CRM TECH
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Colton, CA 92324

MEMORANDUM

Date: May 28, 2025
From: Bai "Tom" Tang, Principal, CRM TECH
To: Heather Roberts, Assistant Project Manager, EPD Solutions, Inc.
Subject: Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California

Dear Ms. Roberts:

As your request, CRM TECH has completed a due-diligence historical/archaeological and paleontological resources study on three segments of public road rights-of-way that have been recently incorporated into the area delineated for the project referenced above. The expansion of the project area was necessitated by additional off-site infrastructure improvements proposed for the project along Terra Cotta Road, Pierce Street, and Collier Avenue, as illustrated in Figures 1 and 2.

The purpose of this study, as an addendum to the historical/archaeological and paleontological resources surveys for the project completed in 2023-2024 (Encarnación and Schmidtling 2024; Tang et al. 2024), is to identify any known "historical resources," as defined by the California Environmental Quality Act (CEQA; PRC §21000, et seq.), or significant, nonrenewable paleontological resources that may be present within the additional project area and thus may be impacted by the expanded project. In addition, the study also seeks to assess the likelihood for as-yet undocumented historical/archaeological or paleontological resources to be encountered in the additional project area. In order to accomplish these objectives, CRM TECH reviewed the results of the historical/archaeological and paleontological resources records searches completed in 2023-2024 for pertinent information and pursued supplemental historical and geological background research on the additional property.

Historical/Archaeological Resources

The results of the historical/archaeological resources records search indicate that, like the original project area, the additional project area was partially included in a number of previous cultural resources studies but has not been surveyed systematically as a whole. The records search results further indicate that additional project area crosses or coincides with Site 33-003832, the former alignment of the Atchison, Topeka, and Santa Fe Railway's Temescal Valley line, along Terra Cotta Road and Collier Avenue. However, as noted during the field survey in 2023, the site is no longer extant in the project vicinity (Tang et al. 2024:15). A close examination of recent satellite photographs confirms that all physical remains of the rail line within or adjacent to the additional project area have been removed by road construction and adjacent real estate development (Google Earth 2023; 2024).

In addition to Site 33-003832, the portion of the additional project area along Collier Avenue lies in close proximity to four other previously recorded historical/archaeological sites, as listed below:

