Appendix H

Non-Confidential Cultural Resources Assessment

NON-CONFIDENTIAL Cultural Resources Assessment (Revised – 2026)

Bonanza Peak Energy Project

PREPARED FOR
Bonanza Peak Solar, LLC

DATE
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NON-CONFIDENTIAL Cultural Resources Assessment (Revised – 2026)

Bonanza Peak Energy Project

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
ARMR	Archaeological Resource Management Reports
BP	Before Present
CAL BP	Calibrated years before the present
CARIDAP	California Archaeological Resource Identification and Data Acquisition Program
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
cm	centimeter
cmbs	centimeters below surface
CRHR	California Register of Historical Resources
CRMTP	Cultural Resources Monitoring and Treatment Plan
Developed Area	An approximately 2,400-acre area that includes Project will be the BESS, a substation, photovoltaic, etc.
DPR	Department of Parks and Recreation
ERM	Environmental Resources Management, Inc.
ESA	Environmentally Sensitive Area
ft	feet
gen-tie	generation tie-in
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HALS	Historic American Landscape Survey
ICC	Inyo County Code
kV	kilovolt
m	meter
mi	mile
MLD	Most Likely Descendant
MM	Mitigation Measure

Acronym	Description
N/A	Not Applicable
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
OSNHT	Old Spanish National Historic Trail
PEIR	Program Environmental Impact Report
PRC	Public Resources Code
Project	Bonanza Peak Energy Project
Project Study Area	2,727.3-acre, privately owned and undeveloped desert scrubland, located within southeastern Inyo County, California approximately 1 mile north of Charleston View
PV	photovoltaic
REGPA	Renewable Energy General Plan Amendment
REP	Renewable Energy Permit
RPA	Register of Professional Archaeologists
SB	Senate Bill
SHRC	State Historical Resources Commission
SLF	Sacred Land File
SEDA	Solar Energy Development Area
SSC	Surface Scrape
SSJVIC	Southern San Joaquin Valley Information Center
STP	Shovel Test Probe
USGS	United States Geological Survey
UTM	Universal Transverse Mercator

EXECUTIVE SUMMARY

Bonanza Peak Solar, LLC, a subsidiary of Hanwha Energy USA Holdings Corp. (Applicant) proposes to develop the Bonanza Peak Energy Project, a utility-scale solar photovoltaic (PV) energy generation facility in southeastern Inyo County, California. The Project will develop up to 2,400 acres within a 3,382-acre Project Area and includes PV arrays, a substation, and associated infrastructure. A 230-kilovolt generation tie-in (gen-tie) line will connect the facility to the Trout Canyon Substation in Nevada. The Project Study Area, totaling approximately 2,727.3 acres, encompasses the Developed Area, a buffer zone, gen-tie corridor, and a previously proposed access road corridor. The current access route will instead utilize the Old Spanish Trail Highway (known as Tecopa Road in Nevada) as well as a 0.25-mile (mi) section of the existing Zircon Street, an existing north-south trending unpaved road with a minimum width of 40 feet. Gravel will be placed on Zircon St. The generation tie-line corridor continues into Nevada to the northeast; however, the Study Area and analysis presented in this revised Cultural Resources Assessment are limited to the portion of the Project located within California.

Environmental Resources Management (ERM) conducted a Phase I Cultural Resources Assessment to identify cultural resources within the Project Study Area and assess potential impacts. ERM's initial investigation completed in 2025 included background research, a review of California Historical Resources Information System (CHRIS) records obtained from the Southern San Joaquin Valley Information Center (SSJVIC), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), and intensive pedestrian surveys conducted between 4 to 12 March 2025 and 1 to 4 April 2025. The findings were documented in a draft report and submitted to Inyo County for review on 12 December 2025.

Following revisions to the Project footprint, ERM conducted supplemental cultural resources investigations in 2026, including an additional desktop analysis, pedestrian survey of an expanded segment of the gen-tie corridor, and targeted Extended Phase I Archaeological Testing. This revised Cultural Resources Assessment supersedes the previous draft report and incorporates the detailed results from the 2025 and 2026 investigations, to support compliance with the California Environmental Quality Act (CEQA) and applicable federal, state, and local regulations. It features a revised Project Description, supplemental background research and desktop analysis, field results, as well as updated resource evaluations and eligibility recommendations for listing in the National Register of Historic Places (NRHP) or in the California Register of Historical Resources (CRHR). The mitigation measures have also been revised and are now following those presented in the Inyo County Renewable Energy General Plan Amendment (REGPA) Program Environmental Impact Report (PEIR; Inyo County 2015) and the Initial Study/Addendum (Inyo County & HELIX 2026).

Archaeological testing utilized a combination of 62 shovel test probes (STPs) and surface scrapes (SSCs), largely following the procedures outlined in the California Archaeological Resource Identification and Data Acquisition Program (CARIDAP), as most recorded sites consist of low-density lithic scatters (Jackson et al. 1988). This approach allowed a streamlined framework for assessing site significance while providing sufficient information to support eligibility determinations. The Extended Phase I efforts confirmed that cultural materials within these sites

are largely restricted to surface contexts. While a limited number of artifacts were recovered from subsurface contexts, their isolated occurrences were not indicative of intact subsurface deposits or more intensive use of the localities. Based on a comprehensive analysis of the available field data, ERM proposes that none of the 25 sites are recommended eligible for listing in the NRHP or in the CRHR. ERM also concurs with prior recommendations for four previously recorded linear resources, which were recommended not eligible for listing in the NRHP or the CRHR.

Given the overall geomorphic context of the Project Area, characterized by a dynamic depositional landscape with extensive alluvial and eolian processes, there is moderate potential of encountering buried cultural resources in areas that were not subject to archaeological testing. Therefore, archaeological monitoring of ground-disturbing activities is proposed. In the event of an unanticipated discovery, work will be halted until an archaeologist, which meets the required qualifications described in Mitigation Measure (MM) CUL-1a, can evaluate the find. If human remains are encountered during Project-related activities, they will be treated in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code (PRC) Section 5097.98.

With the implementation of the proposed MM CUL-1-1g, ERM concludes that the Project would result in a less than significant impact to cultural resources under CEQA.

This report has been prepared in accordance with the California Office of Historic Preservation's (OHP's) *Archaeological Resource Management Reports: Recommended Contents and Format* (ARMR 1990). In addition to this report, ERM has prepared an Archaeological Testing Plan and a (confidential) Cultural Resources Monitoring and Treatment Plan (CRMTP), which will be included as appendices to the final report.

CONFIDENTIALITY AND DATA DISCLOSURE COMPLIANCE

This report includes a set of confidential appendices that contain, when provided, sensitive cultural resources information regarding the location, character, and significance of archaeological sites, historic properties, and Tribal Cultural Resources (TCRs). To ensure the protection of these resources, this documentation has been prepared in two versions:

- Confidential Version: Includes all technical appendices and sensitive spatial data. Access is strictly limited to authorized personnel with a need-to-know for use solely in environmental review and project planning.
- Non-Confidential Version: The same technical appendices are listed for cross-reference but are intentionally left blank and contain no sensitive data.

In all cases, disclosure, reproduction, or public distribution of sensitive information is prohibited and subject to applicable confidentiality requirements. Disclosure is restricted under the following authorities:

- California State Law: Information is withheld pursuant to the California Public Records Act (CPRA) exemptions for archaeological site data and reports (Gov. Code §§ 7927.000), and Native American graves, cemeteries, sacred places, and related places/features/objects (Gov. Code §§ 7927.705). Confidentiality for TCRs is maintained in accordance with AB 52 (PRC § 21082.3(c) and related provisions). Gov. Code § 7927.705 provides a general CPRA exemption for records otherwise protected by law.
- Federal Law: Where federal jurisdiction applies, information is withheld under NHPA Section 304 (54 U.S.C. § 307103) and ARPA Section 9 (16 U.S.C. § 470hh), which authorize agencies to restrict information on the location, character/ownership, and nature/location of historic properties and archaeological resources. Withholding is implemented under the Freedom of Information Act (FOIA) – applicable exemptions, and is reflected in the Section 106 (36 CFR § 800.11(c)) and ARPA regulations (36 CFR § 296.18).
- Data derived from the California Historical Resources Information System (CHRIS) is subject to the CHRIS Information Access and Use Agreement, the Information Practices Act of 1977 (Civil Code § 1798 et seq.), and Government Code § 7920.000 et seq., and may not be redistributed to unauthorized parties.

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1. INTRODUCTION

1.1 PROJECT DESCRIPTION

The Project is located in an unincorporated area within the Charleston View Solar Energy Development Area (SEDA) in southeastern Inyo County, adjacent to the Nevada state line (Figure 1). The solar generation facility, including the PV arrays, substation, and other electrical equipment, would be within a 3,382-acre Project Area with a Developed Area of no greater than 2,400 acres (Figure 2), as dictated by the REGPA PEIR (Inyo County 2015). The Project has a planned net generating capacity of up to 500 megawatts alternating current.

The PV electrical generation facility includes installation of fencing, PV modules, single axis tracker racking, inverters, electrical distribution equipment, overhead and underground power lines, substation, interconnection switchyard, Operation and Maintenance facilities, and an overhead transmission line racking system. While the generation tie-in (gen-tie) line corridor will continue into Nevada to the northeast, only the portion of the Project within California is considered within this scope.

The Developed Area is largely comprised of undeveloped desert scrubland with existing unpaved access roads and scattered disturbance from prior land use. No residential or commercial development occurs within the Developed Area, with the closest community, Charleston View, located approximately 1 mi south.

Construction is anticipated to begin as early as January 2027. The Project may be built in one or more phases within an approximately 18-month construction period. In addition to the permanent infrastructure, temporary disturbance will occur in areas designated for equipment staging, laydown yards, and construction access. A previously proposed access corridor was identified during initial planning; however, the current access route will instead utilize the Old Spanish Trail Highway (known as Tecopa Road in Nevada) as well as a 0.25-mi section of Zircon Street, an existing north-south trending unpaved road with a minimum width of 40 feet. Gravel will be placed on Zircon St. Foundations for major infrastructure, such as PV modules and trackers, will consist of driven piles or slab foundations, which will minimize the need for mass grading.

A 230-kilovolt gen-tie line, approximately 9 miles in length, will run eastward from the onsite substation in Inyo County, California, to the Trout Canyon Substation in Clark County, Nevada. About 0.5 mi of the gen-tie corridor will be located in Inyo County, California, within the Gen-tie Corridor shown on Figure 2, while the remaining segment will cross public lands managed by the Bureau of Land Management in Nye and Clark Counties, Nevada. The transmission structures will range in height from approximately 120 to 170 feet. The transmission line corridor is designed to follow a previously disturbed utility route where feasible, and gen-tie access would primarily use existing roads.

The 2,727.3-acre Project Study Area covered in the Phase I Cultural Resources Assessment was surveyed in full and encompasses the entire 2,400-acre Developed Area, a 200-foot buffer zone following along the northern and eastern boundary of the Developed Area, the gen-tie corridor, and the previously proposed access road corridor (Wiseman and Morales 2025). The survey area is shown on Figure 3. Given that the Project is within a valley that has historically remained

undeveloped, a substantial portion of the Study Area is still in a semi-natural state. All planned ground disturbance will occur on previously undeveloped land.

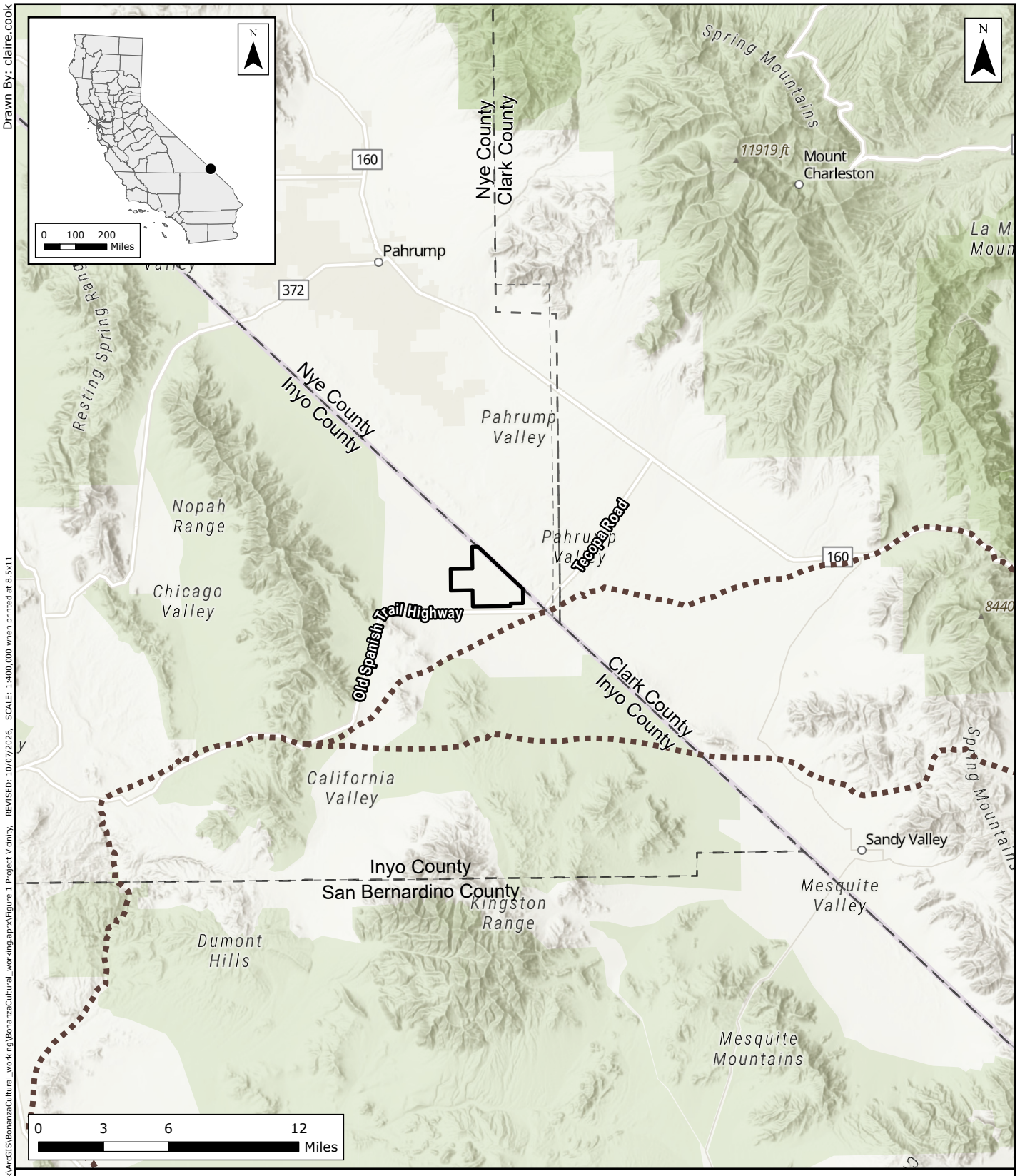
1.2 PROJECT LOCATION AND ZONING

The Project is located on privately owned land within the Charleston View SEDA in southeastern Inyo County, California. The Project lies north of Old Spanish Trail Highway, adjacent to the California-Nevada border, approximately 1 mi north of the rural community of Charleston View, California (Figure 1). The Project includes portions of Township 22 North, Range 10 East, Sections 8, 9, 15, 16, 17, 20, 21, 22, 23, 26, 27, and 28, as depicted on the Tecopa and Calvada Springs United States Geological Survey (USGS) 7.5-minute topographic quadrangles (Figure 2).

The Project is located within the unincorporated jurisdiction of Inyo County and is currently zoned OS-40 (Open Space, minimum parcel size 40 acres), a zoning designation under which commercial renewable energy development is an allowable use. The surrounding area consists primarily of undeveloped desert lands and intermittent utility infrastructure. The closest incorporated city is Las Vegas, Nevada, located approximately 57 mi east of the Project. Other nearby communities include Tecopa, California (26 mi west), Pahrump, Nevada (25 mi north), and Mountain Springs, Nevada (25 mi east).

1.3 PROJECT TEAM

Environmental Resources Management, Inc. (ERM) Principal Technical Consultant, Archaeology, Maria Wiseman, M.A., Registered Professional Archaeologist (RPA), oversaw the Phase I Cultural Resources Assessment, co-authored and reviewed the report, and provided quality assurance/quality control. ERM Managing Technical Consultant, Archaeology, Anthony H. Morales, M.A., RPA, led the field effort and co-authored the report. Both Maria Wiseman and Anthony H. Morales meet the Secretary of the Interior’s Professional Qualification Standards in Archaeology.



Drawn By: claire.cook

V:\US\Projects\A-C\174 Power Global\Bonanza Peak\ArcGIS\BonanzaCultural_working\BonanzaCultural_working.aprx\Figure 1 Project Vicinity, REVISED: 10/07/2026, SCALE: 1:400,000 when printed at 8.5x11

Legend

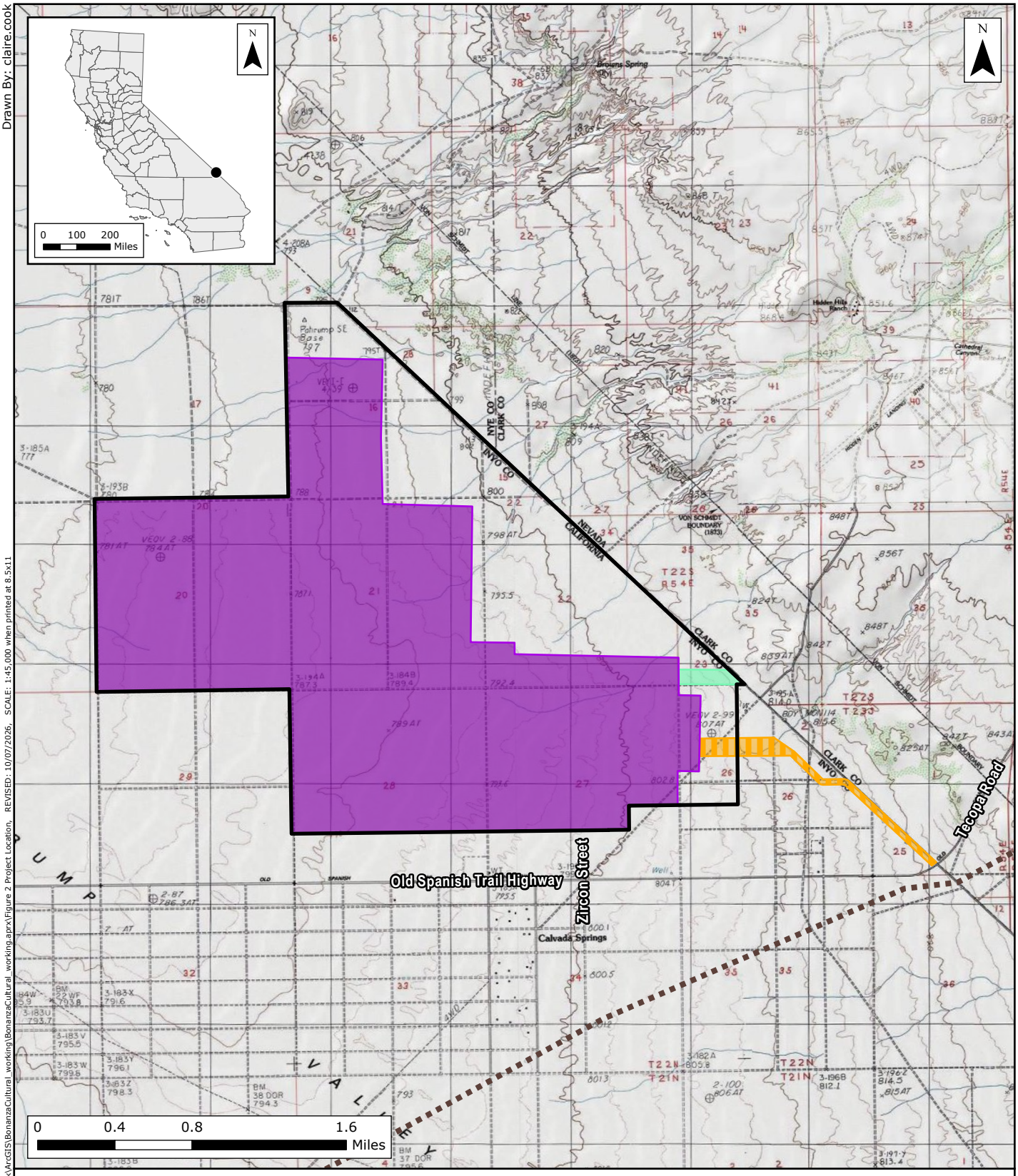
- OSNHT
- Project Area

Figure 1
Project Vicinity

Bonanza Peak Energy Project

ERM

Source: Esri - World Topographic Map; NAD 1983 2011 UTM Zone 11N



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V:\US\Projects\A-C\174 Power Global\Bonanza Peak\ArcGIS\BonanzaCultural_working\BonanzaCultural_working.aprx\Figure 2 Project Location, REVISED: 10/07/2026, SCALE: 1:45,000 when printed at 8.5x11

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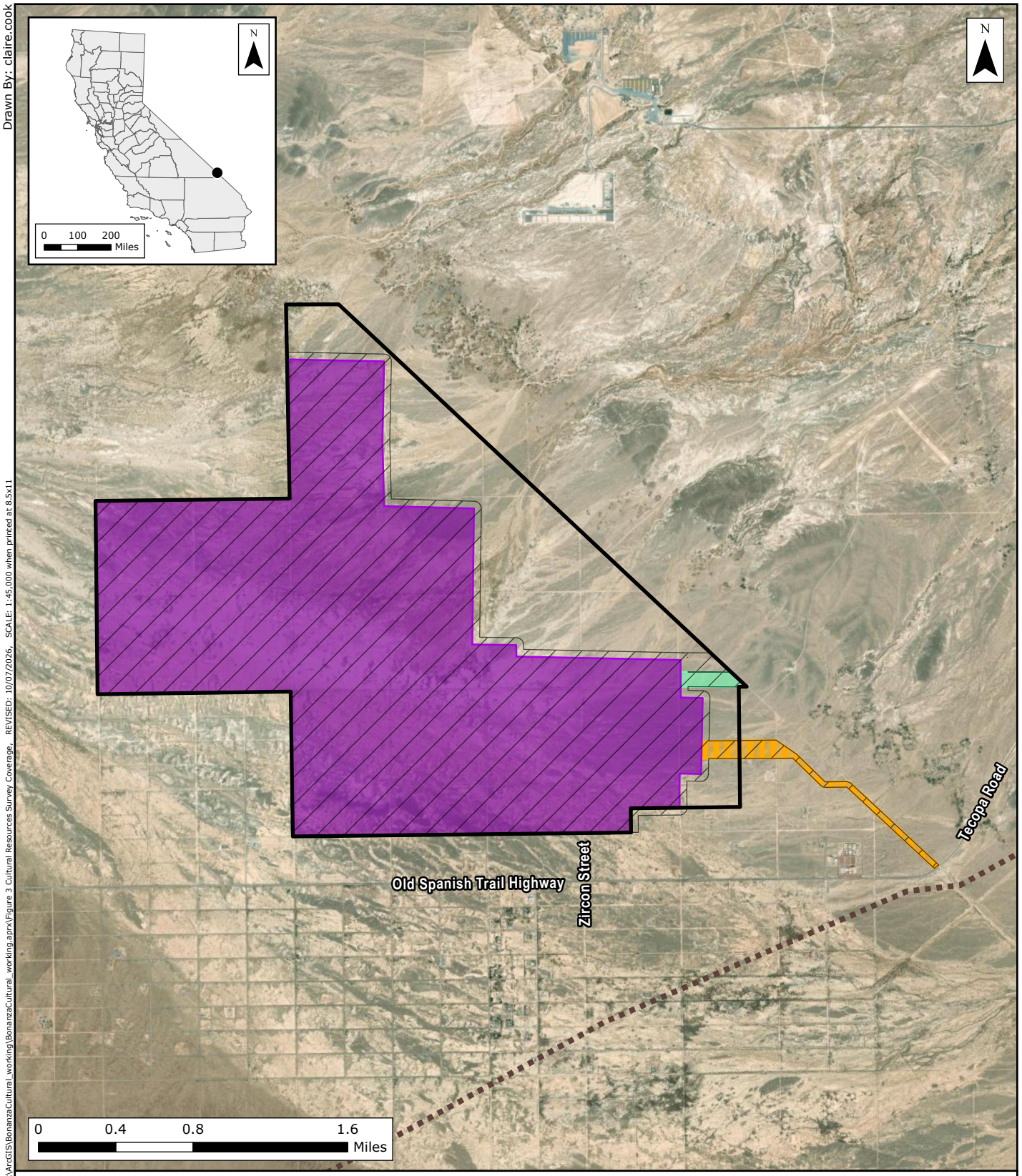
- OSNHT
- Previously Proposed Access Road Corridor
- Gen-tie Corridor
- Developed Area
- Project Area

Figure 2
Project Location

Bonanza Peak Energy Project

ERM

Source: USGS - 24k Quadrangle Series Topographic; NAD 1983 2011 UTM Zone 11N



Legend

- OSNHT
- Previously Proposed Access Road Corridor
- Gen-tie Corridor
- Developed Area
- Project Area
- Cultural Resources Survey Area

Figure 3
Cultural Resources Survey Coverage

Bonanza Peak Energy Project

ERM

Source: ESRI - World Imagery; Imagery Date: 2022/09/07; NAD 1983 2011 UTM Zone 11N

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V:\US\Projects\A-C\174 Power Global\Bonanza Peak\ArcGIS\BonanzaCultural_working\BonanzaCultural_working.aprx\Figure 3 Cultural Resources Survey Coverage, REVISED: 10/07/2026, SCALE: 1:45,000 when printed at 8.5x11

2. REGULATORY CONTEXT

The regulatory framework that mandates consideration of cultural resources in project planning includes federal, state, and local governments. These resources include prehistoric and historical archaeological sites, districts, and objects, as well as locations of important historical events or sites of traditional and/or cultural importance to various groups. Resources may be determined as significant or potentially significant in terms of national, state, or local criteria, either individually or cumulatively. Resource evaluations are conducted using criteria aligned with the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), as appropriate based on context and compliance requirements of each specific project.

