Appendix D

Cultural Resource Assessment Report **HELIX Environmental Planning, Inc.**

11 Natoma Street, Suite 155 Folsom, CA 95630 www.helixepi.com



October 1, 2021

Project # 02576.00034.001

Mr. Steve Banks Principal Planner City of Folsom, Community Development Department 50 Natoma Street Folsom, CA 95630

Subject: Cultural Resource Assessment Letter Report for the Proposed Broadstone Villas Multi-

Family Apartment Project, Sacramento County, CA

Dear Mr. Banks,

HELIX Environmental Planning, Inc. (HELIX) has prepared this cultural resources assessment letter report for the proposed Broadstone Villas Multi-Family Apartment Project in Sacramento County, California. Elliott Home (Applicant) proposes to construct Broadstone Villas (proposed project), a 257-unit apartment community on an estimated 19.7-acre project site located at 1565 Cavitt Drive on the eastern corner of East Bidwell Street and Broadstone Parkway in the City of Folsom (City).

This letter report presents the results of a cultural resources assessment intended to evaluate the potential for the proposed project to significantly impact historical resources. The conclusions and recommendations presented here are based on data from an archival records search, Native American outreach, an intensive pedestrian survey of the project area, and limited subsurface testing of a portion of the project area considered particularly sensitive by Native American groups.

PROJECT LOCATION AND DESCRIPTION

The project area is located at 1565 Cavitt Drive, on the eastern corner of East Bidwell Street and Broadstone Parkway, west of Cavitt Drive in the City of Folsom (City) in Sacramento County, California. The project area consists of APN 072-0270-155, and has frontage along East Bidwell Street, Broadstone Parkway, and Cavitt Drive. The estimated 19.7-acre project site is a part of a current 37.2-acre parcel; the applicant proposes subdividing this parcel between the project site for this project and an estimated 17.5-acre parcel for future commercial development (development of the second parcel is not considered as part of this assessment). The project area is located within Section 5, Township 9 North, Range 8 East (Mount Diablo Base and Meridian) as shown on the United States Geological Survey 7.5-minute Folsom and Clarksville Quadrangle. A Project Vicinity Map is presented as Figure 1, and Figure 2 shows the project area boundary depicted on a topographic background. All referenced figures are included in **Attachment A**.

The project area is currently undeveloped and rough graded. An existing Sacramento Municipal Utility District (SMUD) substation sits near the eastern boundary of the site along Cavitt Drive; this substation would be unchanged by the proposed project. East of Cavitt Drive is a residential subdivision and the Handy Family Park. The site is also bordered to the east by Talavera Apartments. North of the project area is Broadstone Parkway and a commercial shopping center. Along the west boundary, a railroad corridor with a bicycle trail separates the project area from East Bidwell Street; across East Bidwell Street is another commercial shopping center. South of the project area is vacant, rough graded land which may be developed into multifamily residential or mixed-use commercial development in the future.

A variety of apartment units would be constructed within 33 three-story buildings. One standalone six-car garage would be constructed. Additionally, a one-story clubhouse would be constructed that would include approximately 6,063 square feet (ft²) of amenity area and 1,104 ft² of building support area. Residential areas would approximately 285,229 ft². When additionally considering 89,770 ft² of garage space, 3,327 ft² of building support area, 28,510 ft² of circulation areas (hallways, etc.), and 6,063 ft² of amenity space provided by the clubhouse, the development would total 412,889 ft².

Maximum building height of the residential buildings, at the roofline, would be approximately 30-feet above grade, and the parapets would screen the building-attached mechanical equipment from view. Outside the clubhouse would be a large pool, spa, cabanas, outdoor kitchens, bocce ball, fire pits, and lounge areas. Additional outdoor amenities would include landscaped courtyards and walkways adjacent to the residential buildings, along with two dog parks with synthetic turf.

Area of Potential Effects

The Area of Potential Effects (APE) is defined as the geographic area or areas within which a project may directly or indirectly cause alterations in the character or use of significant archaeological or architectural resources. The APE is influenced by the scale and nature of the project as well as by the types of cultural resources in the vicinity. For the purposes of this analysis, the APE is understood to be the area that would be subjected to ground disturbance during construction and implementation of the proposed project. The APE for the Broadstone Villas Multi-Family Apartment Project measures approximately 19.7-acres (Figure 3) and corresponds to the project area described above. The APE's vertical dimension is currently unknown, but is expected to extend at least 4 feet beneath the current ground surface to accommodate grading and trenching for utilities.