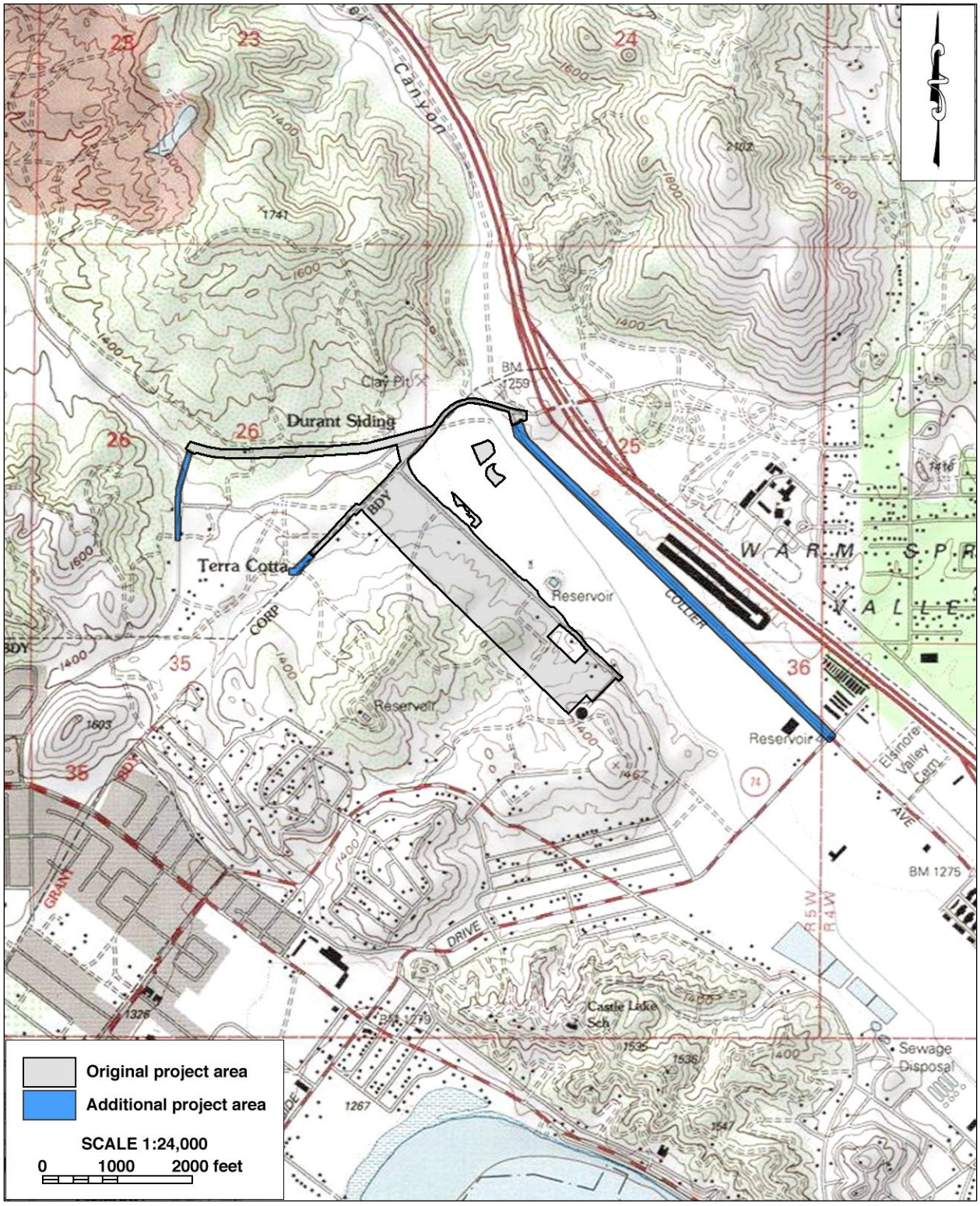


Figure 1. Location of the additional project area in relation to the original. (Based on USGS Alberhill and Lake Elsinore, Calif., 7.5' quadrangles, 1997 edition)