The Project is currently subject to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and CEQA Guidelines (Title 14, California Code of Regulations [CCR], Section 15000 et seq.).

2.1 FEDERAL

2.1.1 NATIONAL HISTORIC PRESERVATION ACT (NHPA)

The NHPA of 1966, The National Historic Preservation Act (NHPA) of 1966, as amended and recodified at Title 54 of the United States Code (U.S.C.), establishes the federal policy for historic preservation in the United States. The NHPA created a comprehensive preservation program administered by the Secretary of the Interior and implemented in coordination with federal, state, Tribal, and local governments. Among other provisions, the NHPA authorizes the National Register of Historic Places (NRHP), establishes the role of the State Historic Preservation Officer (SHPO), provides for Tribal Historic Preservation Officers (THPOs), supports certified local government participation in historic preservation, and establishes the Advisory Council on Historic Preservation (ACHP).

Section 106 of the NHPA requires federal agencies to consider the effects of their undertakings on historic properties, defined as properties listed in or eligible for listing in the NRHP, and to provide the ACHP with a reasonable opportunity to comment. The Section 106 process is implemented through the ACHP's regulations at 36 Code of Federal Regulations (CFR) Part 800.

If a federal permit, approval, funding source, or other federal agency action is identified for the Project in the future, additional federal requirements may apply, including compliance with Section 106 of the NHPA and, as applicable, the Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations for Native American human remains and associated cultural items.

2.1.2 NATIONAL REGISTER OF HISTORIC PLACES (NRHP)

As stated in Title 36 CFR 60.2, the NRHP serves as a key reference for federal, state, and local governments, private groups, and citizens in identifying and protecting the Nation's cultural resources. The NRHP recognizes properties that are significant at the national, state, and local levels. Title 36 CFR 60.4 outlines the criteria for evaluating cultural resources eligible for listing on the NRHP. To qualify, a resource must hold significance 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, workmanship, 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; or
- Criterion B: It is associated with the lives of persons who are significant in our past; or
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

2.1.3 NATIONAL TRAILS SYSTEM ACT

The National Trails System Act (NTSA) (16 U.S.C. §§ 1241–1251) of 1968, as amended, established the National Trails System to provide for recreation opportunities and to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the Nation's open-air outdoor areas and historic resources. The Act includes four categories of trails: National Scenic Trails, National Historic Trails, National Recreation Trails, and connecting or side trails. authorizes several categories of trails, including National Scenic Trails, National Historic Trails, and National Recreation Trails. National Historic Trails are designated by Congress to identify and commemorate historically significant routes and associated resources.

Resources associated with National Historic Trails may include historic trail alignments, high-potential route segments, high-potential historic sites, archaeological resources, cultural landscapes, associated settings, and other features that contribute to a trail's historical significance or interpretive value. On BLM-administered lands, trail management is guided by BLM Manual 6250, BLM Manual 6280, and BLM Technical Reference 6280-1, which address administration, inventory, assessment, planning, management, monitoring, and protection of National Scenic and Historic Trail resources, qualities, values, associated settings, and primary uses. The closest trail to the Project that is part of the National Trails System is the Old Spanish National Historic Trail (OSNHT), shown on Figures 1-3 and located nearly 1.5 miles southeast of the proposed location for the solar PV energy generation facility.

Although the NTSA and BLM guidance provide a federal framework for the management of National Historic Trails, a federal nexus is not currently anticipated for the Project; and therefore, not applicable at this stage of the Project. For CEQA purposes, the presence of a designated National Historic Trail in the broader Project vicinity does not, by itself, constitute a potential

historical resource impact. The potential for impact must be assessed based on whether the Project may cause a substantial adverse change in the significance of a historical resource, consistent with PRC Section 21084.1 and CEQA Guidelines Section 15064.5.

2.2 STATE

2.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA requires an analysis of a proposed project's potential significant effects on cultural resources. This analysis consists of two steps: first, determining whether the proposed project involves cultural resources; and second, if cultural resources are present, the proposed project must be evaluated for any potential "substantial adverse change in the significance" of the resource.

According to CEQA, the definition of a historical resource is a resource listed in, or determined eligible for listing in the California Register of Historical Resources (CRHR); resources included in a local register of historic resources or identified as significant in a historic resources survey meeting the requirements of PRC Section 5024.1(g); or any object, building, structure, site, area, place, record, or manuscript that the lead agency determines to be eligible for national, state, or local landmark listing considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).

CEQA defines unique archaeological resources as an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

- The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.
- The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

2.2.2 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

Under the California PRC, Section 5024.19(a), the CRHR was established in 1992 and implemented in 1998 as an authoritative guide for state and local agencies, private groups, and citizens to identify and protect the state's historical resources from substantial adverse change to the extent prudent and feasible. Properties listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHL) numbered 770 and higher are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, which include sites, buildings, features, or events of local significance (city or county) with anthropological, cultural, military, political, architectural, economic, scientific, technical, religious, experimental, or other value, may be nominated for inclusion in the CRHR. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission (SHRC) are also listed in the California Register. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired.

A resource, whether an individual property or a contributor to a historic district, may be listed in the CRHR if the SHRC determines it meets one or more of the following criteria, modeled on NRHP criteria:

- Criterion 1: Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: Associated with the lives of persons important to California's past.
- Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Criterion 4: Has yielded, or has the potential to yield, information important in prehistory or history.

Generally, a resource is considered "historically significant" if it meets the criteria for listing on the CRHR (CEQA Guidelines Section 15064.5). Integrity refers to the authenticity of a historical resource's physical identity, evidenced by the survival of characteristics from its period of significance. Historical resources eligible for listing in the CRHR must meet one of the significance criteria described above and retain enough of their historical character or appearance to be recognizable as historical resources and convey their significance. Integrity is evaluated based on the retention of location, design, setting, materials, workmanship, feeling, and association, and must be judged with reference to the specific criterion under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

It is possible for historical resources to lack sufficient integrity to meet NRHP criteria but still be eligible for listing in the CRHR. A resource that has lost its historical character or appearance may still have sufficient integrity for the CRHR if it retains the potential to yield significant scientific or historical information or specific data.

2.2.3 SENATE BILL 18

Signed into law in September 2004, Senate Bill 18 (SB 18) requires cities and counties to notify and consult with California Native American Tribes about proposed local land use planning decisions for the purpose of protecting Tribal Cultural Resources. Effective 1 March 2005, cities and counties must provide notice to Tribes identified by the NAHC and conduct consultation prior to the adoption or amendment of a general plan or specific plan, or the designation of land as open space.

SB 18 consultation was conducted as part of Inyo County's implementation of the *REGPA PEIR* (Inyo County 2015). The current Project is being reviewed for consistency with the *REGPA PEIR* and the planning framework established through that process. Accordingly, the Project is being considered within the context of the Tribal consultation previously conducted pursuant to SB 18 during adoption of the REGPA.

2.2.4 ASSEMBLY BILL 52

Effective July 1, 2015, Assembly Bill 52 (AB 52) established a formal consultation process between California Native American Tribes and lead agencies during environmental review conducted pursuant to CEQA. AB 52 was enacted to ensure that Tribal Cultural Resources are protected to the largest extent possible throughout the development process.

The environmental review for the Project consists of an Initial Study and an addendum to the previously certified *REGPA PEIR* (Inyo County 2015). As preparation of an addendum does not require issuance of a new Notice of Preparation, Notice of Negative Declaration, or Notice of Mitigated Negative Declaration, the formal consultation procedures established by AB 52 are not triggered by the current review.

2.3 REGULATIONS CONCERNING DISCOVERY OF HUMAN REMAINS

California Health and Safety Code Sections 7050.5 through 7055 establish procedures for the treatment of human remains discovered outside of a dedicated cemetery. If human remains are discovered during project activities, all ground-disturbing activities in the vicinity of the discovery must cease, and the County Coroner must be notified. No further excavation or disturbance may occur until the Coroner has completed the required evaluation. If the Coroner determines that the remains are Native American, or are believed to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. The Coroner is required to make this determination within two working days of notification.

Pursuant to California Public Resources Code Section 5097.98, upon notification by the Coroner, the NAHC shall identify the Most Likely Descendant (MLD). The MLD may inspect the discovery and provide recommendations regarding the treatment and disposition of the remains and any associated grave goods. The MLD shall complete the inspection and provide recommendations within 48 hours of being granted access to the site. Recommended treatment measures may include nondestructive removal and analysis, preservation in place, relinquishment to the descendants, or other culturally appropriate treatment.

2.4 NON-DISCLOSURE OF DISCOVERIES

2.4.1 CONFIDENTIALITY OF SENSITIVE LOCATIONS

The location of any reburial of Native American human remains or associated cultural items shall remain confidential and is exempt from public disclosure under the California Public Records Act (Government Code § 6254[r]). All Parties, including the Coroner, agency representatives, and additional Project personnel, shall ensure this information is withheld unless otherwise required by law. Disclosure of such locations to unauthorized individuals is strictly prohibited.

2.4.2 HANDLING OF SENSITIVE DATA

- All records, maps, photographs, and notes identifying cultural resources or reburial locations shall be treated as confidential and stored in secure, access-controlled systems.
- Electronic files shall be password-protected, and hard copies shall be kept in locked cabinets accessible only to authorized personnel.

- Sensitive information shall not be included in publicly distributed documents (e.g., environmental reports, press releases) unless required by law and approved by the Lead Agency and Consulting Tribe(s).

2.4.3 COMMUNICATIONS PROTOCOL

- Any communication regarding discoveries, treatment measures, or reburial locations shall occur only between designated representatives of the Lead Agencies, Consulting Tribe(s), and qualified cultural resources professionals.
- No information shall be shared with media, contractors, or third parties without prior written consent from the Lead Agencies and Consulting Tribe(s).

In the event of inadvertent discovery, notifications shall follow the procedures outlined in Health & Safety Code §7050.5 and PRC §5097.98, ensuring timely and confidential coordination with the Coroner and NAHC.

2.5 LOCAL REGULATIONS

2.5.1 INYO COUNTY CODE

The Inyo County Code (ICC) covers the disturbance of archaeological, paleontological, and historical features. In accordance with County regulations (ICC Chapter 9.52), it is prohibited to excavate or investigate any site known to contain Native California Indian burials for archaeological, educational, or artifact-gathering purposes. If archaeological or historical records indicate that a location was once designated as a Native burial area, any proposed development that could impact the site must be reviewed by local Tribal entities. These include, but are not limited to, the Big Pine Paiute Tribe of the Owens Valley, the Bishop Paiute Tribe, the Death Valley Timbisha Shoshone Tribe, the Fort Independence Indian Community of Paiute Indians, the Lone Pine Paiute-Shoshone Tribe, and the Owens Valley Paiute-Shoshone Band. Should a Native burial site be encountered during construction or land modification, the project proponent is required to notify both the County planning commission and the appropriate Tribal representatives. The planning commission will then consider the cultural and scientific significance of the burial site relative to the economic impact on the project and may determine whether to preserve the burial site or allow the project to proceed in a modified location.

2.5.2 INYO COUNTY GENERAL PLAN

Section 8.7, Cultural Resources, of the Conservation/Open Space Element of the Inyo County General Plan recognizes the importance of preserving cultural resources and promoting public awareness and educational efforts related to these resources (Inyo County 2002). In the local context, a “historic resource” is defined as cultures or artifacts that originate from the initial Euro-American contact period (approximately 1834 to the present), while a “prehistoric resource” refers to cultures or artifacts from the era prior to 1834. The term “cultural resources” serves as a label that includes both prehistoric (precontact) and historic resources. The following goals, policies, and implementation measures related to cultural resources are specified in the Conservation/Open Space Element (8.7.4-5):

Goal CUL-1 addresses preservation and promotion of the County's prehistoric and historic cultural heritage through the following policies:

Policy CUL-1.1 Partnerships in Cultural Programs

Encourage and promote private programs and public/private partnership that express the cultural heritage of the area.

Policy CUL-1.2 Interpretive Opportunities

Support and promote the development of interpretive facilities, such as roadside kiosks, museums, and restored historic buildings that highlight the County's cultural resources.

Policy CUL-1.3 Protection of Cultural Resources

Preserve and protect key resources that have contributed to the social, political, and economic history and prehistory of the area, unless overriding circumstances are warranted.

Policy CUL-1.4 Regulatory Compliance

Development and/or demolition proposals shall be reviewed in accordance with the requirements of CEQA and the NHPA.

Policy CUL-1.5 Native American Consultation

The County and private organizations shall work with appropriate Native American groups when potential Native American resources could be affected by development proposals.

3. ENVIRONMENTAL SETTING

The Project is situated within the southern portion of the Basin and Range Geomorphic Province, characterized by a series of angular, approximately parallel, fault-bounded mountain ranges separated by desert basins characteristic of the horst and graben structure (California Geological Survey 2002; Eaton 1982; Norris and Webb 1990; Parsons 2006; Stewart 1980). This horst and graben fault block pattern resulted from crustal extension and faulting caused by subduction of the Farallon Plate and rotation along the San Andreas Fault beginning approximately 30 million years ago in the early Oligocene and continuing to approximately 10 million years ago in the late Miocene (Cohen et al. 2013; Norris and Webb 1990; Parsons 2006). In the Pliocene (approximately 2.58 to 5.33 million years ago), erosion, flash floods, steep mountain slopes, and deep basins were common features of the arid or semiarid Basin and Range Geomorphic Province (Cohen et al. 2013; Norris and Webb 1990). During periods of glaciation in the Pleistocene (with glacial advances estimated from approximately 14,500 to 28,000 in the Western United States), glaciers were likely only present along mountain summits in this province, but climates were cool and dry, with less evaporation than today, resulting in permanent drainages and lakes in basins (Hughes et al. 2013; Norris and Webb 1990). Mountain ranges in the province are flanked by plateaus formed by alluvial fan and axial valley drainage deposits with varying amounts of eolian (windblown sand) deposits (Schmidt and McMackin 2006). Alluvial fans are formed from single-thread channels exiting higher gradient bedrock areas and discharging water and sediment into basins (Schmidt and McMackin 2006). Axial valley drainages are generally located at

topographically lower portions of a valley, flow for longer distances, and deposit sediment from numerous sources (Schmidt and McMackin 2006). Eolian deposits mobilize sediment typically in areas with little to no vegetation and commonly grade into distal portions of alluvial fan deposits as sand sheets with small dunes and vegetation mounds (Schmidt and McMackin 2006). Topographically flattened, fine-grained playa deposits form in areas of groundwater discharge and widespread low-energy flooding (Schmidt and McMackin 2006). The Project lies within the Pahrump Valley, a broad, internally drained basin flanked by the Spring Mountains to the east and the Kingston Range to the west (DWR 2003).

Soils within the Project Area are predominantly classified under the Inyo and Pahrump series. The Inyo series consists of very deep, excessively drained soils formed in alluvial fan deposits, characterized by sandy textures and low water-holding capacity (USDA NRCS 2006a). The Pahrump series comprises very deep, well-drained soils developed in lacustrine sediments, typically found on lake terraces with slopes ranging from 0 to 15 percent (USDA NRCS 2006b). Both soil types exhibit alkaline reactions and are generally non-hydric, supporting sparse desert vegetation.

The Project Area exhibits a relatively flat to gently sloping topography, with elevations ranging from approximately 2,560 to 2,660 ft above mean sea level. The area lacks perennial surface water features but contains ephemeral washes and drainages that convey runoff during infrequent precipitation events. The Pahrump Valley functions as a closed basin, with internal drainage terminating in playas or evaporative basins, and is underlain by the Pahrump Valley Groundwater Basin, which consists of unconsolidated alluvial deposits serving as the primary aquifer system (DWR 2003).

The surficial geology of the Project comprises alluvial fan, axial-channel, eolian, and groundwater deposits deposited through the Pleistocene (11,700 to 2.58 million years ago) and Holocene (present to 11,700 years ago) (Cohen et al. 2013; Schmidt and McMackin 2006). The alternating periods of erosion, deposition, and stability associated with alluvial environments may fragment, arrange, and preserve evidence of human activity as buried resources (Waters 2000). Precontact people who lived in the American Southwest were often concentrated around the arid to semi-arid alluvial environments, which provided freshwater for consumption, water for agriculture, and a biologically diverse environment for hunting and gathering (Waters 2000). Therefore, alluvial deposits within the Project could be conducive to preserving buried cultural resources (Waters 2000).

The climate of the Project Area is arid, characterized by hot summers, mild winters, and low annual precipitation. Average annual temperatures range from lows of approximately 34 degrees Fahrenheit in December to highs around 101 degrees Fahrenheit in July. The region receives an average annual precipitation of approximately 5.11 inches, with the majority occurring between December and March (US Climate Data 2025). The area experiences high evapotranspiration rates, contributing to the aridity and influencing soil moisture regimes and vegetation patterns.

Vegetation within the Project Area is characteristic of the Mojave Desert scrub community. Dominant plant species include creosote bush (*Larrea tridentata*) and white bursage (*Ambrosia dumosa*) in the eastern portions, while the western areas are characterized by shadscale (*Atriplex*

confertifolia) and allscale (*Atriplex polycarpa*) scrub. Some areas exhibit reduced native vegetation cover and are dominated by invasive species such as cheatgrass (*Bromus tectorum*) and saltlover (*Halogeton glomeratus)*. The sparse vegetation cover reflects the arid climate and soil conditions prevalent in the region.

The Project Area is located on private land designated as Open Space (OS-40) by Inyo County, which permits commercial renewable energy development. The surrounding area is predominantly undeveloped desert land, with limited residential development in the nearby community of Charleston View, approximately 1 mile to the south. Existing infrastructure within the Project Area includes unpaved access roads.

4. CULTURAL SETTING

The Project Study Area lies within the Great Basin, a large contiguous area comprised of internally draining watersheds and characterized by basin and range topography (Grayson 2011). The region encompasses Nevada, Utah, and portions of Colorado, Idaho, Oregon, and eastern California (Grayson 2011; d'Azevedo 1978). In addition to its natural definitions, such as hydrographic, botanic, or physiographic boundaries, anthropologists also use the term Great Basin to describe a cultural region, one defined by shared lifeways, subsistence strategies, and material culture traditionally practiced by groups across the region (Grayson 2011).

The chronological framework of the Great Basin is divided into cultural stages characterized by such adaptive strategies (Elston 1986). Precontact archaeological sequences in the western Great Basin consist of the Paleoarchaic period and the Archaic period, which is further divided into three distinct phases: Early Archaic, Middle Archaic, and Late Archaic. More nuanced cultural complexes incorporate region specific models that may focus on specific patterns of change through time, often defined by projectile point types, like those developed for the Mojave Desert region (Bettinger and Taylor 1974; Gardner 2005; Giambastiani et al. 2005; Gilreath and Hildebrandt 1997; Sutton et al. 2007; Sutton 2023; Warren 1984; Warren and Crab Tree 1986). Archaeologists frequently define these periods with reference to geologic time periods, e.g., Late Pleistocene or Middle Holocene and/or with reference to other cultural complexes. The following framework provides a brief overview of the region's prehistory organized using these temporal periods to illustrate broad patterns of change associated with significant changes in the environment.

4.1 PRECONTACT CHRONOLOGY

4.1.1 PLEISTOCENE-HOLOCENE TRANSITION (12,000-10,000 CAL BP)

The Paleoindian period represents the earliest documented human presence in the region, dating to the terminal Pleistocene. In the past, the climate of the Mojave Desert was considerably cooler and wetter, contributing to the proliferation of plants now common in much different settings. The Younger Dryas (ca. 12,900 to 11,600 Before Present [BP]) was an especially cool and moist period that triggered the transgression of many of the pluvial lake basins in the Great Basin. This environment supported vegetation that is drastically different from that of today, with pinyon-juniper woodland existing at lower elevations throughout much of the Mojave Desert (Grayson

2011). Data from packrat middens and sediment samples suggest that these woodlands were present until approximately 11,500 years ago (Grayson 2011; Wigand and Rhode 2002). These conditions contributed to the expansion of mesic environments that were exploited by Paleoindian foragers (Jones and Beck 2014).

Paleoindian period sites in the Mojave Desert are commonly found in open-air settings, lacking associated subsurface deposits and limiting potential information regarding the depositional context of early sites throughout the region. Due to differential preservation, it is common for these sites to consist exclusively of lithic assemblages which limit organic materials suitable for radiocarbon analysis and dietary information. Source identification and obsidian hydration dating have allowed archaeologists to obtain valuable chronometric data and study diachronic trends in Paleoindian mobility and lithic technological organization. Obsidian source studies have been used to identify patterns of mobility, one example being the reconstruction of foraging territories for Paleoindian groups using the lithic conveyance zone concept (Jones et al. 2003). Archaeologists have been able to gauge the scale and extent of ranges of resource procurement using the movement of lithic materials across the Great Basin, discerning various aspects of Paleoindian mobility, and revealing trends in settlement subsistence strategies (Jones et al. 2003; Jones et al. 2012).

Paleoindian assemblages in the Great Basin suggest that early foragers adopted a settlement-subsistence strategy consisting of a high degree of residential mobility and short-term occupations, with sites often located around wetland environments (Elston et al. 2014; Elston and Zeanah 2002; Jones et al. 2003). These rich environments supported a greater diversity and density of both plants and fauna, making them highly attractive to early foragers. Additional studies have proposed that settlement patterns may have also been more varied, becoming increasingly sedentary in regions that supported an abundance of resources (Duke and Young 2007; Madsen 2007).

Lithic assemblages dating to the Pleistocene-Holocene Transition have been interpreted as having a strong hunting focus as they frequently contain tools specifically designed for the pursuit and processing of large game (Elston et al. 2014; Jones and Beck 2014). Diagnostic markers dating to this period include Clovis points, Great Basin Concave Base points, Western Stemmed points, crescents, and turtleback scrapers. Clovis or fluted points are typically found as isolated artifacts, and sites dating to the Pleistocene-Holocene transition are rare. In the Mojave Desert, a small number of such sites have been identified along the margins of pluvial Lake China (Basgall 2007a, 2007b; Giambastiani and Bullard 2007) and the Owens River paleochannel (Morales 2021; Morrato et al. 2018). While such lithic assemblages are suggestive of hunting activities, some researchers have described archaeological correlates in the Paleoindian lithic record that may represent the processing of wetland resources as well, potentially indicating a wider diet breadth and emphasizing the role of carbohydrate rich plants such as geophytes in a Paleoindian diet (McGuire and Stevens 2017).

