SILVA VALLEY PARKWAY INTERCHANGE

Updated Cultural Resources Initial Study El Dorado Hills, El Dorado County, California

Sections 1, 2, 11 & 12, T.9N, R.8E MDM Clarksville 7.5' USGS Quadrangle Approximately 30+ Acres



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MANAGEMENT SUMMARY

The proposed Silva Valley Parkway Interchange is located in the U.S. 50 corridor near the Sacramento County line in western El Dorado County, California. The interchange will provide access to U.S. 50 for existing and approved development in El Dorado Hills on both sides of the freeway. The Silva Valley Parkway Interchange alternative will relieve congestion on the existing El Dorado Hills Boulevard/Latrobe Road interchange and reduce impacts to traffic circulation during construction of future improvements to the existing interchange.

In addition to the interchange itself, the proposed project includes construction of auxiliary lanes between the El Dorado Hills Boulevard/Latrobe Road interchange and the Silva Valley Parkway Interchange.

The purpose of the present updated initial study is to identify historical resources located within the boundaries of the proposed interchange project. The study includes an updated records search by the North Central Information Center, California Historical Resources Information System, results of a sacred lands file search by the Native American Heritage Commission, Native American and local historical organizations contacts, archival research, field inspections and the technical report now in hand.

The Silva Valley Parkway Interchange project was approved back in the early 1990s. With the passage of time and changes in planned lane use and anticipated traffic, as well as changes in the California Environmental Quality Act (CEQA) particularly with respect to the evaluation and treatment of historical resources, the following updated technical report compares the cultural resource findings, impacts and mitigation measures in the original EIR with those of the present updated study.

The original EIR identified a historic ranch site, prehistoric bedrock milling features, stone and post and wire fence remnants, a multi-component site including the historic Tong cemetery, small stamp mill and cabin features, mines and mine prospects, Byram House, the Mormon Tavern monument and the Richmond-Hall cemetery. The updated study, including previous observations by LSA archaeologists identified an additional 27 sites and one district. Byram House is excluded from the current inventory, as it was not identified within the current project area. Remnants of the Mormon Tavern archaeological site do appear within the current project area. However, current project design excludes the remnant site from any ground disturbance.

The original EIR concluded that the project alternatives as designed back then could impact the following cultural resources deemed significant under CEQA's old Appendix K:

- Tong cemetery, stamp mill and cabin site components of multicomponent site, P-9-673.
- Richmond-Hall cemetery
- Mormon Tayern State Historic Landmark no. 699 monument
- A portion of the large multi-component site, CA-ELD-600/H
- Possible impacts to unknown sites

The present updated study, including additional cultural resources and assessments made under revised CEQA statutes and guidelines, concludes that the project as currently designed could impact the following sites, features and historic district eligible or potentially eligible for the California Register of Historical Resources:

- Tong cemetery component of multi-component site, P-9-673.
- Stamp mill site-component of multi-component site, P-9-673.
- Cabin and privy site-component of multi-component site, P-9-673.
- Richmond-Hall cemetery
- Mormon Tavern Monument (California Historical Landmark no. 699)
- A portion of the large multi-component site, CA-ELD-600/H
- Mormon Hill Historic District
- Potential impacts to unknown sites

Under the original EIR, mitigation measures included the following:

- Protect the Richmond-Hall cemetery during construction: Archaeologist to identify cemetery limits, install six foot high fence around perimeter.
- Relocate Mormon Tavern SHL monument by approval of SHPO.
- Relocate Hall/Richmond Cemetery: Determine number and location of graves by geophysical survey. At least three individuals there—possibly several more. Move burials preferable to Clarksville Cemetery.
- Construct retaining wall to protect Tong cemetery component of the multi-component site, P-9-673.
- Preserve other components of site P-9-673 or require additional work.
- Stop work if additional cultural resources are discovered during construction.

As a result of the present updated study and application of current CEQA statutes, guidelines and advisories, the following mitigation measures are proposed:

- Tong Cemetery component of multi-component site, P-9-673: Prior
 to construction activity within the vicinity of the site, encircle the
 cemetery with temporary construction fencing under supervision of
 a qualified archaeologist. Construct retaining wall to protect the
 cemetery, also under the supervision of a qualified archaeologist.
- Stamp mill site component of site, P-9-673: Prior to construction activity within the vicinity of this site, encircle the mill site component with temporary construction fencing under supervision of a qualified archaeologist.
- Cabin and privy site component of the site, P9-673: Prior to construction activity within the vicinity of this site, encircle the cabin and privy site component with temporary construction fencing under supervision of a qualified archaeologist.
- Richmond-Hall Cemetery: As the precise boundary of this cemetery is unknown and remote sensing is not practical in the rocky soils, mechanized test excavations shall be undertaken prior to any ground disturbing activity between the freeway and the existing Tong Road. A qualified archaeologist shall supervise the test excavations. If graves are discovered during or subsequent to the test excavations, then the archaeologist will coordinate with El Dorado County to disinter, remove, transport and reinter the remains.
- Mormon Tavern Monument (California Historical Landmark no. 699). If it is necessary to relocate the monument because of construction, then approval must be sought from the State Office of Historic Preservation and the monument moved prior to construction in the vicinity of its present location.
- If buried archaeological resources (historic foundations, refuse deposits, prehistoric cultural deposits or other recognizable buried cultural resources) are encountered during construction, all work must halt at the location of the find(s) and a qualified archaeologist shall be retained to identify and evaluate their significance and recommend appropriate mitigation, if necessary.
- In the event that human remains are discovered, California Health and Safety Code §7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin

and disposition pursuant to Public Resources Code §5097.98. If the coroner determines that no investigation of the cause of death is required and if the remains are of Native American origin, the coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendant. The descendant will then recommend to the landowner appropriate disposition of the remains and any grave goods.

Implementation of the above measures would reduce impacts of the project on individual cultural resources eligible or potentially eligible for the California Register to a less than significant level. Implementation of the above measures would also reduce impacts of the project on the Mormon Hill Historic District to a less than significant level.

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INTRODUCTION

The proposed Silva Valley Parkway Interchange is located in the U.S. 50 corridor near the Sacramento County line in western El Dorado County, California (see Figures 1 and 2). The interchange will provide access to U.S. 50 for existing and approved development in El Dorado Hills on both sides of the freeway. The Silva Valley Parkway Interchange alternative will relieve congestion on the existing El Dorado Hills Boulevard/Latrobe Road interchange and reduce impacts to traffic circulation during construction of future improvements to the existing interchange.

In addition to the interchange itself, the proposed project includes construction of auxiliary lanes between the El Dorado Hills Boulevard/ Latrobe Road interchange and the Silva Valley Parkway Interchange.

The Silva Valley Parkway Interchange project was approved back in the early 1990s. With the passage of time and changes in planned lane use and anticipated traffic, as well as changes in the California Environmental Quality Act (CEQA) particularly with respect to the evaluation and treatment of historical resources, it is appropriate that the cultural resources initial study is updated.

CEQA Regulatory Background

When the EIR for the project was certified back in 1991, evaluation of cultural resources conformed to CEQA Guidelines in Appendix K. In 1992, the Public Resources Code was amended as it affects historical resources. The amendments included creation of the California Register of Historical Resources (Public Resources Code §5020.4, §5024.1 and §5024.6). While the amendments became effective in 1993, it was not until January 1, 1998, that the implementing regulations for the California Register were officially adopted (Public Resources Code §4850 *et seg.*).

The purpose of the present updated initial study is to identify any historical resources eligible for the California Register of Historical Resources and archaeological resources that potentially meet criteria as "unique archaeological resources" under current CEQA statutes and guidelines (see Appendix A: Statement of Qualifications).

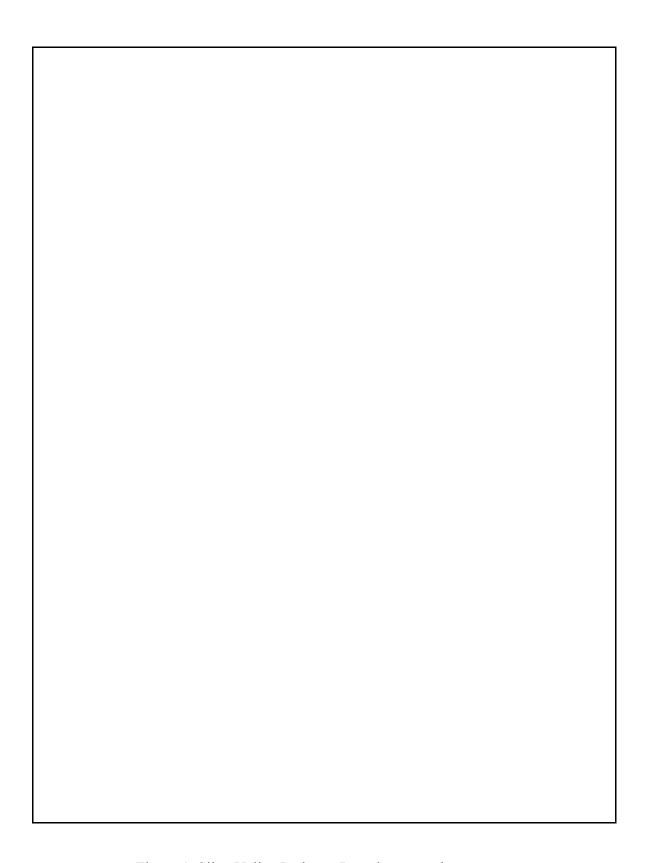


Figure 1. Silva Valley Parkway Interchange project area.

Figure 2. Silva Valley Parkway Interchange design plan.

CEQA statutes [Public Resources Code §21001(b) et seq.] require planning agencies to carefully consider the potential effects of a project on historical resources. Under the revised and adopted CEQA guidelines in §15064.5, a "historical resource" includes: a resource listed in or eligible for the California Register of Historical Resources; or listed in a local register of historical resources; or identified in a historical resource survey and meeting requirements in §5024.1(g) of the Public Resources Code; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines historically significant, provided the determination is supported by substantial evidence in light of the whole record; or a resource so determined by a lead agency as defined in Public Resources Code §5020.1(j) or §5024.1.

Under CEQA guidelines, "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment [Public Resources Code §15064.5(b)]. "Substantial adverse change" is "... physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired [Public Resources Code §15064.5(b)(2)].

While alteration of the setting of an archaeological site that is eligible only for its information potential may not affect the site's significant characteristics, alteration of a property's location (*viz.*, removing or damaging all or part of the site) may have a significant adverse effect. CEQA's Guidelines §15126.4(b)(3) state, "Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature." The guidelines further state that preservation in place is the preferred manner of mitigating impacts, and that preservation ".. may be accomplished by, but is not limited to, the following":

- 1. Planning construction to avoid archaeological sites;
- 2. Incorporation of sites within parks, greenspace, or other open space;
- 3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.
- 4. Deeding the site into a permanent conservation easement.

CEQA guidelines state, "when data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken" [CEQA Guidelines §15126.4(b)(3)(C)].

However, "data recovery shall not be required for a historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource . . ." [CEQA Guidelines §15126.4(b)(3)(D)].

CEQA also requires planning agencies to consider the effects of a project on "unique archaeological resources." If an archaeological site meets the definition of a unique archaeological resource (Public Resources Code §21083.2), then the site must be treated in accordance with the special provisions for such resources, which include time and cost limitations for implementing mitigation.

California law also protects Native American burials, skeletal remains and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains (Health and Safety Code §7050.5, Public Resources Code §5097.94 *et seq.*).

SETTING

Silva Valley Parkway Interchange is situated at the ecotone or "edge area" between the Sacramento Valley and the Sierra foothills. The property is hilly grassland with scattered oaks and gallery forests of mixed trees along seasonal waterways. The principal drainage is Carson Creek, a seasonal stream that meanders through the eastern portion of the interchange project area. Screech Owl Creek emerges from the hills to join Carson Creek south of the project. Bucket Ravine drains south crossing the western portion of the project area. The elevation of the project varies between approximately 600 and 900 feet above sea level. Summers are hot and rainless; winters are cool with 6-20 inches of rainfall and fog. The climate of the region is Mediterranean (Storer and Usinger 1963:27).

The proposed interchange lies at the north edge of the historic townsite of Clarksville, originally a mining camp during the gold rush that quickly developed into a regional trading center for ranchers of the surrounding White Rock and Carson Creek areas.

Prehistory

While scholars have conducted a number of excavations in the deep village mounds along the Sacramento, Cosumnes and American rivers, relatively little scientific work other than surface surveys and limited test excavations has been accomplished along the valley's eastern edge away from the rivers and major tributaries.

Since the early 1950's, stone tools of the so-called "Farmington Complex" have been unearthed periodically along the Sacramento Valley-Sierra foothills ecotone (Moratto 1984:62). Archaeologist Eric Ritter has shown that the artifacts are either contemporaneous with, or older than the Modesto Formation, which would date the tools between 10,000 and 5000 B.C. (Ritter *et al.* 1976).

Commenting on the 1979 excavations by Peak & Associates of a stone tool quarry and campsites near Rancho Murieta, 10 miles south of Clarksville, the late Southwestern archeologist Julian Hayden once remarked about the similarity of Farmington artifact types with those of San Dieguito II from southern California and the Lower Colorado River area (Peak 1981; Julian Hayden, personal communication 1994).

San Dieguito II is coeval with the Western Pluvial Lakes Tradition, an adaptation of ancient cultures to lake, marsh and grassland habitats along the eastern side of the Sierra Nevada as early as 9000 B.C. (Moratto 1984:90-91). The development of the Western Pluvial Lakes Tradition and its regional variants such as the Farmington Complex may, as Moratto suggested, correspond to the emergence and initial differentiation of Hokan languages (1984:544).

The Archaic Period, which in California lasted from about 6000 B.C. to A.D. 1000, is divided by archaeologists into three sub-periods: lower, middle and upper (Fredrickson 1994:100, Figure 9.1). During the Lower Archaic, between 6000 and 3000 B.C., many pluvial lakes across the state became dry playas as a result of climatic changes. Early milling stone complexes of this sub-period have been identified by scholars at a number of sites in southern and northern California. Previous finds of milling stones and Pinto-like projectile points at sites in Marble Valley, two miles east of Clarksville, could reflect Native American use of the area dating back 4000-7000 years (Windmiller 1996:1; 1997:10; see also Moratto 1984:Figure 4).

Seed gathering, inferred from the use of milling stones, was an arid land adaptation. Speakers of Hokan languages probably brought the concept of milling stones to California, since scholars recognize that Hokan peoples were in regions of the western United States where deserts first appeared after the end of the last Ice Age (Moratto 1984:546-547).

The Middle Archaic, dating between 3000 and 500 B.C., marked the beginning of the fluorescence of aboriginal cultures in California's Great Central Valley. Though concerted exploration of the Sacramento Delta's ancient village mounds was well underway by the 1930s, it was not until much later that archaeologists began taking a systematic look at the region where the Sacramento Valley meets the Sierra foothills.

In 1950, Archaeologist Franklin Fenenga reported on salvage archaeology at Folsom Reservoir, four miles northwest of Clarksville (Fenenga 1950). Also, Louis A. Payen reported on the petroglyphs or "Indian rock art" of Sacramento and adjoining counties in 1959 (Payen 1959). Payen's work included an analysis of rock art styles found at sites along the valley edge in the general vicinity of Clarksville.

In 1962, Charles Gebhardt conducted salvage archaeology at CA-SAC-166, a proto-historic and prehistoric midden (village site)along Alder Creek, five miles west of Clarksville (Gebhardt 1962).

It was not until implementation of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) in the early 1970s that the region around Folsom was more extensively inspected for archaeological sites (*cf.* Foster and Bingham 1978; Furnis 1975). As a result of these and many other studies, our understanding of the broad patterns of local prehistory is improving.