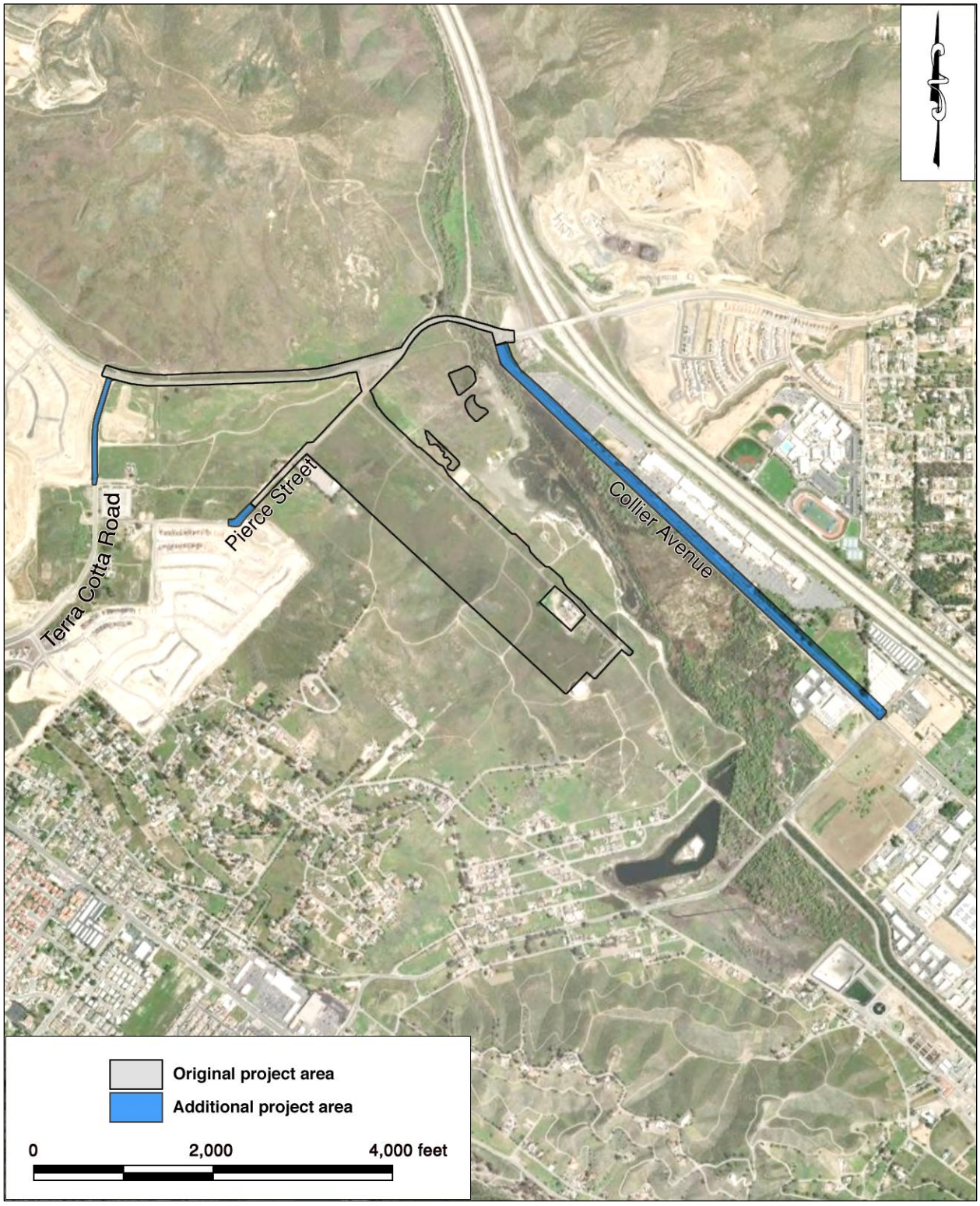


Figure 2. Satellite view of the project area. (Based on Maxar Technologies, Inc., imagery, April 2024)

- 33-004110 (CA-RIV-4110), prehistoric seasonal habitation site;
- 33-007175, adobe farmhouse at 17501 Collier Avenue (ca. 1910);
- 33-017026 (CA-RIV-8865H), structural foundations;
- 33-017027 (CA-RIV-8866H), site of removed building.

Site 33-004110, consisting of a "fairly dense scatter" of groundstone and flaked-stone artifacts, was recorded in 1990 along Collier Avenue, then a narrow dirt road lying slightly to the north of its current alignment at that location (Sturm and Dibble 1990; NETR Online 1985; USGS 1988). The location is now occupied by the Park N Ride parking lot at the Lake Elsinore Outlet Center, and the site presumably no longer exists (Google Earth 2024). The other three sites represented a historic-period building and the former locations of buildings, with 33-007175, recorded in 1981, and Site 33-017027, recorded in 2007, evidently representing the same locality. While the current conditions of these sites are unclear without a field inspection, the proposed project activities at these locations are confined entirely within the public right-of-way and have no potential to substantially alter the conditions of such sites. Therefore, these three sites require no further consideration in connection with the project.

Historical maps and aerial/satellite photographs of the project vicinity demonstrate that the only notable human-made features present within or adjacent to the additional project area during the historic period were the Atchison, Topeka, and Santa Fe Railway and various roads (GLO 1880; USGS 1901-1982; NETR Online 1961-1980). Among the existing roads in the additional project area, Collier Avenue and Terra Cotta Road trace their roots to the late 19th century, while Pierce Street is known to be present at least by the early 1960s (USGS 1901; NETR Online 1961). However, during the historic period Collier Avenue and Terra Cotta Road were both unpaved dirt roads in this area, and the segment of Pierce Street in the additional project area was little more than a foot path (USGS 1901-1982; NETR Online 1961-1980; Sturm and Dibble 1990).

Between 1990 and 1994, Collier Avenue was realigned to its present-day course and upgraded to a four-lane paved road with a median divider (NETR Online 1985; 1994; USGS 1988; 1997; Sturm and Dibble 1990). Terra Cotta Road remained unpaved until it was rebuilt in 2023-2024 in conjunction with a residential development on the adjacent land (Google Earth 2023; 2024). These two roads are essentially modern features in their current configuration. Pierce Street is partially paved today, but the segment in the additional project area remains a nondescript dirt road. As a working component of the modern infrastructure, Pierce Street demonstrates no distinctively historical character, as observed during the field survey in 2023. None of these roads, therefore, constitutes a potential "historical resource" under CEQA provisions.

Paleontological Resources

The paleontological records search conducted by the Western Science Center (WSC) in 2023 for this project yielded no known paleontological localities in or near the additional project area (Stoneburg 2023). The WSC identified the geologic units underlying the additional project area along Terra Cotta Road and Pierce Street as Jurassic marine rocks and those along Collier Avenue as Quaternary alluvium and marine deposits (*ibid.*; see map on Encarnación and Schmidtling 2024:19). Correspondingly, the Riverside County General Plan assigned the additional project area along Terra Cotta Road and Pierce Street a high sensitivity for paleontological resources ("High A," as with the original project area) and the area along Collier Avenue a low sensitivity (RCIT n.d.).