4.1.2 EARLY HOLOCENE (10,000-8,000 CAL BP)

Building on the sparse record of Paleoindian occupation, the earliest well-documented archaeological pattern of the early Holocene in the Mojave Desert is the Lake Mojave pattern,

which dates to approximately 10,000 to 8000 BP (Amsden 1937; Campbell et al. 1937; Sutton 2023). While Great Basin stemmed series points (GBSS)—Lake Mohave and Silver Lake types—serve as primary diagnostic markers of this period, fluted points are occasionally found in early Holocene contexts in the Mojave Desert, indicating a degree of temporal and technological overlap. Materials associated with the Lake Mojave pattern have been reported at a number of sites across the Mojave Desert, including Lake Mojave, Fort Irwin (Basgall 1993; Hall 1993; Jenkins 1987; Warren 1991), Twentynine Palms (Basgall and Giambastiani 2000), Rosamond Lake (Basgall and Overly 2004), and China Lake (Basgall 2003, 2007a, 2007b; Gilreath and Hildebrandt 1997; Rosenthal et al. 2001). Assemblages from this period continue to reflect a highly mobile settlement pattern characterized by short-term occupations; however, subtle shifts in mobility, lithic technology, and settlement-subsistence strategies begin to emerge in the archaeological record during this time. The onset of early Holocene aridity resulted in the disappearance of wetlands and the desiccation of many terminal Pleistocene lakes, dramatically altering the resource base of foragers and causing a shift in subsistence strategies (Madsen 2007).

Archaeologists interpret the Early Holocene as a period of gradual transition, marked by expanded foraging territories, shifts in technology, and the exploitation of a broader range of ecological zones (Basgall and Hall 1991; Sutton 2023). One key development during this time is the emergence of ground stone implements in the archaeological record. While ground stone becomes broadly represented across the Great Basin by approximately 8500 BP (Jones and Beck 2014), earlier occurrences have been documented at Lake Mohave period sites in the Mojave Desert (Basgall 1993). The increased appearance of ground stone in the archaeological record is seen to correspond with a shift in the resource base marked by dietary broadening and an increased reliance on plant resources with a heightened processing cost. Archaeologists have proposed that the earliest examples of ground stone in the Great Basin may be indicative of the environmental stressors that pressured early foragers into adopting an altered mode of subsistence strategies (Elston et al. 2014). The punctuated nature of early ground stone artifacts is thought to reflect the gradual adoption of this technology prior to its widespread integration into Great Basin lifeways.

4.1.3 MIDDLE HOLOCENE (8,000-4,000 CAL BP)

During the Middle Holocene, aridification intensified across the Mojave Desert, culminating in the widespread desiccation of lakes, followed by the retreat of streams and springs (Sutton 2023). This ongoing environmental shift further reduced an already diminishing and once-reliable resource base. In response, foraging ranges became more concentrated and dietary breadth expanded, as reflected in the increased exploitation of resources in both desert and upland zones. The growing presence of milling infrastructure during this period also supports this shift, as ground stone implements became more common, indicating the intensification of plant processing and the continued transformation of Great Basin lifeways.

The Pinto series point complex serves as the primary diagnostic marker of this period and exhibits both temporal and technological overlap with the earlier Lake Mojave and Silver Lake traditions. As with preceding complexes, the co-occurrence of Pinto and Lake Mojave/Silver Lake points over an extended period suggests a gradual cultural and technological transition rather than a sharp break. Pinto assemblages are similar in composition to those of the Lake Mojave pattern,

containing projectile points, bifaces, flake tools, and ground stone—though generally in greater quantities. Materials associated with the Pinto complex have been reported at numerous sites across the Mojave Desert, including the Stahl site (Harrington 1957) and Ayers Rock (Rogers and Yohe 2014; Whitley et al. 2005) in Rose Valley, as well as sites farther south near Fort Irwin and Twentynine Palms (Basgall and Giambastiani 2000) and nearby at Ash Meadows (Hunt and Hunt 1964). These sites often indicate low residential stability and increased resource diversification, reflecting continued adaptation to a progressively arid landscape. Some archaeologists have suggested that much of the Mojave Desert was largely abandoned by about 5,000 BP, with populations shifting toward more sustainable ecological zones along its margins (Sutton et al. 2007).

4.1.4 LATE HOLOCENE (4,000-200 CAL BP)

The Late Holocene is marked by the reoccupation of the Mojave Desert and the continued exploitation of diverse landscapes across the region. The Gypsum complex (ca. 4,000 to 1,750 BP) includes Elko and Gypsum series dart points, diagnostic artifacts dating to early in this period, which reflect continued use of atlatl-based technologies. The increased focus on marginal resources fostered a more sedentary lifeway and an increased reliance on logistical planning as evidenced by toolkits emphasizing transportability. Settlement patterns during this time were increasingly characterized by high residential mobility and the use of base camps. Habitation sites dating to the late Holocene are often found near reliable sources of water with ancillary sites associated with long-distance logistical forays. Foragers likely utilized a division of labor to facilitate lower-level resource procurement (e.g., plant resources with higher processing costs), with hunters conducting long-distance forays for artiodactyl or tool stone procurement while other members of the group remained at camp to collect and process local plant resources such as mesquite, pinyon, and other small-seed taxa.

Over time, dart points were gradually replaced by Rosegate series projectile points (such as Rose Spring and Eastgate types), signaling the adoption of bow-and-arrow technology around 1,500 BP. This complex is referred to as the Saratoga Springs Complex (ca. 1,750 to 800 BP), named after its type site in southern Death Valley (Wallace and Taylor 1959). During this time, subtle regional variations in artifact types became more pronounced and newer technologies were introduced, potentially through external cultural influences as regional groups had increased contact with groups along the Southern California coast, neighboring mountain ranges, and the Southwest. The presence of exotic goods such as Olivella shell beads and the appearance of Puebloan-influenced ceramics in the archaeological record suggest participation in wider regional exchange networks.

The latter part of this period is associated with the appearance of Desert Series points and possibly the expansion of Numic-speaking groups into the Mojave Desert, contributing to evolving lifeways and land-use practices across the region. Sutton (2023) identifies this transition in the northern portion of the far eastern Mojave as the Las Vegas Phase (ca. 1,000 to 200 BP), associated with the establishment of lifeways that persisted into the ethnographic period. This phase is characterized by the appearance of Desert Series projectile points (Desert Side-notched and Cottonwood types), an increased reliance on milling equipment, and a material culture that includes brownware pottery, obsidian and shell beads, ceramic figurines, and distinctive new forms

of rock art, including geoglyphs (Sutton 2023). Settlement patterns during this time emphasize proximity to reliable water sources such as springs, with sites frequently located near plant-rich environments including mesquite stands or at higher elevations where pinyon resources were accessible. Subsistence strategies focused on a broad resource base that included seeds, mesquite, pinyon, small mammals, and, occasionally, larger game. Collectively, these traits reflect a well-established cultural system that corresponds with ethnographically documented practices of Numic-speaking groups in the region, such as the Southern Paiute and Chemehuevi.

4.2 ETHNOGRAPHIC CONTEXT

4.2.1 SOUTHERN PAIUTE

The Southern Paiute or Nuwuvi, are the traditional inhabitants of the region encompassing Pahrump Valley, the greater Las Vegas area, and portions of southeastern California. The Chemehuevi, considered the southmost extension of the Southern Paiute, are closely related and considered a distinct group due to external influences that shaped their material cultural and lifeways. Ethnographic studies suggest that the Chemehuevi represent a more recent offshoot of the Las Vegas band of Southern Paiutes, migrating southward prior to European contact (Kelly 1934). The delineation of specific Southern Paiute bands in this portion of the Mojave Desert has historically been inconsistent, especially in transitional zones such as the Pahrump Valley where the confluence of different groups is noted in the ethnographic record. This area lies at the intersection of several documented territories, including those traditionally attributed to the Western Shoshone to the north and northwest, the Las Vegas Band to the east and the Chemehuevi to the south (Kelly 1934; Kelly and Fowler 1986; Steward 1938; Sutton 2023). Despite this distinction, ethnographic sources describe patterns of shared land use, with neighboring groups inviting one another to gather resources in their respective territories when seasonal yields fluctuated (Steward 1938).

While some sources also reference a locally distinct Pahrump Band (Steward 1938: 182) this designation is inconsistently applied in early ethnographies and is often subsumed under the broader classification of the Las Vegas Band (Chmara-Huff 2006; Hebner 2010; Kelly 1934; Kelly and Fowler 1986). Despite the inconsistency of formal recognition in ethnographic literature, archaeological evidence and regional land-use patterns indicate that Pahrump Valley was persistently occupied and managed by Southern Paiute populations throughout the late prehistoric and early historic periods. The Pahrump Band of Southern Paiutes traditionally occupied lands west of the Spring Mountain Range, including the Pahrump Valley below and the surrounding uplands (Chmara-Huff 2006; Steward 1938). For the purposes of this overview, the term Southern Paiute is used to reflect both the local presence and broader cultural affiliations of Indigenous groups who inhabited and utilized this region.

Linguistically, the Southern Paiute belong to the Numic branch of the Uto-Aztecan language family, which includes neighboring groups such as the Western Shoshone and Ute as well (Kelly and Fowler 1986). Subsistence strategies were structured around a seasonal round that included hunting, gathering, and small-scale horticulture. Notably, native agriculture was a trait the Las Vegas Band and Chemehuevi adopted from the Mohave amongst other elements of their culture

(Kelly and Fowler 1986). The Spring Mountains served as an important ecozone, offering reliable access to staple foods such as pinyon nuts and wild game. While large game like deer were hunted, smaller game such as rabbits, birds, and chuckwalla made up a more consistent part of the diet. Overall, hunting played a relatively minor role in Southern Paiute subsistence compared to gathering (Kelly and Fowler 1986; Steward 1938). Ethnographic studies indicate the adoption of a gendered division of labor in which men conducted specialized hunting trips for artiodactyls while women and other members of the group remained at camp to collect and process local plant resources such as mesquite, pinyon, and other small-seed taxa (Kelly and Fowler 1986; Kroeber 1925; Steward 1938). Extra pine nuts and other excess foods were commonly stored in caches or buried in a suitable area to preserve them for a later date. To the northwest, Ash Meadows offered mesquite, screwbean, and, most critically, access to water. Similarly, the Amargosa River to the west provided another dependable water source and, along with the Spring Mountain Range, held spiritual significance for the Southern Paiute. Pahrump Valley itself supported productive ecological niches, particularly with its stands of honey mesquite (*Neltuma glandulosa),* which grows both as isolated trees and in more concentrated woodlands within badlands containing heightened water tables.

Southern Paiute material culture was also marked by high craftsmanship, particularly in basketry (Kelly and Fowler 1986). Unlike many Native Californian groups, who primarily used juncus, the Southern Paiute favored willow and devil's claw as their principal materials (Trafzer 2015). Women employed the coiling technique to produce tightly woven baskets of various forms, including bowls, jars, winnowing trays, beaters, and carrying baskets, among others. Although baskets were used more frequently, the Southern Paiute also adopted the use of ceramics, another influence from the Mohave, making a wide array of wares including cooking pots, spoons, and water jars (Kelly and Fowler 1986; d'Azevedo and Sturtevant 1978). The integration of weaving and ceramic technologies culminated in a diverse toolkit with functional vessels suited to a multitude of needs.

Today, the Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony is a federally recognized Tribe whose 4,000-acre reservation, Snow Mountain, is located northwest of Las Vegas. Despite being closely related, the Pahrump Paiute Tribe, located in Pahrump, Nevada, does not hold federal recognition. However, the group is acknowledged by the State of California as an established Tribal entity. Both Tribes maintain deep ancestral connections to the broader Mojave Desert region, with places such as the Spring Mountains and Ash Meadows holding long-standing cultural and spiritual significance. The Pahrump Paiute Tribe has taken active steps to reinforce cultural traditions, including the transmission of oral histories, traditional ecological knowledge, and language preservation (Hebner 2010). Together, they continue to maintain their ancestral ties to the region through efforts to safeguard cultural resources and strengthen community identity, all in pursuit of federal recognition (Chmara-Huff 2006; Hebner 2010)

4.3 HISTORIC ERA OVERVIEW

In California, the historic era is generally divided into three periods: the Spanish or Mission period (1769 to 1821), the Mexican or Rancho period (1821 to 1848), and the American period (1848 to

present). This framework has been expanded here to include an earlier Exploration Period (1542 to 1769) to provide context on the foundation for later colonization of California by the Spanish.

4.3.1 EXPLORATION PERIOD (1542-1769)

Generally, the historic period begins with the first documented European presence within a specific region. Due to European contact being established in various parts of California by different groups at different times, most chronological frameworks mark the end of the precontact period for all of California as 1542. It was in this year that the first documented Europeans entered the territory, when Juan Rodríguez Cabrillo explored the California coast by ship, entering San Diego Bay and claiming Alta California for Spain.

Exploration continued with increased economic interest in the territory after Andrés de Urdaneta's discovery of a suitable transpacific trade route between Mexico and the Philippines (Weber 2009). Such a route influenced the establishment of additional settlements that could support these endeavors and 62 years after Cabrillo, Sebastián Vizcaíno was tasked with exploring and charting much of the coastline that Cabrillo originally documented, renaming many of his placenames and culminating in the recommendation of establishing a Spanish settlement at Monterey Bay (Weber 2009). Further exploration and documentation of California's interior, especially the arid interior of the Mojave Desert, did not take off until the 1700s.

4.3.2 SPANISH PERIOD (1769-1821)

The historic period in California began with the establishment of the mission-presidio system, the first of which was the Presidio Reál de San Diego and the Mission San Diego de Alcalá, founded in 1769 by Gaspar de Portolá and Junípero Serra, respectively. The same year, Don Gaspar de Portolá lead the first systematic exploration of Alta California in search for suitable mission sites. The 1770s saw many expeditions travel across coastal and inland areas of California in pursuit of expansion. These religious pursuits were often supplemented with the establishment of strategic military outposts to defend against Russian expansion and Indigenous unrest (Weber 2009). The establishment of missions and increased reconnaissance of California spurred on the development of Spanish settlement in the territory, leading to increased contact and tension with Indigenous groups. These changes greatly disrupted Indigenous lifeways. Many Indigenous peoples were forcibly relocated to established missions, where communities were fragmented and individuals were subjected to forced labor and compelled to abandon traditional religious and cultural practices. Along with the introduction of disease, these changes contributed to the disruption of traditional knowledge and the decimation of Indigenous populations. Despite this, many groups evaded and actively resisted Spanish control to safeguard and preserve their cultural identities.

Due to its harsh environment and lack of economic incentives, the Mojave Desert remained largely peripheral to Spanish expansion efforts, primarily functioning as a transit corridor with the establishment of a connection between settlements in Sonora and growing settlements in Alta California. The discovery of viable overland routes between established settlements was a priority of Spanish expansion, aimed at facilitating the development and missionization of the territory. Spanish explorers launched multiple efforts to chart viable inland routes during this period. Juan Bautista de Anza led two expeditions in 1774 and 1775 that skirted the southern margin of the

Mojave, seeking to establish an overland route between Sonora and Monterey. His success, culminating in the establishment of a settlement in San Francisco Bay, confirmed the feasibility of sustained overland travel into Alta California. In 1776, Father Francisco Garcés crossed the Mojave Desert from the Colorado River to Mission San Gabriel, relying heavily on Indigenous guides and long-established native trail systems (Garcés 1900). The route that Garcés followed, later known as the Mojave Trail, had long been used by Mojave groups for travel between the Colorado River and the coast in both precontact and historic times. Such explorations laid the foundation for later colonization of California by the Spanish, spurred on by strategic, religious, and economic incentives. Although development of the Mojave was largely deterred due to the harsh environment and the lack of these incentives, the region would serve as a valuable strategic interface between coastal California and the interior Southwest during the subsequent Mexican Period.

4.3.3 MEXICAN PERIOD (1822-1848)

Mexico became independent of Spain in 1821, gaining control of the region between Texas and California. The Decree of Secularization, passed in 1833, effectively ended the Mission period, and transferred ownership of Mission lands to the Mexican government. Accompanying regulations guiding the implementation of secularization were passed the following year. The subsequent rancho system that emerged was marked by the proliferation of cattle ranching throughout the territory, as the Mexican governor, Pío Pico, granted vast tracts of land to well-off Mexican (and some American) settlers. In an effort to establish stability over Alta California, viable forms of trade and travel between settlements remained a priority.

The Old Spanish Trail was formally established in 1829 by Antonio Armijo when he crossed the Mojave Desert and completed the first successful trade caravan from Santa Fe to Los Angeles. As an amalgam of Indigenous trails and early Spanish exploration routes, the Old Spanish Trail would become the favored route into California, facilitating trade, emigration, and communication between coastal settlements and the Southwest. By the 1840s the trail had become well established, drawing interest from American explorers. In 1844, John C. Frémont traveled along portions of the Old Spanish Trail under the direction of the US Corps of Topographical Engineers to map the American West. Frémont documented his expedition and published his account in 1845, popularizing the trail and promoting American awareness of the region. Notably, Frémont describes his travels across Pahrump Valley and one of his camps at the nearby Stump Spring (Frémont 1845). His journey through the Mojave Desert served both scientific and strategic purposes, producing detailed maps and observations that underscored the utility of the corridor.

Use of the transportation corridor through the Mojave Desert led to increased overland traffic, bringing sustained contact between travelers and the region’s Indigenous peoples. This influx of activity foreshadowed the rapid social, political, and economic changes that would soon reshape large swaths of the American West. Despite these fluctuating tensions, the Mojave Desert remained largely inhabited by Indigenous groups throughout the Mexican Period. The region’s harsh environment and limited water sources continued to discourage widespread settlement, dynamics that would set the stage for the subsequent period.

4.3.4 AMERICAN PERIOD (1848-PRESENT)

Following the conclusion of the Mexican American War and the signing of the Treaty of Guadalupe Hidalgo, the United States acquired California in 1848. The Mojave Desert continued to serve as an important corridor facilitating American expansion into the West. A portion of the Old Spanish Trail passes through the south of Pahrump Valley, providing access to multiple springs for potential stopovers on route to southern Nevada or inland California. The discovery of Gold in California in 1848 increased traffic on the route, serving the 49ers along with the many emigrants, freight wagons, and mail carriers that made their way westward.

The 1850s and 60s brought about an increased emphasis on developing reliable transportation infrastructure across the desert. The establishment of the Mojave Road, which was built over the former Mojave Trail, drew more attention to the region as it facilitated the transfer of supplies between Southern California and Arizona. Further development of overland routes throughout the region lead to increased contact and tension with Indigenous groups, culminating in multiple violent incidents (NPS 2023). Increased military presence on the road sought to remedy the conflict and Fort Mohave was established in 1859 to provide protection for travelers crossing the Mojave Desert. Additional way stations were also established along the road in addition to a small army camp at Camp Cady, east of present-day Barstow. The Mojave Road was largely abandoned after the completion of the Southern Pacific Railroad (NPS 2023). By the late 19th century, railroad expansion supplanted overland travel as the predominant source of settlement and economic growth across the Mojave Desert. Regional rail lines such as the Las Vegas and Tonopah Railroad (LV&T) and the Tonopah & Tidewater Railroad connected rising boomtowns across the American West, fueled by the riches of valuable minerals including gold, silver, salt, and borax (McCracken 1990). Pahrump Valley remained peripheral to many of these developments, owing to its lack of major mineral discoveries during the initial wave of western prospecting. Unlike surrounding areas such as Tecopa, Tonopah, Rhyolite, or Goldfield, which experienced episodic mining activity, Pahrump did not see the rapid influx of population or infrastructure associated with mining booms (McCracken 1990). The valley truly remained one of the most isolated areas in the region, lacking a paved road until 1953, electricity until 1963, and a railroad altogether (McCracken 1990).

Despite its relative isolation and lack of mineral wealth, access to reliable water sources made Pahrump Valley suitable for agriculture and ranching. By the late 1870s, multiple ranches had been established in the area, including Manse Ranch and Pahrump Ranch, which relied on waters from Manse Spring and Pahrump Springs, respectively, to support the limited cultivation of crops and the raising of livestock. Over time, the valley’s agrarian economy diversified, with ranchers producing livestock feed, fruits and vegetables, dairy, and cotton. These agricultural products helped support nearby mining communities, although they could not compete with the larger and more established agricultural industries of Southern California.

Beginning in the 1940s and 1950s, transportation improvements, most notably the construction and extension of State Route 160, began to reduce the valley’s isolation, integrating it with the nearby Las Vegas metropolitan area. The valley’s established agricultural industry, combined with its proximity to Las Vegas, made it increasingly attractive for residential development. By the 1980s, modern infrastructure had begun to replace many of the older ranching operations, and

the community of Pahrump emerged as a low-density exurban extension of the Las Vegas region. Despite this growth, much of the Pahrump Valley remains undeveloped, preserving large areas of open desert that retains the character of the past. These preserved areas continue to reflect the patterns of movement and land use once associated with historic-era travel corridors and early exploration routes, as well the Indigenous landscape they ultimately displaced.

5. METHODS

5.1 BACKGROUND RESEARCH

On 26 December 2024, ERM requested a confidential CHRIS records search from the SSJVIC to identify previously documented cultural resources and cultural resource studies within a 0.5-mile radius of the nearly 3,400-acre Project Area. A supplemental request for a CHRIS records search was submitted to the SSJVIC on 11 February 2025, to encompass the 32.6-acre portion of the previously proposed access road corridor that extended beyond the Project Area, connecting the Project to Old Spanish Trail Highway (see Confidential Appendix A).

The background research also involved a comprehensive review of the NRHP, the CRHR, the California Points of Historical Interest list, the CHL list, and the California Historical Resources list. In addition, ERM analyzed historical aerial imagery in conjunction with historical USGS 7.5-minute quadrangle maps for Mound Spring, Calvada Springs, Stump Spring, as well as 15-minute quadrangle maps for Pahrump and Horse Thief Springs. This review included documenting modifications to the topographical setting and identifying distinguishable natural or artificial features that could potentially indicate the presence of cultural resources.

5.2 NATIVE AMERICAN HERITAGE COMMISSION CONSULTATION

Consistent with the consultation framework established during preparation of the *REGPA PEIR* (Inyo County 2015), Inyo County conducted Tribal outreach in accordance with SB 18 to provide culturally affiliated Tribes an opportunity to identify concerns and provide information relevant to the Project. On 27 August 2024, Inyo County initiated Tribal consultation by mailing letters offering an opportunity to consult on proposed renewable energy projects county-wide to one or more representatives of the following Tribes:

- Big Pine Paiute Tribe of the Owens Valley
- Bishop Paiute Tribe
- Cabazon Band of the Mission Indians
- Fort Independence Indian Community of Paiutes
- Kern Valley Indian Community
- Lone Pine Paiute-Shoshone Tribe
- Timbisha Shoshone Tribe
- Torez Martinez Desert Cahuila Indians
- Twenty-Nine Palms Band of Mission Indians

Twenty-Nine Palms Band of Mission Indians was identified as culturally affiliated and contacted in regard to this Project.

On 26 December 2024, ERM submitted a supplemental SLF request to the NAHC via email. The request commenced a search for known Native American resources and the contact information of Native American groups or individuals with cultural affiliation to the 3,382-acre Project Area and the 32.6-acre portion of the previously proposed access road corridor that extended beyond the Project Area (see Confidential Appendix B).

5.3 FIELD SURVEY METHODS

5.3.1 INTENSIVE PEDESTRIAN SURVEY

The methodology for fieldwork is determined by the specific types and characteristics of the resources common to the geographical region. The scope of the Phase I survey efforts included identifying and documenting cultural resources within the Project Study Area that exceed 45 years in age. Modern land surface conditions, the landform context, and existing geomorphic data within all areas with planned disturbance were assessed for the potential of subsurface cultural deposits.