Native Americans of the Middle Archaic may have used the lower foothills as a summer resource area (Moratto 1984:206). A study of Hawyer Cave located in the foothills near the American River revealed artifact types common in the Middle Archaic levels of village mounds in the Sacramento Delta region (Wallace and Lathrap 1952).

Bedrock mortars are common along the Sacramento Valley-Sierra foothills edge. Reliance on acorns as a staple is inferred from what is generally recognized as the first appearance of mortars and pestles in archeological sites dating early in the period (Fredrickson 1994:100, Figure 9.1).

Between 4000 and 2000 B.C., it is probable that Hokan languages were spoken in much of California. However, with increased aridity east of the Sierra, speakers of Penutian languages apparently began moving from the deserts of the northwestern Great Basin and southern Columbia Plateau into northern California.

Sedentary villages were established in the western Sierra by the time of Christ, possibly earlier (Moratto 1984:303). In the mid-Sacramento Valley, these developments followed the formation of the Sacramento Delta and marsh lands, which were fully formed by 2000 B.C. Birth of the delta was a consequence of the rising sea level caused by global warming and melting of glaciers at the end of the Pleistocene.

The Windmiller Pattern dates back as early as 2400 B.C. in the Central Valley. Its origins are also tentatively traced to the Altithermal cultures of the northwest Great Basin and southern Columbia Plateau, as archaeologists have speculated that people of the same language group occupied the juncture

between the Great Basin and Plateau provinces before 2500 B.C. (Moratto 1984:552)..

It is also possible that other Great Basin peoples occupied the area in place of the proto-Yokutsan speaking people of the Windmiller Pattern. The so-called "Martis Complex" with its characteristic dart points made of basalt originally identified by archaeologists at sites in the high Sierra is also represented in the Sierra foothills and may reflect local settlement by an entirely different language group. Such sites may date to the period, 2000 B.C. to A.D. 500 (cf. Elston et al. 1977). Large, Martis-like projectile points have been discovered at archaeological sites in the lower foothills (cf. Wallace and Lathrap 1952 and Archeo-Tec 1991). Finds in Marble Valley included projectile point styles similar to Martis (Windmiller 1996:1). Moratto speculated on a Hokan language association with the Sierra foothills expression of Martis (Moratto 184:562).

Between 2000 and 500 B.C., Utian populations appear to have occupied the Sacramento Delta, the areas along rivers and streams, marsh land, as well as the hills on both the east and west sides of the Sacramento Valley (Moratto 1984:553). Expansion westward into the San Francisco Bay area seems to have brought about some type of fusion between the bearers of Utian languages and the resident speakers of Hokan and Yukian languages. This apparent fusion of cultures, whatever its precise nature, resulted in what archaeologists now recognize as the Berkeley Pattern, sometimes still referred to as the "Middle Horizon."

Ancestors of the Nisenan, a Maiduan people who historically inhabited the American River drainage and who lived for part of their history in the Clarksville vicinity, migrated to the region rather late in time. Increased aridity in the Great Basin seems to have been an important factor initially that prompted entry of ancestral Maiduans into the northern Sierra Nevada.

During the first 200 years of the Christian era, Maiduan groups penetrated farther west to the Yana territory of northeastern California (Moratto 1984:562). Ritter's Bidwell Complex may represent the radiation of Maiduan speakers into the Oroville locality around A.D. 600-700 (Ritter 1970a, 1970b; Moratto 1984:562).

After comparing various linguistic models of Maiduan radiation, archaeologist Makoto Kowta suggested that Maiduan-speakers entered California from the north around A.D. 500 and settled first in the foothills or valley edge in what historically became Nisenan territory (1988:190).

During the Bidwell phase, population growth in the foothills is evident from the archaeological discoveries. In the Sacramento Valley, such growth is reflected by the occurrence of large village mounds along the Sacramento, Cosumnes and American rivers.

The Emergent Period, A.D. 1000-1800, was characterized by the consolidation of territories formed as a result of the migration of native groups, including the Nisenan. The territories formed during the Emergent probably remained in much the same locations as noted by early Spanish observers (*cf.* Fredrickson 1994:100, Figure 9.1). Interregional trade seems to have expanded greatly during the Emergent, up to the succeeding Mission Period when Spanish intrusions began tearing the fabric of native life in California.

Ethnography/Ethnohistory

The Silva Valley Parkway Interchange project area is located within a boundary zone between traditional Nisenan and Miwok territories. James Bennyhoff's doctoral dissertation, which has become the definitive work on Plains Miwok ethnogeography, indicated a boundary area located between Latrobe on the south and Folsom on the north (Bennyhoff 1977:165).

In both Valley Nisenan and Plains Miwok groups, the tribelet, a loose political organization, controlled specific districts usually bounded by the land between drainages (*cf.* Wilson 1995:2-36). Prior to the gold rush, the establishment of Sutter's Fort, and prior to the 1833 epidemic, villages were distributed along the banks and tributaries of major rivers such as the Sacramento, American and Cosumnes (Bennyhoff 1977:34).

Valley Nisenan communities ranged in size from small, extended families of 15 to 25 people to large villages with a population over 500 (Kroeber 1925:831). In the early 1800s, a large group could be found at a single village or a cluster of small camps around a large village. The Valley Nisenan built their villages on low, natural levees along rivers and streams, or on gentle slopes with southern exposure (Wilson and Towne 1978:388). The post-Sutter Nisenan village of *Kadema* (CA-SAC-192) excavated by John S. Clemmer in 1960 was situated on a low knoll along the American River 20 miles west of Clarksville.

The villages varied in size from three to 40 or 50 houses. Living quarters were dome-shaped, 10-15 feet diameter, covered with earth, tule mats or grasses. Brush shelters supported by upright posts were constructed in summer and during seasonal rounds of food-gathering. Specialized structures included the semi-subterranean assembly house located at major villages, the sweat house used for curing and purification and the acorn granary. The women of most villages made mortar holes in exposures of bedrock to pulverize acorns.

According to the published literature, foothill Nisenan villages were located on ridges and large flats along major streams. These village sites were smaller than their valley counterparts. Littlejohn reported on the Nisenan village sites of *Bamon* at Shingle Springs, *Yo hi mu* and *Tu lul* near Shingle Springs, *Po lun kit* near Clarksville and *Wapumi* at Latrobe (Littlejohn 1928:44-46). In the foothills, it was common for families to live away from the main village. Other sites included seasonal camps, quarries, ceremonial grounds, trading sites, fishing locales, cemeteries, river crossings and battlefields (Wilson and Towne 1978:389).

The 1833 epidemic, probably malaria brought south from Oregon by a party of trappers, decimated an estimated 75 percent of California's native population. By the 1840s, a number of the remaining Nisenan people settled around Sutter's Fort and worked for Sutter until the gold rush. Others pressed into traditional Miwok territory (Wilson 1995:2.46).

Independent records show the 1840-1843 location of *Yusumne*, a Valley Nisenan village, on the valley portion of the American River six miles east of Sutter's Fort. However, in 1846, when Gatten took a census of Indians along the Cosumnes, he intimated that *Yusumne* was located between Sloughhouse and Plymouth. Bennyoff saw the apparent move as the first concrete evidence of Nisenan intrusion into Miwok territory (Bennyhoff 1977:85).

Payen described a Nisenan group from Carson Creek (CA-ELD-80/H?) that moved five miles southwest of Clarksville to Walltown under pressure from miners on Carson Creek during the early part of the gold rush (Payen 1961:6). Payen indicated that the Walltown Nisenan group attended a "Big Time" (dances and ceremonies) at *Po lun kit* (CA-ELD-918/H and field no. V-45?), thereby retaining their connections with the Clarksville area. In the 1870s, however, Walltown residents apparently forced the native people to move again. This time, the move was to *Palmul* at Michigan Bar on the Cosumnes River (Payen 1961:18).

Prior to 1848, members of another Nisenan tribelet, the *Wapumne*, were apparently located along the foothills portion of the American River drainage. The tribelet center may have been near Shingle Springs. However, the tribelet moved to Latrobe, several miles south of Clarksville, sometime between 1847 and 1864 (Bennyhoff 1977:92).

In 1861, miners burned an Indian village located near present-day Cameron Park. The miners killed its leaders and ran off the village's 450 inhabitants (Payen 1961:6). Yet, not all relations between miners and native people were hostile. In the early part of the gold rush, Nisenan headmen supplied labor for the placer mines. Intermarriage also occurred. John Wilson, descendant of a local ranching family, recounted the story of an Irishman named Craig who

prospected around Clarksville in the 1850s. Craig was said to have taken a native woman "... from Screech Owl, up the canyon south of Clarksville" (CA-ELD-918/H and field no. V-45?) and had five children (Wilson 1986; Windmiller and Osanna 1999:27-30).

Archaeological excavations at CA-ELD-451 and CA-ELD-452, three miles northwest of Clarksville, revealed the presence of cremations, glass beads and other historic artifacts. The two neighboring archaeological sites, possibly the ruins of a pre-Sutter period Nisenan camp and post-Sutter cry site, are situated in a sheltered canyon at the west edge of the first tier of Sierra foothills east of Folsom (Windmiller and Starns 1998).

By 1880, Nisenan were probably intermarrying with Northern Sierra Miwok from *Yuleyumne*, located near Plymouth. Sometime after 1890, Nisenan people moved from *Palmul* at Michigan Bar to *Homit*, a new site that was probably at "Indian Hill" four miles northwest of Ione (Bennyhoff 1977:93)...

Based on Bennyhoff's exhaustive study and other sources mentioned above, the historical record illustrates a progressive movement of Nisenan southward, a movement that began during the Sutter period and was probably accelerated by the gold rush.

Prior to 1843, it is likely that Valley Nisenan held the territory along the American River and Plains Miwok "...held the entire valley drainage of the Cosumnes River from its juncture with the Mokelumne River to about the 500 foot contour in the foothills." The area between the two drainages may have been used by both groups and possibly also by Hill Nisenan people (Bennyhoff 1977:94).

History

Following the initial discovery of gold at Sutter's Mill, Coloma, in January, 1848, two members of the disbanded Mormon Battalion found gold on the South Fork of the American River about a mile above its confluence with the North Fork. The March, 1848 discovery at "Mormon Island" actually started the gold rush (Castenada *et al.* 1984:31).

The discoveries spurred thousands of immigrants to California. By May, 1848, there were only a few hundred working at shallow placer mines. By the end of 1848, there were 8,000-10,000. During the following year, 1849, almost 40,000 followed routes by land and sea to the gold fields. The migration of 1850 was just as great (Caughey 1953:245,247,252).

The early mining focused on the river placers. Deposits of gravel along the river meanders were an initial attraction. Mining camps arose at these river

"bars." Early placer mining expanded from Coloma to Weber Creek and then to the rich creek gravels in the vicinity of present-day Placerville. Fueled by discoveries at Coloma, Placerville and Folsom, nearly every ravine in the region was mined (Lindstrom 1998:13).

The route of immigrants bound for Sacramento and who entered California by way of Carson Pass in 1849 was a simple wagon road that followed the present-day Highway 50 corridor in the vicinity of the proposed Silva Valley Parkway Interchange. In turn, immigrants who came by ship to San Francisco, then by boat from Sacramento and disembarked for Weber Creek and Placerville traveled along the same route. Roadside inns and taverns were put up at numerous locations along the Sacramento to Placerville road.

The earliest settlement in the Silva Valley Parkway Interchange vicinity was the Mormon Tavern. A roadhouse established in 1848 by a Mormon immigrant named "Morgan," Mormon Tavern was situated at the foot of the first steep grade into the Sierra foothills from Sacramento. According to local avocational historian John Wilson, the original Mormon Tavern was a large building noted for its immense dining room. Due to its strategic location at the intersection of the Sacramento-Placerville road and the stage road from Folsom and Mormon Island, the inn remained in business through the 1860s and 1870s (Wilson 1986:122).

As the earliest settlement in the locality, Mormon Tavern lent its name to the steep grade beyond it and to the toll road that climbed the grade (also known as the old Bass Lake Road). Mormon Tavern was a stage stop during the 1850s. During the short-lived Pony Express, Mormon Tavern also served as a changing station for the horses (Jones & Stokes Associates 2000:9; Wilson 1986:123).

Near Mormon Tavern was a large house known as "The Nunnery," used as a home by a group of nuns. At the top of the hill behind the house, the nuns chiseled a bench from solid rock where they would meditate. In 1876, Joseph Joerger, his daughter and second wife moved into The Nunnery, which by that time had been abandoned by the sisters. When The Nunnery burned during the winter of 1878-1879, Joerger purchased Mormon Tavern from then owner, Charlie Winchell. The Joerger family used the tavern as their home while operating a dairy. In April, 1964, the old building was burned as a training exercise (Wilson 1986:122-123).

In 1986, John Wilson wrote: ". . . nothing is left . . . except a historical marker, nearly out of sight across Highway 50 from the site of the original Mormon Tavern" (Wilson 1986:124).

Clarksville, established one-half mile east of Mormon Tavern began as a mining camp and way station. John Wilson wrote that by this time, ravines throughout the region were dotted with camps and cabins. In recent years, cultural resource studies both north and south of Clarksville identified stone footings of small cabins, as well as crescent-shaped hearths where the earliest miners apparently built pole and canvas structures heated by the fireplaces (*cf.* Jones & Stokes Associates 2000 and Windmiller and Osanna 1999).

In the early years of the gold rush, Clarksville was known as "Clarkson's" or "Clarkson Town." The mining camp was situated near the junction of the freighting road to the mines and the stage coach road that connected Rhoad's Diggings, Prairie City and Sacramento. The freight wagon road was a separate route owing to the fact that freight wagons were much slower than stage coaches. The freighting route connected Clarksville with Placerville to the east and White Rock Springs and Mill's Station to the west.

During the 1850's, Clarksville boasted of four inns: the Railroad House located in the upper part of town; Mormon Tavern on the stagecoach road west of town; Umbrella House, west of town on the freighting road and; Alex Richmond's hotel, also on the freighting road west of town (Wilson 1986:13).

In his *Historical Souvenir of El Dorado County*, Paolo Sioli indicated that quartz veins were prospected from the Mother Lode westward to the foothills-valley edge. Sioli described rich pocket mines at "... Gray's Flat, around Shingle Springs, and as far down as Clarksville; but in the main, the work has been desultory and unsatisfactory" (Sioli 1883 [1998]:94).

The early period of mining was confined to the wet seasons of winter and spring when sufficient water was available in the local creeks. Miners constructed small, temporary camps near the diggings along the creeks and gullies. Archaeologist Susan Lindstrom indicated that Carson, Screech Owl and Plunket creeks were all seasonal; the seasonal availability of water needed for mining along these creeks and their tributaries was supplemented by ditches tapping the system connected with the American Reservoir (Bass Lake), which was constructed in 1856 (Lindstrom 1998:54).

Local ranchers supplemented their income with proceeds from gold mining. Lindstrom indicated that James Van Wicklin and Tim Coglin filed a mining claim on Plunkett Creek south of Clarksville in the early 1880s. During the early part of the 20th century, Van Wicklin's descendant contracted with Williken, Boething and Edwards to mine 20 acres in the vicinity of Screech Owl Creek. The mining resulted in at least 32 prospects, shafts or pocket mines, as well as access roads and isolated artifacts (Lindstrom 1998:20-21).

Tong, Bence and Taylor of Clarksville owned and worked quartz mines in the Clarksville locality. In the 1890s, news articles announced discoveries including a quartz ledge near Marble Valley to the east (Lindstrom 1998:21).

