

November 13, 2019

Mr. Glen L. Powles
Guardian Capital
5780 Fleet Street, Suite 225
Carlsbad, CA 92008

Subject: Cultural/Paleontological Resource Survey Update for the Bedford Canyon Marketplace Project-Bedford Ranch Phase 2B Mass Grading Plan, City of Corona, County of Riverside, California

Dear Mr. Powles:

At the request of Guardian Capital, Duke Cultural Resources Management, LLC (DUKE CRM) has conducted a cultural and paleontological assessment update for the Bedford Canyon Marketplace Project-Bedford Ranch Phase 2B Mass Grading Plan Alternative, located in the City of Corona, Riverside County, California. The purpose of this letter is to address any impacts to cultural and paleontological resources for the updated Bedford Canyon Marketplace Phase 2B Mass Grading Plan Alternative.

The Bedford Ranch Phase 2B Mass Grading Plan Alternative (Project Alternative) exists entirely within the original Arantine Hills Specific Plan (AHSP) limits (Figure 1). DUKE CRM conducted a cultural and paleontological resources study for the Bedford Canyon Marketplace Project in August 2019 (Duke et al. 2019) and LSA conducted a cultural resources assessment (Duke 2010) for the original AHSP in 2010 as well conducted archaeological (Tonley et al. 2018) and paleontological monitoring (Reiboldt 2018) during ground disturbances for the AHSP.

The primary difference in the Project Alternative from the original Bedford Canyon Marketplace Project is an increase in vertical impacts to potential cultural and paleontological resources. As stated in the original Bedford Canyon Marketplace Project description (Duke et al. 2019), the majority of the Bedford Canyon Marketplace Project area (west of the Bedford Canyon wash) is at a lower elevation than the adjacent portion of the AHSP and requires the import of approximately 440,000 cubic yards of dirt. The Project Alternative proposes to export sediments and fill material from the Phase 2B Mass Grading area (depicted in blue-Figure 1), located east of the Bedford Canyon Wash (Wash), directly west across the Wash to utilize in elevating the 17.7 acres located within the Bedford Canyon Marketplace Project area (depicted in green-Figure1). Project proponents include:

1. Phase 2B area was previously graded and a new existing pad elevation established.
2. Phase 2B area was over-excavated approximately 5 to 7 feet below the current pad elevation. That dirt was removed, blended, replaced, and compacted to 90%.
3. Therefore, the area previously disturbed extends 5 to 7 feet below the existing pad grade.
4. This area was monitored for archaeology, paleontology and Native American cultural resources.
5. The Project Alternative proposes to lower Phase 2B area approximately 13 feet. This will require the over excavation of 5 to 7 feet below the new pad elevation.

6. Therefore, of the 13 feet of removal, 5 to 7 feet has already been disturbed. The remaining 6 feet of over-excavation would disturb native material.
7. Archaeological and paleontological monitoring would be required for work within native material.

The original grading for the AHSP (depicted in yellow – Figure 1) included the removal of five to seven feet of sediments. The sediments were removed, blended, replaced, and compacted. The updated Project Alternative proposes to lower Phase 2B area 13 feet and export the fill and sediments west of the Wash into the Bedford Canyon Marketplace Project area (depicted in green-Figure 1).