An intensive pedestrian survey of the Project Study Area was conducted in three separate field sessions under the direction of ERM archaeologist, Anthony H. Morales, M.A., RPA. The first field session occurred from 4 to 12 March 2025, the second field session from 1 to 4 April 2025, and the third from 2 to 4 February 2026. The survey methodology consisted of transect intervals spaced no greater than 15 meters apart, with no portion of the Project Study Area excluded from pedestrian investigations. The third field session was conducted to assess a supplemental area north of the Gen-tie Corridor in support of additional project planning. Considerations were made regarding depositional context and the extent of modern disturbances, providing an integrated evaluation of the potential for subsurface preservation. A survey of the 0.25-mile stretch of Zircon Street, which will have gravel placed upon it, is not required as all proposed ground disturbance will be within the established road (Inyo County 2025b).

Cultural resources were documented with iPads using the ArcGIS Field Maps application connected to a Juniper Geode Global Navigation Satellite System (GNSS) receiver, providing sub-meter accuracy for recordation. The Universal Transverse Mercator (UTM) location of artifacts, features, and isolated resources were documented as single points. Archaeological sites were recorded in more detail, incorporating individual points as well as the site boundaries and intra-site concentrations or features as needed. Detailed photographs of cultural materials and overviews of sites were documented using a digital camera with iPad photographs serving as a supplementary backup. Standardized paper forms supplemented the collection of these data. ERM archaeologists did not collect any artifacts.

6. RESULTS

6.1 BACKGROUND RESEARCH AND RECORDS SEARCH RESULTS

On 21 January and 17 February 2025, ERM received the confidential CHRIS records search results from the SSJVIC. The search identified four previously conducted cultural resource studies within

a 0.5-mile radius of both the 3,382-acre Project Area and the previously proposed access road corridor, three of which intersect the 2,727.3-acre the Study Area (see Table 1). Six previously recorded resources were also identified within the same radius, five of which are located within the Study Area (see Table 2). All previously recorded resources within the Study Area are found within the 2,400-acre Developed Area and not located within the gen-tie corridor or the previously proposed access road corridor. The results of the CHRIS records search are provided in Confidential Appendix A.

In addition to the CHRIS records search, the review of the NRHP, the CRHR, the California Points of Historical Interest list, the CHL, and relevant historical maps and aerial imagery did not indicate the presence of other previously known or unknown cultural resources within the Project Study Area.

6.1.1 OLD SPANISH NATIONAL HISTORIC TRAIL (OSNHT)

A review of National Trails System resources in the Project vicinity identified OSNHT as the closest designated National Historic Trail to the Project area; see Figures 1-3. The OSNHT commemorates one of the principal historic transportation routes linking New Mexico and California during the Spanish, Mexican, and early American periods. Although the Mojave Indian Trail provided a more direct route across the Mojave Desert, safety concerns associated with travel through the region led many explorers, traders, settlers, and emigrants to use the more northerly Old Spanish Trail (NPS 2023).

Current available information places the OSNHT alignment outside of the Developed Area for the Project, approximately 1.5 miles from the planned solar PV energy generation facility (NPS 2026). Furthermore, access roads segments for the Project will be constructed to the north of the Old Spanish Trail Highway/Tecopa Road. The intervening area includes highway and roadway traffic, utility lines, road signs, commercial structures, buildings, and other existing development. The recreation-route hiking trail identified in the *Old Spanish National Historic Trail Recreation & Development Strategy San Bernardino & Inyo Counties, California* (2015) is located more than 20 miles from the Project area and is separated from the Project by mountain ranges. Given the distance; existing, visually obstructing infrastructure; and lack of anticipated direct disturbance to the OSNHT trail route, the Project is not expected to result in a potential historical resource impact to the OSNHT. This conclusion is consistent with the findings of the Visual Impact Assessment prepared for the Project, which determined that the proposed facilities would not degrade the existing visual character or quality of public views in the Project vicinity (Inyo County & HELIX 2026).

TABLE 1 PREVIOUS CULTURAL RESOURCES STUDIES WITHIN A 0.5-MILE RADIUS OF THE PROJECT AREA AND PREVIOUSLY PROPOSED ACCESS ROAD CORRIDOR

Report Number	Title	Year	Author
IN-00053	Deteriorated Pole Replace. Project, Arch. Survey of Eight Pole Locations on the Color 4 kilovolts (kV) Desolate 12kV, Earth 12kv, Lockhart 33kv, Nipton 33 kV, Police 12kV, And Potosi 25kV T/L, San Bernardino County, and the Pahrump 25kV T/L Inyo County, California.	2005	Pollock, Kathleen, and Kathleen Hull
IN-00069*	Archaeological Survey of the Hidden Hills Ranch Project Site, Inyo County, California.	1979	Breece, William H., and A. Schilz
IN-00938*	Archaeological Survey Report for Southern California Edison's Interset Pole Project on the Pahrump 25 kV Circuit North of Highway 16, Inyo County, California, and Clark County, Nevada.	2010	Heidelberg, Kurt
IN-00967*	Historic Trails and Roads Technical Study; Hidden Hills Solar Electric Generating System.	2012	Lawson, Natalie, and W. Geoffrey Spaulding

*Previous studies that intersect the Project Study Area

TABLE 2 PREVIOUSLY RECORDED CULTURAL RESOURCES WITHIN A 0.5-MILE RADIUS OF THE PROJECT AREA AND PREVIOUSLY PROPOSED ACCESS ROAD CORRIDOR

Resource Number / Primary Number	Age	Site Description	CRHR/NRHP Eligibility Recommendation
P-14-002492 / CA-INY-2492*	Precontact	Lithic scatter of two chert or chalcedony cores and numerous flakes	Evaluated as part of this study
P-14-011677 / CA-INY-10323H*	Historic	Historic road segment connecting the old Nevada State Route 16 to the Tecopa Pass Road	Recommended not eligible
P-14-011678 / CA-INY-10322*	Precontact	Single, ephemeral trail or footpath that measures approximately 35 to 40 centimeters (cm) wide, possibly precontact	Recommended not eligible
P-14-011679 / CA-INY-10320H*	Historic	Narrow historic road parallel to the California-Nevada border	Recommended not eligible
P-14-011680 /	Historic	Historic track on the south side of Old Spanish Trail Highway (Tecopa Road in Nevada)	Not evaluated

Resource Number / Primary Number	Age	Site Description	CRHR/NRHP Eligibility Recommendation
CA-INY-10321H			
P-14-011681 / CA-INY-010370H*	Historic	Shallow graded historic road connecting Hidden Hills Ranch to Sandy Valley	Recommended not eligible

*Previously recorded resources that intersect the Project Study Area.

6.1.2 PREVIOUSLY RECORDED LINEAR RESOURCES

P-14-011677 / CA-INY-10323H

P-14-011677 is a historic road segment, measuring approximately 20 ft (6.1 m) in width and 8,250 ft (2,514.6 m) in length. The road was previously recorded in 2012 by CH2M Hill. The road appears to have been in use before 1910 as a two-track, but significant portions of it have subsequently been machine graded. As such, the road lacks integrity and was not considered a contributing element to the Old Spanish Trail, which is eligible for inclusion on the NRHP (Lawson and Spaulding 2012). ERM concurs with this recommendation that the road segment does not meet the NRHP/CRHR eligibility criteria.

P-14-011678 / CA-INY-10322

P-14-011678 is an ephemeral trail or footpath represented by two extant sections, measuring approximately 60 ccm (23 inches) in width. The northeast segment is approximately 79.4 m (260.5 ft) in length and the southwest segment is approximately 236 meters (774 ft)in length. The trail was recorded by CH2M Hill in 2012. The trail is not depicted on historic maps and may represent a precontact footpath from local springs. Dirt bikes have used parts of the trail within the northeast segment where much of the trail has been impacted by recreational use and erosional forces. The southwest segment lies within a large wash with elevated areas situated atop desert pavement, where portions of the trail are relatively intact. Overall, the trail is heavily impacted where it intersects any of the nearby dirt roads, which were graded in the late 1960s when the neighboring property was subdivided. As such, the trail lacks integrity and was recommended as not eligible for listing on the CRHR or the NRHP (Lawson and Spaulding 2012). ERM concurs with this recommendation.

P-14-011679 / CA-INY-10320H

P-14-011679 is a narrow road, measuring approximately 2 mi (3218 m) in length. The road was made by a single pass of a grader and does not appear on historic maps. Its origin and terminus remain unknown. The road was originally recorded by CH2M Hill in 2012. It was recommended as not eligible for the CRHR or the NRHP (Lawson and Spaulding 2012). ERM concurs with this recommendation.

P-14-011681 / CA-INY-10370H

P-14-011681 is a road segment measuring approximately 12 ft (3.7 m) in width and 4,025 ft (1,227 m) in length with the portion revisited during the survey measuring 450 ft (137 m) in length. Its construction consists of a shallow grade in the natural landform. This road is depicted on the 1956 USGS 15-minute Horse Thief Springs quadrangle map but not on earlier maps. The resource is in poor condition as mechanical grading has destroyed much of its integrity. As such, the road was recommended not eligible for the CRHR or the NRHP (Lawson and Spaulding 2012). ERM concurs with this recommendation

6.2 NAHC RESULTS

Tribal consultation under SB 18 was initially conducted by Inyo County in connection with its renewable energy development plans as part of the *REGPA PEIR* (Inyo County 2015). In response to the letters mailed on 27 August 2024, one Tribe, the Twenty-Nine Palms Band of Mission Indians, requested formal consultation. On 31 December 2025, ERM received a response from the NAHC to the supplemental SLF search request associated with the Project. The NAHC reported negative results for Tribal Cultural Resources or areas of traditional or cultural significance to the Tribe, and provided a list of Tribes culturally affiliated with the Project Area. The list included contact information for three individuals representing a single Tribal organization, the Twenty-Nine Palms Band of Mission Indians. The results of the supplemental SLF search are provided in Confidential Appendix B.

As part of the consultation process, Inyo County staff has made three attempts to coordinate with the requesting Tribe and has not received a response in return. At this time, the County considers tribal consultation to be complete (Inyo County 2025a).

6.3 FIELD SURVEY RESULTS

The Phase I pedestrian survey effort documented 90 newly identified cultural resources, including 65 isolated artifacts and 25 archaeological sites. Survey results maps are included in Confidential Appendix C, and survey photographs are provided in Confidential Appendix D.

The newly recorded resources represent both precontact and historic-era utilization of the land within the Study Area. In addition, five previously recorded resources were revisited and their records updated, comprising four historic linear resources and one precontact site. Documentation for all newly identified and updated resources is provided on California Department of Parks and Recreation (DPR) Series 523 forms (see Confidential Appendix E).

The isolates include 57 precontact artifacts and eight historic-era artifacts. Under CEQA guidelines, isolated resources are generally considered categorically ineligible for listing in the CRHR unless an artifact demonstrates exceptional significance and meets the definition of a unique archaeological resource as outlined in subdivision (g) of PRC Section 21083.2. Based on the field observations and subsequent evaluation, none of the recorded isolates exhibit characteristics that would qualify them as unique archaeological resources or confer exceptional significance. Therefore, these isolates are not considered historical resources under CEQA and do not warrant further consideration.

Archaeological sites are defined as discrete locations of past human activity that hold historical, cultural, or scientific significance. For this study, sites consist of three or more associated artifacts within a 30-meter area, one or more features, or Tribal Cultural Resources, such as cultural landscapes or sacred sites, with or without material remains. Newly recorded sites consist of 22 precontact sites, one historic-era site, and two multicomponent sites containing both precontact and historic-era elements.

Based on the results of the 2025 pedestrian survey and consideration of the environmental and cultural context of the Study Area, ERM conducted a preliminary evaluation of the documented cultural resources, which was presented in ERM's 2025 draft report. This analysis determined that one resource, ERM-2025-INY-S-025, a historic-era resource representing an isolated dumping episode associated with a short-term transitory stop, was recommended not eligible for listing in the CRHR or NRHP under any criterion. ERM also concurred with previous recommendations that four previously recorded linear resources (P-14-011677, P-14-011678, P-14-011679, and P-14-011681) are not eligible for listing in the CRHR or NRHP.

Conversely, 24 of the 25 archaeological sites (ERM-2025-INY-S-001 through ERM-2025-INY-S-024) and one previously recorded precontact site (P-14-002492) exhibited the potential to contain intact subsurface cultural deposits, as they are situated within alluvial depositional settings. Accordingly, ERM recommended limited subsurface investigations to confirm the absence or presence of buried cultural materials that could yield information regarding site age, function, occupation, and research value, thereby supporting further evaluation of the significance and CRHR/NRHP eligibility of these sites. Subsequently, ERM conducted targeted Extended Phase I archaeological testing at the 24 archaeological sites, as well as at specific locations identified as having elevated sensitivity for buried cultural deposits within areas of proposed ground disturbance.

6.4 ARCHAEOLOGICAL TESTING

Based on the results of the Phase I survey, additional investigations were recommended for 25 archaeological sites to further evaluate their research potential and significance, and at selected locations with elevated sensitivity due to the terrain and close proximity to recorded sites. The archaeological testing was conducted in one field session under the direction of Anthony H. Morales, M.A., RPA, occurred from 30 March to 8 April 2025. The goal of the testing program was to confirm the presence or absence of buried cultural deposits while limiting excavation efforts to the level necessary to evaluate site integrity and data potential (see *Archaeological Testing Plan* in Appendix A).

6.4.1 TESTING PROGRAM DESIGN

Archaeological sites chosen for subsurface testing include two multicomponent sites and 23 precontact sites. The precontact components of these sites share a high degree of similarity as they are largely represented by lithic scatters. Only, two of these sites contain cultural constituents representative of additional artifact classes. Additionally, four sites (ERM-2025-INY-S-022, ERM-2025-INY-S-023, ERM-2025-INY-S-024, P-14-002492) consist of scatters with a higher

density of artifacts and a more diverse assemblage, all within a complex depositional context with a higher potential to contain intact subsurface cultural deposits in comparison to the other sites.

Considering the composition of these sites, primarily low-density lithic scatters with similar artifact types, a majority of the sites qualify for management under the California Archaeological Resource Identification and Data Acquisition Program (CARIDAP), which allows for streamlined treatment of sparse lithic scatters. Developed by the OHP, CARIDAP establishes standardized procedures for identifying, documenting, and managing sites that, while limited in data potential, may still yield useful information in the pursuit of understanding regional archaeological themes. The application of CARIDAP may be sufficient for evaluating site significance; however, in cases where additional testing is required to determine eligibility, the findings may be incorporated into more intensive testing or a data recovery program if necessary. Data collected under CARIDAP would support eligibility evaluations and undergo formal review and concurrence by the appropriate agencies (Jackson et al. 1988).

The primary objective of the testing program was to confirm the presence or absence of buried cultural deposits and obtain the necessary data to adequately assess site integrity and data potential per Criterion 4 of the CRHR and Criterion D of the NRHP. This included identifying surficial constituents and recording the spatial distribution of artifacts and/or features, confirming or redefining the site boundary, collecting and processing surface materials if necessary, defining the spatial variability and determining the horizontal and vertical extent of the cultural deposit, and evaluating the contents and data potential of the subsurface deposit if observed. The resulting data was used to assess the depth, age, integrity, and contents of each site's cultural deposit, culminating in a determination of eligibility for listing in the CRHR and NRHP.

6.4.2 SITE MAPPING

The results of intensive pedestrian survey indicate that the newly identified sites are representative of late 19th- to early 20th-century transitory land use and precontact use characterized by toolstone procurement, the production and rejuvenation of lithic implements, and the processing of subsistence-related resources. Although the areal extent of these sites had been previously assessed, the testing program included a comprehensive surface inspection, reestablishing and recording the distribution of surface artifacts to confirm or redefine the site boundary if required (e.g., encountering associated subsurface deposits outside of the previously recorded site boundary). This effort aided the strategic placement of excavation units to evaluate areas exhibiting a higher density of artifacts and/or a heightened degree of subsurface data potential based on depositional context.

The location of artifacts and placement excavation units was documented with iPads using the ArcGIS Field Maps application connected to a Juniper Geode Global Navigation Satellite System receiver, providing sub-meter accuracy for recordation. The UTM location of artifacts was documented as single points or polygons, as appropriate, to determine site boundaries and identify intra-site loci, concentrations, or features. Detailed photographs of cultural materials and overviews of sites were documented using a digital camera with iPad photographs serving as a supplementary backup. Standardized paper forms supplemented the collection of these data.

6.4.3 EXCAVATION METHODS

Archaeological testing utilized controlled excavation units consisting of shovel test probes (STPs) and surface scrapes (SSCs) to determine the horizonal and vertical extent of the cultural deposit. The quantity, location, and maximum depth of each testing unit varied depending on the size of each site, the composition of encountered soils, and the depositional environment wherein. STPs measured 50 by 50 cm and were manually excavated in 10 cm arbitrary levels. All STPs were excavated up to a minimum depth of 30 cm, barring a subsurface obstacle or encountering a substrate with no potential to contain a cultural deposit, and all sediments were screened through a 1/8-inch mesh. If cultural materials were encountered, excavations continued below the deepest positive level until two consecutive sterile levels were documented, even if this exceeded 30 cm. Soil composition, stratigraphy, and all observed cultural materials, or lack thereof, were documented in the field by respective level on standardized forms. Upon termination, all units were backfilled and restored to their original grade. SSCs measuring 2 by 2 meters were employed in instances where broader exposures were useful and excavated to a maximum depth of 10 cm.

On larger more complex sites, employing a combination of STPs and SSCs offered a more comprehensive approach to subsurface testing. STPs provided a targeted, high-resolution sampling with greater depth (if positive), making them effective for identifying potential buried deposits. However, their pinpoint nature can sometimes miss small features or localized concentrations of artifacts. In contrast, surface scrapes lack vertical resolution but expose broader horizontal areas, increasing the likelihood of detecting near surface level features or patterns that may not have been immediately observable utilizing STPs. Together, this approach balanced precision and coverage while maintaining flexibility in the field, culminating in a more complete data recovery to help determine the presence of subsurface components and the archaeological significance of the sites.

6.4.4 ARTIFACT COLLECTION AND ANALYSIS

The testing program was designed to determine the presence or absence of buried cultural deposits while limiting excavation and laboratory efforts to those necessary to evaluate site integrity and research potential. No artifacts were collected during the pedestrian survey or archaeological testing program. Given the composition of the recorded archaeological sites and the results of subsurface investigations, recovered materials were documented in the field and returned during backfilling.

Should cultural resources be encountered during Project-related ground-disturbing activities, they will be evaluated and treated in accordance with the procedures outlined in the (confidential) CRMTP.

6.5 ARCHAEOLOGICAL TESTING RESULTS

Archaeological testing was conducted at 25 sites during a single field session between 30 March and 8 April 2025 and included 62 subsurface excavations consisting of STPs and SSCs (see Table 3). The following sections present testing results for each site and provide eligibility

recommendations for listing in the CRHR and NRHP. Testing result maps are included in Confidential Appendix C, and DPR forms for each site are provided in Confidential Appendix E.

ERM-2025-INY-S-001

ERM-2025-INY-S-001 consists of a multi-component site containing historic refuse and a low-density of precontact artifacts. The assemblage is interpreted as an informal disposal episode adjacent to a dirt push pile, likely associated with the grading of an unpaved dirt road within the site boundary. The low-density precontact component may have been displaced by this ground disturbance and is likely out of context. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation, and no additional constituents were observed. The site is located on a relatively flat (<2 degrees) alluvial valley floor, with surrounding vegetation dominated by creosote, bunch grasses, and other Mojave Desert scrub species. Observed surface sediments consist of very pale brown silt with coarse-grained sand and granitic gravels. An ephemeral channel follows the southeast margin of the site, where a recent drainage cut was observed paralleling the unpaved road.

Investigations at ERM-2025-INY-S-001 were conducted on April 7th, 2026, and included the excavation of two STPs: one placed adjacent to previously recorded precontact artifacts and another within an undisturbed location west of the push pile. Excavations at STP 1 encountered loosely compacted very pale brown (10YR 7/3) silt with a sub-rounded gravel lens at 10 cm below surface (cmbs), that transitioned into a more compact, well-sorted silt package terminating at the interface of a second gravel lens at 30 cmbs. STP 2 exposed a comparable stratigraphic sequence, consisting of loosely compacted loess with rounded to subrounded gravel that graded into a slightly more compact silt with an increase in depth. A rodent burrow was noted 24 cmbs which persisted until unit termination at 30 cmbs. The presence of an alluvial gravel lens bracketing a well-sorted silt deposit is indicative of episodic flooding events and sheet wash, with discharge into the adjacent ephemeral channel likely originating from a mapped stream approximately 2,840 ft northeast of the site boundary. While this alluvial depositional environment has the potential to preserve and bury cultural materials on the surface, both STPs were sterile, and no cultural materials were observed.

CRHR/NRHP Eligibility Recommendation

Data derived from subsurface investigations at ERM-2025-INY-S-001 indicates that the site lacks a discrete subsurface cultural component, with cultural materials limited to a sparse surficial representation of past limited-use activities. Observed historic materials lack sufficient density to support an interpretation beyond an informal dumping episode, while the precontact component, though evincing limited plant processing and lithic reduction activities, is just as sparse, lacking chronologically diagnostic indicators and represented by only two artifacts. Additionally, the assemblage is likely out of context due to modern disturbance, bioturbation, and fluvial processes, affecting the site's integrity of location and setting.

Collectively, the site exhibits limited data potential and is unlikely to yield significant insight into regional research domains, thus it is not recommended as eligible to the NRHP or CRHR under Criterion D/4. Additionally, the site is not associated with events that have made a significant

contribution to the broad patterns of our history, it is not associated with the lives of persons significant in our past, and it does not embody distinctive characteristics of a type, period, or method of construction. Therefore, it is not considered eligible to the NRHP or CRHR under Criterion A/1, B/2, or C/3.

ERM-2025-INY-S-002

ERM-2025-INY-S-002 is a precontact site containing a small scatter of artifacts distributed within two concentrations, and an additional three artifacts dispersed within the site boundary. A resurvey of the area confirmed that site conditions and artifact attribute descriptions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is located on a relatively flat (<2 degrees), sparsely vegetated, deflated alluvial valley floor. Vegetation surrounding the flat is represented by creosote, bitterbrush, salt brush, and other Mojave Desert scrub species. Observed surface sediments consist of very pale brown silt with coarse-grained sand and granitic gravels.

Investigations at ERM-2025-INY-S-002 were conducted on April 7th, 2026, and included the excavation of two STPs. STP 1 was placed 0.75m east of Concentration 1 (C1), and STP 2 was placed adjacent to two previously recorded artifacts within the southwest portion of the site. Excavations at STP 1 encountered compacted very pale brown (10YR 7/3) sandy silt alluvium with compact sand nodules and an angular gravel lens that continued into the 10 cmbs level. The matrix transitioned into a loosely compacted silt at approximately 20 cmbs with small compact sand nodules and subangular to subrounded gravels that persisted until the unit was terminated. STP 2 exposed a comparable stratigraphic sequence, consisting of compact silt package with sand and coarse gravel nodules that graded into a more homogeneous, slightly less compact silt with fine sand and minimal coarse gravel as depth increased. The final 20-30 cmbs level was characterized by fine sand with indurated sand and silt nodules. Both units were sterile for cultural materials and were terminated at 30 cmbs.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-002 is a limited use site consisting of small, discrete clusters of artifacts consistent with ephemeral use during logistical movement or resource procurement. Materials are dispersed across a deflated context, with no discrete subsurface component identified during investigations. Observed constituents do touch on regional themes of subsistence, land use, and technology, but lack sufficient density or diversity to support an interpretation beyond an informal depositional episode. With no diagnostic artifacts or features, the activities associated with the site are wholly represented by the surface assemblage.

As such, the ERM-2025-INY-S-002 is not recommended as eligible to the NRHP or CRHR under Criterion D/4 as the assemblage has limited data potential and is unlikely to yield significant insight into regional research domains. Additionally, the site is not associated with events that have made a significant contribution to the broad patterns of our history, it is not associated with the lives of persons significant in our past, and it does not embody distinctive characteristics of a type, period, or method of construction. Therefore, it is not considered eligible to the NRHP or CRHR under Criterion A/1, B/2, or C/3.