ARCHIVAL RECORDS SEARCH

On July 6, 2021, an archival records search in support of the proposed project was conducted at the North Central Information Center (NCIC) of the California Historical Resources Information System, located at California State University, Sacramento. The records searches addressed all portions of the APE and a 0.5-mile radius around the APE (hereafter referred to as the study area). Sources of information included previous survey and cultural resources files; the National Register of Historic Places (NRHP); the California Register of Historical Resources (CRHR); the Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility; the OHP Directory of Properties in the Historic Property Data File; historical topographic maps; and historical aerial photographs.



Previous Studies

The records search identified 36 studies that have previously been conducted within the study area (Table 1). Five studies directly examined the current APE during their surveys; these are shown in bold in Table 1 and discussed briefly below.

Table 1
PREVIOUS STUDIES CONDUCTED WITHIN THE STUDY AREA

Report	Year	Author(s)	Title	Affiliation
003749	1995	Smith, Kim	East Bidwell Street Scott Road Interchange Project on	Jones & Stokes
1555 Silitif, Kill		Simery Killi	Route 50	Associates, Inc.
003830	1997	Windmiller, R., L. A. Payen, and P. Payen	Evaluation of Cultural Resources Broadstone Unit 3 Folsom Sacramento County, California	None
003925	1990	Derr, Eleanor	The Broadstone Master Plan Project: Final Report	Cultural Resources Unlimited
004475	1991	Peak & Associates, Inc.	Cultural Resources Assessment of the Russell Ranch Project, Sacramento County, California	Peak & Associates, Inc.
004476	1986	Archeo-Tec	An Archaeological Surface Reconnaissance of the Proposed Russels Ranch Development Project, Folsom, California	Archeo-Tec
004477	1994	Jackson, Robert J.	Determination of Adverse Effect for the Russell Ranch Project	Pacific Legacy, Inc.
004481	1991	Lindstrom, Susan	A Cultural Resource Evaluation of the Broadstone 3 Project Involving 570 Acres Near Folsom, California, Sacramento County	None
004482	1989	Dreyer, William	A Cultural Resource Survey of the Proposed El Dorado Campus of Los Cerritos Community College, Folsom, California	None
004483	1993	Peak & Associates, Inc.	A Determination of Eligibility and Effect on Cultural Resources Within the Russell Ranch Project Area, Sacramento County, California	Peak & Associates, Inc.
004489	1986	Archeo-Tec	An Archaeological Surface Reconnaissance of the Proposed Willow Creek Estates South Development Project, Folsom, California	Archeo-Tec
004520	1992	Maniery, Mary	Historic Survey Report and Historic Resource Evaluation Report for Sixteen Sites, Highway 50 Interchange Project, Post Mile 18.8 TO 23.1, Sacramento County, California	PAR Environmental Services, Inc.
004523	1989	Jensen & Associates	Addendum to an Archaeological Inventory Survey of the Proposed Broadstone Unit # 1 Subdivision Parcel, Folsom, Sacramento County, California	Jensen & Associates
004525	1991	Maniery, Mary	Archaeological Survey Report for the Highway 50 Interchange Project, Post Mile 15.8 to Post Mile 23.1, Sacramento County, California	PAR Environmental Services, Inc.
006384	2005	Golden Hills Environmental Services	Cultural Resources Evaluation for the Golf Links Substations and Interconnecting 69kV Powerline Loop	Golden Hills Environmental Services
007121	2004	Clark, Matthew	The Status of Cultural Resources Research for the Kaiser Folsom Project Area in the City of Folsom, Sacramento County, CA	None
007878	2004	Peak, Melinda A.	Determination of Eligibility and Effect for the Saca Property, City of Folsom, CA	
008119	2006	Kaptain, Neal	Historic Property Survey Report for the State Route 50/ LSA Empire Ranch Road Interchange Project	
008736	2006	Windmiller, Ric	Carpenter Ranch Cultural Resources Inventory, Folsom, Sacramento County, California	None



