of Redlands Historic and Scenic Preservation Commission

**From:** BCR Consulting LLC, David Brunzell and Kara Brunzell

**Date:** November 5, 2020

**Subject:** Second Supplemental Memo to Cultural Resources Assessment and Historical Resources Evaluation 301 West Palm Avenue, City of Redlands, San Bernardino County, California

BCR Consulting LLC (BCR Consulting) is presenting this Second Supplemental Memo to *Cultural Resources Assessment and Historical Resources Evaluation 301 West Palm Avenue, City of Redlands, San Bernardino County, California* (the CRA) dated July 16, 2020. The CRA was prepared by Secretary of the Interior Qualified Cultural Resources Professionals and was peer reviewed by professionals holding the same credentials. The CRA has recommended that the proposed residential project is consistent with Secretary of the Interior Standards for Rehabilitation because the resulting alterations are moderate enough to allow the subject property to retain integrity. Since the proposed residential project does not produce a substantial adverse change under CEQA Guidelines Section 15064.5(b), *mitigation* of its effects is not required. Based on discussion with Diversified Pacific the following avoidance, minimization, and compensation/enhancement measures to help minimize impacts are feasible (i.e. capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors).

### **Archaeological Matters**

Systematic archaeological test excavations have not been proposed because sensitivity for intact buried remains appears to be low, particularly in areas that would be subject to ground disturbance. As indicated in the CRA, the entire property was “water leveled” so that water could be distributed by the gravity-flow irrigation system. The leveling of the property for irrigation is evident by an elevation difference of about five feet visible between the subject property and the property to the east. This confers low sensitivity for intact buried remains that predate development of the subject property (i.e. prehistoric archaeological resources or historic-period resources from a previous use). Surface visibility at the project site was high (approximately 75 percent) during the archaeological survey and no soil discolorations, surface artifacts, foundations, footings, or depressions were observed to indicate potential for buried resources. Rural properties developed in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries often used privies which, when abandoned, were filled with garbage. These pits can contain information suitable for archaeological analysis. Privies are less common on affluent agricultural properties that lacked worker housing, such as the subject property.

Such properties tended to use septic systems as early as the 19<sup>th</sup> century, although research was not conclusive on this topic. Privies (outhouses) were not visible in available aerial photos from as early as 1938. In any event, privies would not have been placed in areas subject to surface irrigation. It is also unlikely that significant refuse concentrations

would be deposited in such areas, particularly on a small agricultural property owned and occupied by affluent persons. Since all project-related ground disturbance is proposed in areas that have been subject to regular irrigation containing mature orange trees, it is unlikely that project activities would disturb any such resources.

Finally, most of the gravity irrigation system is above the ground and it would be adequately documented during HALS efforts. Although a small portion of the system is buried (evidenced by two small standpipes), systematic excavation is not likely to yield any important data related to this feature. Since sensitivity for significant buried resources is low in areas proposed for project-related ground disturbance, we do not believe that test excavations on the portion of the site where the residential project will be developed are necessary. And since preservation is preferable to destructive excavation and data collection under CEQA, we do not believe that test excavation is necessary on the remaining portion of the site that will not be subject to project-related ground disturbance.

Although the likelihood for significant intact buried remains is low within proposed impact areas, it is always possible that project-related excavation could reveal significant buried remains. Therefore, it is acceptable to allow archaeological monitoring for project-related ground disturbing activities. The archaeological monitor would work under the supervision of a Cultural Resource Professional that meets the U.S. Secretary of the Interior Professional Qualification Standards for Archaeology. In the event of an archaeological discovery, the monitor would have the authority to temporarily divert construction excavation in the vicinity of the find until it can be evaluated for significance.

### **Project Enhancements**

Measures used to reduce or avoid impacts which are not significant are considered avoidance or minimization measures, not mitigation measures. Additional measures which do not address an impact may be considered enhancement measures intended to create a net benefit as compared to an existing condition. During public hearings with the City of Redlands Historic and Scenic Preservation Commission, additional measures have been requested to compensate for reduction of the orange grove, and for removal of the gravity-flow irrigation system. Several enhancement measures are proposed in the letter from Diversified Pacific Communities which accompanies this Memo.

### **Historic American Landscapes Survey (HALS)**

According to the National Park Service, the Historic American Landscapes Survey (HALS) is intended to record historic landscapes using measured drawings and interpretive drawings, written histories, and large-format black and white photographs and color photographs. HALS documentation can be used for scholarly research, interpretation and education, and may provide a basis for preservation easements. The HALS program is federal, and since there is no federal nexus for the current project, this minimization measure proposes a HALS-like document (Level III) in which measured drawings, a written history, and large-format black and white and color photographs of landscape features would be archived at the A.K. Smiley Public Library, the City of Redlands, and a maximum of two additional appropriate repositories to be chosen by members of the Redlands Historic and Scenic Preservation Commission in concert with other local interested parties.

### **Create an Interpretive Center**

The HALS will document the portions of the grove that will be removed. This documentation

will be used to create exhibits describing the former extent of the grove and those exhibits will be included in a kiosk which will serve as an "Interpretive Center". This kiosk like structure will be designed and installed by the applicant near the corner of Palm and Alvarado and be positioned to be viewed by the public.

The design of the kiosk will be approved by City Planning and exhibits will be developed under the guidance of BCR.