ERM-2025-INY-S-003

ERM-2025-INY-S-003 consists of a low-density scatter comprised of four artifacts evenly distributed throughout the site boundary, interpreted as the result of a localized stone tool production or rejuvenation. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation, and no additional constituents were observed. The site is located on a relatively flat (<1 degree) alluvial valley floor, with surrounding vegetation dominated by low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of light gray (10YR 7/2) silt with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-003 were conducted on March 31st, 2026, and included the excavation of four STPs placed 1 to 4 meters from the location of previously recorded artifacts. Excavations across STPs 1 through 4 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions. STPs 1, 3, and 4 encountered light gray (10YR 7/2) silt with coarse-grained sand and volcanic gravel in the upper portion of the profile, extending to depths of approximately 10 to 20 cmbs. In STP 1, this matrix was very compact and remained consistent until approximately 20 cmbs, where it transitioned to a light brownish gray (10YR 6/2) with small roots (<1 mm diameter) that comprised approximately 5-10% of the final level (20-30 cmbs). Similarly, STP 3 exhibited a transition to a very pale brown (10YR 7/3) at approximately 10 cmbs that continued to termination. In STP 4, moderately compact sediments extended to approximately 20 cmbs, which remained throughout, apart from small, compact white sand nodules observed from 20 to 30 cmbs. STP 2 differed slightly from the other units, exposing a homogeneous sandy silt matrix (light brown; 7.5YR 6/3) from surface to termination. Across all units, sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix. All four units were terminated at a final depth of 30 cmbs after each unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-003 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage. Activities associated with the site are wholly represented by the surface assemblage as a localized episode of stone tool production, maintenance, or the informal testing of cryptocrystalline silicate (CCS) toolstone. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-004

ERM-2025-INY-S-004 consists of a low-density lithic scatter containing four artifacts dispersed throughout the site boundary, likely the result of a localized reduction episode or tool maintenance. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation and identified two additional artifacts beyond those previously recorded. Noted disturbances include OHV tracks just west of the site boundary. The site is located on a

relatively flat (<1 degree), sparsely vegetated, alluvial valley floor with surrounding vegetation dominated by low-lying brush such as rabbitbrush, bitterbrush, and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of light gray (10YR 7/2) silt with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-004 were conducted on March 31st, 2026, and included the excavation of three STPs: STPs 2 and 3 were placed within 2 meters of observed artifacts, and STP 1 was placed slightly further away (6 meters) to avoid areas disturbed by OHV activities. Subsurface investigations across the three STPs identified relatively consistent sediment conditions, with minor variability in compaction, inclusions, and the presence of localized staining. STPs 1 and 2 encountered light tan (10YR 7/3) silt with subangular gravel, extending from the surface to termination. In STP 1, sediments became slightly more compact with depth, and rootlets were observed beginning at approximately 19 cmbs, along with discrete dark staining likely representing in situ root burning. STP 2 exhibited similar sediments, with a noted increase in compaction at approximately 8 cmbs. A localized gray (7.5YR 5/1) lens was observed at 10.5 cmbs along the eastern wall and interpreted as a non-cultural ash lens associated with a previous burn. Roots were observed starting at 15 cmbs with sediments becoming more sand rich from 18 cmbs to termination. STP 3 differed slightly, exposing a relatively homogeneous matrix of very pale brown (10YR 8/2) sandy silt with granitic gravel throughout. Across all units, stratification was subtle to indistinct. All three units were terminated at a final depth of 30 cmbs after each unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-004 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. A single obsidian biface fragment was identified on the surface; however, in the absence of additional diagnostic artifacts or a more substantial assemblage, it does not meaningfully contribute to regional spatial or temporal interpretations. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-005

ERM-2025-INY-S-005 is a precontact site low-density lithic scatter comprised of five (5) artifacts. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is located on a relatively flat (<1 degree) alluvial valley floor within a deflated, sparsely vegetated hardpan. The surrounding vegetation is dominated by low-lying brush such as rabbitbrush, bitterbrush, and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments consist of light gray (10YR 7/2) silt with coarse-grained sand and volcanic gravels.

Subsurface investigations at ERM-2025-INY-S-005 were conducted on March 31st and April 1st, 2026, and included the placement of four STPs. STPs 1, 2, and 4 were placed within 4 meters of previously recorded artifacts. STP 3 was placed between the other STPs, near the center of the site.

Excavations across STPs 1-4 encountered similar sediments characterized by a sandy silt matrix with varying proportions of angular to subrounded gravel and minor changes in compaction. STPs 1 and 4 primarily consisted of a loosely to moderately compact light gray (10YR 7/3) gravelly sand. In STP 1, this remained consistent down to a depth of 30 cmbs, with gravel size decreasing slightly with depth and becoming more subrounded. STP 4 was comparable apart from rootlets between 10 and 30 cmbs comprising approximately 35% of the sediment by volume. Additionally, a fossilized coral fragment was observed within the last level (20-30 cmbs). STPs 2 and 3 differed slightly, with STP 2 showing increased gravel content with depth and compact white sand nodules between 20-30 cmbs, while STP 3 contained compact silt nodules throughout and minor rootlet fragments at 23 cmbs that persisted till termination. Overall, exposed sediments reflect consistent depositional environment with minor variability in gravel content, compaction, and observed inclusions. Stratification was relatively weak, consisting of a homogeneous sediment matrix; however, subtle sorting is indicated by increasing gravel content and more subrounded clast morphology with depth, along with the presence of smaller nodules in the lower portions of several units. All four units were terminated at 30 cmbs following three consecutive sterile levels.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-005 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-006

ERM-2025-INY-S-006 consists of a small (18.6m × 16.7m) low-density lithic scatter containing six artifacts. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is located on flat (<1 degree), sparsely vegetated deflated hardpan. Vegetation surrounding the alkali flat consists of low-lying Mojave Desert scrub species such as rabbitbrush, bitterbrush, salt brush, along with sparse bunch grasses. Surface sediments are characterized by a light gray (10YR 7/2) silt loam with coarse-grained sand and volcanic gravel. The site has been disturbed by prevalent off-road vehicle activity, including OHV tracks that intersect the site.

Investigations at ERM-2025-INY-S-006 were conducted on April 1st, 2026, and included the excavation of one STP located in the eastern portion of the site, away from disturbed areas, approximately 7m east of a cluster of weathered flakes. One artifact was observed on the surface of the unit. The excavation of STP 1 exposed a moderately compact, very pale brown (10YR 7/3) silty loam with coarse gravel and small pebbles of volcanic material that transitioned to very compact, white (2.5YR 8/1) caliche at 4 cmbs. The unit was terminated at a depth of 10 cmbs after it was determined that cultural material was highly unlikely below the caliche layer, due to the limited potential for cultural deposition.

CRHR/NRHP Eligibility Recommendation

Data derived from subsurface investigations at ERM-2025-INY-S-006 indicate that the site lacks a discrete subsurface cultural component, with cultural materials limited to a sparse surficial representation of past limited-use activities. Accordingly, the assemblage is consistent with the definition of a sparse lithic scatter under CARIDAP. Observed precontact material lacks sufficient density to support an interpretation beyond an individual instance of stone tool production, rejuvenation, or the informal testing of local toolstone. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-007

ERM-2025-INY-S-007 is a multicomponent site consisting of 26 historic artifacts within a concentrated area (C1) and a lithic scatter containing nine artifacts. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is located on a sparsely vegetated, slightly elevated deflated hardpan. The surrounding vegetation is dominated by creosote, bitterbrush, salt brush, and other Mojave Desert scrub species. Observed surface sediments consist of light gray (10YR 7/2) silt loam with coarse-grained sand and volcanic gravels. The historic component of the site is interpreted as an informal depositional episode dating to the late nineteenth to early twentieth century while the precontact component is indicative of a short-term lithic reduction episode associated with the refinement of bifacial implements.

Investigations at ERM-2025-INY-S-007 were conducted on April 1st, 2026, and included the excavation of two STPs. STP 1 was placed within the boundary of C1 in the northeastern portion of the site, where most of the amethyst glass shards are located, and STP 2 was placed in the southwestern part of the site. Excavations of STP 1 encountered loosely compacted, light gray (10YR 7/2) silt with coarse gravel and small pebble-sized volcanic material covering up to 90% of the surface of the unit. Additional surface elements included sparse organics and bunch grasses (10%), with evidence of recent bioturbation. Within the upper 10 cmbs, compaction quickly increased to moderate with depth, and the presence of gravel decreased significantly. This change was accompanied by a slight color change to a very pale brown (10YR 8/2) silt, which persisted to a terminal depth of 30 cmbs. In contrast, the composition of STP 2 exhibited a much more compact matrix characterized by sand and gravel nodules near the surface, transitioning into a very compact sand and gravel beginning at 8 cmbs. This cemented silt and gravel layer continued to approximately 20 cmbs where excavation was terminated due to the limited potential for cultural deposition. Both STPs reflect consistent depositional conditions with localized variability in gravel content and compaction. Stratification was weak or indistinct, though increased compaction and cementation with depth suggest limited preservation potential in lower deposits.

CRHR/NRHP Eligibility Recommendation

Data derived from subsurface investigations at ERM-2025-INY-S-007 indicates that the site lacks a discrete subsurface cultural component, with cultural materials limited to a sparse surficial

representation of past limited-use activities. Observed historic material lacks sufficient density to support an interpretation beyond an informal depositional episode. Observed precontact material lacks sufficient density to support an interpretation beyond an individual instance of stone tool production or rejuvenation. The site is likely to be the result of transitory activities rather than habitational use, as supported by the lack of observed subsurface cultural materials. Collectively, the site exhibits limited data potential and is unable to yield significant insight into regional research domains. Thus, ERM-2025-INY-S-007 is not recommended as eligible to the NRHP or CRHR under Criterion D/4. Additionally, the site is not associated with events that have made a significant contribution to the broad patterns of our history, it is not associated with the lives of persons significant in our past, and it does not embody distinctive characteristics of a type, period, or method of construction. Therefore, it is not considered eligible to the NRHP or CRHR under Criterion A/1, B/2, or C/3.

ERM-2025-INY-S-008

ERM-2025-INY-S-008 is a low-density lithic scatter consisting of one segregated reduction locus (SRL) comprised of 10 artifacts and 12 additional artifacts distributed across the site. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact and the single SRL. The site is located on a subtle alluvial terrace (0–2-degree slope) bounded by ephemeral channels to the north and south, forming a slightly elevated surface relative to the surrounding landscape. The surrounding vegetation is dominated by creosote, bitterbrush, salt brush, and other Mojave Desert scrub species. Observed surface sediments consist of pale brown (10YR 6/3) silt with coarse-grained sand and small volcanic gravel. The assemblage is indicative of a short-term lithic reduction episode associated with stone tool production, rejuvenation, or the testing of local material, potentially carried out during transitory activities.

Investigations at ERM-2025-INY-S-008 were conducted on April 7th, 2026, and included the excavation of two STPs: STP 1 was placed adjacent to the SRL within the northeastern portion of the site and STP 2 was placed 0.5m southwest of an artifact within the southwestern part of the site. STPs 1 and 2 exposed similar sediments consisting of a pale brown (10YR 6/3) silt with coarse-grained sand and small volcanic gravel. In both units, gravel comprised approximately 20% of the soil matrix within the upper 10 cmbs. In STP 1, the gravel content decreased to approximately 10% by 20 cmbs, remaining consistent to a terminal depth of 30 cmbs. Rootlets were observed between 20 and 30 cmbs. STP 2 exposed a comparable sequence, with minor variability. Compaction changed from low to moderate beginning at the 10-20 cmbs level where a gravel and cobble lens was exposed at 13 cmbs. Rootlets were present on the 20 cmbs floor of second level, persisting till termination. Both units were closed at 30 cmbs following three consecutive sterile levels. The presence of a gravel and cobble lens within an otherwise moderately sorted silt matrix indicates episodic alluvial deposition, likely associated with seasonal flooding and sheet wash.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-008 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage.

Activities associated with the site are wholly represented by the surface assemblage as a localized episode of stone tool production, maintenance, or the informal testing of CCS toolstone. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-009

ERM-2025-INY-S-009 consists of a low-density lithic scatter consisting of 10 artifacts evenly distributed throughout the site boundary. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact. The site is situated on a small alluvial terrace in a relatively flat (< 1-degree) valley floor. Vegetation is dominated by low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of very pale brown (10YR 7/3) silt with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-009 were conducted on April 5th, 2026, and included the excavation of two STPs placed at the location of previously recorded debitage. STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions. Both STPs encountered very pale brown (10YR 7/3) silt with approximately 10% of the levels comprised of rootlets and the remainder coarse-grained sand and volcanic gravel in the upper portion of the profile, extending to depths of approximately 20 cmbs. This gravel lens persisted to approximately 31 cmbs in STP 2 where the matrix transitioned into a loosely compacted, well sorted silt. Across all units, sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix. STP 1 reached a terminal depth of 30 cmbs after encountering no cultural materials. A single artifact was observed in the 10-20 cmbs level of STP 2, prompting the excavation of two additional levels. STP 2 was terminated at a final depth of 40 cmbs after no additional materials were observed. The cultural find was interpreted as a near surface constituent of the scatter rather than an intact subsurface component.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-009 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. Lacking diagnostic indicators, features, or an intact subsurface component, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-010

ERM-2025-INY-S-010 is a low-density lithic scatter consisting of nine artifacts evenly distributed throughout the site boundary. A resurvey of the area confirmed that site conditions consistent with ERM's previous recordation, with the addition of two newly recorded artifacts observed on the surface of STP 1. The assemblage is interpreted as the result of localized stone-tool production or

the informal testing of CCS material. The site is situated within a flat (< 1-degree) alluvial valley floor on a slightly elevated alluvial terrace that is crosscut by a small, southwest-trending ephemeral channel. Vegetation consists primarily of low-lying varieties such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments consist of very pale brown (10YR 7/3) silt with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-010 were conducted on April 5th, 2026, and included the excavation of two STPs situated atop the subtle alluvial terrace, outside the observed path of the ephemeral channel. Both STPs positioned adjacent to relocated artifacts. Excavations exposed similar depositional conditions, with minor variability in color, compaction, and inclusions. STPs 1 and 2 encountered very pale brown (10YR 7/3) silt with coarse-grained sand and volcanic gravel in the upper portion of the profile, extending to approximately 20 cmbs, with rootlets comprising roughly 10% of the matrix. STP 1 exhibited a slight increase in gravel content between 10 and 20 cmbs (to 50%), which diminished with depth to approximately 20% and further decreased to approximately 5% within the final level. STP 2 remained relatively consistent silt and coarse gravel matrix throughout, which also exhibited a reduction in gravel content with depth. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting consistent with fluvial action. In addition to the two surficial artifacts, STP 1 observed one artifact at a depth of 10-20 cmbs, prompting the excavation of two additional levels. STP 1 was terminated at a depth of 40 cmbs after no additional materials were observed and STP 2 was terminated at a depth of 30 cmbs after it was determined the unit was sterile for cultural materials. Subsurface cultural finds were interpreted as near surface constituents of the scatter rather than an intact subsurface component.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-010 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are entirely represented by the surface assemblage and a low-density of subsurface materials observed in one (STP 1) of the two STPs. Such materials are interpreted as redeposited via fluvial processes associated with the cross-cutting ephemeral channel and do not represent an intact subsurface cultural deposit or evidence of sustained activity at the site. Lacking diagnostic indicators and features, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-011

ERM-2025-INY-S-011 is a low-density lithic scatter consisting of eight artifacts. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact. The overall assemblage is indicative of a short-term lithic reduction episode associated with stone tool production or the testing of local material, potentially carried out during transitory activities. The site is located on a slightly elevated (<2 degree) alluvial terrace. Vegetation includes low-lying Mojave Desert scrub species such as bitterbrush and

salt brush, along with sparse bunch grasses. Observed surface sediments primarily consist of very pale brown (10YR 7/3) lightly cemented silt crust with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-011 were conducted on April 5th, 2026, and included the excavation of two STPs placed atop the alluvial terrace, away from the observed path of an ephemeral channel. Both STPs were positioned adjacent to relocated artifacts. Excavations across STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions. Both STPs encountered lightly cemented, very pale brown (10YR 7/3) silt with rootlets from bunch grasses comprising approximately 10% of the matrix. In STP 1, coarse-grained sand and volcanic gravel comprised up to approximately 50% of the upper 10 cmbs, decreasing to approximately 20% below that depth and persisting to termination. In contrast, STP 2 exhibited a more consistent and well-sorted matrix of subangular to subrounded gravel, with only minor changes in compaction with depth. STP 1 observed two artifacts within the upper 10 cmbs and one artifact within the second 20-30 cmbs level, prompting the excavation of two additional levels. STP 1 was terminated at a depth of 50 cmbs after encountering two consecutive sterile levels. Subsurface materials were interpreted as redeposited surface constituents, with no evidence of an intact subsurface cultural deposit. STP 2 was terminated at a final depth of 30 cmbs after it was determined to be sterile for cultural materials. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting consistent with fluvial action.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-011 assemblage is limited to a low-density surficial distribution of lithic artifacts consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are wholly represented by the surface assemblage and a low-density of subsurface materials observed in one (STP 1) of the two STPs. Such materials are interpreted as redeposited via fluvial processes and do not represent an intact subsurface cultural deposit or evidence of more intensive activities at the site. Lacking diagnostic indicators and features, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-012

ERM-2025-INY-S-012 is a low-density lithic scatter consisting of six artifacts, interpreted as the result of a localized stone tool production or the testing of local material. A resurvey of the area confirmed that site conditions and flake attribute descriptions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is situated on a small alluvial terrace within a relatively flat (<2-degree) alluvial valley floor. Vegetation is dominated by low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of very pale brown (10YR 7/4) sand with small coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-012 were conducted on April 5th, 2026, and included the excavation of one STP placed adjacent to a relocated artifact. Excavations at STP 1 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions to

surrounding sites. STP 1 encountered a very pale brown (10YR 7/4) sand with approximately 30% of the levels comprised of rootlets from bunch grasses in the top portion of the 0-10 cmbs level. Across all levels of the unit, sediments reflected a consistent depositional condition, with subtle and indistinct stratification within a relatively uniform sediment matrix of loosely compacted silty sand with small gravel inclusions and slightly compacted sand nodules that continued to a depth of 30 cmbs. At 25cmbs a burned root cavity was observed with a very dark gray (10YR 3/1) soil color near the cavity. At 30 cmbs the stratigraphic layer transitioned to a very compact layer of caliche. STP 1 was terminated at a final depth of 30 cmbs after the unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-012 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage. Activities associated with the site are wholly represented by the surface assemblage as a localized episode of stone tool production, maintenance, or the informal testing of CCS toolstone. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-013

ERM-2025-INY-S-013 is a low-density lithic scatter consisting of four artifacts evenly distributed throughout the site boundary. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact. The assemblage is indicative of a short-term lithic reduction episode associated with stone tool production, rejuvenation, or the testing of local material, potentially carried out during transitory activities. The site is located on a relatively flat (<2 degree) alluvial playa. Vegetation is minimal and includes some low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of very pale brown (10YR 7/3) silt crust with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-011 were conducted on April 5th and 6th, 2026, and included the placement of two STPs placed in differing depositional environments observed within the site boundaries. STP 1 was placed within an alkali flat, and STP 2 was placed on the alluvial terrace, that bordered the playita, 14 m to the north of STP 1. Both STPs were placed atop relocated cultural artifacts.

Excavations across STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color and inclusions. Both STPs encountered a very pale brown (10YR 7/3) silt crust with approximately 10% of the levels comprised of rootlets from bunch grasses, and up to 10% of the soil matrix being coarse-grained sand and volcanic gravel in the upper portion of the profile, extending to depths of approximately 30 cmbs. STP 1 remained loosely compacted throughout with compacted silt nodules, and STP 2 remained moderately compacted. Across all units, sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a

relatively uniform sediment matrix. Both units were terminated at a final depth of 30 cmbs after each unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-013 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage. Activities associated with the site are wholly represented by the surface assemblage as a localized episode of stone tool production, maintenance, or the informal testing of CCS toolstone. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-014

ERM-2025-INY-S-014 consists of a localized concentration of artifacts (C1) and a low-density lithic scatter containing four artifacts. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, and no additional artifacts were observed. The localized concentrations of artifacts suggest that they all originate from a single piece, likely representing a discrete depositional episode, either the result of accidental breakage during use or the deliberate discard of the artifact. The site is located on a relatively flat (0-2 degrees), sparsely vegetated wash with surrounding vegetation consisting of creosote, bitterbrush, salt brush, and other Mojave Desert scrub species. Observed surface sediments consist of very pale brown (10YR 7/3) silt with a sparse surficial layer of coarse-grained sand and granitic gravel.

Investigations at ERM-2025-INY-S-014 were conducted on April 7th, 2026, and included the excavation of one STP placed within C1. Excavations exposed a loosely compact silt matrix with coarse-grained sand and subangular to subrounded gravel comprising approximately 5% of the deposit, decreasing slightly with depth. Stratification was weak, and the profile of the unit was homogenous with minimal variation. The unit was terminated at a depth of 30 cmbs after encountering three consecutive sterile levels. The absence of associated features, additional artifacts, or subsurface materials suggests there is no evidence of an intact subsurface cultural deposit. As such, the assemblage is representative of short-term, transitory activities, such as resource procurement and processing, potentially reflective of mobile land-use patterns rather than habitational use of the locality.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-014 is a limited-use site consisting of a small, discrete cluster of artifacts consistent with ephemeral use during logistical movement or resource procurement. Materials are dispersed within a wash, with no discrete subsurface component identified during investigations. Observed artifacts do touch on regional themes of subsistence, land use, and technology, but lack sufficient density or diversity to support an interpretation beyond an informal, isolated depositional episode. With no diagnostic artifacts or features, the activities associated with the site are wholly represented by the surface assemblage. As such, the ERM-2025-INY-S-014 is not recommended as eligible to the NRHP or CRHR under Criterion D/4 as the assemblage has limited data potential and is unlikely to yield significant insight into regional research domains.

Additionally, the site is not associated with events that have made a significant contribution to the broad patterns of our history, it is not associated with the lives of persons significant in our past, and it does not embody distinctive characteristics of a type, period, or method of construction. Therefore, it is not considered eligible for the NRHP or CRHR under Criterion A/1, B/2, or C/3.

ERM-2025-INY-S-015

ERM-2025-INY-S-015 consists of a low-density lithic scatter containing eight artifacts. The site is situated on a subtle, slightly elevated alluvial terrace, with materials observed within two distinct clusters. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact. The site boundary was slightly revised and expanded to encompass the newly identified materials. The overall assemblage is indicative of a short-term lithic reduction episode associated with stone tool production or the testing of local material, potentially carried out during transitory activities. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, and native bunch grasses. Observed sediments consist of a very pale brown (10YR 7/3) lightly cemented silt loam with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-015 were conducted on April 6th, 2026, and included the excavation of two STPs, each placed within each artifact cluster. Both STPs exposed similar silt deposits with coarse gravel and nodular inclusions, showing minor variability in compaction and gravel content. STP 1 exposed a loosely compacted silt matrix that contained approximately 20% gravel near the surface which increased with depth, ultimately comprising 45% of the matrix. Compaction increased below 10 cmbs, transitioning from a loose to a more moderately compact silt. This transition was accompanied by the presence of small rootlets which persisted until unit termination. STP 2 exhibited a more uniform profile, with approximately 15-20% coarse gravel and compact silt nodules observed throughout, increasing slightly with depth. Subsurface cultural materials were limited to the upper 10 cmbs, including one artifact in STP 1 and two artifacts in STP 2. Both STPs were terminated at a depth of 30 cmbs after encountering two consecutive sterile levels. Subsurface materials were interpreted as redeposited surface constituents, with no evidence of an intact subsurface cultural deposit. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-015 assemblage is limited to a low-density surficial distribution of lithic artifacts consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are entirely represented by the surface assemblage and a low-density of near surface materials observed in both STPs. Such materials are interpreted as redeposited via fluvial processes and do not represent an intact subsurface cultural deposit or evidence of more intensive activities at the site. Lacking diagnostic indicators and features, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-016

ERM-2025-INY-S-016 is a precontact lithic scatter consisting of a segregated reduction locus with a total of 23 artifacts. Size classification and artifact morphology indicate that activities were focused on the early stages of core reduction. A resurvey of the area confirmed that site conditions and flake attribute descriptions were consistent with ERM's previous recordation, and no additional artifacts were observed. The site is situated on a relatively flat (<1 degree) alluvial terrace. Vegetation is dominated by low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of very pale brown (10YR 7/4) sand with small coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-016 were conducted on April 7th, 2026, and included the excavation of one STP placed atop relocated cultural artifacts. Excavations at STP 1 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions to surrounding sites. The STP encountered a very pale brown (10YR 7/4) silty sand with approximately 30% of the levels comprised of rootlets from bunch grasses in the top portion of the 0-10 cmbs level. Across all levels of the unit, sediments reflected a consistent depositional condition, with subtle and indistinct stratification within a relatively uniform sediment matrix of compacted silty sand with small gravel inclusions and slightly compacted sand nodules that continued to a depth of 30 cmbs. STP 1 was terminated at a final depth of 30 cmbs after the unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

ERM-2025-INY-S-016 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage. Activities associated with the site are wholly represented by the surface assemblage as the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-017

ERM-2025-INY-S-017 is a lithic scatter containing a total of 25 artifacts distributed within two concentrations: Concentration 1 contains seven artifacts and Concentration 2 (C2) contains 18 artifacts. The assemblage is indicative of short-term lithic reduction episodes associated with stone tool production or informal testing of locally available CCS, potentially carried out during transitory activities. A resurvey of the area confirmed that site conditions and flake attribute descriptions were consistent with ERM's previous recordation. The site is located on a sparsely vegetated, subtle alluvial terrace (<2-degree slope) bounded by an ephemeral channel to the south, forming a slightly elevated surface relative to the surrounding landscape. Nearby vegetation is dominated by creosote, bitterbrush, salt brush, and other Mojave Desert scrub species. Observed surface sediments consist of very pale brown (10YR 7/3) loosely compact silt with a surficial layer of coarse-grained sand and small volcanic gravel. Noted disturbances include

the presence of OHV tracks southeast of the site boundary stemming from an unimproved road to the east.