Report	Year	Author(s)	Title	Affiliation	
009185	1991	Jones, D. A., M. Babal, S. D. Mikesell, and S. R. Wee	A Cultural Resources Study for the Folsom East Area Facilities Plan and Portions of the Sewer and Water Line System	Far Western Anthropological Research Group; Jackson Research Projects	
010464	2010	Shapiro, W.	Archaeological Survey Report for the SMUD Lake Feeder #2 Extension Project In Sacramento County (2205-03)	Pacific Legacy, Inc.	
010555	2010	Pappas, Stephen	Cultural Resources Inventory Report: Folsom Lake College Athletic Field Expansion, Phase I, Sacramento County, California, Project No. 2009-093.1	ECORP Consulting, Inc.	
010712	2011	Pappas, Steven, and Lisa Westwood	Cultural Resources Inventory Report: Folsom Lake College Athletic Field Expansion, Phase II, Sacramento County, California, Project No. 2009-093.2	ECORP Consulting, Inc.	
011001	2012	Westwood, Lisa, and Stephen Pappas	Folsom South of US Highway 50 Specific Plan Project: Preliminary Historic Properties Synthesis Report, Sacramento County, California, Project No. 2005-429.1	ECORP Consulting, Inc.	
011191	2013	Armstrong, M. D., M. C, Baloian, and A. P. Monastero	Cultural Resources Survey for the Missouri Flat-Gold Hill 115 kV Reconductoring Project El Dorado and Sacramento Counties, California	Applied Earthworks, Inc.	
011337	2013	Knapp, Katherine, and Lisa Westwood	Cultural Resources Testing and Evaluation Report for the Mangini Ranch APE, Folsom South of U.S. Highway 50 Specific Plan Project, Sacramento County, California, ECORP Project No. 2012-037.1	ECORP Consulting, Inc.	
011408	2012	Westwood, L., K. Knapp, S. Pappas, D. Quivey, and R. Mason	Cultural Resources Testing and Evaluation Report for the Carpenter Ranch Permit Area, Folsom South of U.S. Highway 50 Specific Plan Project; Cultural Resources Inventory Report for the Carpenter Ranch APE within the Folsom South of Highway 50 Specific Plan	ECORP Consulting, Inc.	
011632	2014	Pierce, Wendy	Willow Hill Reservoir Trail Project, Cultural Resource Inventory, City of Folsom, Sacramento	Pierce Archaeological Consulting	
011728	2014	Westwood, Lisa	Historic Property Treatment Plan for the Non- Backbone Prairie City Road Business Park Permit Area, Folsom South of U.S. Highway 50 Specific Plan Project, Sacramento County, California	ECORP Consulting, Inc.	
011894	2014	Westwood, L., and K. Knapp	Finding of Effect Report for the Arcadian Heights APE Folsom South of U.S. Highway 50 Specific Plan Project Sacramento County, California	ECORP Consulting, Inc.	
012049	2015	Westwood, Lisa	Light Detection and Ranging (LIDAR) data for the Folsom South of U.S. Highway 50 Specific Plan Project. Generated in compliance with Section 4.4 of the approved (August 2013) Historic Property Treatment Plan for the Backbone Infrastructure permit area (SPK-2007-02159)	ECORP Consulting, Inc.	
012053	2015	Westwood, Lisa	Data Recovery Report for Archaeological Sites in the Backbone Infrastructure Area of Potential Effects, Folsom South of U.S. Highway 50 Specific Plan Project, Sacramento County, California, ECORP Project No. 2005-429.6	ECORP Consulting, Inc.	
012088	2015	Westwood, L., and K. Knapp	Historic Property Treatment for the Non-Backbone Prairie City Road Business Park Permit Area, Folsom South of U.S. Highway 50 Specific Plan Project, Sacramento County, California (ECORP Project No. 2009-168.8)	ECORP Consulting, Inc.	
012381	2016	Pappas, Stephen	Cultural Resources Inventory Report for the Broadstone Parkway Apartments, City of Folsom, Sacramento County, California	ECORP Consulting, Inc.	
012382	2016	Webb, Megan, and Kim Tanksley	Cultural Resources Inventory Report for East Bidwell Commercial, Sacramento County, California	ECORP Consulting, Inc.	



Report	Year	Author(s)	or(s) Title	
012419	2013	Knapp, Katherine, and Lisa Westwood	Historic Property Treatment Plan for the Backbone Infrastructure Permit Area, Folsom South of U.S. Highway 50 Specific Plan Project, Sacramento County, California	ECORP Consulting, Inc.
012458	2015	Westwood, L., J. Adams, S. Pappas, S. Lindstrom, and R. Mason	Folsom South of U.S. Highway 50 Specific Plan Project, Historic Properties Management Plan, Sacramento County, California	ECORP Consulting, Inc.