During the so-called "second gold rush" of the 1930s, dragline and dry-land dredging was conducted at the Jumbo Placer Mine along Carson Creek southwest of Clarksville. Formerly the White Rock Land and Mineral Company mine, the property was first worked in the 1920s by digging shafts to bedrock and drifting. Lindstrom reported that the gold content of gravel worked in the drift mines was spotty (Lindstrom 1998:23). Most gold mining across the country ceased in 1942 by order of the War Production Board.

The land around Clarksville had little agricultural value, except for stock raising and dairying. During the gold rush and before the railroads, agriculture in western El Dorado County depended mainly on the home demand, which was regulated by the mining industry. Strategically located near the junction of the freighting and stage coach roads, Clarksville quickly developed from a mining camp and way station to a regional trading center, which drew ranchers of the surrounding White Rock and Carson Creek areas (Wilson 1986:13).

Prominent among Clarksville's early citizens was John H. Tong, who became the proprietor of the Railroad House, a well-known resort. Other Clarksville notables were Dr. John W.S. Giles, physician; E. Daniel and H. M. Johnson, merchants; Russell Bean, blacksmith; Mr. A. Morgan, restauranteur and Sylvester Kelly Cram, saloon-keeper. The area's early ranchers included George Carston, Dennis Phillip Bence, W. S. Cothrin, William Dormody, George Fitch, Abe Jewell, Andrew Morrison and William Showers (Wilson 1986:13).

Land ownership in the region surrounding Clarksville was dominated by Joerger, Cothrin, Euer and Van Wicklin families. The Joerger holdings alone amounted to several thousand acres near Clarksville and in Martis Valley near Truckee. By the 1870s, many of the region's ranchers owned and leased land in the Sierra high country to "summer" their herds. Around Clarksville during the summer months, John Wilson, descendant of local ranchers wrote "...the land is seared to a lifeless yellow, the creeks lay naked in their beds and the dull, brown dust settles in huge feathery heaps along the sides of rutted roads" (Wilson 1986:131).

Sheep were introduced to the semi-arid foothills around Clarksville in the 1850s. The peak of sheep raising was probably reached by the 1860s and 1870s. The California Trespass Act of 1850 required farmers to fence their crops to keep out grazing animals. By the late 1860s, however, the burden of fencing was placed on the ranchers who kept livestock. Many of the rock fences found in the region may date to this period and later.

Armin Winje, an elderly Gold Hill resident, once stated that rocks were abundant in the Clarksville area and fences were made out of whatever was handy and cheap. Mr. Winje recalled that fences were built as high as they

could be built, then a strand or more of barbed wire was placed along the top of the rock fence to make it higher (Armin Winje, personal communication 1997).

The late Jess Tong, descendant of the pioneer Clarksville family, once told the author that in winter when there was little to do, you could always build more rock fence (Jess Tong, personal communication 1996).

The land around Clarksville was rocky and clearing fields was necessary to allow the grass to grow and relieve difficulty in mowing. Ranchers would extend barbed wire fences from the rock walls to create acreage. The fences functioned as field divisions, section lines and corrals.

Shifting transportation corridors spelled the end of Clarksville and numerous inns of the locality. The Comstock boom of the 1860s temporarily boosted the area's economy. By 1864, however, 12 miles of the Sacramento and Placerville Railroad had been built from Folsom toward Latrobe, bypassing Clarksville. The new railroad was originally designed as a link from Sacramento via the Sacramento Valley Railroad to Latrobe and Placerville, then as far as the Carson Valley and Virginia City across the Sierra through Johnston Pass (Briggs 1954:77-78).

With the railroad, there was less need for the inns, less demand for quantities of supplies and the consequent decline of a local market for the neighboring farmers and ranchers. The period, 1870-1960 was characterized by a consolidation of land holdings and the transhumance or seasonal movement of livestock to greener pastures in the Sierra. By the early 1870s, it was virtually impossible to earn a living from the smaller parcels of land that once dotted the countryside around Clarksville. The early mixed economy of mining, ranching and other activities was replaced by the focused strategy of large-scale cattle and sheep ranching.

RECORDS SEARCH RESULTS

On October 16, 2003, the North Central Information Center, California Historical Resources Information System responded to a records search request from LSA Associates, Inc. The records search encompassed the proposed Empire Ranch Road Interchange on U.S. 50. The results of the records search illustrated the location of cultural resource surveys previously conducted, as well as objects, sites, structures and districts previously documented within what is presently the proposed Silva Valley Parkway Interchange project area. The records search results listed the cultural resources and surveys within the project area as it was defined at the time and a half-mile radius beyond the project location. According to information center records of the time, 25 different studies had been conducted in the

area. The cultural resources identified during those studies ranged from isolated piles of field stones to the Mormon Hill Historic District (see Appendix B: Records Search Results).

Additional information was provided by the information center to LSA Associates on the interchange project in May and June, 2006.

In an updated March 24, 2010 records search specifically for the Silva Valley Parkway Interchange, North Central Information Center staff reported no "new" cultural resources recorded since the 2003 records search despite four new studies within the same area: #8119 (Kaplain and Huster's 2006 survey along U.S. 50); #10119 (Blind's 2009 survey for the El Dorado Hills Boulevard Interchange modifications); #8924 (Peak's 2007 survey for the Clarksville Professional Business Park) and; #10131 (DeBaker and Siskin's 2008 survey for the Goldhill to Clarksville Reconductoring Project) (for the updated records search report, see also Appendix B: Records Search Results).

CONSULTATIONS

On March 16, 2010, the Native American Heritage Commission responded to the consultant's request for a search of its sacred lands file and list of Native American contacts. The file search failed to indicate the presence of Native American cultural resources in the immediate project area. Commission staff enclosed a list of six Native American contacts and recommended soliciting information from those individuals and groups. The contacts included: El Dorado County Indian Council, El Dorado (Miwok/ Maidu); Ms. Jessica Tavares, Chairperson, United Auburn Indian Community of the Auburn Rancheria, Auburn (Maidu/Miwok); Mr. Christopher Suehead, Todd Valley Miwok-Maidu Cultural Foundation, Foresthill (Miwok/Maidu); Mr. Nicholas Fonseca, Chairperson, Shingle Springs Band of Miwok Indians, Shingle Springs (Miwok/Maidu); Tribal Preservation Committee, United Auburn Indian Community of the Auburn Rancheria, Auburn (Maidu/ Miwok); Ms. April Moore, Colfax (Nisenan-Southern Maidu/Konkow/ Washoe). The consultant contacted each by letter. No response has been received to date.

On March 13, 2010, the consultant contacted Ms. Sue Silver, former member of the El Dorado County Pioneer Cemeteries Commission, a non-profit organization. One, potentially two, historic cemeteries are located within or immediately adjacent to the project area: the Tong Cemetery (also known as the Railroad House cemetery) and the Metropolitan Exchange Cemetery (also known as the Richmond-Hall cemetery or the "Fitch" graves, or "Indian Graves." In a December 31, 2003 letter report to LSA Associates, Silver presented a detailed history of both cemeteries. Silver also outlined previous research and recommended mitigation considering potential impacts of the

proposed Silva Valley Parkway Interchange. The mitigation recommendations included an effort to locate the one-acre Metropolitan Exchange (Richmond-Hall) Cemetery on the ground and re-establish the legal boundaries of the one-acre parcel. Once the boundaries are re-established and surveyed, Silver recommended that the survey map should be filed with the County Recorder accompanied by a statement of dedication to cemetery purposes. Silver also recommended that the cemetery should be fenced and provided with a gate for pedestrian access. A sign identifying the cemetery should be installed at the site (Sue Silver, personal communication 2010).

In the same 2003 letter, Silver recommended that a ground penetrating radar (GPR) survey should be conducted within 100 feet of all sides of the Tong Cemetery outside the existing cemetery fence to locate unmarked graves. Silver cited verbal reports including Mrs. Jess (Mimi) Tong's conversation with a clerk in the El Dorado County Recorder's Office where Mrs. Tong indicated her father-in-law, George Tong, had broken up several gravestones and buried the broken pieces near where they had been erected. Silver also recommended that a site record form should be filed on the cemetery (Sue Silver, personal communication 2010).

On April 27, 2010, the consultant met with Geraldine Joerger, Clarksville Historical Society. During the consultation, the author questioned Ms. Joerger about the various historic sites located within the Silva Valley Parkway Interchange project area. Of particular interest was LSA's location of the first Tong residence at Clarksville, which was given the field number, "SV-4" by LSA's archaeologist. LSA had indicated that the site was located on the east side of Carson Creek, north of U.S. 50. Ms. Joerger suggested that the first Tong house site was on the south side of the freeway. Descendant of the pioneer Joerger family, Ms. Joerger also commented on the Mormon Tavern site. Ms. Joerger indicated that modernization (widening) of U.S. 50 had taken out the Mormon Tavern site. When questioned about remaining features on the north side of U.S. 50 near what had been the Mormon Tavern historic site, Ms. Joerger indicated that foundations of the later Joerger dairy barn remain. Also, Ms. Joerger commented that up the hill from the Mormon Tavern site, the bench chiseled from rock by the nuns was still intact (Geraldine Joerger, personal communication 2010).

FIELD METHODS

Because the project area has been thoroughly inspected by a number of archaeologists on different projects over the past 23 years, the consultant focused on revisiting the identified cultural resources and assessing their current condition. In the process of re-locating the previously identified cultural resources, the consultant also traversed the project area in broad transects to check the reliability of previous field survey coverage and walked

areas on the fringes of those marked by the information center as previously surveyed to insure adequate coverage of the entire project area.

The majority of previously documented cultural resources located within the Silva Valley Parkway Interchange project area were recorded by Peak & Associates, Inc., Foothill Archaeological Services and Jones & Stokes Associates. LSA Associates, Inc. was the most recent firm to tackle the identification of cultural resources within the project area. LSA identified the sites designated with the field number prefix, "SV-." However, none of the LSA sites were documented on record forms. In addition, LSA provided the present consultant with several tentative lists with differing field numbers for the same cultural resources, which seemed to indicate that the list was not a final draft.

The present consultant revisited not only the previously recorded resources, but also the cultural resources noted by LSA. The consultant applied many of the "SV-" field numbers to the same resources as LSA. However, where the LSA field numbers varied between LSA lists, the present consultant finalized the site list and arbitrarily applied an "SV-" field number to each resource whose identifier was in question.

Where an archaeological site with an "SV-" field number could not be relocated during the present study or where no physical evidence of such a site existed, the present consultant still included the field designation in the list of sites along with the appropriate explanation (could not be found or no physical evidence of the suspected site could be found at the previously designated location). The consultant presents this explanatory scheme in the "Description of Cultural Resources" and "Evaluation" sections, below, as well as in Appendices D and E.

Upon visiting each archaeological site, the present consultant updated existing records by filling out an entirely new set of record forms using DPR 523 series forms distributed by the California Office of Historic Preservation. In the case of sites with the "SV-" field number prefix, the record forms filled out by the consultant are the original first set of forms for those particular cultural resources, although LSA originally identified the sites. In some cases the "SV-" field numbers were added by the present consultant to sites with pre-existing site and/or feature numbers to signal that the record forms represented an update to previously recorded information.

DESCRIPTION OF ARCHAEOLOGICAL RESOURCES

The original EIR for the Silva Valley Parkway Interchange cited two previous Peak & Associates cultural resource studies as having encompassed most of the project area as defined at that time (Peak & Associates, Inc. 1987a,

1987b). Ten sites, isolated features and a building were identified within the original project area. The sites included CA-ELD-558-H, the 1930s enclosure surrounding the Fitch home and gardens and associated ranch features; additional features including bedrock mortars associated with an extensive site recorded as CA-ELD-600/H; A variety of historic features including the historic Tong Cemetery and a bedrock milling station documented as CA-ELD-585/H; five isolated features including rock fence remnants, a mine prospect and a bedrock milling station; the Richmond-Hall Cemetery, Mormon Tavern Monument and Byram House, a residence dating to the 1950s (Jones & Stokes Associates 1989:220-221).

In the present study, 41 individual cultural resources and one historic district are located within the current project area of the proposed Silva Valley Parkway Interchange. Among the sites and features are those mentioned in the preceding paragraph as part of the previous EIR (see Appendix D: Confidential Location of Archaeological Resources, below, and Appendix E: Confidential Record Forms).

Prehistoric (Native American) Archaeological Resources

Bedrock Milling Station (P-9-017). This minor archaeological resource is a single shallow bedrock mortar hole located on a rock outcrop measuring 0.7 x 2.5 meters. The bedrock mortar is situated on an east-facing slope on the west side of Carson Creek. The site currently shows a shallow mortar hole near the south end of a nearly flat grano-diorite outcrop at ground level. Surrounding soil is reddish orange clay. No artifacts or cultural deposits were found in association with the bedrock mortar. The bedrock milling feature appears to be in the same condition as earlier described by Peak & Associates.

Bedrock Milling Station (CA-ELD-600/H, Feature 11). This minor archaeological resource is an elongated outcrop of grano-diorite on the west side of the Carson Creek streambed. Reported but not recorded in 1992 by Foothill Archaeological Services as Feature 11 of CA-ELD-600/H (a large site containing some related and some disparate features on the north side of U.S. 50 in the Carson Creek drainage), this elongated bedrock milling station has five oval mortar holes. Currently, four of the five mortar holes are gravel filled. One is partly inundated by the creek flow. The outcrop lies on the north side of a narrow, three foot-deep erosion gully. No midden or other cultural deposit was noted in the vicinity. The milling station appears in much the same condition as described earlier by Foothill Archaeological Services.

Bedrock Milling Station (CA-ELD-600/H, Feature 12). This minor archaeological resource was described by Foothill Archaeological Services during its 1992 field inspection as "a bedrock mortar feature with

approximately six shallow pits in a smooth granodiorite outcrop in the main course of Carson Creek." The site was noted by Foothill's archaeologists, but not recorded. Although the site lies between Foothill's Feature 11 and Feature 13, current attempts to relocated the site have failed. It is possible that growth of cattails in the creek channel or the abundant present water flow obscure the feature from view.

Bedrock Milling Station (CA-ELD-600/H, Feature 13). This minor archaeological resource was described but not recorded by Foothill Archaeological Services during its 1992 field inspection as a bedrock mortar feature with 6-10 deep pits in a granodiorite outcrop on the north bank of Carson Creek. Currently, the bedrock milling station consists of a waterworn, relatively flat outcrop of grano-diorite on the west side of Carson Creek bed with 11 mortar holes scattered across its surface. The outcrop is inclined toward the center of the creek. The mortar holes vary from circular and shallow to oval and deep. Some mortar holes are filled with water worn pebbles from times of high water. At least one mortar hole is submerged in the stream flow of mid-April. No midden or other cultural deposit was identified at or near the bedrock milling station. Condition of the site is good.

Historic Archaeological Sites

Mormon Tavern (CHL-699; CA-ELD-1266-H). In a recent draft Historic Resource Evaluation Report (HRER) for Caltrans, Foothill Resources archaeologists described the original Mormon Tavern site as encompassing a large, two-story frame structure with a two-story veranda on the front, a large barn, sheds, two frame houses and a 1950 residence. The archaeologists continued with their description by observing that all were demolished during the widening of U.S. 50 in the 1960s. In the year 2000, when Foothill Resources, Ltd. conducted its field survey, the archeologists identified three structure depressions, a hand stacked, mortared rock wall and a concentration of historic artifacts. This description conforms roughly to the contemporary description by Jones & Stokes archaeologists who identified a concentration of artifacts and daffodils at the highway's cutbank edge, a rock wall, house depression and paved walkway farther north (away from) the highway's cutbank edge, a nearby water reservoir and some 300 feet to the northwest, two depressions with a concentration of 19th century artifacts (Jones & Stokes Associates 2000: Appendix A). The site remains in much the same condition as described 10 years ago by Jones & Stokes archaeologists. However, the Jones & Stokes archaeologists overlooked the rock bench where the nuns once meditated.