Investigations at ERM-2025-INY-S-017 were conducted on April 7th, 2026, and included the excavation of two STPs, both placed adjacent to a recorded concentration. Excavations across STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions consisting of very pale brown (10YR 7/3) silt. STP 1 contained very fine, loosely compacted silt with subangular volcanic gravel comprising 25 to 30% of the matrix within the upper 10 cmbs. Below this, sediments became more compact, containing a higher amount of silt nodules (30-40%), with a slight increase in coarse gravel and pebbles (to 35%) between 20 and 30 cmbs. STP 2 contained lightly cemented silt on the surface overlying a slightly compact silt with small nodules. This transitioned into a less compact matrix at 17 cmbs before encountering a gravel lens at 21 cmbs consisting of subrounded to rounded coarse gravel that persisted until termination. Rootlets were observed below 26 cmbs. Both units were terminated at 30 cmbs after encountering three consecutive sterile levels. The presence of a gravel and cobble lens within an otherwise moderately sorted silt matrix indicates episodic alluvial deposition, likely associated with seasonal flooding and sheet wash.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-017 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. Size classification and flake morphology indicate that activities were focused on the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-018

ERM-2025-INY-S-018 is a rock feature comprised of at least 75 stones organized into one circular inner ring constructed in a single concourse of 32 stones and one dispersed partial outer ring that includes approximately 43 equally large stones. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of 18 newly recorded artifacts and a large unmodified CCS boulder that may have been used as a seating place for lithic reduction activities, as evidenced by three artifacts located adjacent to the boulder. The site is located on a relatively flat (<1 degree) alluvial terrace bordered by ephemeral channels to the north and south. Vegetation is sparse and includes some low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments primarily consist of very pale brown (10YR 7/3) silt crust with coarse-grained sand and volcanic gravel.

Investigations at ERM-2025-INY-S-018 were conducted on April 6th, 2026, and included the excavation of two STPs placed in differing depositional environments observed within the site boundaries. STP 1 was placed on an alluvial terrace and STP 2 was placed 5m northeast of an

artifact within an alkali flat near the northeastern border of the site. Both STPs were placed atop relocated cultural artifacts. Excavations across STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions. Both STPs encountered a very pale brown (10YR 7/3) sandy silt with coarse-grained sand and volcanic gravel in the upper portion of the profile, extending to depths of approximately 20 cmbs. At a depth between 10-20 cmbs, STP 1 encountered a decrease in compaction that extended to unit termination. STP 2 encountered a thin layer of bicarbonate at 10 cmbs that transitioned into a gravel lens that persisted until the final depth of 30 cmbs. Across all units, sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix. Both units were terminated at a final depth of 30 cmbs after each unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-018 assemblage is limited to a rock feature associated with a low-density surficial distribution of debitage consistent with past limited-use. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. Size classification and artifact morphology indicate that activities were focused on the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-019

ERM-2025-INY-S-019 consists of three lithic reduction concentrations representing individual SRLs containing a total of 27 artifacts. Size classification and artifact morphology indicate that activities were focused on the early stages of reduction. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation. The site is located on a sparsely vegetated, subtle alluvial terrace (<2-degree slope) 50 ft north of an ephemeral channel. Vegetation is sparse and includes some low-lying brush such as bitterbrush and salt brush, along with sparse bunch grasses and other Mojave Desert scrub species. Observed surface sediments consist of light gray (10YR 7/2) loosely compact silt with a surficial layer of coarse-grained sand and small volcanic gravel.

Investigations at ERM-2025-INY-S-019 were conducted on April 1st, 2026, and included the placement of two STPs. STP 1 was placed in the northern portion of the site within the boundary of Concentration 3 and STP 2 was placed in the southern part of the site between Concentrations 1 and 2. Both STP locations were placed atop relocated cultural artifacts. Excavations across STPs 1 and 2 exposed similar stratigraphic conditions, with minor variability in color, compaction, and inclusions. Both STPs encountered a loose to moderately compact light gray (10YR 7/2) to very pale brown (10YR 7/3) silt matrix. STP 1 saw minimal to no gravel from 0-20 cmbs, transitioning to a loosely compacted gravel lens observed in the 20-30 cmbs level. STP 2 had two distinct gravel layers observed at 14-19 cmbs and again at 27-30 cmbs. The presence of an alluvial gravel lens bracketing a well-sorted silt deposit is indicative of episodic flooding events and sheet wash associated with the ephemeral channel just north of the site boundary. While this alluvial

depositional environment has the potential to preserve and bury cultural materials on the surface, both STPs were sterile, and no cultural materials were observed. Both units were terminated at a final depth of 30 cmbs after each unit was determined to be sterile for cultural materials.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-019 assemblage is limited to a low-density surficial distribution of debitage consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are represented solely by the surface assemblage and reflect a localized episode of stone tool production, maintenance, or the informal testing of CCS material. Size classification and flake morphology indicate that activities were focused on the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage lacks the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-020

ERM-2025-INY-S-020 consists of a SRL containing 11 artifacts. A resurvey of the area confirmed that site conditions were consistent with ERM's previous recordation, with the addition of a newly recorded artifact. Size classification and artifact morphology indicates that activities were focused on the early stages of core reduction. The site is situated on a gently sloping alluvial terrace flanked on the north and south by an ephemeral wash, forming a slightly elevated surface. The surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, cholla cacti, and native bunch grasses. Observed sediments consist of a light brownish-gray silty loam with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-020 were conducted on April 1st, 2026, and included the excavation of one STP, exposing a well-sorted pale brown (10YR 6/3) silt matrix with fine-grained sand and gravel. A gravel lens was identified within the upper portion of the profile, between 6 and 10 cmbs, and sparse rootlets were observed beginning at approximately 15 cmbs, persisting until unit termination. Sediments in the lower portion of the unit became increasingly sandy and gravel-rich (up to approximately 30% of the matrix), with a corresponding transition from loose to moderate compaction. No cultural materials were identified, and the unit was terminated at 30 cmbs.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-020 assemblage is limited to a highly localized surficial distribution of debitage consistent with a single reduction event focused on stone tool production or the testing of local CCS toolstone. Size classification and artifact morphology indicate that activities were focused on the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage meets the criteria for classification as a sparse lithic scatter as defined under CARIDAP and does not contain the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-021

ERM-2025-INY-S-021 consists of a low-density lithic scatter containing a total of 16 artifacts. A resurvey of the area confirmed that site conditions descriptions were consistent with ERM's previous recordation and identified three additional artifacts beyond those previously recorded. The overall assemblage is indicative of a short-term lithic reduction episode associated with stone tool production or the testing of local material, potentially carried out during transitory activities or the opportunistic procurement of plant resources. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, and native bunch grasses. Observed sediments consist of a very pale brown (10YR 7/3) lightly cemented silt with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-021 were conducted on April 3rd, 2026, and included the excavation of two STPs, placed adjacent to the location of recorded artifacts. Both STPs exposed similar very pale brown (10YR 8/2 to 7/3) sandy silt deposits with coarse subangular to subrounded gravel. STP 1 exhibited low to moderate compaction and a consistent gravel content (20%) that diminished slightly with depth. STP 2 was more uniform, comprised of a moderately compact sandy silt matrix. Both STPs were terminated at a depth of 30 cmbs after encountering two consecutive sterile levels. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-021 assemblage is limited to surficial distribution of debitage consistent with low intensity reduction events focused on stone tool production or the testing of local CCS toolstone. Size classification and flake morphology indicate that activities were focused on the early stages of core reduction. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage meets the criteria for classification as a sparse lithic scatter as defined under CARIDAP and does not contain the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-022

ERM-2025-INY-S-022 is a low-density lithic scatter comprised of a SRL and a total 50 artifacts. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation. The overall assemblage is indicative of a short-term lithic reduction episode associated with stone tool production or the testing of local material, potentially carried out during transitory activities or the opportunistic procurement of plant resources. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, and native bunch grasses. Observed sediments consist of a very pale brown (10YR 7/3) to light gray (10YR 7/2) loosely compacted silt to silty sand, with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-022 were conducted on April 3rd, 2026, and included the excavation of five STPs, placed adjacent to the location of recorded artifacts. All STPs exposed similar light gray to very pale brown (10YR 7/2 to 10YR 7/3 & 8/3) sandy silt and sandy loam deposits with coarse subangular to subrounded gravel. STP 1 exhibited low to moderate compaction and consistent gravel content that remained present with depth until encountering a compact bicarbonate rich layer at 30 cmbs. STP 5 exposed a similar matrix but lacked a bicarbonate layer at the final depth. STP 2, 3, and 4 exposed a loosely compact silt loess on the surface that transitioned to a slightly compact silt package with some coarse gravel, intermittent cobbles, and intermixed silt nodules. All STPs were terminated at a depth of 30 cmbs after encountering two consecutive sterile levels. Subsurface cultural materials were only observed in the upper 10 cmbs of STP 4 and included one artifact. These materials were interpreted as redeposited surface constituents, with no evidence of an intact subsurface cultural deposit. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-022 assemblage is limited to a low-density surficial distribution of lithic artifacts consistent with a sparse lithic scatter as defined under CARIDAP. Site activities are wholly represented by the surface assemblage and a low-density of subsurface materials observed in one (STP 4) of the five STPs. Such materials are interpreted as redeposited via fluvial processes and do not represent an intact subsurface cultural deposit or evidence of more intensive activities at the site. Lacking diagnostic indicators and features, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-023

ERM-2025-INY-S-023 consists of a low-density lithic scatter containing 17 artifacts distributed across a low-lying terrace bisected by two southwest-trending ephemeral streams. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation and identified two additional artifacts beyond those previously recorded. The overall assemblage is located at the foot of a hill that progresses east into Nevada, with cultural materials likely extending eastward across the CA-NV border where the landscape transitions into more rugged badlands. Consequently, the observed materials may represent the margins of this larger distribution of artifacts or redeposited materials due to alluvial and colluvial action. Cultural materials observed within Nevada limits were not documented, as they reside beyond the scope of the project and are located within a different jurisdiction. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, various cacti, and native bunch grasses. Observed sediments consist of a light brown to light-gray silt with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-023 were conducted on April 2nd, 2026, and included the excavation of five STPs and one SSC. Subsurface testing across all STPs exposed similar deposits consisting of very pale brown to light gray silt with variable gravel content, compaction, and

sorting. STPs 1, 2, 3, and 5 had comparable matrices characterized by sandy silt with subangular to subrounded granitic and volcanic gravel. Sediments were low to moderately compact with minor variability in gravel content and sorting. STP 1 exhibited a surficial concentration of subangular to subrounded gravel overlying loosely compacted very pale brown (10YR 8/2) silt, with compaction and gravel content increasing slightly with depth to a moderately compact deposit below 10 cmbs. In STP 2, a rock encountered approximately 23 cmbs exhibited extensive mineral bicarbonate deposition on its underside, suggesting limited recent disturbance within the surrounding sediments. At the southern extent of the site, STP 3 displayed poorer sorting with a reduction in gravel content with depth, while STP 5 remained relatively uniform with minor rootlet inclusions (approximately 5%). This pattern likely reflects low- to moderate-energy fluvial deposition associated with the adjacent ephemeral channels, with finer, well-sorted silts settling under lower-energy conditions and coarser gravel representing episodic higher-energy events or colluvial action from hillslopes to the east. STP 4 differed slightly from the rest, consisting of a silt rich deposit with coarse sand and gravel and an abundance of compact silt nodules between 1 and 3cm in diameter. This matrix transitioned between 10 and 20 cmbs to a less compact, silt with finer-grained sand and reduced gravel content (<5%) that persisted to termination. All STPs were terminated at approximately 30 cmbs after being determined sterile for cultural materials.

SSC 1 was placed within the northwest portion of the site, atop the alluvial terrace (2-3-degree slope) bounded by the southwest-trending ephemeral channels to the north and south. This location was informed by both proximity to nearby artifacts and its position within a relatively stable landform, avoiding areas adjacent to the ephemeral channels exhibiting a greater potential for disturbance due to fluvial reworking. The broader, shallow exposure (0-10 cmbs) was consistent with stratigraphy observed within the other STPs, consisting of a very pale brown (10YR 7/2) sandy silt matrix with approximately 25% angular to subrounded gravel. Two artifacts were identified within the near surface context, consisting of one piece of CCS shatter in the northwest quadrant and one large (<5 cm) CCS primary flake in the northeast quadrant.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-023 assemblage is limited to sparse surficial distribution of lithic implements and debitage consistent with low intensity use of the site, likely associated with episodic reduction events focused on stone tool production or the testing of local CCS toolstone. Observed subsurface materials within SSC 1 are interpreted as redeposited, near surface constituents and are not representative of an intact subsurface cultural deposit or provide evidence of more intensive activities or longer-term occupations at the site. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage meets the criteria for classification as a sparse lithic scatter as defined under CARIDAP and does not contain the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

ERM-2025-INY-S-024

ERM-2025-INY-S-024 consists of a low-density lithic scatter situated across low-lying terraces intersected by two southwest-trending ephemeral streams along the western and eastern margins of the site. Observed constituents include 10 artifacts distributed across the toe of a gentle slope

that ultimately progresses east into Nevada where the landscape transitions into more rugged badlands. A resurvey of the area confirmed that site conditions and artifact descriptions were consistent with ERM's previous recordation. The assemblage is indicative of a short-term lithic reduction episode associated with stone tool production or the testing of local material, potentially carried out during transitory activities or the opportunistic procurement of plant resources or toolstone. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, various cacti, and native bunch grasses. Observed surficial sediments consist of a light brown sandy silt with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at ERM-2025-INY-S-024 were conducted on April 4th, 2026, and included the excavation of three STPs. STPs 1 and 2 exposed comparable deposits characterized by very pale brown (10YR 7/3) sandy silt with subangular to subrounded gravel and compact silt nodules. STP 1 was uniform throughout, apart from a thick root that extended across the center of the unit at 10 cmbs. STP 2 was also well sorted and moderately compact, with minimal variation in matrix composition. STP 3 differed slightly, exhibiting a lightly cemented surface crust overlying a moderately sorted, loosely compact silt matrix with fine sand and gravel. Gravel comprised approximately 15% of the matrix within the upper 10 cmbs, decreasing to 5% with depth and remaining consistent till termination. Subsurface cultural materials within the units were limited to the upper 10 cmbs and included one artifact in STP 2 and another in STP 3. All three STPs were terminated at a depth of 30 cmbs after encountering two consecutive sterile levels. The observed cultural finds are interpreted as near surface constituents of the scatter rather than an intact subsurface component. Overall, exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting.

CRHR/NRHP Eligibility Recommendation

The ERM-2025-INY-S-024 assemblage is limited to surficial distribution of debitage consistent with low intensity reduction events focused on stone tool production or the testing of local CCS toolstone. Observed subsurface materials are interpreted as redeposited, near surface constituents and are not representative of an intact subsurface cultural deposit or provide evidence of more intensive activities at the site. Lacking diagnostic artifacts, features, or a subsurface component, the assemblage meets the criteria for classification as a sparse lithic scatter as defined under CARIDAP and does not contain the data necessary to address regional domains beyond those already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

P-14-002492 (Update)

P-14-002492 is a low-density lithic scatter previously recorded by WESTEC Services in 1979. ERM revisited the site in 2026 and identified additional artifacts beyond those documented during the original recordation, resulting in an expansion of the original site boundary. Cultural constituents include a total of 48 artifacts, 13 of which are associated with a single SRL. Artifacts were widely dispersed across the site, indicating an overall low-density, with localized concentrations reaching a maximum of three artifacts per square meter. Size classification and artifact morphology

indicate that activities were focused on the early stages of core reduction, with sparse evidence of late-stage reduction. Surrounding vegetation consists of Mojave Desert scrub, a plant community characterized by a moderate cover of creosote, bitterbrush, salt brush, and native bunch grasses. Observed sediments consist of a very pale brown (10YR 7/3) loosely compacted silt loess, with a sparse surficial layer of coarse gravel and small pebbles of volcanic material.

Investigations at P-14-002492 were conducted on April 4th and 5th, 2026, and included the excavation of six STPs, placed atop the location of recorded artifacts. All STPs exposed a homogenous very pale brown (10YR 7/3 & 8/2) sandy silt and loess deposit with a lightly cemented crust on the surface and a sparse armoring of coarse subangular to subrounded gravel. Subsurface cultural materials were identified in STPs 4, 5, and 6. In total, four artifacts were recovered, including one artifact from STP 5 and three artifacts from STP 6 all within the upper 10 cmbs, and one artifact from STP 4 in the 20-30 cmbs level. All STPs except STP 4 were terminated at 30 cmbs following the excavation of two consecutive sterile levels. Excavations at STP 4 continued to 50 cmbs and the unit was closed after two consecutive sterile levels. Subsurface materials were interpreted as redeposited surface constituents, with no evidence of an intact subsurface cultural deposit. Exposed sediments reflect consistent depositional conditions, with subtle or indistinct stratification within a relatively uniform sediment matrix and minor variability in gravel content and sorting.

CRHR/NRHP Eligibility Recommendation

P-14-002492 meets the criteria for a sparse lithic scatter as defined under the CARIDAP, as the assemblage is characterized by a low-density surficial distribution of lithic debitage and formal artifacts. Site activities are entirely represented by the surface assemblage and a low-density of subsurface materials observed in three (STP 4, 5 and 6) of the six STPs. Such materials are interpreted as redeposited via fluvial processes associated with the cross-cutting ephemeral channel and do not represent an intact subsurface cultural deposit or evidence of sustained activity at the site. Lacking diagnostic indicators and features, the assemblage lacks the data necessary to address regional domains beyond that which is already represented by similar sites in the region. As such, the site is considered not eligible for listing in the NRHP or CRHR.

TABLE 3 ARCHAEOLOGICAL TESTING RESULTS

Resource ID	STP/SSC #	Dimensions (W x L x D)	Excavation Method	Screening Method	Disturbances	Testing Results
ERM-2025-INY-S-001	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Bioturbation	Negative
ERM-2025-INY-S-002	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-003	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative

Resource ID	STP/SSC #	Dimensions (W x L x D)	Excavation Method	Screening Method	Disturbances	Testing Results
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 4	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-004	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Dark Staining	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Ash Lens	Negative
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-005	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	Rootlets	Negative
	STP 4	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-006	STP 1	50×50×10 cm	Hand Tools	1/8th inch	Deflation	Negative
ERM-2025-INY-S-007	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Bioturbation	Negative
	STP 2	50×50×20 cm	Hand Tools	1/8th inch	Cementation	Negative
ERM-2025-INY-S-008	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
ERM-2025-INY-S-009	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×40 cm	Hand Tools	1/8th inch	n/a	Positive
ERM-2025-INY-S-010	STP 1	50×50×40 cm	Hand Tools	1/8th inch	Rootlets	Positive
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Rootlets	Negative
ERM-2025-INY-S-011	STP 1	50×50×50 cm	Hand Tools	1/8th inch	Rootlets	Positive
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Rootlets	Negative
ERM-2025-INY-S-012	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative

Resource ID	STP/SSC #	Dimensions (W x L x D)	Excavation Method	Screening Method	Disturbances	Testing Results
ERM-2025-INY-S-013	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-014	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-015	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Bioturbation	Positive
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Bioturbation	Positive
ERM-2025-INY-S-016	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Roots	Negative
ERM-2025-INY-S-017	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
ERM-2025-INY-S-018	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-019	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
ERM-2025-INY-S-020	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
ERM-2025-INY-S-021	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-022	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Caliche	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 4	50×50×30 cm	Hand Tools	1/8th inch	n/a	Positive
	STP 5	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
ERM-2025-INY-S-023	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative

Resource ID	STP/SSC #	Dimensions (W x L x D)	Excavation Method	Screening Method	Disturbances	Testing Results
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	STP 4	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 5	50×50×30 cm	Hand Tools	1/8th inch	Fluvial Action	Negative
	SSC 1	200×200×10 cm	Hand Tools	1/8th inch	n/a	Positive
ERM-2025-INY-S-024	STP 1	50×50×30 cm	Hand Tools	1/8th inch	Roots	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Positive
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	n/a	Positive
P-14-002492 (Update)	STP 1	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 2	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 3	50×50×30 cm	Hand Tools	1/8th inch	n/a	Negative
	STP 4	50×50×50 cm	Hand Tools	1/8th inch	n/a	Positive
	STP 5	50×50×30 cm	Hand Tools	1/8th inch	n/a	Positive
	STP 6	50×50×30 cm	Hand Tools	1/8th inch	n/a	Positive

7. SENSITIVITY ASSESSMENT

The archaeological sensitivity of the Project Study Area and potential for significant intact cultural resources were assessed based on the results of background research, the current field investigations, and an examination of the local environmental and depositional context. Based on the results of subsurface testing, which included 61 STPs and one SSC, the Project Study Area is considered to possess moderate potential for encountering intact subsurface archaeological deposits.

Subsurface investigations consistently yielded negative results for intact cultural deposits. Although limited quantities of cultural materials were recovered from subsurface contexts, these materials occurred at extremely low densities, frequently limited to one observation, and are interpreted as redeposited near-surface constituents rather than evidence of an intact archaeological deposit or areas of intensive cultural activity.

Excavations identified broadly consistent alluvial deposits composed of a silt-rich matrix with varying amounts of gravel and nodular inclusions. Observed stratigraphic variability was low and,

when present, was attributed to fluvial processes, including episodic flooding and/or sheetwash resulting in well-sorted silt deposits and localized gravel lens formation. While this depositional environment has the potential to bury and preserve cultural materials beneath younger sediments, subsurface testing did not identify any intact subsurface cultural deposit.

Collectively, the lack of primary cultural indicators within the test units suggests that these sites are represented by surficial traces of past activities, consistent with short-term or intermittent use of the localities. These sparse assemblages consistently contain limited quantities of lithic debitage, and similarly low densities of artifacts associated with the testing and reduction of locally available CCS toolstone. The predominance of debitage related to early-stage reduction activities reflects the opportunistic procurement and use of local toolstone packages, while the limited occurrence of formal tools indicates occasional processing and subsistence-related activities, albeit to a lesser extent. Overall, the absence of intact cultural deposits, features, or other indicators of long-term occupation suggest a reduced potential for significant buried archaeological resources relative to what may have been anticipated based on background research and surface observations alone. Nevertheless, the Project Study Area retains moderate archaeological sensitivity due to the presence of numerous cultural resources and the potential for buried deposits to occur within localized areas.