Of these 36 studies, five directly addressed the current APE:

- Report 003830 was conducted in 1997 in support of Broadstone Unit 3, a planned 570-acre
 mixed-use development. The study documented NRHP evaluations of five previously
 documented archaeological sites, none of which are located within the current APE
- **Report 004481**, conducted in 1991, also addressed the 570-acre Broadstone 3 planning unit. The study did not document or evaluate any cultural resources within the APE.
- Report 009185 was conducted in 1991 to investigate five planning units and a linear utility
 alignment for the Folsom East Area Facilities Plan. The study included surveys of Woodard
 Ranch, a property within which the current APE is located. The study did not document or
 evaluate any cultural resources within the APE.
- **Report 012381** documents a 2016 cultural resources inventory for the proposed Broadstone Parkway Apartments Project (now known as the Talavera Apartments). No cultural resources were discovered within the APE.
- Report 012382 was conducted in 2019 in support of the proposed 33.65-acre East Bidwell
 Commercial Project. No cultural resources were discovered in the current APE, which the
 researchers noted was heavily disturbed and highly modified.

Previously Documented Resources

The records search also determined that there are 22 previously recorded cultural resources located within the study area (Table 2). One of these resources are located within the boundaries of the current APE; it is shown in bold in Table 2 and discussed briefly below.

Table 2
PREVIOUSLY DOCUMENTED RESOURCES WITHIN THE STUDY AREA

TREVIOUSET BOCOMENTES RESOURCES WITHIN THE STORT AREA					
Primary	Trinomial	Year	Author(s)	Description	
P-34-000021	None	1991	Jones, D., D.	Isolated chert projectile point fragment	
			Glover, and L.		
			Glover		
P-34-000022	None	1991	Jones, D., and D.	Two historic-era ceramic sherds	
			Dyer		
P-34-000335	CA-SAC-308H	1992	Maniery, M.	Folsom Mining District	
P-34-000771	CA-SAC-593H	1990	Derr, E. H., and R.	Two historic-era hearths	
			Derr		



Primary	Trinomial	Year	Author(s)	Description
P-34-000805	CA-SAC-371H	1991	Jones, D., T.	Woodward Ranch Site
			Kingsbury, D. Dyer,	
			and S. Warnesh	
P-34-000806	CA-SAC-367/H	1991	Jones, D., T.	Gould Ranch Site
			Kingsbury, D. Dyer,	
			and S. Warnesh	
P-34-000807	CA-SAC-368	1991	Jones, D., T.	Prehistoric bedrock milling feature
			Kingsbury, D. Dyer,	
			and S. Warnesh	
P-34-000808	None	1991	Jones, D., D. Glover,	Woodard and Gould Ranch Fence
			and E. Montes	
P-34-000902	None	1991	Peak, M., and R.	Historic-era stacked rock fence
			Gerry	
P-34-000903	None	1990	Peak, M., and R.	Historic-era stacked rock fence
		1001	Gerry	
P-34-000990	None	1991	Syda, K., and C.	Historic-era stacked rock fence
D 24 000004		1001	Thomas	
P-34-000991	None	1991	Syda, K., and C. Thomas	Historic-era stacked rock wall and fence
P-34-001393	Nama	1001		Historia and ditale accurate
P-34-001393	None	1991	Syda, K., and W.	Historic-era ditch segment
P-34-001480	CA-SAC-903H	1990	Shapiro Derr, E. H., and K.	Rhoads' Branch Ditch
P-34-001460	CA-3AC-905H	1990	McIvers	Kiloaus Branch Ditti
P-34-001482	CA-SAC-905H	1991	Jones, D., D. Glover,	Keefe-McDerby Mine Ditch
F-34-001462	CA-3AC-90311	1991	and E. Montes	Reele-Michelby Mille Dittil
P-34-001765	None	2006	Windmiller, R.	Historic-era stacked rock fence
P-34-001809	None	2006	Windmiller, R.	Historic-era fence line marked by a narrow berm
P-34-001812	None	2006	Windmiller, R.	Historic-era rock pile
P-34-001813	None	2006	Windmiller, R.	Historic-era rock pile
P-34-004621	None	2012	Pappas, S., and D.	Isolated dredge cable fragment
1 31 00 1021	None	2012	Quivey	isolated areage easie magnitude
P-34-004623	None	2012	Pappas, S., and D.	Historic-era rock pile
			Quivey	
P-34-005120	None	1991	Syda, K., and W.	Placerville & Sacramento Valley Railroad
			Shapiro	

One previously documented resource is located within the current APE:

• **P-34-000021** is an isolated prehistoric chert projectile point fragment that was originally discovered in 1991, and is the only resource previously documented within the current APE. An effort was made to relocate the artifact in 2016, but the area had been graded and it could not be found. The artifact would have been located near the northwestern end of the APE.