Prospect (P-9-013-H/Field no. IF-4). This minor historic archaeological resource is a depression measuring 15 x 20 feet and five deep. The depression was originally documented on record forms by Peak & Associates back in

1987. The Peak & Associates archaeologist recorded a square nail, end piece of shoring, belt buckle and a five inch diameter can lid associated with the feature. Despite a search of the area, the present consultant was unable to relocate the feature.

Rock Fence (P-9-014). This minor historic resource is a rock fence remnant that borders the south side of the old White Rock Road (Lincoln Highway) immediately west of the 1918 Carson Creek bridge. The rock fence makes a 90 degree turn to the south to parallel the west bank of Carson Creek. The east-west fence bordering White Rock Road is at present approximately 600 feet long and is backed by a more modern wood post and barbed wire fence with some metal T-posts. The east-west fence is in poor condition with rocks stacked as high as three feet, but more often much less including short reaches where only the initial rock footings survive. The north-south rock fence segment along Carson Creek reaches heights of four feet and is in much better condition. This reach of the fence is about 300 feet long. Both fences suffer from loss of rock. Peak and Associates originally recorded only the east-west fence line (as 1,150 feet long) back in 1987, although both fences are connected and may have been constructed during the same period, 1895-1917.

Rock Fence (P-9-016). This minor historic archaeological resource is the remnants of a "rock reinforced" fence line. Recorded by Peak & Associates back in 1987, the old fence line appears unaltered since that time. At present, the fence remnant consists of an alignment of rocks no more than a single rock high and wide with scattered rocks in places along this roughly east-west former fence. Actual orientation of the old fence line is \$70°W (true bearing). The old fence line was probably post and wire with rock placed along the base, as other fences in the locality. Current condition of this linear resource is poor. Posts and wire are gone.

Rock Fence (P-9-018). This minor historic resource is, according to Peak & Associates' 1987 record form, a "dry-laid rock-reinforced fence line." This linear resource remains in much the same condition as described in 1987. However, the fence line is best described as a wood post and barbed wire fence constructed on an alignment of rocks where rock outcrops naturally occur on the same ridge. The segment of fence line documented here is approximately 400 feet long and located within the Silva Valley Parkway Interchange project area. The fence line is oriented true north-south and abuts the old fence line documented above as P-9-016. Current condition of the fence line segment is poor. There are missing posts and down wire.

Fitch House Site (P-9-646). The 1987 Peak & Associates record documents this 1920s site of a home and gardens located on a small hill. The site was largely enclosed with fencing supported by concrete and stucco pillars. Other features included a stone-lined well with concrete rim, 1932-dated watering

trough, remnants of a barn, cement-lined well, concrete dam with rock trim, concrete storage tank. An updated record from 2002 by Pacific Legacy, Inc. noted deterioration of the site: stone-lined well, water trough, rock and concrete wall and rock garden, concrete tank were still visible. Currently, only a few pillars remain. Much of the enclosure has been shattered into ruins. The well is largely filled in. However, the stone-topped concrete dam is intact. The concrete, four-compartment, tank (cistern?) remains intact, though painted with graffiti. The porch footings of quarried sandstone blocks remain largely intact. The site occupies the south end of a south-trending ridge. Exotic trees on site include two varieties of palm, cyprus, pines and red Eucalyptus. The site is littered with modern trash. Current overall condition of the site is poor.

Multi-Component Site Including Tong Cemetery (P-9-673). The boundaries of this archaeological site surrounded a number of related as well as unrelated features: the historic Tong family cemetery, the site of a stamp mill, mine and miner's cabin (all historically related), a ditch remnant, depression, bedrock mortar station, rock bridge abutments, covered mine shaft and tailings. The site also included excavated pits, which, during the present study were recorded as a separate site—historic bank diggings (SV-23, described below). All of the features appear in much the same condition as originally described in the Peak & Associates 1998 site record forms. However, the bedrock milling station could not be re-located.

Like the Richmond-Hall Cemetery, the Tong Cemetery is situated on the crest of a hill overlooking Clarksville, but from a slightly lower elevation. An estimated 25 graves occupy the Tong Cemetery. Four graves marked with either headstone or rocks lie outside the cemetery's fence. Within the approximately 50 x 100 foot cemetery fence, the cemetery includes graves, each marked with an outline of rocks. Some headstones are white marble; some are simply large flat rocks turned on end. Several graves are marked with an outline of rocks and a flat board as a head or foot "stone." The cemetery also includes more modern black granite monuments and cement caps over some of the graves. Most of the graves are those of the Tong family. However, the earliest marked grave is that of Calvin E. Rose who died in 1856. The most recent grave is that of Jess Tong, 1996. The graveyard within the existing fence is tended at least seasonally. Overall condition is good. The one grave outside the cemetery fence marked with a white marble headstone dated 1868 is missing part of that headstone.

The largely in-filled ditch segment located on the west and south sides of the cemetery is in poor condition. It was barely recognizable when revisited during the present study. The ditch terminates at a circular depression overgrown with woody shrubs. The condition of both features is poor, as is the condition of the adit and tailings on the east side of the cemetery.

The stamp mill site situated by Carson Creek west of the cemetery consists of three relatively small and roughly leveled terraces, one below the other. The uppermost terrace is marked by a dry-laid rock retaining wall. Some quartz rock lies on and next to the terraces. A dump of large rock lies on the north side of the terraces. An adit was reported nearby, but was apparently taken out with widening of U.S. 50. The stamp mill was removed from the terraced mill feature. Therefore, no structures remain. Condition of the mill feature is poor.

Downstream from the mill feature are the dry-laid rock foundations of a small cabin and associated depression of what is probably a privy feature. The rock foundation is approximately 8 x 12 feet. Approximately 12 feet south of the foundation is the shallow depression approximately 4x5 feet in plan view. Present condition of the cabin site is good. There does not appear to have been any vandalism.

Rock "bridge" abutments reported by Peak & Associates were not re-located.

Sacramento to Placerville Road Segment (P-9-809). This historic linear resource is a short segment of the Sacramento to Placerville road that parallels an old fence line on its west side. The southern end of the road segment lies on the north side of Tong Road and extend northeasterly for a distance of approximately 800 feet. The old road is approximately 15 feet wide. The current condition of this old road trace is poor. A currently used, deeply rutted dirt road mounts the old road and occupies the northern third of the old road trace.

Corral Remnant (P-9-861-H). This minor historic resource was originally reported by Peak & Associates in 1987. It was described as a corral associated with the Richmond/Hall Dairy. The site was described as a flat terrace with two non-contiguous low rock walls. The remaining corral fencing locations were marked by narrow, low berms encompassing an area approximately 70 feet on a side. A north-south rock wall measured approximately 45 feet long, while an east-west rock wall remnant along the existing fence line bordering White Rock Road on the north measured half that length. In revisiting the site, the rock fence remnant paralleling White Rock Road remained intact. The north-south rock wall was not seen from the road. Closer inspection was not possible due to bees swarming. Several patches of young *Alianthus* trees mark the corral's location. Otherwise, the site is overgrown with high, dense grasses and annuals including a swath graded at some time in the past that may have disturbed the northern half of the site. Condition of the site remains poor.

Silva Valley Road Segment (P-9-1141). This road segment north of U.S. 50 was recorded by Foothill Archaeological Services back in 1992. Foothill archaeologists also reported the road on the same forms as the old Coloma

Road to Clarksville. Revisited during the current study, the only remnant road segment identified is approximately 400 feet long and visible on a southeast-facing hill slope from the new straightened, widened and paved Silva Valley Parkway. The old road trace is visible from the side of the present-day paved road and ends at the south boundary of a new residential development. The old road trace is estimated at approximately 16 feet wide and is in poor condition.

Rock Fence (P-9-1646). Peak & Associates described this minor historic resource as a "dry-laid rock-reinforced fence line" on a 1987 record form. This approximates a current description of the old wood post and wire fence remnant with a single rock width alignment at its base along the east slope of a ridge. The fence line is oriented east-west on true bearings. On the west, the fence abuts a true north-south fence of similar construction (see P-9-018). The east end of the rock fence line P-9-016 also abuts P-9-018-H, but is offset approximately 15 feet north of the west end of P-9-1646. Condition of P-9-1646 is poor. There are missing posts and down wire.

Road Segment (Field No. SV-1). This old road segment is approximately 12 feet wide and 500 feet long. Located on the east side of Carson Creek, the abandoned track's east end is overrun by the current dirt road that connects the Old Bass Lake Road (Lincoln Highway) with Silva Valley Road. The old road segment is cut into the uphill side of the west-facing slope by approximately 12 inches. The road is overgrown with grasses and annuals. Judging by the lack of erosion and width corresponding to the width of a bulldozer blade, it is tempting to speculate that the road cut was made no earlier than the 1950s. Condition of the road segment is fair.

Road Segment (Field No. SV-2). This historic archaeological resource is an old road cut on the west-facing slope of Mormon Hill. The old road segment roughly parallels the Old Bass Lake Road (Lincoln highway) about 200 feet up slope from the concrete road. The old dirt road segment is approximately 12 feet wide and 500 feet long. The road segment is overgrown with dense grasses and annuals. Piles of field rocks (probably from clearing the field) have been placed on the old roadway. Condition of the road is poor. The southern extension to Clarksville appears to have been obliterated in the surrounding field.

Mine Tailings (Field no. SV-3). This minor historic archaeological resource consists of rock tailings on the southeast side of Carson Creek immediately downstream from a creek crossing of the dirt track (narrow unimproved road) from Silva Valley Road on the west to the old Bass Lake Road (Lincoln Highway) on the east. The rock tailings may have been disturbed by construction of the church immediately southeast. The tailings pile is approximately 15-20 feet high and 50 feet north-south paralleling the creek. An estimate of the uphill side is not possible due to the effects of

earthmoving when the modern church as constructed. There remains no visible evidence of the mine; condition of the remaining resource, the tailings dump, is poor.

Site of First Tong Residence (Field no. SV-4). The site of the first Tong residence on the east side of Carson Creek, north of U.S. 50, was noted by LSA, but not formally recorded. Upon revisiting the purported location of the site between the creek and a modern church, it was apparent that earthmoving related to construction of the Korean church may have destroyed the site. Earth and rock had been pushed westward to a point near the edge of the ravine through which Carson Creek flows. The remaining narrowed terrace above the creek was searched. However, no evidence of a habitation site (drylaid rock foundation, depression(s) or artifacts) was found. Consultation with the Joerger family descendant indicated that the first Tong residence was located south of the freeway and not at the location by the church indicated by LSA (Geraldine Joerger, personal communication 2010). The California Office of Historic Preservation's Instructions for Recording Historical Resources states that the threshold for recording such resources is "any physical evidence of human activities over 45 years old" (California Office of Historic Preservation 1995:2). Lacking physical evidence, the purported location of the Tong residence was not recorded on DPR 523 series forms during the present study.

Road and Borrow Area (Field no. SV-5). This minor historic resource is a single lane dirt road that originates at a gate on the metal T-post and wire fence that parallels the north side of Tong Road on the ridge immediately west of Carson Creek. The road descends the east slope of the ridge in a northeasterly direction to the west side of Carson Creek. At the terminus of the road, there is an area excavated from the side of the ridge. The roadway, overgrown with grasses and annuals is approximately 12 feet wide and was probably constructed in the late 1950s, early 1960s and may even coincide with construction of additional highway lanes and Tong Road in 1965. Condition of the road and borrow area is fair.

Rock Pile (Field no. SV-6). This minor historic archaeological resource is a large pile of rock. Most of the rock is angular. The pile is about three feet high, 15 feet long (north-south) and 12 feet wide (east-west). The site is located in the middle of a west-sloping field bounded by old fence lines on the east (SV-8) and south and (before construction of modern U.S. 50) on the north. Condition of the rock pile is fair. Area old timers would comment that the size of the rocks (head-size and smaller) would be good to outline graves. Similar stones were used to outline graves found in the Tong Cemetery in nearby Clarksville.

Prospect (Field no. SV-7). This minor historic archaeological resource is a large mine prospect. The remaining pit is approximately 20 feet east-west and

15 feet north-south with a spoil pile on the downhill (west) slope adjacent to the pit. The pit itself is about four feet deep in the middle. Above the northeast corner of the sub-rectangular-shaped pit stands a rusted iron wagon axle driven into the ground. The axle stands approximately four feet high above the ground surface outside the pit. Condition of this minor resource is fair.

Road Segment (Field no. SV-8). This historic archaeological site includes a segment of an old N25°W (true bearing) fence line and road segment (down hill side of the fence). It is presumed that the road paralleled the fence line, though down hill (west of the fence). Although previously visible to archaeologists who noted the road, with high spring season grasses, the road does not appear obvious at this time. The fence line is post and wire with few wooden posts remaining. Some rock is gathered along the base of the fence line, which is marked by a low, narrow berm. The north end of the fence terminates approximately 30 feet south of the U.S. 50 right of way fence. The south end of the fence is disturbed by recent earth-moving and construction of a staging area. The road segment is disturbed by construction of a modern power pole near the middle of the segment and destroyed by earth-moving and construction of a staging area at its south end. Total remaining length of both fence and road is approximately 500 feet.

Road Segment (Field no. SV-9). This dirt road segment was identified but not recorded by LSA on the southeast corner of White Rock Road and Silva Valley Parkway. However, the old roadbed could not be re-located during the present study. Recently, an equipment and materials staging area was constructed and additional earth-moving undertaken at the approximate location of the old roadbed. These ground-disturbing activities may have obscured remaining evidence of the old road segment.

Prospect (Field no. SV-10). This minor historic archaeological resource was reported but not recorded by LSA archaeologists. The feature was described as a circular depression approximately 25 feet in diameter. The location of the prospect on a hill south of White Rock Road leading into Clarksville and east of Silva Valley Parkway places the feature within the bounds of a currently graveled equipment and materials staging area. As a consequence, the feature could not be re-located during the present study.

Corral Fence (Field no. SV-11). This minor historic resource is a rectangular corral or small fenced enclosure approximately 75 feet on a side. The remnant fencing consists of split cedar or redwood posts and barbed wire. The corral fencing abuts the rock fence (P-9-014) that parallels the south side of White Rock Road on the west side of Clarksville. A gate opening appears in the rock fencing and in the mixed wood post and wire fencing on the opposite (south) side of the enclosure. Condition of the enclosure is poor; few posts remain standing. The Richmond-Hall Dairy

corral on the north side of White Rock Road opposes this enclosure on the south side of the road. Their contemporaneity is unknown.

Rock Fence (Field no. SV-12). This minor historic resource is a rock fence remnant that parallels the west bank of Carson Creek from the old Lincoln Highway bridge at Carson Creek south (downstream) for a distance of approximately 300 feet. The rock fence meets the east end of the remnant rock, post and wire fence P-9-014 at the southwest bridge abutment. The rock fence attains a height of nearly four feet in some places. In other spots, the fence rocks have collapsed to a height of two feet more or less. The south end of the rock fence curves westward away from the creek for a distance of approximately 15 feet. Condition of the fence is fair.

Fence Remnant (Field no. SV-13). This minor historic archaeological resource is an old fence line on the west side of White Rock Road between Latrobe Road and Silva Valley Road. The old fence line consists of scattered rocks on an alignment paralleling the existing White Rock Road at a distance varying between 15 and 30 feet. Portions of the old fence line survive as tumbled rock from what may have been a stacked rock fence. Other portions survive only as a narrow berm and may have been post and wire. The old fence line remnant extends for a distance of 1,500 feet from about 400 feet south of the Joerger Cutoff to a unnamed gated access road east of Latrobe Road intersection. Condition of this linear resource is poor.