Conclusion and Recommendations

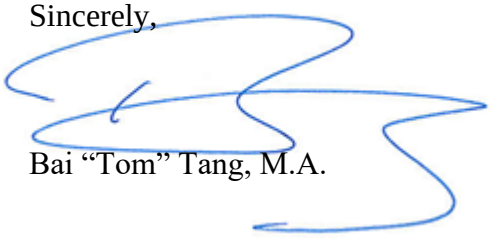
In summary of the research results presented above, no "historical resources" or significant, nonrenewable paleontological resources are known to be present within the additional project area. The extensively disturbed surface soils in the additional project area appear to be low in sensitivity for intact, potentially significant archaeological or paleontological remains. However, beyond the extent of past ground disturbance, the native soils at depth below surface are relatively high in paleontological sensitivity in the Cotta Road and Pierce Street portions of the additional project area.

Based on these findings, CRM TECH considers the conclusions recommended to the City of Lake Elsinore in the 2023-2024 studies to be valid and appropriate for the expanded project area. For "historical resources," CRM TECH reiterates the conclusion of *No Impact*. As stated in the 2023-2024 study (Tang et al. 2004:16-17), no further cultural resources investigation is recommended for this project unless development plans undergo further geographical expansion. If buried cultural materials are discovered during earth-moving operations, however, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

For paleontological resources, the mitigation program recommended in the 2023-2024 study, featuring primarily periodic monitoring upon commencement of earth-moving operations and continuous monitoring upon reaching the depth of three feet or any potentially fossiliferous sediments (see Encarnación and Schmidtling 2024:11 for further details), would also apply to the portions of the additional project area along Cotta Road and Pierce Street. No further paleontological procedures will be necessary at the Collier Avenue location.

Thank you for this opportunity to be of service. If you have any questions or need further information regarding the findings of this study, please feel free to contact me at (909) 824-6400 or ttang@crmtech.us.

Sincerely,



Bai "Tom" Tang, M.A.

References Cited:

Encarnación, Deirdre, and Ron Schmidtling
2024 Paleontological Resources Assessment Report: Baker Industrial Project, City of Lake Elsinore, Riverside County, California. Report prepared for EPD Solutions, Inc., by CRM TECH.

GLO (General Land Office, U.S. Department of the Interior)
1880 Plat Map: Township No. 5 South Range No. 5 West, SBBM; surveyed in 1854-1880.

Google Earth
2023-2024 Satellite photographs of the project vicinity; taken in April 2023 and September 2024. Available through the Google Earth software.

NETR (Nationwide Environmental Title Research) Online
1961-1994 Aerial/satellite photographs of the project vicinity; taken in 1961, 1967, 1978, 1980, 1985, and 1994. http://www.historicaerials.com.
RCIT (Riverside County Information Technology)
n.d. Map My County. https://gis1.countyofriverside.us/Html5Viewer/?viewer=MMC_Public.
Stoneburg, Brittney Elizabeth
2023 Letter of findings, paleontological resources records search for the proposed project. Prepared for CRM TECH by the Western Science Center, Hemet, California.
Sturm, B., and S. Dibble
1990 California Historical Resources Inventory record forms, Site 33-004110 (CA-RIV-4110). On file, South Coastal Information Center, San Diego State University, San Diego, California.
Tang, Bai "Tom," Deirdre Encarnación, Daniel Ballester, and Hunter O'Donnell
2024 Historical/Archaeological Resources Report: Baker Industrial Project, City of Lake Elsinore, Riverside County, California. Report prepared for EPD Solutions, Inc., by CRM TECH.
USGS (United States Geological Survey, U.S. Department of the Interior)
1901 Map: Elsinore, Calif. (30', 1:125,000); surveyed in 1897-1898.
1942 Map: Lake Elsinore, Calif. (15', 1:62,500); aerial photographs taken in 1939.
1953 Map: Elsinore, Calif. (7.5', 1:24,000); aerial photographs taken in 1951.
1973 Map: Elsinore, Calif. (7.5', 1:24,000); 1953 edition photorevised in 1973.
1982 Map: Lake Elsinore (formerly Elsinore), Calif. (7.5', 1:24,000); 1953 edition photorevised in 1980.
1988 Map: Lake Elsinore, Calif. (7.5', 1:24,000); 1953 edition photorevised in 1985.
1997 Map: Lake Elsinore, Calif. (7.5', 1:24,000); 1988 edition revised in 1997.