Additional Sources of Information

Historic topographic maps (Clarksville 1953; Folsom 1941 and 1944) and historic aerial photographs failed to provide any information about previous occupation or use of the APE. In all of these documents the APE is portrayed as an open, undeveloped landscape, although aerial photographs indicate that extensive grading had begun by 2002.



NATIVE AMERICAN OUTREACH

On September 1, 2021, HELIX requested that the Native American Heritage Commission (NAHC) conduct a search of their Sacred Lands File for the presence of Native American sacred sites or human remains in the vicinity of the proposed project area. As of the date of this report, no response from NAHC has been received (Attachment B).

During consultation with the City under Assembly Bill 52 (AB 52), the Wilton Rancheria indicated that a Tribal Cultural Resource was located in the northwestern portion of the APE, in the area where P-34-000021, an isolated prehistoric chert projectile point fragment, was found in 1991. Wilton Rancheria did not provide specific information about the size or nature of the resource, but requested that limited subsurface testing be conducted in the area where it was thought to be located.

The United Auburn Indian Community requested consultation with the City in an email dated September 30, 2021. UAIC indicated the presence of a TCR located to the west of the project site but have not provided more specific information as of the date of this report.

FIELDWORK

Intensive Pedestrian Survey

On August 24, 2021, HELIX Senior Archaeologist Clarus Backes, RPA conducted a pedestrian survey to characterize any prehistoric or historic-era archaeological resources located within the APE. During the survey the ground surface throughout the APE was examined for the presence of historic-era artifacts (e.g., metal, glass, ceramics), prehistoric artifacts (e.g., flaked stone tools, tool-making debris), and other features that might represent human activity that took place more than 50 years ago. Photographs of the APE are presented in **Attachment C**.

The APE consists of disturbed vacant land that is transected by ditches and culverts. The northwestern portion of the APE slopes gently down to East Bidwell Street to the west and Broadstone Parkway to the north (Photograph 1), while the southeastern portion of the APE consists of a pad that rises approximately 10 to 15 feet above the rest of the APE (Photograph 2); the pad holds a partially graveled access road leading to a small Sacramento Municipal Utilities District (SMUD) utilities compound. Shallow dirt ditches line the APE's northern and western margins (Photograph 3). A larger, cement-lined ditch bisects the APE from east to west, terminating at culverts at either end (Photograph 4).

The soil on the site has been heavily graded, and consists of a mix of rounded and angular cobbles in a matrix of compact, patchy sand and silt, suggesting that it is comprised at least partially of imported fill. Sparse annual grasses cover the area and allowed good surface visibility during the survey.

Cultural materials within the APE were limited to modern roadside and windblown trash. No historic-era or prehistoric artifacts or features were found during the survey.

Limited Subsurface Testing

On September 3, 2021, HELIX archaeologists Clarus Backes, RPA and Jentin Joe conducted limited subsurface testing to determine the presence or absence of intact subsurface archaeological deposits



within the APE. This type of testing is typically conducted if there is limited visibility due to dense vegetation cover, or if the APE is likely to contain archaeological materials that have been buried due to the deposition of soils by alluvial or other processes.

Six shovel test pits (STP) were excavated to establish whether intact subsurface archaeological deposits are present; each STP measured approximately 30 centimeters (cm) in diameter and was excavated in 20 cm levels until an impenetrable layer such as bedrock or cobbles was encountered. Soils from each STP were dry screened through 3.1 millimeter (1/8 inch) mesh hardware cloth. A Global Positioning System (GPS) unit was used to record the locations of the STPs.

The STPs were distributed throughout the area in the northwestern portion of the APE where a potential Tribal Cultural Resource was thought to be located (Figure 3). Field observations were recorded on standard data record forms, including unit and unit level records. Soil color and texture for each 20-cm level were recorded using Munsell™ soil color charts. Each STP was backfilled upon completion.