Rock Pile (Field no. SV-14). This minor historic archaeological resource is a deflated pile of rock quarried from an outcrop at the same location. The rock pile is no higher than one foot above ground surface, 15 feet long (north-south) and six feet wide (east-west). The rock pile lies about 25 feet up slope (east) of the remnants of an old fence line, itself marked by a berm that parallels the route of the old Sacramento-Placerville road on historic maps. The fence line was reinforced in places along its base with similar quarried rocks. Condition of the rock pile is fair.

Old Bass Lake Road Segment of Lincoln Highway (P-9-809; Field no. SV-15). This historic linear resource is an approximately 400 foot long segment of the old concrete Lincoln Highway (Old Bass Lake Road) located within the Silva Valley Parkway Interchange APE. The segment begins approximately 50 feet south of a gate entry on a T-post and wire fence and ends before an abrupt right turn east. The concrete road is 17 feet wide with a two-foot wide asphalt shoulder on each side. Condition is poor in relation to the road's segment on the south side of U.S. 50 in Clarksville. The cracked concrete surface displays a ghost impression of the six inch wide solid white line down the center of the road. Grasses grow along large fissures in the road. The road still serves local traffic. Condition of the segment is poor.

Rock Fence (CA-ELD-600/H, Feature 14; Field no. SV-17). This minor historic resource is a dry-laid rock fence remnant. The fence remnant parallels the east bank of Carson Creek for a distance of approximately 90 feet. The remnant functioned as a creek bank erosion control as the uphill side of the fence is largely in-filled. On the down hill (creek) side, the highest point of the remnant fence is four feet. Located directly under modern power lines, the fence remnant extends only a few inches above ground surface on the uphill side. Condition of the fence is fair. A large section of the middle has tumbled into the creek drainage.

Rock Fence (P-9-69; Field no. SV-20). This minor historic resource is a rock fence that parallels the west side of Carson Creek north of the 1918 bridge on White Rock Road (Lincoln Highway). The fence consists of three segments. The first segment is approximately 10 feet long, 2.5 feet wide at the base and three feet high. This first segment is located adjacent to the north side of the old Lincoln Highway bridge on Carson Creek in Clarksville. The second segment is approximately 75 feet long, 100 feet north (upstream) from the first segment. The third segment is approximately 10 feet long and located about 100 feet north of the second. The width and height of the third and second segments of rock fence are similar to the first. Overall condition of the fence is fair.

Ditch Segment (Field no. SV-21). This minor historic archaeological resource is a short (50 feet long) segment of a largely in-filled ditch. The ditch is approximately two feet wide across the top with no residual depth. The segment was recognized at the southeast edge of a ridge where rocks had been removed from the ditch location and stacked within five feet uphill. The ditch probably brought water from Carson Creek downstream to the bank diggings along the northwest bank of the same creek. The ditch would have served bank diggings between U.S. 50 on the north and the old Lincoln Highway bridge on the south. Condition of the ditch is poor. Only a short segment of the ditch is recognizable on the landscape.

Bank and Hillside Diggings (Field no. SV-22). This minor historic archaeological resource consists of heavily eroded, amorphous bank diggings on the west side of Carson Creek immediately south (downstream) from the old Lincoln Highway bridge on Carson Creek. The site also includes heavily eroded diggings on the adjacent east-facing hillside that survives as a hummocky landscape. The old placer mined site encompasses an area approximately 400 feet north-south and 200 feet east-west. The bank diggings are confined to two low-lying areas at the foot of the moderate to steep, east-facing hill slope. The hill side diggings are confined to the moderate slope above, immediately west of the bank diggings. Condition of the site is poor.

Bank Diggings (Field no. SV-23). This minor historic archaeological resource is a series of bank diggings along the west side of Carson Creek

located between U.S. 50 on the north and the old Lincoln Highway bridge at Carson Creek on the south. The northernmost diggings are located adjacent to the rock foundations of a cabin previously recorded as the rock foundation and possible privy feature of P-9-673, a large multi-component site that includes the Tong Cemetery. The bank diggings reported here consist of a series of six separate diggings extending along approximately 200 feet of the creek's west bank. The diggings range from a small circular pit about 15 feet diameter and 3-4 feet deep to a large ground-sluice like feature approximately 40 feet long, 15 feet wide and six feet deep. Rocks are stacked along side of the diggings. A short ditch segment recorded as field no. SV-21 may have provided water for the sluice. The diggings are less eroded than those reported for Field no. SV-22 and may be more recent.

Richmond-Hall Cemetery (Field no. SV-25). This historic cemetery is tentatively identified near the crest of a hill overlooking Clarksville to the south. The only physical evidence remaining on the surface are loose rocks purported to have marked graves at the one acre cemetery site. However, the location is overgrown with dense grasses and annuals, which frustrated attempts to identify the precise boundaries of the one acre parcel. In an undated draft Historic Resource Evaluation Report, Foothill Resources Ltd. indicated that in 1965 during construction of additional highway lanes and Tong Road, the cemetery had brush piled and burned on it. Construction equipment was also parked on the cemetery site. At least one of the graves and possibly others were identified by "rings" of rock and flat slabs of rock on the surface. The location was also identified by the nearby access gate constructed by Caltrans in 1965 on the south side of Tong Road. The cemetery was originally laid out with north-south and east-west boundaries. There may be at least five graves at the cemetery dating between the 1870s and 1930. Condition of the site surface is poor. Condition of the human burials is unknown.

Rock Fence (CA-ELD-600/H, Feature 10; Field no. SV-26). This minor historic resource is a dry-laid rock fence remnant that forms the south boundary of a meadow on the west side of Carson Creek. The 1992 updated record by Foothill Archaeological Services described the fence remnant as a T-shaped rock fence feature about two feet wide and one to three feet high that outlined a large meadow and intersected the historic Mormon Hill Toll Road on the north. The rock fence appears in much the same condition today as documented by in 1992. Condition of the fence is fair. Portions of the fence have tumbled to one side or the other.

North Clarksville Segment of Lincoln Highway (P-9-809; Field no. SV-27). This historic linear resource is an approximately 100 foot long segment of the old concrete Lincoln Highway located within the Silva Valley Parkway Interchange project area on the south side of U.S. 50. The segment lies on the south side of the existing U.S. 50 right-of-way. The concrete road is 17 feet

wide with a two-foot wide asphalt shoulder on each side. Condition is poor due to overcoating of the concrete with asphalt and construction of a much larger turn-around area adjacent to the highway's south right-of-way fence.

West Clarksville Segment of Lincoln Highway (P-9-809; Field no. SV-28). This historic linear resource is an approximately 800 foot long segment of the old concrete Lincoln Highway located within the Silva Valley Parkway Interchange project between the existing White Rock Road/Silva Valley Parkway intersection on the west and the 1918 Carson Creek bridge on the east. The old concrete road is approximately 17 feet wide with two-foot wide asphalt shoulders on each side of the roadway. Condition of the road segment is poor due to asphalt over paving and destruction of the curved west portion of the road and replacement of the curve by a modern asphalt intersection with the modern, widened asphalt White Rock Road, Silva Valley Parkway and Joerger Cutoff. Condition of the eastern two-thirds of the road segment is only fair with some asphalt patching.

Historic Structures and Objects

White Rock Road at Carson Creek (Bridge no. 25C0112). This concrete bridge was constructed in 1918 for the Lincoln Highway crossing of Carson Creek at Clarksville. The roadway is 21 feet wide and 68 feet long. The concrete bridge railings are three feet high. The massive concrete bridge abutments support both ends of the bridge, while two sets of arched concrete pillars support the bridge span. Inlaid into the end railing pillar on the northwestern corner of the bridge is a brass U.S. Coast and Geodetic Survey Bench Mark dated 1932. Condition of the bridge is good.

Joerger Cutoff at Bucket Ravine (Field no. SV-24). This historic "bridge" is a concrete box culvert with raised concrete sides in the form of molded panels. The bridge is approximately 14 feet wide with a 12 foot span. Bucket Ravine is a small, seasonal tributary to Carson Creek. The culvert crossing is about 300 feet west of the intersection of Joerger Cutoff and White Rock Road. Construction date is unknown. Condition of the culvert is good.

Mormon Tavern Monument (California Historical Landmark no. 699). This stone masonry monument with brass plaque commemorating Mormon Tavern was erected in April, 1960. At 50 years old, the monument itself must now be considered as a potential historical resource.

Spring House and Well (Field no. SV-19). This historic structure is a spring house consisting of a rectangular concrete reservoir enclosed by sheet metal siding and a gable roof clad in corrugated iron sheets. The little house is approximately 8x12 feet, four feet high. The south elevation has an off-set vent, a centered, square door hung by two hinges and secured by a metal

hasp. A hole in the center of the roof peak suggests another vent once existed. The north elevation has an off-set vent and a 3/4 inch pipe with gate valve. A capped concrete well (concrete portal 4x4 feet) lies approximately 75 feet north northeast of the spring house. Remnants of a water line continue south towards Clarksville. Condition of the spring house is fair.

Historic Districts

Archaeologists recognize several different types of resources that can occur on a given property. The above descriptions include sites, structures and objects. Objects are generally small in scale and simply constructed, such as a monument. Structures are part of the built environment such as bridges or covered concrete water reservoirs. Sites are locations of prehistoric or historic human occupation or activity, a ruined building or structure, or a natural landmark with a strong association with significant historic or prehistoric events.

A district is a significant concentration of sites and/or objects (and also may include buildings and structures) that are related historically by function, theme, plan or physical development. From the archaeologist's perspective, a district is a grouping of archaeological sites related principally by their common components (Townsend *et al.* 1993:9-11).

Two historic districts were previously defined in the local region, portions of which lie within the Silva Valley Parkway Interchange project area: the El Dorado Hills Historic District and the Mormon Hill Historic District (see Figure 3).

El Dorado Hills Historic District. Peak & Associates defined this historic district as a result of their 1987 cultural resources inventory for the El Dorado Hills Specific Plan. The district reportedly included 26 archaeological sites and 22 isolated archaeological features and spanned an area from the Carson Creek drainage north to the Allegheny Creek drainage. Out of this total number of resources, Peak & Associates defined the El Dorado Hills Historic District, which included 12 contributing and five non-contributing cultural resources (Peak & Associates 1994).

Mormon Hill Historic District (P-9-1670). In conducting archaeological studies in conjunction with the Serrano El Dorado Hills development, Jones & Stokes Associates had a goal of mitigating the adverse effects of the project on the El Dorado Hills Historic District. It was during these studies that Jones & Stokes archaeologists recognized that by reorganizing the El Dorado Hills Historic District boundaries, the resulting new district would include only those cultural resources with common ties to a specific history. The El Dorado Hills Historic District, as defined earlier by Peak & Associates

Figure 3. The two historic districts and the Silva Valley Parkway Interchange project area juxtaposed.

included historic sites along two separate drainages, each with separate historical associations. Jones & Stokes' newly defined Mormon Hill Historic District focused specifically on the Carson Creek drainage and the historic townsite of Clarksville. Jones & Stokes archaeologists then categorized the original contributing resources of the El Dorado Hills Historic District as belonging to one or the other of the new Mormon Hill Historic District or the re-defined El Dorado Hills Historic District (Jones & Stokes Associates 2000:3-4).

Based on the redefinition of districts, the Mormon Hill Historic District is now the only previously identified district located within the present footprint of the proposed Silva Valley Parkway Interchange. In fact, the Mormon Hill Historic District, as defined by the Jones & Stokes study, encompasses all, or in a few cases, portions of all the cultural resources identified in the present Silva Valley Parkway Interchange study.

EVALUATION

In the original EIR for the Silva Valley Parkway Interchange, the evaluation of significance was based on guidance found in CEQA's Appendix K. Cultural resource specialists of the time compared the identified cultural resources against a short list of criteria of significance. An "important" cultural resource was one that:

- A. Is associated with an event or person of:
 - 1. Recognized significance in California or American history, or
 - 2. Recognized scientific importance in prehistory.
- B. Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable or archaeological research questions;
- C. Has a special or particular quality such as oldest, best example, largest or last surviving example of its kind;
- D. Is at least 100 years old and possesses substantial stratigraphic integrity; or
- E. Involves important research questions that historical research has shown can be answered only with archaeological methods.

In 1992, the Public Resources Code was amended as it affects historical resources. The amendments included creation of the California Register of Historical Resources (Public Resources Code §5020.4, §5024.1 and §5024.6). The objective of the amendments was to bring the evaluation of historical

resources into closer congruence with federal regulations, as often compliance with both federal and state regulations was necessary. The criteria of significance for cultural resources outlined in CEQA's Appendix K, while having some similarities with federal regulations, posed some irreconcilable differences. For example, CEQA's criterion D indicated that a historical resource must be at least 100 years old where National Register criteria of eligibility was often determined by an age of 50 years or more. And, in certain cases, significance could be applied to a cultural resource less than 50 years old. While the amendments to bring CEQA in line with federal regulation became effective in 1993, it was not until January 1, 1998, that the implementing regulations for the California Register were officially adopted (Public Resources Code §4850 *et seq.*).

Under the California Environmental Quality Act (CEQA), historical resources are recognized as a part of the environment [Public Resource Code §21001(b), §21083.2, §21084(e), §21084.1]. A "historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant, or important in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (Public Resources Code §5021.1).

The California Register is an authoritative listing and guide for state and local agencies and private groups and citizens in identifying historical resources. This listing and guide indicates which resources should be protected from substantial adverse change. The California Register includes historical resources that are listed automatically by virtue of their appearance on or eligibility for certain other lists of important resources. The Register includes historical resources that have been nominated by application and listed after public hearing. Also included are historical resources listed as a result of an evaluation by specific criteria and procedures adopted by the State Historical Resource Commission.

The criteria used for determining the eligibility of a cultural resource for the California Register are similar to those developed by the National Park Service for the National Register of Historic Places. However, criteria of eligibility for the California Register were reworded to better reflect California history.

Any building, site, structure, object or historic district meeting one or more of the following criteria may be eligible for listing in the California Register:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

- 2. It is associated with the lives of persons important to local, California, or national history;
- 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- 4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Eligibility for the California Register also depends on the integrity, or the survival of characteristics of the resource that existed during its period of significance. Eligible historic resources must not only meet one of the above criteria, but also they must retain enough of their historic character or appearance to convey the reasons for their importance, or retain the potential to yield significant scientific or historical information or specific data.

Like the process of evaluating historical resources for National Register eligibility, California Register evaluations include the consideration of seven aspects of integrity: location, design, setting, materials, workmanship, feeling and association. The evaluation of integrity must be judged with reference to the particular criterion or criteria under which a resource may be eligible for the California Register. However, the implementing regulations specifically caution that alterations of a historic resource over time may themselves have historical, cultural or architectural significance.

Most often, historical resources eligible for the California Register will be 50 years old or older. However, the new implementing regulations stipulate that "a resource less than fifty (50) years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance." If an archaeological resource does not meet the definition of a "historical resource," it may meet the definition of a "unique archaeological resource" under Public Resource Code §21083.2. An archaeological resource is "unique" if it:

- 1. Is associated with an event or person of recognized significance in California or American history or recognized scientific importance in prehistory;
- 2. Can provide information that is of demonstrable public interest and is useful in addressing scientifically consequential and reasonable research questions;
- 3. Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind;

- 4. Is at least 100 years old and possesses substantial stratigraphic integrity;
- 5. Involves important research questions that can be answered only with archaeological methods.

Note that the above criteria are similar to those outlined in CEQA's old Appendix K.