TABLE 4 ARCHAEOLOGICAL SITES WITHIN THE PROJECT STUDY AREA

Resource Number	Age	Resource Description	NRHP/CRHR Eligibility Recommendation	Proposed Mitigation Measures
ERM-2025-INY-S-001	Multicomponent	Precontact artifact scatter; Historic features and refuse scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-002	Precontact	Artifact Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-003	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-004	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-005	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-006	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-007	Multicomponent	Precontact Lithic Scatter; Historic Refuse Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable

Resource Number	Age	Resource Description	NRHP/CRHR Eligibility Recommendation	Proposed Mitigation Measures
ERM-2025-INY-S-008	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-009	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-010	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-011	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-012	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-013	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-014	Precontact	Artifact Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-015	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-016	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-017	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-018	Precontact	Rock Feature & Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-019	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-020	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-021	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable

Resource Number	Age	Resource Description	NRHP/CRHR Eligibility Recommendation	Proposed Mitigation Measures
ERM-2025-INY-S-022	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-023	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-024	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
ERM-2025-INY-S-025	Historic	Refuse Scatter	Recommended Not Eligible	N/A
P-14-002492 / CA-INY-2492	Precontact	Sparse Lithic Scatter	Recommended Not Eligible	MM-CUL-1a though MM-CR-1g as applicable
P-14-011677 / CA-INY-10323H	Historic	Historic Road Segment	Recommended Not Eligible	N/A
P-14-011678 / CA-INY-10322	Precontact	Ephemeral trail or footpath	Recommended Not Eligible	N/A
P-14-011679 / CA-INY-10320H	Historic	Historic Road	Recommended Not Eligible	N/A
P-14-011681 / CA-INY-010370H	Historic	Historic Road	Recommended Not Eligible	N/A

CRHR = California Register of Historical Resources
NRHP = National Register of Historic Places

8. APPLICABLE MITIGATION MEASURES

As previously determined, the Project is situated within a desert valley environment characterized by alluvial and eolian depositional context. Such a landscape is highly dynamic, shaped by ongoing processes of erosion and deposition, which can result in the burial or obscuring of archaeological sites beneath younger sediments. ERM's pedestrian survey effort identified numerous archaeological sites, demonstrating that the area contains evidence of past human activity and should be considered archaeologically sensitive. Although Extended Phase I testing indicates that the recorded sites lack the research potential and integrity necessary to support eligibility for listing in the NRHP or CRHR (see Table 4), the potential remains for previously unidentified subsurface resources. Therefore, the following cultural resources mitigation measures (MM) presented in the REGPA PEIR are applicable to ensure that any cultural resources encountered during project construction are appropriately identified, documented, evaluated, and treated in accordance with regulatory requirements (Inyo County 2015).

REGPA PEIR MM CUL-1: Minimize impacts to cultural resources

Adverse effects to historical resources (CRHR[1]-eligible cultural resources) would be resolved on a project-specific level. As part of this process, resource identification efforts including pedestrian surveys, formal government-to-government tribal consultation with state lead agencies, and engagement with Native American communities would be necessary.

Examples of ways to resolve adverse effects include:

- Plan ground disturbance to avoid cultural resources.
- Deed cultural resources into permanent conservation easements.
- Cap or cover archaeological resources with a layer of soil before building on the location.
- Plan parks, greenspace, or other open space to incorporate cultural resources.
- Write synthetic documents summarizing the current understanding of the history and prehistory of the project area and vicinity.
- Recover data for archaeological resources.
- Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of sensitive resources.
- Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs.
- Coordinate with visual resources staff to ensure visual management standards consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (e.g., TCPs, trails).
- Measures to address visual impacts to the setting of built-environment resources include:
    - Existing mature plant specimens shall be used for screening during construction, operation, and decommissioning phases. The identification of plant specimens that are determined to be mature and retained shall occur as part of the design phase and mapped/identified by a qualified plant ecologist or biologist and integrated into the final design and project implementation.
    - Revegetation of disturbed areas within the project area shall occur as various activities are completed. Plans and specifications for revegetation shall be developed by a qualified plant ecologist or biologist before any extant vegetation is disturbed. The revegetation plan shall include specification of maintenance and monitoring requirements, which shall be implemented for a period of 5 years after project construction or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist. Plant material shall be consistent with surrounding native vegetation.

[1] The acronym "CRHR" has been corrected here from "CRHP," which appears in the REGPA PEIR (Inyo County 2015). In this context, CRHR refers to the California Register of Historical Resources.

- The color of the wells, pipelines, storage tanks, control structures, and utilities shall consist of muted, earth-tone colors that are consistent with the surrounding natural color palette.
- Matte finishes shall be used to prevent reflectivity. For example, integral color concrete should be used in place of standard gray concrete.
- The final revegetation and painting plans and specifications shall be reviewed and approved by an architect, landscape architect, or allied design professional licensed in the State of California to ensure that the design objectives and criteria are being met.
- Specific impact identification and adjustments to finish specifications shall occur during project design. Implementation of the revegetation and coloration plans shall occur during oilfield development. Maintenance and monitoring requirements shall be implemented after initial project construction for a period of 5 years, or after the vegetation has successfully established, as determined by a qualified plant ecologist or biologist.

- Protective measures and monitoring protocols can be implemented for built environment resources located in close proximity to a project but that are not anticipated to be directly impacted by demolition or development but which may be subject to other direct impacts such as change in historic setting, vibration, noise, or inadvertent damage include:
  - Historic Structures Reports (HSR) shall be prepared for buildings and structures adjacent to the project area for which detailed information is required to develop protection measures. Reports shall be completed for buildings and structures that appear to be in poor condition and, therefore, potentially sensitive to development-related activities such as vibration. These reports shall determine if predevelopment stabilization through temporary shoring and bracing of these buildings is warranted.
  - Predevelopment condition assessments shall be prepared for buildings and structures that qualify as historical resources that are adjacent to the project area and are structurally stable, but could be unintentionally damaged during development. Should there be any question as to whether the project caused damage, these condition assessments will provide confirmation of the predevelopment condition.
  - Precautions to protect built environment historical resources from construction vehicles, debris, and dust may include fencing or debris meshing. Temporary mothballing, and fire and intrusion protection may be needed if the buildings are unoccupied during oil and gas field development.
  - Protective measures shall be field checked as needed during development by a qualified architectural historian with demonstrated experience conducting monitoring of this nature. Vibration monitoring may be required for buildings determined susceptible to vibration damage located in close proximity to development activities or machinery that cause vibration.

- These measures are designed to avoid direct impacts such as vibration that may result in structural damage or inadvertent direct impacts. Structural damage or demolition would otherwise potentially result in a significant impact because character-defining features and aspects of historic integrity that convey the resource's significance could be materially impaired.
- Redesign of relevant facilities shall be used to avoid destruction or damage where feasible.

- For built resources that will be directly and significantly impacted, mitigation typically includes:
  - Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) records will be prepared for historical resources that will be demolished. The HABS/HAER/HALS documentation will be prepared as appropriate for the impacted historical resource with HABS normally completed at Level II. These reports will include written and photographic documentation of the significant and character-defining features of these properties. While this documentation will not reduce impacts to a less than a significant level, it is needed to capture and preserve a description of the significant information and characteristics associated with the resource.
  - All HABS/HAER/HALS reports are subject to review and approval by the NPS. Following approval, the lead agencies will produce sufficient copies for distribution to identified repositories, including the Library of Congress, the California State Library, the University of California Water Resources Center Archives, and any local repositories, as appropriate and agreed upon with the County Planning Department and interested parties. Distribution will ensure the formal documentation is retained and conveyed to a wide audience.
  - Deconstruction and salvage of materials from demolished buildings will be performed to the extent feasible to enable the restoration of similar buildings and structures outside of the area of direct impact. Deconstruction and salvage will not reduce impacts to a less than significant level, but will help to ensure that similar resources are restored and maintained in manner that will ensure that examples of the resource type are preserved.
  - Relocate historically significant resources for which demolition cannot be feasibly avoided by development. In such circumstances, relocation must meet the requirements for the Special Criteria Consideration for Moved Buildings, Structures, and Objects to ensure the significance of the building is retained.
  - Require that the preservation or reuse of an eligible structure follow Department of the Interior (DOI) Standards and Guidelines for Archeology and Historic Preservation. If the building is considered a historic resource under CEQA, the local building inspector must grant code alternatives under the State Historic Building Code.

  - In a case where HABS/HAER documentation does not provide adequate mitigation to reduce impacts to a less than significant level, projects would normally be required to take additional steps to capture the history and memory of the resource and share this information with the public using various methods such as Web media, static displays, interpretive signs, use of on-site volunteer docents, or informational brochures.

- Avoidance and minimization are the preferred means by which the County would prevent potential impacts to cultural resources, including cultural landscapes. Preservation in place is the preferred manner to avoid and minimize impacts to historical and archaeological resources. All impacts to cultural resources that are eligible or potentially eligible for listing on the CRHR shall be avoided, to the greatest extent possible. Preservation in place may be accomplished by, but is not limited to, the following: Avoidance of significant or potentially significant cultural resources through project redesign and the relocation of project element.
- Following avoidance and minimization, measures to address impacts to cultural resources at a landscape scale should follow the guidance in A Strategy for Improving Mitigation Policies and Practices of the Department of the Interior (DOI 2014) and the National Park Service Preservation Brief 36 - Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes, including but not limited to:
  - Document the individual landscape characteristics and features in the context of the landscape as a whole in a Cultural Landscape Report, including contributing and non-contributing features.
  - Develop compensatory mitigation.
  - Coordinate with other agencies.
  - Monitor and evaluate the progress of long-term mitigation.
  - Develop and maintain geospatial information systems for use in identifying existing and potential conservation strategies and development opportunities.

REGPA PEIR MM CUL-1a: Designate Project Cultural Resources Staff

Project Cultural Resources Specialist. Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County Planning Department, a cultural resources specialist whose training and background conforms to the US Secretary of Interior's Professional Qualifications Standards, as published in Code of Federal Regulations Title 36, part 61 shall be retained by the project owner to conduct a cultural resources inventory, evaluate any resources, produce a Cultural Resources Management and Treatment Plan and other related plans for the approved project and to implement any required plans and mitigation, as necessary as determined by the cultural resource specialist.

Their qualifications shall be appropriate to the needs of the project and shall include local knowledge. If the project primarily impacts resources archaeological in nature, the cultural resources specialist shall have a background in archaeology, anthropology or cultural resource

management. If the project impacts primarily built environment resources, the cultural resources specialist shall have a background in architectural history. Resumes of the proposed cultural resources staff shall be submitted to the County Planning Department or other CEQA lead agency for review and approval. The Monitoring and Treatment Plan (Mitigation Measure CUL-1c) shall be prepared and implemented under the direction of the cultural resources specialist and shall address and incorporate CUL-1 through CUL-1g.

Additional Cultural Resources Staff. The project's cultural resources specialist may obtain the services of specialists, cultural resources monitors and field crew if needed, to assist in identification, evaluation, mitigation, monitoring, and curation activities. Cultural resources staff shall have a Bachelor's degree in anthropology, archaeology, history, architectural history or related field, and demonstrated field experience. These individuals must also meet local lead agency qualifications, and their resumes must be reviewed and approved by local lead agency staff prior to beginning work.

REGPA PEIR MM CUL-1b: Draft a Historical Resources Treatment Plan

To mitigate the potential impacts on historical resources identified during inventory of the project area, a treatment plan for historical resources shall be developed by, depending on the nature of the resources identified, an archaeologist and/or architectural historian who meets the Secretary of Interior's Professional Qualifications Standards. This treatment plan would include data recovery plans that would address NRHP/CRHR-eligible cultural resources that would be impacted by the project by requiring some level of extracting the scientific value and analysis of the resources prior to development.

REGPA PEIR MM CUL-1c: Draft a Monitoring and Treatment Plan

To mitigate the potential impacts related to inadvertent discovery of archaeological resources during construction, the project proponents shall have a Secretary of the Interior-qualified archaeologist implement a monitoring program and an unanticipated archaeological resource treatment plan. The qualified archaeologist will evaluate any resources uncovered during ground disturbing activities and implement appropriate treatment as specified in the archaeological resource treatment plan. During all phases of the project that include ground disturbance, these ground- disturbing activities will be observed by an archaeological monitor, as determined necessary by the archaeologist.

- If, during the course of monitoring, a potentially significant resource is discovered, the qualified archaeologist will have the authority to stop or redirect ground disturbing activities away from the resource until it can be evaluated.
- If previously unknown cultural deposits are discovered during the course of construction, such as previously undiscovered stratified cultural deposits, a testing program will be implemented to evaluate the stratified cultural deposit.
- A separate Native American monitor shall be retained by the project proponent to monitor ground disturbing activities in and around archaeological resources. The Native American

monitor shall be selected through consultation with Native American tribal groups. The Native American monitor shall work in conjunction with the qualified archaeologist.

REGPA PEIR MM CUL-1d: Grant Authority to Halt Project Activities

Prior to the approval of a Renewable Energy Permit, Renewable Energy Development Agreement, or Renewable Energy Impact Determination by the County or the relevant CEQA lead agency, the project owner shall submit a written document granting authority to halt project related activities to the project's cultural resources specialist (as defined in Mitigation Measure CUL-1a) and cultural resources monitors in the event of a discovery or possible damage to a cultural resource. Redirection of project related activities shall be accomplished under the direction of the project supervisor in consultation with the cultural resources specialist. The details of this agreement shall be stipulated in the Cultural Resources Management and Treatment Plan as required in Mitigation Measure CUL-1b.

REGPA PEIR MM CUL-1e: Develop a Cultural Resources Worker Environmental Awareness Program

Prior to and for the duration of project activities, the project owner shall provide Worker Environmental Awareness Program (WEAP) training to all new workers within their first week of employment at the project site. The training shall be prepared by the project's cultural resources specialist (as defined in CUL-1) in consultation with local Native Americans and shall incorporate the traditions and beliefs of local Native American groups into the presentation. The presentation may be conducted by any qualified cultural resources specialist and a Native American, if possible, and may be presented in the form of a video. A consulting fee or honorarium shall be negotiated with the local Native American consultants and presenter and paid to them for their participation. The training may be discontinued when project activities are completed or suspended but must be resumed when project activities resume.

The training shall include:

1. A discussion of applicable laws and penalties under the law;
2. Samples or visuals of artifacts that might be found in the project vicinity;
3. A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed;
4. A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during ground-disturbance, and the range of variation in the appearance of such deposits;
5. A discussion of what local Native American beliefs are, how those beliefs are related to cultural resources that may be found in the area, and the appropriate respectful behavior towards sacred places and objects;
6. Instruction that all cultural resources specialists have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the project cultural resources specialist (as defined in CUL-1);

7. Instruction that employees are to avoid areas flagged as sensitive for cultural resources;
8. Instruction that employees are to halt work on their own in the vicinity of a potential cultural resources discovery and shall contact their supervisor and the project cultural resources specialist (as defined in CUL-1), and that redirection of work would be determined by the project supervisor and the project cultural resources specialist;
9. An informational brochure that identifies reporting procedures in the event of a discovery;
10. An acknowledgement form signed by each worker indicating that they have received the training which shall be submitted to the County Planning Department and any other CEQA lead agency; and,
11. A sticker that shall be placed on hard hats indicating that environmental training has been completed.

REGPA PEIR MM CUL-1f: Conduct Cultural Resources Reporting

The project cultural resources specialist shall document results in interim and final reports as necessary. The contents and timing of these reports shall be stipulated in the Cultural Resources Management and Treatment Plan (CUL-1b). Final reports for archaeological resources, human remains, and some landscapes, shall be written by or under the direction of a Secretary of the Interior qualified archaeologist or architectural historian as appropriate for the project. Reports shall be provided in the California Office of Historic Preservation *Archaeological Resource Management Reports: Recommended Contents and Format* and local agency formats. Final documents shall report on all field activities including dates, times and locations, results, samplings, and analyses. All survey reports, Department of Parks and Recreation 523 forms, data recovery reports, and any additional research reports not previously submitted to the CHRIS and the State Historic Preservation Officer shall be included as appendices.

REGPA PEIR MM CUL-1g: Proper Curation of Cultural Resources Collections

All archaeological materials retained as a result of the cultural resources investigations (survey, testing, data recovery) shall be curated in accordance with the California State Historical Resources Commission's *Guidelines for the Curation of Archaeological Collections*, into a retrievable storage collection in a public repository or museum. Additionally, all collection and retention of archaeological materials as a result of cultural resources investigations must comply with the regulations and policies of the land managing agency or property owner.

REGPA PEIR MM CUL-2: Implement Proper Actions in the Event of the Incidental Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified within 24-hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie potential remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or are believed to be Native American, the Coroner shall notify the NAHC within 24-hours. In accordance with California PRC Section

5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant of the deceased Native American. The descendant shall complete their inspection within 48-hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the County, the disposition of the human remains. Should human remains be discovered at any time during construction of the project, construction in the vicinity would halt and the County Coroner would be contacted immediately. If the Coroner determines that the remains do not require an assessment of cause of death and are probably Native American, then the NAHC would be contacted to identify the Most Likely Descendant.

9. SUMMARY

This revised Cultural Resources Assessment presents the results of cultural resources investigations conducted by ERM between 2024 and 2026 for the Project and supersedes the draft report submitted to Inyo County in December 2025. Initial investigations included background research, CHRIS records searches, and Phase I pedestrian survey of the Project Study Area. No resources listed in or formally designated under the NRHP, CRHR, CHL, or California Points of Historical Interest were identified within the Project Study Area. Additionally, a review of National Trails System resources identified the OSNHT (see Figures 1-3) as the nearest designated National Historic Trail; however, the trail is located outside the Developed Area and is not expected to be affected by the Project.

The survey resulted in the documentation of 90 newly identified cultural resources, including 65 isolated artifacts and 25 archaeological sites, as well as revisits to five previously recorded resources, reflecting both precontact and historic-era land use within the Study Area. Recorded isolated cultural resources included standalone or groups of artifacts (less than three associated objects) older than 45 years (greater than or equal to 1980) that did not meet the criteria of a site. Isolates are considered categorically ineligible for listing on the CRHR unless the artifact is of exceptional significance, meeting the criteria of a unique archaeological resource as defined in subdivision (g) of Section 21083.2. None of the documented isolates met the criteria of a “unique archaeological resource” and are therefore considered not eligible.

An evaluation of the documented sites determined that one newly identified site, ERM-2025-INY-S-025, was recommended not eligible for listing in the CRHR or the NRHP under any of the four criteria as the information it yields had been realized through recordation. Additionally, ERM concurred with previous eligibility recommendations that the four previously recorded linear resources (P-14-011677, P-14-011678, P-14-011679, and P-14-011681) were not eligible for listing in the CRHR or the NRHP (Lawson and Spaulding 2012); therefore, no further consideration of these four resources under the CEQA process is recommended.

Extended Phase I archaeological testing included 62 subsurface excavations consisting of STPs and shovel scrape clearings SSCs of the remaining 24 newly documented sites and one previously recorded resource, P-14-002492, and at selected locations with elevated cultural resources sensitivity. The test excavations did not identify intact subsurface cultural deposits, features, or other evidence of any significant buried archaeological resources. Together, the results of the

Phase I pedestrian survey and the Extended Phase I archaeological testing provide sufficient information to evaluate integrity and research potential in support of eligibility determinations under Criterion 4 of the CRHR and Criterion D of the NRHP. Consistent with management under CARIDAP, 20 sites meet the criteria for a sparse lithic scatter and are not considered eligible for listing in the NRHP or CRHR. The remaining sites (ERM-2025-INY-S-001, ERM-2025-INY-S-002, ERM-2025-INY-S-007, and ERM-2025-INY-S-014) exhibit limited data potential, lack of intact subsurface deposits, reducing their potential to contribute meaningful new information about regional prehistory. As such, the sites are recommended not eligible for listing in the NRHP or CRHR under any of the four criteria.

Although the test excavations did not identify buried deposits, the Project Study Area retains moderate archaeological sensitivity due to its environmental and depositional setting and the number of recorded cultural resources. Therefore, with the implementation of the proposed MM CUL-1-1g, including retention of qualified cultural resources staff, preparation of a Historical Resources Treatment Plan and a Monitoring and Treatment Plan combined into a single (confidential) CRMTP, cultural resources construction monitors with the authority to halt Project-related activities, development of a WEAP program, report preparation, and established curation procedures, ERM concludes that the Project would result in a less than significant impact to cultural resources under CEQA. Additionally, if human remains are encountered, they will be treated in accordance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These measures provide a framework for the identification, evaluation, and treatment of any previously unidentified cultural resources that may be encountered during Project construction.

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APPENDIX A ARCHAEOLOGICAL TESTING PLAN

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MEMO

TO	Stephanie Lauer Senior Director, Permitting Hanwha Renewables, LLC
FROM	Maria Wiseman, M.A., RPA, Anthony H. Morales, M.A., RPA
DATE	18 February 2026 (*Final Draft Submittal Date*)
REFERENCE	Bonanza Peak Energy Project (0756349)
SUBJECT	Archaeological Testing Plan

1. INTRODUCTION

The following Archaeological Testing Plan outlines the field methods and reporting protocols for limited subsurface archaeological site testing to be conducted prior to implementation of the Bonanza Peak Energy Project (Project).

[***Administrative Note:*** *Refer to the Cultural Resources Assessment (Revised – 2026) technical report for sections containing duplicate or more current information (Wiseman and Morales 2026). To reduce file size, these sections have been removed from this version of the Archaeological Testing Plan*.]

2. PROJECT OVERVIEW

2.1 PROJECT DESCRIPTION

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for updated details*.]

2.2 PROJECT LOCATION

The Project is located on privately owned land within the Charleston View SEDA in southeastern Inyo County, California. The Project lies north of Old Spanish Trail Highway, adjacent to the California-Nevada border, approximately 1 mile north of the rural community of Charleston View, California (Figure 1). The Project includes portions of Township 22 North, Range 10 East, Sections 8, 9, 15, 16, 17, 20, 21, 22, 23, 26, 27, and 28, as depicted on the Tecopa and Calvada Springs United States Geological Survey 7.5-minute topographic quadrangles (Figure 2).

The Project is located within the unincorporated jurisdiction of Inyo County and is currently zoned OS-40 (Open Space, minimum parcel size 40 acres), a zoning designation under which commercial renewable energy development is an allowable use. The surrounding area consists

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primarily of undeveloped desert lands and intermittent utility infrastructure. The closest incorporated city is Las Vegas, Nevada, located approximately 57 miles east of the Project. Other nearby communities include Tecopa, California (26 miles west), Pahrump, Nevada (25 miles north), and Mountain Springs, Nevada (25 miles east).

2.3 PROJECT TEAM

ERM Principal Technical Consultant, Archaeology, Maria Wiseman, M.A., Registered Professional Archaeologist (RPA), will oversee the proposed cultural resources testing program, co-author and review the report, and provide quality assurance/quality control. ERM Managing Technical Consultant, Archaeology, Anthony H. Morales, M.A., RPA, will lead the field effort and co-author the report. Both Maria Wiseman and Anthony H. Morales meet the Secretary of the Interior's Professional Qualification Standards in Archaeology.

3. REGULATORY CONTEXT

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for a current summary of the applicable federal, state, and local regulations governing cultural resource compliance for this Project*.]

4. ENVIRONMENTAL SETTING

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for details*.]

5. CULTURAL SETTING

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for details*.]

6. METHODS

6.1 PHASE I FIELD RESULTS

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for a current summary of the 2025 and 2026 pedestrian survey results*.]

6.2 TESTING PROGRAM DESIGN AND OBJECTIVES

The sites chosen for subsurface testing include two multicomponent sites, 21 precontact sites, and one site consisting of a singular feature. The precontact components of these sites share a high degree of similarity as they are largely represented by lithic scatters. Two of these sites also contain cultural constituents representative of additional artifact classes such as precontact ceramics. Three sites (ERM-2025-INY-S022, ERM-2025-INY-S023, ERM-2025-INY-S024) consist of lithic scatters with a higher density of artifacts and a more diverse assemblage, all within a complex depositional context with a higher potential to contain intact subsurface cultural deposits in comparison to the other sites. ERM proposes limited subsurface archaeological testing at each

site to determine the presence of subsurface cultural components and assess the significance and data potential of these resources per Criterion 4 of the CRHR.