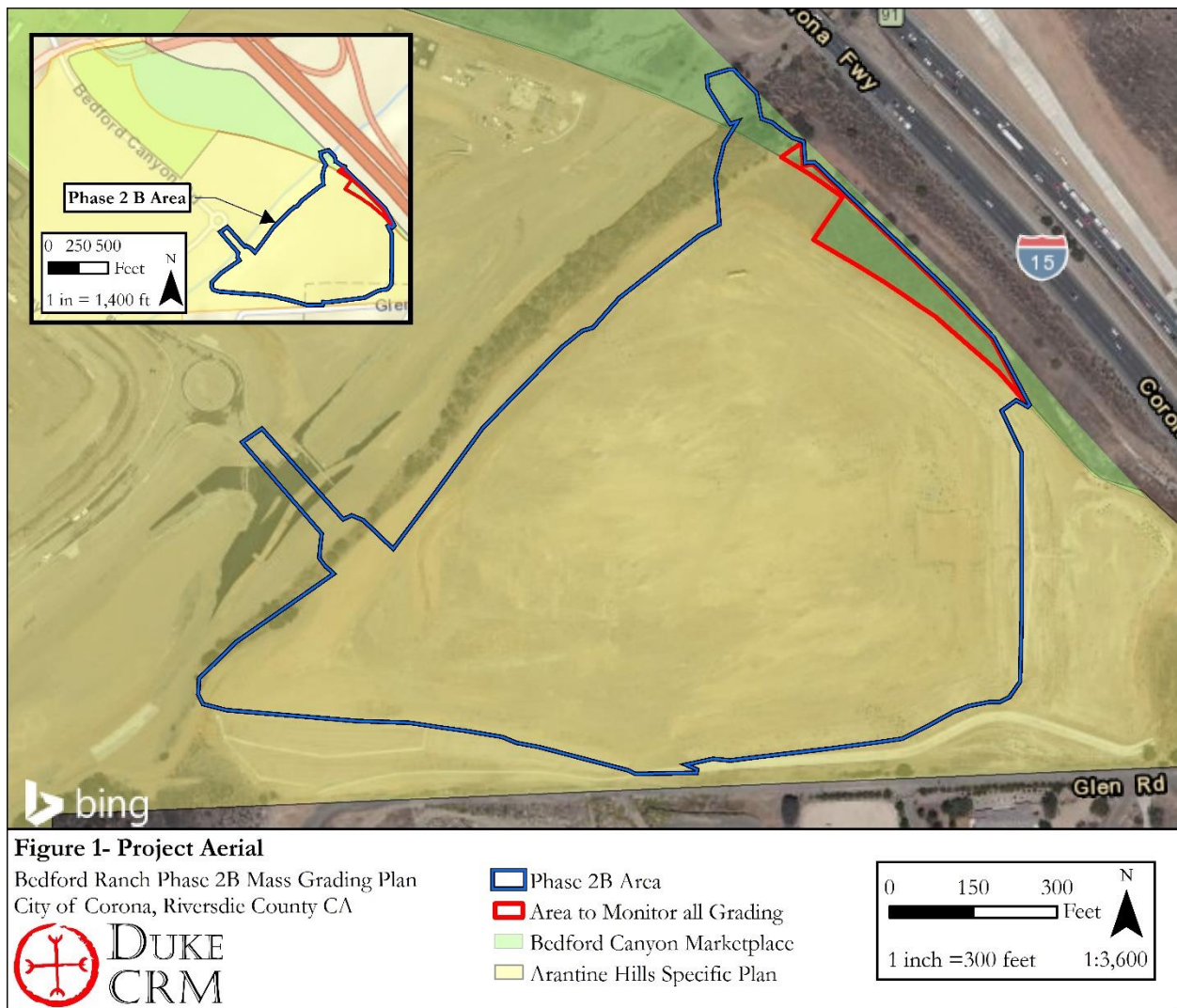


Figure1. Bedford Ranch Phase 2B Mass Grading Plan

CONCLUSION AND RECOMMENDATIONS

The majority of the Bedford Ranch Phase 2B Mass Grading Plan Alternative has been previously graded to a depth of five to seven feet. It is recommended that no archaeological or paleontological monitoring is required within the previously graded and recompactified fill area.

However, archaeological paleontological monitoring is recommended for native sediments, which is assumed to be at a depth of five-seven feet below the present ground surface in Phase 2B area as well as for all ground disturbances in the northeastern portion of the Project Alternative (depicted in red-Figure 1). Archaeological and paleontological monitoring recommendations for the Project Alternative shall be the same mitigation measures outlined in the Cultural and Paleontological Resources Assessment, Bedford Canyon Marketplace Report (Duke et al. 2019). If the proposed Project Alternative changes, additional survey efforts may be necessary.

If you have any questions or comments, you can contact me at (949) 303-0420 or by e-mail at curt@dukecrm.com.

Sincerely,

DUKE CULTURAL RESOURCES MANAGEMENT, LLC



Curt Duke, M.A., RPA
President/Principal Archaeologist

REFERENCES CITED

Duke, C., M. Wilson and B. Scherzer

2019 Cultural and Paleontological Resources Assessment, Bedford Canyon Marketplace, (Arantine Hills Specific Plan Amendment No. 3) City of Corona, Riverside County, California. On File at DUKE CRM, Irvine, California

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Rieboldt, Sarah

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Tonley, Joshua, Ivan Strudwick, and Sandy Duarte

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