Prehistoric (Native American) Archaeological Resources

Bedrock Milling Stations (P-9-017, CA-ELD-600/H Features 11, 12 and 13). These minor archaeological resources are isolated bedrock milling features. No midden or other cultural deposit was found associated with these isolated features. In the original EIR, isolated features, which included a bedrock milling station, were recorded on forms distributed by the California Office of Historic Preservation. The process of recording such isolated finds was considered to have exhausted their research potential and therefore the isolated finds had no further research value.

Under current CEQA guidelines and advisories, all four criteria of potential eligibility for the California Register must be considered. To be eligible for the California Register under Criterion 1, the bedrock milling stations would have to be associated with a specific period or trend marking an important aspect of local, regional or state prehistory or history. Under Criterion 2, the sites would have to have a direct association with an important person in history and to the reason why that person is important. Under Criterion 3, the sites would need to be distinguished as a significant representative of culture or technology. Under Criterion 4, the sites must have as a minimum the potential to yield information of an archaeological nature important to our understanding of local prehistory.

While the bedrock milling stations grouped here retain the most important aspects of integrity for resources of their type under Criterion 4 (information potential), by themselves, they do not contribute to important research domains such as the refinement of local or regional culture sequences. The nature and location of the milling stations may contribute to our understanding of Native American subsistence patterns.

However, these data were gathered when the sites were recorded. It is unlikely that the isolated bedrock milling sites would contribute further information important in any local study or regional analysis given current methods and theory in North American archaeology. Therefore, it is the consultant's opinion that the sites do not meet any of the four criteria of eligibility, nor do they qualify as a "unique archaeological resource" under CEQA.

Historic Archaeological Sites

Mormon Tavern (CHL-699; CA-ELD-1266-H). In a recent draft Historic Resource Evaluation Report (HRER) for Caltrans, Foothill Resources archaeologists described the original Mormon Tavern site as encompassing a large, two-story frame structure with a two-story veranda on the front, a large barn, sheds, two frame houses and a 1950 residence. The archaeologists continued with their description by observing that all were demolished during the widening of U.S. 50 in the 1960s.

In the year 2000, when Foothill Resources, Ltd. conducted its field survey, archeologists identified three structure depressions, a hand stacked, mortared rock wall and a concentration of historic artifacts. This description conforms roughly to the contemporary description by Jones & Stokes archaeologists who identified a concentration of artifacts and daffodils at the highway's cutbank edge, a rock wall, house depression and paved walkway farther north (away from) the highway's cutbank edge, a nearby water reservoir and some 300 feet to the northwest, two depressions with a concentration of 19th century artifacts (Jones & Stokes Associates 2000:Appendix A).

It is the present consultant's opinion that the latter two depressions may represent "The Nunnery" where the Joerger family first lived. No mention was made in previously archaeological studies of finding the bench chiseled out of rock and used by the nuns. However, it does still exist. The other remaining depression, rock wall, house depression and paved walkway apparently represents a later Joerger residence site (Geraldine Joerger, personal communication 2010). The historic artifact scatter and area of daffodils near the present freeway cutbank may represent all that remains of the Mormon Tavern site itself, while the other remaining features probably relate to either The Nunnery or the more recent Joerger residence. In evaluating solely the Mormon Tavern landmark, most of that site has been destroyed by previous highway construction. Lacking archaeological test excavations as means of identifying the presence of any significant subsurface remnants specifically associated with the Mormon Tavern and not the Nunnery or later Joerger construction, it is not possible to evaluate site's current eligibility for the California Register or to determine if the site qualifies in any way as a "unique archaeological resource." Because a determination cannot be made at present, it must be assumed that the site retains its eligibility for the California Register of Historical Resources.

Prospects (P-9-013-H/Field no. IF-4; SV-7; SV-10). These minor historic archaeological resources are depressions interpreted as mine prospects. SV-

10 was identified by LSA but not recorded and this particular isolate could not be located during the present study to assess its present condition. This isolate may have been destroyed by construction of a staging area. P-9-013 was previously recorded by Peak & Associates and it, too, could not be located during the present study to assess its current condition. None of the three isolated prospects could be associated with any specific mining activity or period of significance, which is often the case for prospect pits. Lacking historical associations, any evidence of innovation in mining technology or other aspects of significance, it is the consultant's opinion that none of the three isolates is eligible for the California Register under any criterion of eligibility. Also, none of the three qualify as a "unique archaeological resource' under CEQA.

Rock and/or Post and Wire Fences (P-9-014; P-9-016; P-9-018; P-9-069; P-9-861-H; CA-ELD-600/H, Features 10 and 14; P-9-1646; SV-11; SV-12; SV-13; SV-17). In previous studies of the Clarksville vicinity, archaeologists have noted that rock fences are associated with the fluorescence of sheep and cattle ranching dating back to the 1870s and 1880s. Within the Silva Valley Parkway Interchange project area, the condition of rock fences is generally poor, except for a few specific places along a rock fence line remnant. For example, the rock fence along Carson Creek south of the old Lincoln Highway bridge has a few places where the fence achieves a height of approximately four feet, while in most places, the fence height is considerably less and even mostly tumbled down.

Sections of fence built of rock are located primarily where rock was locally available. Among ranchers of the foothills-valley edge, it was cheaper to construct a rock fence than to import split cedar or redwood posts and purchase wire, although barbed wire was often used to raise the effective height of a rock fence. Some of the fence remnants encountered within the Silva Valley Parkway Interchange project area are what have been described in the cultural resource technical reports as "rock reinforced" fence lines. Here, rock alignments at ground level formed the base of a former post and wire fence line, as exemplified by P-9-016. All that remains of this fence is the rock alignment. The old fence line P-9-018 abuts P-9-016 and is marked in places by a rock alignment where such rock outcrops nearby. P-9-018 is also marked by remnant split wood posts and barbed wire. The condition of the post and wire fences is poor.

Corral fencing consisting of remnant rock walls as in P-9-861-H and post and wire remnants as in Field no. SV-11 is likewise in poor condition.

While rock fence ruins may be the most visible reminder of historic ranching on a landscape, it is difficult to demonstrate under Criterion 1 for the California Register, the importance of the rock fence remnants located within the Silva Valley Parkway Interchange project area. Under Criterion 2, the

historic fence remnants would have to be directly linked to an important person and the reason why that person was considered important. Under Criterion 3, the fence remnants would need to represent a significant innovation for agriculture generally, or mark a notable change in engineering or construction methods. Under Criterion 4, the fences would need to have the potential to yield information important in history. As fences were originally built by local ranchers, their families and hired hands, it is difficult to demonstrate how further study could contribute significantly to our understanding of local history beyond existing oral and written histories. It is the consultant's opinion that the fences located within the Silva Valley Parkway Interchange project area are not eligible for the California Register under any criterion, nor do they qualify as "unique archaeological resources" under current CEQA statutes and guidelines.

Fitch House Site (P-9-646). The 1987 Peak & Associates site record documents this 1920s-1930s site of a home and gardens located on a small hill. It is clear from reading the succession of records made of this site over the years, including recent field visits by this consultant, that the site's condition has degraded considerably since the early Peak & Associates record.

The site represents the remnants of the residence either constructed or acquired by Albert Fitch, an avid gardener whose reported interest included planting a tree from every country in the world. The son of George Clinton Fitch who settled in the Clarksville vicinity in 1865, Albert Fitch continued the family's ranching occupation. The house identified here as P-9-646 burned in the early 1950s. Fitch then moved to Clarksville where he lived until 1954 when he died.

In 2003, Pacific Municipal Consultants evaluated the Fitch residence site for National Register of Historic Places eligibility and for its potential significance under CEQA statutes and guidelines. As a result of that evaluation, Pacific Municipal Consultants' staff deemed the site not eligible for the National Register, the California Register, nor did it qualify as a "unique archaeological resource" under CEQA (Pacific Municipal Consultants 2003:18-19). The present consultant concurs with PMC's earlier conclusions.

Multi-Component Site Including Tong Cemetery (P-9-673). The original Peak & Associates record drew an arbitrary boundary around a number of related, as well as non-related cultural resources: the historic Tong family cemetery, the site of a stamp mill, mine and miner's cabin, a ditch segment, depression, bedrock mortar station, rock bridge abutments, covered mine shaft and tailings. The site also included two examples of bank diggings on the west side of Carson Creek, which the present consultant has recorded as a separate site (Field no. SV-23). The mine that was apparently the source of

quartz reduced by the stamp mill was apparently destroyed with the earlier expansion of U.S. 50. The bedrock milling station was also not located during the present updated study. No bridge abutments were located. Though mentioned in the original site record forms, there is no illustration of bridge abutments or road trace on the site sketch map.

The Tong cemetery is an example of the "rural" cemetery movement dating from the 1850s to the last burial in 1996. Most of the marked graves are those of the Tong family that settled at Clarksville in 1857. The family patriarch was proprietor of the Rail Road House, an early inn located in the upper part of Clarksville. Another member of the family was postmaster at Clarksville and also served as justice of the peace. Over the 150 year period in which the Tongs lived in Clarksville, their predominant occupation was ranching and mining. The cemetery may be eligible under Criterion 1 because of its association with the historic development of Clarksville and as a potential contributing resource to the Mormon Hill Historic District (see below under "Historic Districts"). As an individual historical resource, the cemetery is of sufficient age to represent the pattern of early development of Clarksville. Although the cemetery may not be eligible for the California Register under criteria 2 and 3, it may be eligible under Criterion 4 (information Potential), as it has the potential to provide clues to mid-19th and early 20th century burial practices.

The ditch remnant is a narrow, largely filled-in feature. While it appears to be related to placer mining, no actual historical association has been established for the ditch. Due to its largely in-filled nature and lack of a specific historical association, it is the present consultant's opinion that the ditch remnant fails to convey any historical importance it may have had under any of the four criteria of eligibility. It is also the consultant's opinion that the ditch remnant does not qualify as a "unique archaeological resource" under CEQA.

The mill feature of this multi-component site occupies three successive small terraces on the lower slope of a hill above Carson Creek. One of the terraces associated with the stamp mill is longer than the upper two terraces and may have been mistaken for a road. It is also likely that rock footings on the terrace may have been mistaken for a bridge abutment.

Peak & Associates interviewed the late Jess Tong, who confirmed that the stamp mill was apparently abandoned for a short time before the machinery was sold to Bob Craig *circa* 1917 and moved to another site. Jess Tong indicated that the land on which the mine and mill were located always belonged to the Tong family. However, he did not remember a direct family association with the discovery or working of the mine. Peak & Associates indicated that the Tong family may have leased portions of their land (Peak & Associates 1987a:29-30).

Gold recovery operations incorporating a stamp mill typically occupied multiple terraces on a relatively steep hill slope, which is reflected by the three successive small terraces at the present site. The dry-laid rock footings at the uphill side of each terrace and the terraces themselves reflect this type of gravity milling operation. Typically, ore was dumped into the mill over a screen at the upper end of the mill. The materials were then fed by gravity or mechanically to the stamps and lead battery and the resulting pulp was then passed over mercury amalgamation plates and concentrated (*cf.* Wagner 1970:250 and Young 1970:195-198).

The mill site documented by Peak & Associates and the physical remnants observed during the present study did not yield any evidence of technological innovation or differences in operation beyond that described above. Apparently, the mill was in operation at least 50 years after stamp mills first came into common use in California's gold country. It is the consultant's opinion that the mill site, which is now devoid of machinery, has only a weak association with the history of local and regional gold mining. The mill structures were dismantled and only the terraces remain. It is the consultant's opinion that the site fails to convey any historical importance that it may have had.

Under Criterion 1 for California Register eligibility, this cultural resource would need to be associated with events that made a significant contribution to at least local history. The most applicable area of significance under this criterion would be agriculture, where mining was conducted as an adjunct to stock-raising, as exemplified in the Tong family history. However, it is apparent that the Tong family did not own or operate the stamp mill.

Under Criterion 2, the mill would have to be associated with the lives of significant persons. However, the owner-operator of the mill does not appear in local (written) history. Under Criterion 3, the mill site would need to be significant in architecture or in mine engineering, neither of which is the case.

Under Criterion 4, the mill site would need to have at least the potential to yield information important in history. Areas of significance under this criterion would be the potential for important contributions in the arena of variability and change in mining technology, spatial organization of mining settlements, production and consumption of commodities in the mining frontier. It is the consultant's opinion that data recovery would not significantly add to the body of scientific knowledge about any one of these areas of study. It is the consultant's conclusion that the mill site is not eligible for the California Register under any criterion due in part to integrity considerations and in part to the inability of the site to yield such information in its present state. It is also the consultant's opinion that the site does not qualify as a "unique archaeological resource" under CEQA.

The historic cabin feature of this multi-component site was associated with the mine and presumably the mill feature, according to a Peak & Associates staff interview with Jess Tong (Peak & Associates 1987a:13-14). As the mine and stamp mill were apparently in operation around the turn of the 19th century, which coincides with the official closing of the American frontier, archaeological excavations at the site could potentially provide information on lifestyle and morbidity of the miner(s) some 50 years after the gold rush, yet at a time when America was in transition from a predominantly agrarian country to a modern industrial nation. It is unlikely that the site would be eligible for the California Register under criteria 1,2 or 3, but under Criterion 4, it does have the potential to yield information important to local and possibly regional history by means supplementing written history on the lifestyle of miners at small operations during this period of significant culture change.

Sacramento to Placerville Road Segment (P-9-809). The Primary Number "P-9-809" has been assigned by the North Central Information Center to more than one historic route between Sacramento and Placerville. The specific road segment evaluated here is an approximately 800 foot long dirt road remnant and associated old fence line remnant that follows the road on its east side from the north side of Tong Road northeast to the west edge of a hill where the road and the fence line remnant turn east. A currently used, deeply rutted dirt road mounts the old road and occupies the northern third of the old road trace. The old fence line is marked only by ground-level rock "footings" in places. Modern traffic over the old road trace has literally made it impossible to distinguish the old from the new. The southern portion of the trace, while not impacted by modern traffic, is so eroded that it is difficult to distinguish from the surrounding landscape. It is the consultant's opinion that the road trace described here fails to convey any historical importance it may have had. Therefore, the consultant concludes that the trace and accompanying fence line remnant are not eligible for the California Register under any criterion on the basis of integrity considerations.

Silva Valley Road Segment (P-9-1141). This road segment north of U.S. 50 was recorded by Foothill Archaeological Services back in 1992. Foothill archaeologists also reported the road on the same forms as the old Coloma Road to Clarksville. Due to recent road construction and residential development, the consultant could only identify an approximately 400 foot long remnant of the road and adjacent remnant post and wire fence line previously described by Foothill Archaeological Services. The linear site's materials, workmanship, setting and feeling, four very important aspects of integrity for a cultural resource of this type are severely compromised. It is the consultant's opinion that the road remnant fails to convey any historical importance it may once have had and, therefore, is not eligible for the California Register nor qualify as an "unique archaeological resource."

Road Segment (Field No. SV-1) and Road and Borrow Area (Field No. SV-5). These two road segments may be contemporary with one another. Based on the relative lack of erosion, both appear to have been made within the last 50 years by modern mechanized equipment. Field no. SV-1 lies in an open field. Its approximately 12-14 foot width suggests that it was made with a bulldozer or grader. The second road, which connects Tong Road with a borrow area next to Carson Creek begins at a gate in a fence built in the mid-1960s during highway construction. Neither road nor road and borrow area have demonstrated any significant historical associations. It is the consultant's opinion that neither resource is old enough to have achieved any historical importance. Therefore, neither resource appears eligible for the California Register. Neither qualifies as a "unique archaeological resource" under CEQA.