Considering the composition of these sites, primarily low-density lithic scatters with similar artifact types, some sites may qualify for management under the California Archaeological Resource Identification and Data Acquisition Program (CARIDAP), which allows for streamlined treatment of sparse lithic scatters. Developed by the California Office of Historic Preservation (OHP), CARIDAP establishes standardized procedures for identifying, documenting, and managing sites that, while limited in data potential, may still yield useful information in the pursuit of understanding regional archaeological themes. The application of CARIDAP may be sufficient for evaluating site significance; however, in cases where additional testing is required to determine eligibility, the findings may be incorporated into more intensive testing or a data recovery program if necessary. Data collected under CARIDAP would support eligibility evaluations and undergo formal review and concurrence by the appropriate agencies (Jackson et al. 1988).

The primary objective of the proposed testing program is to confirm the presence or absence of buried cultural deposits and obtain the necessary data to adequately assess site integrity and data potential. This includes identifying surficial constituents and recording the spatial distribution of artifacts and/or features, confirming or redefining the site boundary, collecting and processing surface materials if needed, defining the spatial variability and determining the horizontal and vertical extent of the cultural deposit, and evaluating the contents and data potential of the subsurface deposit if observed. The resulting data will be used to assess the depth, age, integrity, and contents of each site's cultural deposit, culminating in a determination of eligibility for listing in the CRHR and NRHP. The methods presented here are subject to review and approval by the Consulting Tribes and appropriate Agency representatives.

6.3 SITE MAPPING

The results of intensive pedestrian survey indicate that the newly identified sites are representative of late 19th- to early 20th-century transitory land use and precontact use characterized by toolstone procurement, the production and rejuvenation of lithic implements, and the processing of subsistence-related resources. Although the areal extent of these sites has been previously assessed, the testing program will include a comprehensive surface inspection, reestablishing and recording the distribution of surface artifacts to confirm or redefine the site boundary if required (e.g., encountering associated subsurface deposits outside of the previously recorded site boundary). This effort will aid in the strategic placement of excavation units to evaluate areas exhibiting a higher density of artifacts and/or a heightened degree of subsurface data potential based on depositional context.

The location of artifacts and placement excavation units will be documented with iPads using the ArcGIS Field Maps application connected to a Juniper Geode Global Navigation Satellite System receiver, providing sub-meter accuracy for recordation. The Universal Transverse Mercator location of artifacts will be documented as single points or polygons, as appropriate, to determine site boundaries and identify intra-site loci, concentrations, or features. Detailed photographs of cultural materials and overviews of sites will be documented using a digital camera with iPad

photographs serving as a supplementary backup. Standardized paper forms will supplement the collection of these data.

6.4 SUBSURFACE TESTING

Archaeological testing of these sites will utilize controlled excavation units consisting of shovel test probes (STPs) and surface scrapes (SSCs) to determine the horizonal and vertical extent of the cultural deposit. The quantity, location, and maximum depth of each testing unit will vary depending on the size of each site, the composition of encountered soils, and the depositional environment wherein. STPs will measure 50 by 50 centimeters (cm) and be excavated in 10-cm arbitrary levels. All STPs will be manually excavated to a depth of 30 cm, and all sediments will be screened through a 1/8-inch mesh. If cultural materials are encountered, excavation will continue below the deepest positive level until two consecutive sterile levels are documented, even if this exceeds 30 cm, barring a subsurface obstacle or encountering a substrate with no potential to contain a cultural deposit. Soil composition, stratigraphy, and all observed cultural materials, or lack thereof, will be documented in the field by respective level on standardized forms. Upon termination, all units will be backfilled and restored to their original grade

Positive findings may require additional units or extended excavation units to fully expose or define a cultural deposit. In instances where broader exposures may be useful, SSCs will be employed. SSCs will measure 2 by 2 meters and excavated to maximum depth of 10 cm. On larger more complex sites, employing a combination of STPs and SSCs offers a more comprehensive approach to subsurface testing. STPs provide a targeted, high-resolution sampling with greater depth (if positive), making them effective for identifying buried deposits. However, their pinpoint nature can sometimes miss small features or localized concentrations of artifacts. In contrast, surface scrapes lack vertical resolution but expose broader horizontal areas, increasing the likelihood of detecting near surface level features or patterns that may not be immediately observable utilizing STPs. Together, this approach balances precision and coverage while maintaining flexibility in the field, culminating in a more complete data recovery to help determine the presence of a subsurface component and the archaeological significance of the sites.

6.5 ARTIFACT COLLECTION AND ANALYSIS

Given the composition of the 24 newly identified archaeological sites, it is anticipated that surface collection, laboratory analysis, and curation will not be required as the materials identified during pedestrian investigations, primarily cryptocrystalline silicate lithic debitage, can be adequately recorded in the field. If surficial constituents are consistent with those recovered during subsurface testing, they will be documented and evaluated for significance in the field.

The goal of the proposed testing plan is to confirm the presence or absence of buried cultural deposits while limiting excavation and laboratory efforts to what is necessary for evaluating site integrity and data potential. Should testing reveal artifacts with diagnostic value or other qualities with research potential, appropriate collection and analysis will be conducted as needed. If no significant deposits are encountered, recovered materials will be documented and returned during backfilling.

Cultural materials chosen for collection will include formal tools, temporally diagnostic artifacts, obsidian debitage (for sourcing/hydration studies), and associated faunal remains if observed. These artifacts will first be analyzed in the field, point-provenienced, bagged with provenience and description details, assigned a unique ID, and documented in a collection inventory. Following initial field documentation, the collected artifacts will be analyzed in a laboratory setting, catalogued, and reported on in the cultural resources testing technical report. Upon completion of analysis, the artifacts will be curated at an accredited curatorial facility in accordance with the OHP's guidelines for archaeological collections.

6.6 DATA RECORDATION PLAN FOR INADVERTENT DISCOVERY OF CULTURAL RESOURCES

The following plan identifies the protocol for assessing and evaluating the significance of newly discovered resources. This section follows State guidelines for management of cultural resources, as well as current best practices and industry standards for cultural resource management professionals. Please note that if inadvertent discoveries of TCR are observed, the Consulting Tribes, representing Agencies, and other stakeholders will be contacted by ERM and all work will cease until further guidance is received. Additionally, the affiliated Tribes will be consulted before further investigation of these resources occurs, to ensure proper treatment and disposition. Tribal Representatives shall analyze any TCR for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. The significance of TCR will be evaluated in accordance with applicable regulations and will consider the religious beliefs, customs, and practices of the affiliated Tribes. All items found in association with ancestral human remains are subject to stipulations per California PRC 5097.98.

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for additional details*.]

6.6.1 ISOLATES

Isolates are defined as less than three artifacts within a 10-meter squared location. Isolates may consist of, for example, a single projectile point, a chert lithic flake, a culturally modified animal bone, a tin can, or a glass bottle. When isolates are discovered, the monitor will carefully examine the surrounding area to ensure that other artifacts are not present. Subsequently, the monitor will photograph the isolate with a scale bar, obtain GPS coordinates of the location, and record the isolate using standard California Department of Parks and Recreation (DPR) series 523 forms. While most isolated finds are considered insignificant, should an isolate appear to be unique in nature an evaluation to determine if the isolate meets significance criteria will occur.

6.6.2 ARCHAEOLOGICAL SITES

Archaeological sites are defined as discrete locations of past human activity that hold historical, cultural, or scientific significance. For the purposes of this study, a site is characterized by the presence of three or more associated artifacts within a 30-meter area, or by one or more features

with or without associated artifacts. This definition also encompasses places of importance or TCR, such as cultural landscapes or sacred sites, which may exist with or without material remains.

All contributing factors for a site require standardized data collection for analysis and recordation on DPR 523 forms. Features or sites older than 45 years must be delineated and photographed (except human remains and associated grave goods or other Native American Graves Protection and Repatriation Act items unless Tribal permission is granted). GPS coordinates must be recorded, and DPR forms must include field maps and sketch map drawings. Comprehensive mapping is required for all cultural resources and must document accurate provenience, including depth of recovery if observed below the ground surface. Each site must be evaluated to determine whether it meets significance criteria per NHPA/CEQA. An archaeological site is considered significant if it is eligible or potentially eligible for listing in the CRHR or NRHP.

6.7 REPORTING

A comprehensive cultural resources technical report that encapsulates the support provided, including methodologies for cultural resources fieldwork, field and laboratory results, and treatment outcomes will be prepared under the direction of the Principal Investigator/Qualified Archaeologist and will follow the recommended contents and format of the State of California OHP's Archaeological Resource Management Reports (ARMR) (OHP 1990). A copy of the full report will be provided to Consulting Tribes for approval. The final approved report will be provided to the Consulting Tribes, appropriate Agencies, and submitted along with prepared site records to the SSJVIC for its permanent record. The report will demonstrate that ERM has made a reasonable level of effort to identify archaeological resources that is commensurate with the scale and scope of the undertaking.

6.8 FUNERARY CULTURAL MATERIALS AND NATIVE AMERICAN HUMAN REMAINS

If human remains are discovered, ground-disturbing activities will be suspended within a 100-foot radius of the find, and an Environmentally Sensitive Area (ESA) barrier will be established. The Lead Agency and Applicant shall contact the County Coroner as required by California Health and Safety Code §7050.5(c). If the remains are determined to be Native American, the Coroner shall notify the NAHC within 24 hours. The NAHC will designate an MLD pursuant to PRC Section 5097.98(a).

The MLD will inspect the discovery site and make recommendations for treatment and disposition within 48 hours, as required by law. Reburial of human remains and associated funerary objects shall comply with PRC Section 5097.98(a) and (b). The MLD, in consultation with the landowner, will make the final determination regarding appropriate disposition. Onsite reburial in a location protected from future disturbance is preferred. All Parties shall maintain confidentiality regarding the reburial location, which is exempt from disclosure under the California Public Records Act (Government Code §6254(r)).

7. NATIVE AMERICAN MONITORING

If the Lead Agency determines it applicable, a Native American monitor will be invited to participate in all proposed archaeological fieldwork activities. ERM will coordinate the fieldwork schedule with all parties involved. The Tribal Representative will have the authority to advise crews on the culturally appropriate treatment for sensitive resources, if discovered, and to temporarily divert field activities to achieve that treatment. The archaeological Field Supervisor, Field Director, and field staff will work together with the Consulting Tribal Representatives for identifying archaeological materials. In the event that more than one Tribal groups requests participation in Native American monitoring of the proposed work, the Lead Agency respects the sovereignty of federally recognized Tribes and will work with all Tribal Governments engaged in Tribal Consultation that has requested monitoring.

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for additional details*.]

8. REFERENCES

[***Administrative Note:*** *See the Cultural Resources Assessment (Revised – 2026) technical report for full list of references*.]

Wiseman, Maria, and Anthony H. Morales. 2026. Cultural Resources Assessment (Revised – 2026). Bonanza Peak Energy Project. ERM. Irvine, California.

APPENDIX B CONFIDENTIAL—CULTURAL RESOURCES MONITORING AND TREATMENT PLAN

APPENDIX C ERM LEAD STAFF RESUMES

Maria Wiseman, M.A., RPA

Principal Technical Consultant, Archaeology



Maria Wiseman, Principal Technical Consultant, Archaeology, at ERM, and serves as Principal Investigator on multiple federal and state permits. With more than 16 years of experience in cultural resources consultation, she has led complex environmental compliance programs and multidisciplinary field operations statewide in compliance with federal, state, and local regulations. Maria has established and maintained close working relationships with Native American Tribes and agencies. She exceeds the professional qualification requirements outlined in the Secretary of the Interior's (SOI) Standards for Archaeology.

EXPERIENCE: 16 years' experience in Cultural Resources Management

LINKEDIN: https://www.linkedin.com/in/maria-wiseman-m-a-rpa-aa09465

EMAIL: maria.wiseman@erm.com

EDUCATION

- Master of Arts. Classical Archaeology and Ancient History, Uppsala University, Uppsala, Sweden, 2009
- Bachelor of Arts. Archaeology, and Classical Archaeology and Ancient History, Uppsala University, Uppsala, Sweden, 2007

PROFESSIONAL AFFILIATIONS AND REGISTRATIONS

- Exceeds the Secretary of the Interior's Professional Qualifications Standards in Archaeology (36 Code of Federal Regulations [CFR] Part 61); Register of Professional Archaeologists (RPA)
- United States Bureau of Land Management Permit for Archeological Investigations, Principal Investigator, California (2024-2027)
- United States Bureau of Land Management Permit for Archeological Investigations, Principal Investigator, Arizona (2025-2028)
- United States Bureau of Land Management Permit for Archeological Investigations, Crew Chief (Historic: Statewide; Prehistoric: Southern Nevada and Battle Mountain Districts), Nevada (2025-2028)

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- United States Department of the Interior Permit for Archeological Investigations (ARPA) (CA Parks), Principal Investigator, California (2024-2026)
- United States Forest Service (USFS) Region Master Special Use Permit (MSUP), Principal Investigator, California (2024-2026)
- State of Nevada Antiquities Permit, Principal Investigator, Nevada (2025-2026)
- Arizona Antiquities Act Blanket Permit, Principal Investigator/Project Director, Arizona (2025-2026)

FIELDS OF COMPETENCE

- Cultural Resources Program Development and Project Management
- State, Federal, and Local Regulatory Compliance (CEQA, AB 52, NEPA, NHPA Section 106)
- Agencies Coordination, Permitting, and Stakeholder Engagement
- Principal Investigator-Level Technical Leadership and Quality Assurance
- Cultural Resources Impact Assessment, Sensitivity Analysis, and Significance Evaluation and Determinations of Eligibility
- Mitigation Planning, Treatment Strategies, and Compliance Support
- Tribal Consultation, Indigenous Engagement, and Repatriation Assistance
- Archaeological Field Investigations and Data Recovery Management

SELECTED KEY PROJECTS

Environmental Consulting Services; Confidential Client/Project – Tulare County, California (2025- present)

Principal Technical Consultant. ERM provides environmental consulting services in accordance with CEQA and local regulatory requirements for the proposed Sequoia Solar and Energy Storage Project, a utility-scale renewable energy development comprising a 200-megawatt solar PV facility, BESS, 4 miles of gen-tie transmission line, and substation improvements across 1,772 acres in southern Tulare County. The Phase I cultural resources support includes records review, sensitivity assessment, pedestrian survey, impact assessment, mitigation planning, and preparation of technical studies supporting environmental review and permitting. Role as Principal Technical Consultant involves providing technical leadership, regulatory strategy, quality assurance, and authoring and reviewing technical report and project deliverables.

Environmental Consulting Services; Confidential Client/Project – Calaveras County, California (2026- present)

Principal Technical Consultant. ERM provides environmental consulting services for a federal land conveyance and mine remediation project to facilitate the private acquisition and environmental remediation of a historic mining complex encompassing approximately 2,062 acres of BLM-administered land. The project consists of cultural resources support in accordance with NEPA and Section 106 of the National Historic Preservation Act, including preparation of an Environmental Assessment (EA), cultural resources investigations, agency coordination, environmental permitting support, pedestrian field inventory, and preparation of a Class III

Cultural Resource Investigation. Project support also includes the development and application of advanced geospatial analyses, including LiDAR-derived digital terrain models, 3D visualizations, viewshed analyses, and high-resolution mapping products to support cultural resources identification, evaluation, environmental review, and agency decision-making. Role as Principal Technical Consultant involves providing strategic and technical leadership for cultural resources compliance, including oversight of LiDAR-derived terrain modeling, geospatial analysis, and visualization products; client and agency coordination; and authoring and reviewing the Class III technical report and project deliverables.

Environmental Consulting Services; Confidential Client/Project – City of Carlsbad, San Diego County, California (2024- present)

Principal Technical Consultant. ERM provides environmental consulting services for a complex coastal infrastructure project involving both onshore and offshore components and requiring compliance with CEQA, Section 106 of the NHPA, as well as additional multiple federal, state, local, and tribal regulatory requirements. Cultural resources support includes archaeological investigations, tribal cultural resources assessments, pedestrian survey, geoarchaeological evaluation, archaeological testing (unit excavation, auger samples), site documentation, osteological analysis, and permitting support. Role as Principal Technical Consultant involves overseeing all aspects of the cultural resources support, agency coordination, Tribal Consultation, and authoring and reviewing technical reports and project deliverables.

Environmental Consulting Services; Confidential Client/Project – San Bernardino County, California (2024-2026)

Principal Technical Consultant. ERM provided cultural resources compliance support for a 5-megawatt solar energy development project in unincorporated San Bernardino County. Services included a CEQA Phase I Cultural Resources Study with pedestrian survey and formal AB 52 Tribal Consultation with federal and state-recognized Tribes. ERM facilitated Tribal outreach and consultation, supported government-to-government engagement, collaborated with consulting Tribes to develop culturally appropriate avoidance and mitigation measures, and provided consultation support to the Lead Agency and Applicant. Role as Principal Technical Consultant involved leading consultation with affiliated Tribes, developed avoidance and mitigation strategies, advised the Lead Agency and Applicant, and reviewing cultural resources technical report and project deliverables.

Environmental Consulting Services; Confidential Client/Project – City of Goleta, Santa Barbara County, California (2024- present)

Principal Technical Consultant. ERM provides environmental consulting services for a Battery Energy Storage System (BESS) development located on a 2.2-acre parcel in the City of Goleta. The project consists of cultural resources support in accordance with CEQA and local regulatory requirements, including a Phase I Cultural Resources study with pedestrian survey and Extended Phase I archaeological testing. Role as Principal Technical Consultant involves overseeing the cultural resources support, agency coordination, providing technical expertise, and authoring and reviewing technical reports and project deliverables.

Anthony H. Morales, M.A., RPA

Managing Technical Consultant, Archaeologist

Anthony Morales is a Secretary of the Interior (SOI) qualified archaeologist with more than a decade of experience in cultural resource management. His regional focus spans California's Central Coast and Channel Islands, the Eastern Sierra Nevada, the Mojave Desert, and the Great Basin, with broader project work in Mesoamerica. Anthony has managed large-scale projects for the military and utilities sectors across California, Arizona, Nevada, and Utah, cultivating a firm understanding of the NRHP/CRHR evaluation of resources, NHPA Section 106, NEPA, and CEQA.



EXPERIENCE: 10+ years in Cultural Resources Management

EMAIL: Anthony.morales@erm.com

EDUCATION

- Master of Arts in Anthropology, California State University, Los Angeles, 2021
- Geographic Information Systems Certificate, California State University, Los Angeles, 2017
- Bachelor of Arts in Anthropology, California State University, Los Angeles, 2015

PROFESSIONAL AFFILIATIONS AND REGISTRATIONS

- Exceeds the Secretary of the Interior's Professional Qualifications Standards in Archaeology (36 Code of Federal Regulations [CFR] Part 61). Register of Professional Archaeologists (RPA)
- United States Bureau of Land Management Permit for Archeological Investigations, Field Director, California (2024-2027)
- United States Bureau of Land Management Permit for Archeological Investigations, Principal Investigator (Historic: Statewide; Prehistoric: Statewide), Nevada (2025-2028)
- United States Bureau of Land Management Permit for Archeological Investigations, Field Director, Arizona (2025-2028)
- United States Department of the Interior Permit for Archeological Investigations (ARPA) (CA Parks), Principal Investigator, California (2024-2026)

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- United States Forest Service (USFS) Region Master Special Use Permit (MSUP), Field Director, California (2024-2026)
- State of Nevada Antiquities Permit, Principal Investigator, Nevada (2025-2026)
- Arizona Antiquities Act Blanket Permit, Project Director, Arizona (2025-2026)

FIELDS OF COMPETENCE

- Cultural Resources Project Management
- CEQA and NHPA Section 106 Archaeological Field Investigations and Data Recovery Management
- Federal, State, and Local Permitting
- Treatment Plans / Monitoring and Discovery Plans
- Cultural Resources Impact Assessment, Sensitivity Analysis, and Significance Evaluation and Determinations of Eligibility
- Construction Monitoring
- Geographic Information Systems (GIS) and Spatial Statistics

KEY PROJECTS

Environmental Consulting Services; Confidential Client/Project – Tulare County, California (2025- present)

Managing Technical Consultant. ERM provides environmental consulting services in accordance with CEQA and local regulatory requirements for the proposed Sequoia Solar and Energy Storage Project, a utility-scale renewable energy development comprising a 200-megawatt solar PV facility, BESS, 4 miles of gen-tie transmission line, and substation improvements across 1,772 acres in southern Tulare County. The Phase I cultural resources support includes records review, sensitivity assessment, pedestrian survey, impact assessment, mitigation planning, and preparation of technical studies supporting environmental review and permitting. Role as Managing Technical Consultant involves project planning, budget management, client coordination, fieldwork supervision, and author of technical report and project deliverables.

Environmental Consulting Services; Confidential Client/Project – Multiple Counties, California (2024-present)

Managing Technical Consultant / Cultural Resources Lead. ERM provides environmental consulting services for various operations, including utility infrastructure replacements and other program-related activities, performed in multiple counties, as part of a Transmission and Distribution (Poles and Wire) Program. Cultural resources support provided by ERM consists of archaeological desktop reviews for all work activities performed on private and public land, fieldwork, and the preparation of reports and program deliverables, in accordance with federal and state permits and agreements (MSUP, BLM, CDPR, CDFW, etc.). Role as Cultural Resources Lead involves providing senior-level resource leadership and technical oversight of data analysis, client and agency point of contact, and authoring and reviewing deliverables (reports, site records, and desktop reviews).

Environmental Consulting Services; Confidential Client/Project – Multiple Counties, California (2024-present)

Managing Technical Consultant / Cultural Resources Lead. ERM provides environmental consulting services for various operations, including transmission and distribution utility pole replacements, vegetation removal, and other program-related activities, performed in multiple counties, as part of the Vegetation Management Program. Cultural resources support provided by ERM consists of archaeological desktop reviews for all work activities performed on private and public land, fieldwork, and the preparation of reports and project deliverables, in accordance with federal and state permits and agreements (MSUP, BLM, CDPR, CDFW, etc.). Role as Cultural Resources Lead involves providing senior-level resource leadership and technical oversight of data analysis, client and agency point of contact, and authoring and reviewing technical deliverables (reports, site records, and desktop reviews).

Environmental Consulting Services; Confidential Client/Project – Calaveras County, California (2026- present)

Managing Technical Consultant. ERM provides environmental consulting services for a federal land conveyance and mine remediation project to facilitate the private acquisition and environmental remediation of a historic mining complex encompassing approximately 2,062 acres of BLM-administered land. The project consists of cultural resources support in accordance with NEPA and Section 106 of the National Historic Preservation Act, including preparation of an Environmental Assessment (EA), cultural resources investigations, agency coordination, environmental permitting support, pedestrian field inventory, and preparation of a Class III Cultural Resource Investigation. Project support also includes the development and application of advanced geospatial analyses, including LiDAR-derived digital terrain models, 3D visualizations, viewshed analyses, and high-resolution mapping products to support cultural resources identification, evaluation, environmental review, and agency decision-making. Role as Managing Technical Consultant involves project planning, budget management, client coordination, directing fieldwork, and authoring the Class III technical report and project deliverables.

Environmental Consulting Services; Confidential Client/Project – City of Carlsbad, San Diego County, California (2024- present)

Managing Technical Consultant. ERM provides environmental consulting services for a complex coastal infrastructure project involving both onshore and offshore components and requiring compliance with CEQA, Section 106 of the NHPA, as well as additional multiple federal, state, local, and tribal regulatory requirements. Cultural resources support includes archaeological investigations, tribal cultural resources assessments, pedestrian survey, geoarchaeological evaluation, archaeological testing (unit excavation, auger samples), site documentation, osteological analysis, and permitting support. Role as Managing Technical Consultant involves project planning; health and safety coordination; and management of complex archaeological GIS data, mapping, and deliverables.

APPENDIX D CONFIDENTIAL—CHRIS RECORDS SEARCH REQUEST AND RESULTS

APPENDIX E CONFIDENTIAL—SUPPLEMENTAL NAHC SEARCH REQUEST AND RESULTS

APPENDIX F CONFIDENTIAL—SURVEY AND TESTING RESULTS MAPS

APPENDIX G CONFIDENTIAL—FIELDWORK PHOTOGRAPHS

APPENDIX H CONFIDENTIAL—DPR RECORDS



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