No cultural materials were found during the test excavations. Stratigraphy and soil types were generally identical among the six STPs, and consisted of extremely compacted, dry sandy silt with approximately 50 percent angular granitic cobbles and pebbles (Munsell™ color 5YR 5/4). Soils in all six STPs appeared to have been moderately to heavily disturbed by previous grading. With the exception of STP-2, which was excavated to a depth of 35 centimeters, the maximum depth of the STPs was limited to 20 centimeters due to a layer of impenetrable cobbles.

Due to the heavy cobble layer none of the STPs could be excavated to a depth greater than 26 centimeters, and none yielded any artifacts, modified soil or rock, or faunal remains that might indicate a cultural deposit.

CONCLUSIONS AND RECOMMENDATIONS

The records search determined that the entire APE has previously been surveyed for cultural resources three times. Only one resource, an isolated projectile point fragment, has been documented within the APE's boundaries. The results of the Sacred Lands File search by the NAHC are still pending, although during AB 52 consultation with the Wilton Rancheria indicated that a Tribal Cultural Resource was present near the northwestern end of the APE and requested that limited subsurface testing be conducted in that area. Additionally, UAIC indicated that potential TCRs were located west of the project site.

Although ground visibility was good, no cultural resources were found during the survey; subsurface testing yielded no cultural materials. This suggests that the likelihood of encountering surficial or shallowly buried archaeological materials during project implementation is low. However, because Wilton Rancheria states that a Tribal Cultural Resource is located within the APE, the area should be considered moderately sensitive for cultural resources at depths of 5.0-feet or more below the current ground surface.

The recommendations provided below are intended to minimize the potential for buried cultural resources to be significantly impacted during project implementation.



Inadvertent Discoveries

In the event that cultural resources are exposed during ground-disturbing activities, construction activities should be halted in the immediate vicinity of the discovery. If the site cannot be avoided during the remainder of construction, an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards should then be retained to evaluate the find's significance under the California Environmental Quality Act (CEQA). If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and should be discussed in consultation with the City.

Treatment of Human Remains

Although there is no evidence to suggest the presence of human remains, their discovery is always a possibility during a project. If such an event did occur, the specific procedures outlined by the NAHC, in accordance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code, will be followed:

- 1. All excavation activities within 60-feet of the remains will immediately stop, and the area will be protected with flagging or by posting a monitor or construction worker to ensure that no additional disturbance occurs.
- 2. The project owner or their authorized representative will contact the County Coroner.
- 3. The coroner will have two working days to examine the remains after being notified in accordance with HSC 7050.5. If the coroner determines that the remains are Native American and are not subject to the coroner's authority, the coroner will notify NAHC of the discovery within 24 hours.
- 4. NAHC will immediately notify the Most Likely Descendant (MLD), who will have 48 hours after being granted access to the location of the remains to inspect them and make recommendations for treatment of them. Work will be suspended in the area of the find until the senior archaeologist approves the proposed treatment of human remains.
- 5. If the coroner determines that the human remains are neither subject to the coroner's authority nor of Native American origin, then the senior archaeologist will determine mitigation measures appropriate to the discovery.

Should you have any questions regarding our approach, methodology, results or conclusions, please do not hesitate to contact me.

Sincerely,

Clarus J. Backes, Jr., RPA Senior Archaeologist

ch / Bac

Attachments:

Attachment A – Figures

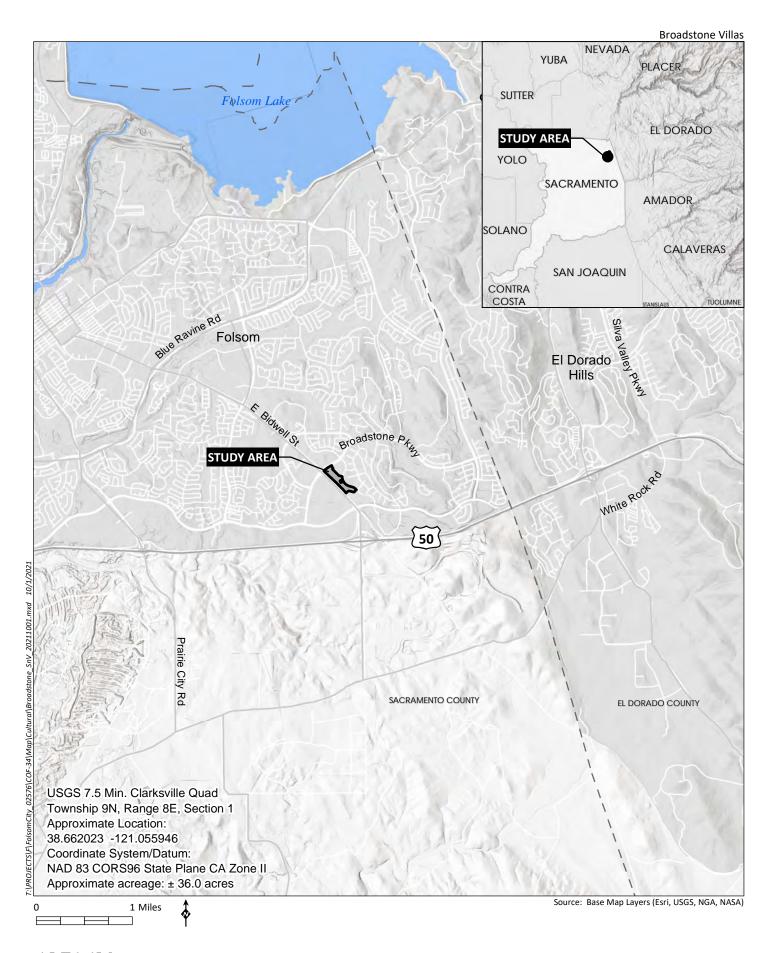
Attachment B – Native American Correspondence

Attachment C – Representative Site Photos

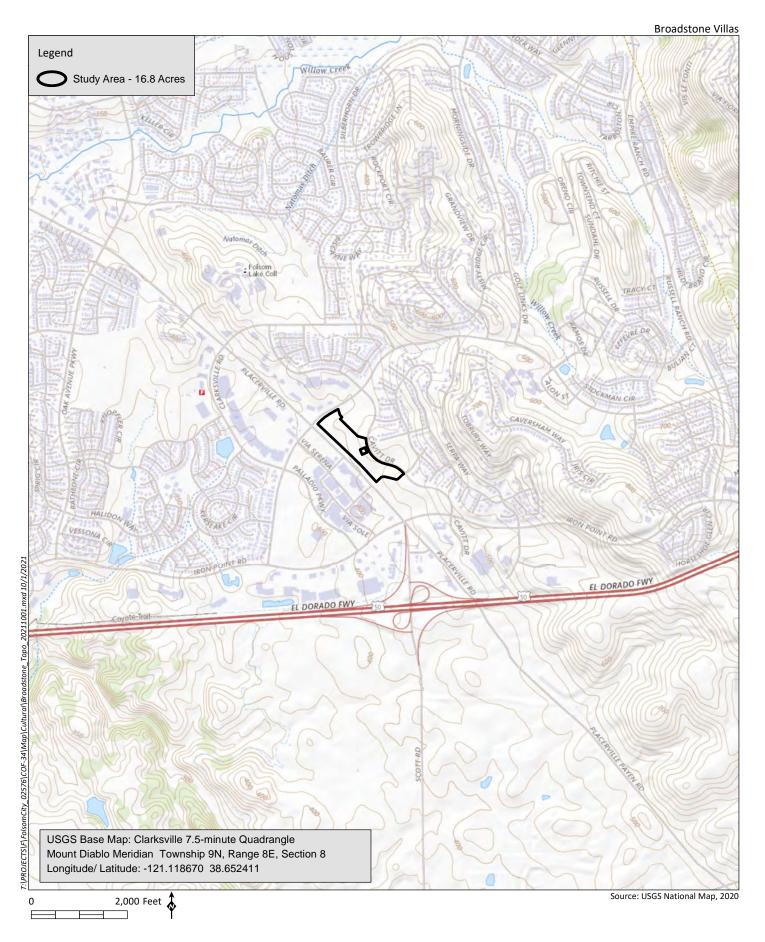


Attachment A

Figures













Attachment B

Native American Correspondence (results pending)

Attachment C

Representative Site Photos



Photograph 1. Overview of the northwest portion of the APE, looking west.



Photograph 2. Overview of the southeast portion of the APE, with the elevated pad and SMUD compound in the background, looking south.





Photograph 3. Dirt ditch along the APE's western border, looking northwest.



Photograph 4. Concrete lined ditch, looking west.