Road Segment (Field No. SV-2). This historic archaeological resource is an old road cut on the west-facing slope of Mormon Hill that roughly parallels the old Lincoln Highway and could be another feature of P-9-809, if precedents set by the North Central Information Center in designating segments of the Sacramento to Placerville Road is extended to this example. Piles of field stones are stacked on the road segment, which of course suggests that the road remnant predates the collecting and stacking of field stones. The southern extension of the road to Clarksville is not longer in evidence in the sloping field. The linear site's integrity of materials and workmanship have been severely compromised. It is the consultant's opinion that because of this loss of integrity, the road remnant is not eligible for the California Register as it fails to convey any historical importance it may have had. It follows that the site does not qualify as a "unique archaeological resource" under CEQA.

Mine Tailings (Field no. SV-3). This minor historic archaeological resource consists of rock tailings on the southeast side of Carson Creek. It is apparent that the rock tailings may have been disturbed by construction of the church immediately southeast of the site. Coupled with the absence of any evidence of a mine, which may have been destroyed by construction of the church, it is the consultant's opinion that the site fails to convey any historical importance it may have had. Lacking the most important aspects of integrity for a cultural resource of its type (location, design, setting, materials, workmanship and association—all due in part to the absence of the mine and specific historical associations), it is the consultant's opinion that the tailings feature is not eligible for the California Register under any criterion on the basis of integrity considerations. It is also the consultant's opinion that the site does not qualify as a "unique archaeological resource" under CEQA.

Site of First Tong Residence (Field no. SV-4). The site of the first Tong residence on the east side of Carson Creek, north of U.S. 50, was noted by LSA, but not formally recorded. Upon revisiting the purported location of the

site between the creek and a modern church, it was apparent that earthmoving related to construction of the church may have destroyed the site, if it existed at that location. Earth and rock had been pushed westward to a point near the edge of the ravine through which Carson Creek flows. The remaining narrow terrace above the creek was searched. However, no evidence of a habitation site (dry-laid rock foundation, depression(s) or artifacts) was found. In a subsequent conversation with the descendant of early settlers at Clarksville, Geraldine Joerger indicated that the first Tong residence was on the opposite (south) side of U.S. 50 and not at the location indicated by LSA. Joerger was not specific as to the exact site of the first Tong residence on the south side of the freeway. However, it does not appear on the roster of sites documented within the proposed Silva Valley Parkway Interchange. It is the present consultant's opinion that eligibility for the California Register cannot be determined, as no physical evidence of an early residence has been identified.

Rock Piles (Field no. SV-6 and SV-14). These two rock piles share similarities. Both occur in open fields. Both consist of angular rock. However, SV-6 may have been the result of clearing an agricultural field of rocks, while SV-14 was a small quarry where rock was broken from an outcrop and may have been used to construct part of a nearby fence that followed the route of an early Sacramento to Placerville road recorded as P-9-809. Both are minor archaeological resources with only weak association to local historical events and areas of significance such as agriculture. As such, they are not eligible for the California Register under any criterion. It is also the consultant's opinion that neither resource qualifies as a "unique archaeological resource" under CEQA.

Road Segment (Field no. SV-8). This historic archaeological site includes a segment of an old N25°W (true bearing) fence line and dirt road segment (down hill side of the fence) located on the south side of U.S. 50. This may have been a part of the old Sacramento-Placerville Road (another segment of P-9-809). The condition of this segment is very poor—the trace is hardly recognizable if it was not for the remaining berm that marks the old fence line. For the non-rancher, narrow berms that marked old fencelines are an artifact left from livestock walking up and down at least one side if not both sides of a fence. The result is deflation of the soil on one or both sides of the fence leaving the visual impression of a berm. In the case of this linear resource, the physical evidence remaining is so little that the site fails to convey any historical importance it may have had. It is the consultant's opinion that the site is not eligible for the California Register under any criterion due to integrity considerations and fails to qualify as a "unique archaeological resource" under CEQA.

Road Segment (Field no. SV-9). This dirt road segment was identified but not recorded by LSA on the southeast corner of White Rock Road and Silva

Valley Parkway. However, the old roadbed could not be re-located during the present study. Recently, an equipment and materials staging area was constructed and additional earth-moving undertaken at the approximate location of the old roadbed. These ground-disturbing activities may have obscured remaining evidence of the old road segment. The consultant concludes that lacking physical evidence, the site fails to convey any historical importance it may have had and, therefore, is not eligible for the California Register under any criterion due to integrity considerations. The site also does not qualify as a "unique archaeological resource" under CEQA.

Lincoln Highway Segments (P-9-809; CA-ELD-721-H; Field nos. SV-15, SV-27 and SV-28). Three segments of the old Lincoln Highway are located within the Silva Valley Parkway Interchange project area. The northernmost segment lies on the north side of U.S. 50 (Field no. SV-15). This approximately 400 foot-long segment of concrete road is in poor condition. The concrete, laid in 1918, is heavily fractured and partially overgrown with grass, despite the fact that the road is still in use by local residents. Although the road is potentially eligible for the California Register under criteria 1 and 3, this particular segment fails to convey its historical importance due to its present condition.

The second segment of the old Lincoln Highway (Field no. SV-27) located within the Silva Valley Parkway Interchange project area lies immediately adjacent to the south side of U.S. 50. Here, the Lincoln Highway has been paved over with asphalt and does not yield any surface evidence of the original road. Again, based on integrity considerations, this segment of the old highway fails to convey its historical importance.

The third segment of the old Lincoln Highway (Field no. SV-28) located within the project area begins at the intersection with Silva Valley Parkway and extends east to the 1918 bridge over Carson Creek. The first third of this road segment is partially paved over with asphalt. Originally, the road curved to the south just east of the current Silva Valley Parkway intersection. The curve outside the existing right of way has been demolished. The remaining two-thirds of the roadway east to the Carson Creek bridge (Caltrans Bridge no. 25C0112) are in fair condition. The bridge appears in better condition than the road.

Pacific Municipal Consultants evaluated that portion of the old highway south of present-day U.S. 50 and found it eligible for the National Register of Historic Places under Criterion A–associated with events that made a significant contribution to broad patterns of history. However, PMC staff also disqualified the road from National Register eligibility citing lack of integrity of design, setting, materials, workmanship, feeling and association. This appears to be the case for those specific segments of the old highway described above. However, the present consultant would disagree with

PMC's findings for that portion of the old highway that lies outside the Silva Valley Parkway Interchange project area where it meanders through Clarksville itself. There, the old highway does retain all of the aspects of integrity that PMC staff declared it did not (Pacific Municipal Consultants 2003:20-21)...

PMC staff suggested that the old highway may be eligible for the California Register because of its regional and local significance. However, it is the present consultant's opinion that due to integrity considerations, the three short segments of the old Lincoln Highway located within the Silva Valley Parkway Interchange project area and that lie outside Clarksville are not eligible for the California Register due to integrity considerations. It is also the consultant's opinion that the three short highway segments do not qualify as "unique archaeological resources" under CEQA.

Ditch segment (SV-21). This short ditch remnant is a narrow, largely filled-in feature. While it appears to be related to placer mining, no actual historical association has been established for the ditch. Due to its largely in-filled nature and lack of a specific historical associations, it is the present consultant's opinion that the ditch remnant fails to convey any historical importance it may have had under any of the four criteria of eligibility. It is also the consultant's opinion that the ditch remnant does not qualify as a "unique archaeological resource" under CEQA.

Placer Diggings (Field no. SV-22 and SV-23). These two minor historic archaeological resources consist of placer diggings along the west bank of Carson Creek both north and south of the old Lincoln Highway at Carson Creek bridge. The diggings south of the bridge to the first turn west of the creek are heavily eroded bank diggings and the hummocky east-facing hill slope overlooking the creek. These amorphous diggings may well date back to the gold rush. North of the bridge, there is one area of bank diggings closest to the south side of U.S. 50 that are equally eroded and may be contemporaneous with those south of the bridge. However between the northernmost eroded diggings and the bridge are a series of much less eroded diggings that may date to a much later period such as the 1890s-1900 or the 1930s. However, no direct historical associations have been found.

These particular diggings lack specific historical associations and do not represent significant examples of mining technology. For example, one of the more recent-appearing bank diggings was elongated and suggestive of a ground sluicing operation. However, no rock-reinforced gate feature was identified, nor were other features in evidence, such as a ditch to feed the sluice. It is the consultant's opinion that the mining features have only weak association with the gold rush and later periods of mining activity in the locality and region. It is unlikely that the mines would be eligible for the

California Register under any criterion. It is also the consultant's opinion that the mines do not qualify as 'unique archaeological resources' under CEQA.

Richmond-Hall Cemetery. This historic cemetery is tentatively identified near the crest of a hill overlooking Clarksville to the south. The only physical evidence remaining on the surface are loose rocks purported to have marked graves at the one acre cemetery site. There may be at least five graves at the cemetery dating between the 1870s and 1930. Due to its location on a hill overlooking the historic townsite of Clarksville, the cemetery marks a continuation of the "rural" cemetery movement when cemeteries were established on elevated sites with vistas at the outskirts of communities. The Richmond-Hall cemetery's first documented use was during the post-Civil War period when land conservation and public health concerns brought agitation for the practice of cremation. Although the cemetery may not be eligible for the California Register under criteria 1, 2 or 3 based on surface integrity considerations, it may be eligible under Criterion 4 (information potential). Here, the cemetery is associated with at least one local ranching family representing a small part of the Clarksville community. The burials may provide clues to Late 19th and early 20th century burial practices, as well as social and economic status not found in public records.

Historic Structures and Objects

White Rock Road at Carson Creek (Bridge no. 25C0112). This concrete bridge was constructed in 1918 for the Lincoln Highway crossing of Carson Creek at Clarksville. Despite the good condition of the bridge and its association with the historic Lincoln Highway, Caltrans has evaluated the bridge as not eligible for the National Register of Historic Places including, it is presumed, with respect to local significance. As it is not eligible for the National Register, the bridge is not automatically eligible for the California Register.

Joerger Cutoff at Bucket Ravine (Field no. SV-24). This historic "bridge" is a concrete box culvert with raised concrete sides in the form of molded panels. This "bridge" has not been evaluated in the Caltrans bridge inventory, according to the results of previous records searches. In California, the most common historic bridge type is that constructed of concrete. The use of reinforced concrete was introduced to the United States from Europe in the mid-1870s. Its first use in bridge work in the country was in 1889. The consultant estimates that the Joerger Cutoff culvert was constructed no earlier than the White Rock Road at Carson Creek bridge at the end of the first World War.

Such reinforced concrete structures are more numerous in California than in other states, which may be a reason why the Carson Creek bridge was

deemed not eligible for the National Register (cf. California Department of Transportation 1990:71). From a strictly California Register perspective, the Joerger Cuttoff at Bucket Ravine culvert does not appear to represent innovation in design or materials, as bridges of concrete were already in common use in the state by the time of its estimated period of construction. It is not associated with a specific designer, engineer or contractor significant in California or local history, nor is it a particularly significant type of structure. Therefore, it does not appear eligible under criteria 1, 2, or 3. Also, the bridge does not appear to have the potential to yield information important in local, regional, state or national history. It is the consultant's opinion that the bridge is not eligible for the California Register under any criterion.

Mormon Tavern Monument (California Historical Landmark no. 699).

This stone masonry monument with brass plaque commemorating Mormon Tavern was erected in April, 1960. At 50 years old, the monument itself must now be considered as a potential historical resource. As a commemorative property, the monument was obviously constructed well after the site it commemorates—Mormon Tavern. There is no apparent direct association between the monument and the Tavern site. Therefore, the monument must be evaluated for significance based on its own value.

The monument was constructed by the California State Park Commission in cooperation with E. Clampus Vitus, Native Daughters of the Golden West and the Central Overland Pony Express Trail Association. Angular rock mortared together forms the tabular shape of the monument. Its height is greater than its width. The monument's thickness is less at the top than at the bottom. A founded brass plaque is affixed to the monument's flat side that now faces the freeway from just outside the current highway right-of-way fence. The monument is unimposing and occupies a narrow space between the right-of-way fence and the narrow, paved Joerger Cutoff. A Pacific Gas & Electric Company substation occupies the opposite site of the Joerger Cutoff at the monument's location. As the brass plaque faces the freeway, it is at least reasonable to assume that at one time, when U.S. 50 was not a divided highway, there may have been a turnout where tourists could have stopped to read the monument's message. That setting is now gone.

Nonetheless, the monument still retains its integrity of location, design, materials and association, if not its integrity of setting and feeling. The use of a certain type of rock may be associated with a particular mason or designer presently unknown to this consultant. Also, the monument may represent a particular type significant in the history of commemorative monuments constructed in California. Therefore, it is possible that the monument may have significance under Criterion 2 or 3 and possibly Criterion 1, though not under Criterion 4 (information potential).

Spring House and well (Field no. SV-19). This historic structure is a spring house consisting of a rectangular concrete reservoir enclosed by sheet metal siding and a gable roof clad in corrugated iron sheets. While potentially at least 50 years old, this structure does not represent a structure significant in any particular period, nor associated with a significant architect, designer or builder. Construction was probably carried out by a local individual or individuals, quite possibly the landowner of the time, or his hired help. The little structure does not appear to be a particularly good representative of spring houses, nor does it have the potential to yield information important in history. It is the consultant's opinion that the structure is not eligible for the California Register under any criterion.

Historic Districts

Archaeologists recognize several different types of resources that can occur on a given property. The above descriptions include sites, structures and objects. Objects are generally small in scale and simply constructed, such as a monument. Structures are part of the built environment such as bridges or covered concrete water reservoirs. Sites are locations of prehistoric or historic human occupation or activity, a ruined building or structure, or a natural landmark with a strong association with significant historic or prehistoric events.

A district is a significant concentration of sites and/or objects (and also may include buildings and structures) that are related historically by function, theme, plan or physical development. From the archaeologist's perspective, a district is a grouping of archaeological sites related principally by their common components (Townsend *et al.* 1993:9-11).

Two historic districts were previously defined in the local region, portions of which lie within the Silva Valley Parkway Interchange project area: the El Dorado Hills Historic District and the Mormon Hill Historic District (see Figure 3).

El Dorado Hills Historic District. During a 1987 cultural resources inventory for the El Dorado Hills Specific Plan, Peak & Associates identified 26 archaeological sites and 22 isolated archaeological features. Out of this total number of resources, Peak & Associates defined the El Dorado Hills Historic District, which included 12 contributing and five non-contributing cultural resources located across an area spanning the Carson Creek drainage north to the Allegheny Creek drainage. (Peak & Associates 1994).

LSA expended considerable effort to determine the National Register eligibility of the El Dorado Hills Historic District, as it did not appear on lists during LSA's records search. In a June, 2006 communication from

archaeologist Leslie Fryman to LSA's Neal Kaptain, Fryman indicated that the State Historic Preservation Officer (SHPO) concurred on the eligibility of sites located within the district, as only the sites were listed for concurrence and no district name was included in Peak & Associates' request for concurrence. Jones & Stokes Associates were awarded the contract for data recovery. Leslie Fryman was one of the supervising archaeologists for Jones & Stokes. It was Fryman's opinion that the reason why the district is not officially listed is that the district as an entity separate from the individual sites located within it was not a part of any concurrence between the Corps of Engineers and the SHPO at that time (1995-1996) (*cf.* Email from Leslie Fryman to Neal Kaptain, June 30, 2006).

Following the Caltrans precedent where the American River Placer Mining District was redefined (and replaced) by the Alder Creek Corridor Mining District along U.S. 50 several miles to the west, it is this consultant's opinion that we can propose the same action here. As the subsequently defined "Mormon Hill Historic District" includes those previously identified cultural resources within the El Dorado Hills Historic District and located within the Silva Valley Parkway Interchange project area-- and association of those sites with the Mormon Hill Historic District is more germane to understanding any historical significance that the sites may have had--then it makes sense to evaluate only the Mormon Hill Historic District for California Register eligibility (cf. Windmiller 2007:24-26; 62-68; 93-98).

Mormon Hill Historic District (P-9-1670). In conducting archaeological studies in conjunction with the Serrano El Dorado Hills development, Jones & Stokes Associates had a goal of mitigating the adverse effects of the project on the El Dorado Hills Historic District. It was during these studies that Jones & Stokes archaeologists recognized that by reorganizing the El Dorado Hills Historic District boundaries, the resulting new district would include only those cultural resources with common ties to a specific history. The El Dorado Hills Historic District, as defined earlier by Peak & Associates included historic sites along two separate drainages, each with separate historical associations. Jones & Stokes' newly defined Mormon Hill Historic District focused specifically on the Carson Creek drainage and the historic townsite of Clarksville. Jones & Stokes archaeologists then categorized the original contributing resources of the El Dorado Hills Historic District as belonging to one or the other of the new Mormon Hill Historic District or the re-defined El Dorado Hills Historic District (Jones & Stokes Associates 2000:3-4).

Based on the redefinition of districts, the Mormon Hill Historic District is now the only previously identified district located within the present footprint of the proposed Silva Valley Parkway Interchange. In fact, the Mormon Hill Historic District, as defined by the Jones & Stokes study, encompasses all, or

in a few cases, portions of all the cultural resources identified in the present Silva Valley Parkway Interchange study.

Though not explicit in the Jones & Stokes study, it is apparent that Peak & Associates defined the El Dorado Hills Historic District primarily on the basis of function and theme, whereas the Jones & Stokes archaeologists redefined the El Dorado Hills and Mormon Hill districts more on the basis of plan and development.

Jones & Stokes archaeologists described the Mormon Hill Historic District as "characterized by its 'gold country' setting and its development as a rural agricultural community following the Gold Rush era." Its period of significance dated from 1848 to 1900. Its key characteristics included economic dependence on the Sacramento to Placerville transportation corridor, the landmark inn, Mormon Tavern, the town of Clarksville, eight large ranch complexes, mining camps, transitional mining claims and homesteads, and remnants of the Eureka ditch (Jones & Stokes 2000:26).

The archaeological sites located within the Serrano El Dorado Hills development proposed at the time of the Jones & Stokes study and considered contributing resources to the Mormon Hill Historic District included: the Mormon Tavern site; portions of the Mormon Hill Toll Road; Eureka ditch; three mining camps along Carson Creek, a possible quarry site and four historic ranch complexes (Jones & Stokes Associates 2000:27).

Jones & Stokes archaeologists indicated that all cultural resources within the district would be eligible for the National Register under Criterion A (California Register Criterion 1), although it was noted that significance under Criterion A could not be conveyed by most of the district's resources provided that their historical association could be demonstrated by means of archaeological investigations. The Jones & Stokes archaeologists therefore argued that it was likely that all of the district's contributors were eligible under National Register Criterion D (California Register Criterion 4).

Below is a list of the proposed contributing and non-contributing resources of the district based on plan and development within the district's period of significance *and* located within the current Silva Valley Parkway Interchange project area:

Contributing Resources

- Mormon Tavern (CHL-699; CA-ELD-1266-H)
- Richmond-Hall Cemetery
- Tong Cemetery (P-9-673, unnumbered cemetery feature)
- Stamp Mill Site (P-9-673, unnumbered mill feature)

• Cabin and Privy Site (P-9-673, unnumbered foundation and privy features)

Non-Contributing Resources

- Bedrock milling stations (P-9-017, CA-ELD-600/H, features 11, 12 and 13).
- Prospect (P-9-013)
- Rock Fence (P-9-014)
- Rock Fence (P-9-016)
- Rock Fence (P-9-018)
- Fitch House Site (P-9-646)
- Bedrock milling station, depression (prospect?), in-filled ditch, filled adit and tailings features of P-9-673.
- Sacramento to Placerville Road Segment (P-9-809; Mormon Toll Road Segment CA-ELD-721-H cited in Jones & Stokes 2000:Appendix A)
- Corral Remnant (P-9-861-H)
- Silva Valley Road Segment (P-9-1141)
- Rock Fence (P-9-1646)
- Road Segment (Field no. SV-1)
- Road Segment (Field no. SV-2)
- Mine Tailings (Field no. SV-3)
- Site of First Tong Residence (Field no. SV-4)
- Road and Borrow Area (Field no. SV-5)
- Rock Pile (Field no. SV-6)
- Prospect (Field no. SV-7)
- Road Segment (Field no. SV-8)
- Road Segment (Field no. SV-9)
- Prospect (Field no. SV-10)
- Corral Fence (Field no. SV-11; CA-ELD-773-H cited in Jones & Stokes 2000:Appendix A)
- Rock Fence (Field no. SV-12)
- Fence Remnant (Field no. SV-13)
- Rock Pile (Field no. SV-14)
- Lincoln Highway Segments (P-9-809; Field nos. SV-15, SV-27 and SV-28)
- Rock Fences (CA-ELD-600/H, Features 10 and 14/SV-17)
- Rock Fence (P-9-69; Field no. SV-20)
- Ditch Segment (Field no. SV-21)
- Bank and Hillside Diggings (Field no. SV-22)
- Bank Diggings (Field no. SV-23)
- White Rock Road at Carson Creek Bridge (Bridge no. 25C0112)
- Joerger Cutoff at Bucket Ravine Culvert (Field no. SV-24)
- Mormon Tavern Monument (California Historical Landmark no. 699)
- Spring House and Well (Field no. SV-19)

Discussion

Only one identified cultural resource located within the Silva Valley Parkway Interchange project area was considered not eligible for the California Register as an individual resource, but potentially eligible for the register as a contributing resource to the Mormon Hill Historic District: the stamp mill feature of the multi-component site, P-9-673. Oral history places the age of the stamp mill site roughly within the district's period of significance. While the feature may not be eligible under Criterion 4, information potential and not eligible as an individual resource under the remaining three criteria because of its weak association to the overall history of mining in the region, it may be eligible under Criterion 1 as a contributing resource to the Mormon Hill Historic District. As a contributing resource to the district, the mill feature represents "transitional" mining described by Jones & Stokes archaeologists as a component of the district (Jones & Stokes 2000:27).

In an opposite sense, the Mormon Tavern Monument (State Historic Landmark no. 699) is potentially eligible for the California Register as an individual resource, but because the monument was constructed only 50 years ago, it does not date to the Mormon Hill Historic District's period of significance and, therefore, is not eligible as a contributing resource to the district.

It is important to note that the majority of cultural resources identified in the present study are not considered contributing resources to the Mormon Hill Historic District. All of the non-contributing resources are also not eligible for the California Register as individual resources—many because of their lack of the most important aspects of integrity for a resource of their type. Ditch remnants are a perfect example. The two ditch remnants located within the Silva Valley Parkway Interchange project area are largely in-filled; their origins and destinations could not be determined.

Some of the cultural resources are non-contributors because their historical association falls outside of the district's period of significance. The bedrock milling stations provide such an example.

Since the Mormon Hill Historic District was defined 10 years ago by Jones & Stokes archaeologists, road and residential construction has impacted primarily the north and west portions of the district. Although it is beyond the scope of the present study to re-evaluate the California Register eligibility of the district as a whole, as the district is far larger than the Silva Valley Parkway Interchange project, nonetheless, it is important to point out that the present integrity of the district has been severely impacted with the exception of the original Jones & Stokes contributors such as the townsite of Clarksville, Clarksville and Tong cemeteries and remnants of the Mormon Tavern site.

POTENTIAL EFFECTS

The potential impacts of the Silva Valley Parkway Interchange on significant or potentially significant cultural resources outlined in the original EIR were disturbance or destruction of the following cultural resources depending on which design alternative was used:

- Tong cemetery component of multi-component site, P-9-673.
- Richmond-Hall cemetery
- Mormon Tavern State Historic Landmark no. 699
- A portion of the large multi-component site, CA-ELD-600/H
- Possible impacts to unknown sites

Under current CEQA regulations, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment [Public Resources Code §15064.5(b)]. The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a resource that convey its historical significance, unless the evidence demonstrates that the resource is not historically or culturally significant [Public Resources Code §15064.5(b)(2)(A-C)].

Potential Effects on Individual Resources

Implementation of the proposed development could destroy or alter potential historical resources as defined under current CEQA statutes and guidelines. A direct impact would be the result if an archaeological site is located at least partly within an area of planned construction and cannot be avoided. An indirect impact would be a potential if the archaeological site is located outside of areas of physical disturbance (grading, trenching and construction) and would not be directly impacted by construction. One indirect impact would be the increased potential for vandalism with the likelihood of increased public access and awareness of the archaeological resources during or after construction. However, recent development in the project vicinity has already contributed to increased potential for vandalism. Therefore, it is difficult to project any degree of increase in exposure to such indirect impacts.

Since the time when the original EIR was certified, additional cultural resources have been identified within the Silva Valley Parkway Interchange project area. The following cultural resources evaluated in the present study as meeting one or more criteria of eligibility for the California Register of Historical Resources or that qualify as "unique archaeological resources"

under CEQA may be directly impacted by the Silva Valley Parkway Interchange as currently conceived:

- Tong cemetery component of multi-component site, P-9-673.
- Stamp mill site-component of multi-component site, P-9-673.
- Cabin and privy site-component of multi-component site, P-9-673.
- Richmond-Hall cemetery
- Mormon Tavern Monument (California Historical Landmark no. 699)
- A portion of the large multi-component site, CA-ELD-600/H
- Potential impacts to unknown sites

Potential Effects on Historic Districts

Based on the re-definition of the El Dorado Hills Historic District by Jones & Stokes archaeologists back in the year 2000, it is this consultant's opinion that the historic district lies outside the current Silva Valley Parkway Interchange project area and will not be impacted directly or indirectly by the proposed project.

However, the Mormon Hill Historic District boundaries defined by Jones & Stokes archaeologists in that same year encompasses most of the Silva Valley Parkway Interchange. Therefore, construction of the interchange will have an effect on the district. The question is whether or not construction of the interchange will alter the California Register or National Register eligibility of the historic district, which was originally defined largely on the basis of its eligibility for the National Register under Criterion D (information potential). The California Register counterpart for eligibility would be Criterion 4. Jones & Stokes archaeologists previously made the case that the district's eligibility under Criterion A was arguable and depended in great measure on its eligibility under Criterion D (Jones & Stokes 2000:Appendix A).

The most important aspects of integrity for a property eligible under Criterion D. Criterion D has two requirements that must be met to maintain its eligibility:

- The district must have or have had information to contribute to our understanding of human history or prehistory and;
- The information must be considered important on a local, regional or national level.

Construction of the Silva Valley Parkway Interchange may affect adversely the Mormon Hill Historic District's eligibility for the National Register under Criterion D and the California Register under Criterion 4.

MITIGATION PROPOSALS

The original EIR for the Silva Valley Parkway Interchange stipulated the following mitigation alternatives with respect to cultural resources:

- Protect the Richmond-Hall cemetery during construction: Archaeologist to identify cemetery limits, install six foot high fence around perimeter. No sign to draw attention to site.
- Relocate Mormon Tavern SHL monument by approval of SHPO.
- Relocate Hall/Richmond Cemetery: Determine number and location of graves by geophysical survey. At least three individuals there—possibly several more. Move burials preferable to Clarks-ville Cemetery.
- Construct retaining wall to protect Tong cemetery component of the multi-component site, P-9-673.
- Preserve other components of site P-9-673 or require additional work.
- Stop work if additional cultural resources are discovered during construction.

Under current CEQA statutes, guidelines and advisories, the ideal mitigation is reducing any adverse effects to a less than significant level. The preferred approach is to preserve significant archaeological resources in place. This can be accomplished by planning construction to avoid the significant archaeological sites or features; incorporating them within parks, greenspace or other open space, covering them with a layer of chemically stable soil before constructing light use facilities or; deeding significant sites and features into permanent conservation easements. CEQA advises that there may be other options, as well.

The California Office of Historic Preservation's advisory on CEQA and historical resources states that "a project that has been determined to conform with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* can generally be considered to be a project that will not cause a significant impact (CEQA Guidelines §15126.4(b)(1)." However, the same publication emphasizes that the use of drawings, photographs, and/or displays do not mitigate the physical impact on the environment caused by demolition or destruction of a historical resource. CEQA requires that all feasible mitigation should be undertaken even if it does not mitigate the adverse effects to a less than significant level (Office of Historic Preservation 2000:3).

As implementation of the proposed Silva Valley Parkway Interchange could destroy or alter potential historical resources, the following mitigation measures are proposed to lessen the impacts to a less than significant level.

- Tong Cemetery component of multi-component site, P-9-673:
 Prior to construction activity within the vicinity of the site, encircle
 the cemetery with temporary construction fencing under
 supervision of a qualified archaeologist. Construct retaining wall
 to protect the cemetery, also under the supervision of a qualified
 archaeologist.
- Stamp mill site component of site, P-9-673: Prior to construction activity within the vicinity of this site, encircle the mill site component with temporary construction fencing under supervision of a qualified archaeologist.
- Cabin and privy site component of the site, P9-673: Prior to construction activity within the vicinity of this site, encircle the cabin and privy site component with temporary construction fencing under supervision of a qualified archaeologist.
- Richmond-Hall Cemetery: As the precise boundary of this cemetery is unknown and remote sensing is not practical in the rocky soils, mechanized test excavations shall be undertaken prior to any ground disturbing activity between the freeway and the existing Tong Road. A qualified archaeologist shall supervise the test excavations. If graves are discovered during or subsequent to the test excavations, then the archaeologist will coordinate with El Dorado County to disinter, remove, transport and reinter the remains.
- Mormon Tavern Monument (California Historical Landmark no. 699). If it is necessary to relocate the monument because of construction, then approval must be sought from the State Office of Historic Preservation and the monument moved prior to construction in the vicinity of its present location.
- If buried archaeological resources (historic foundations, refuse deposits, prehistoric cultural deposits or other recognizable buried cultural resources) are encountered during construction, all work must halt at the location of the find(s) and a qualified archaeologist shall be retained to identify and evaluate their significance and recommend appropriate mitigation, if necessary.
- In the event that human remains are discovered, California Health and Safety Code §7050.5 states that no further disturbance shall

occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code §5097.98. If the coroner determines that no investigation of the cause of death is required and if the remains are of Native American origin, the coroner will notify the Native American Heritage Commission, which in turn will inform a most likely descendant. The descendant will then recommend to the landowner appropriate disposition of the remains and any grave goods.

It is the consultant's opinion that if the above mitigation measures are implemented, the proposed project will not have any adverse effect on the California Register- or National Register-eligibility of the Mormon Hill Historic District. In addition, the above recommended mitigation proposals for individual cultural resources eligible for the California Register of Historical Resources or that qualify as "unique archaeological resources" under CEQA will reduce impacts to less than significant.

The local government general plan, specific plan(s), ordinances or other regulations may affect the validity of any of the above mitigation proposals. The above mitigation alternatives are presented as information only and do not constitute legal advice.

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APPENDIX A: STATEMENT OF QUALIFICATIONS

APPENDIX B: RECORDS SEARCH RESULTS

This appendix may contain information on the specific locations of archaeological resources. This information is not for publication or release to the general public. It is for planning, management and research purposes only. Information on the locations of prehistoric and historic sites are exempted from the California Freedom of Information Act, as specified in Government Code §6254.10.



APPENDIX D: CONFIDENTIAL LOCATION OF ARCHAEOLOGICAL RESOURCES

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Figure 4. Confidential location of archaeological resources.

APPENDIX E: CONFIDENTIAL RECORD FORMS

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