



MEMORANDUM

DATE: January 5, 2022

TO: Orlando Hernandez, Planning Manager
City of Menifee Community Development Department

FROM: Riordan Goodwin, RA, Senior Cultural Resources Manager
LSA

SUBJECT: Peer Review of the *Updated Phase I Cultural Resources Assessment for the Menifee Riverwalk Project Site as Shown on TPM 38219 Located Adjacent to Bradley Road and South of the Salt Creek Channel, City of Menifee, Riverside County, California (2nd Revision)* by Robert S. White (December 2021) for CEQA Compliance (LSA Project No. CIM2105)

LSA noted errors/deficiencies in the following sections:

Management Summary. Same comment: (The findings and recommendations are not supported by complete and current data [see below]).

Archival Research Methods (IV). This comment was not fully addressed: although it was noted that an additional eight records searches were reviewed, all but one (2021) are also out-of-date and none are cited. Again, current data are essential in assessing subsurface sensitivity, particularly when survey results for the project area itself are negative. Industry standard for currency of records searches is five years, after which an update is appropriate. However, given the continuing backlog issue at the EIC (with no end in sight), if it can be demonstrated that the 2021 records search radius included the current project area and a substantial portion of its' study area (perhaps a half-mile or at least adjacent parcels), the City may wish to consider making an exception and accept the report.

Report of Findings (VII). This will require editing for consistency once current records search data is provided.

Management Considerations. See comment on Archival Research Methods above. This must be considered a draft report until such time as data from a records search update *or* sufficient data from a recent nearby project are added.

Appendices. Same comment (It is noted in a placeholder in Appendix B [Records Search Results] that a "current records search at the Eastern Information Center [EIC] ... was not available due to the on-going COVID 19 virus crisis ... [t]hus, potentially some data were lacking. When the EIC reopens or catches up on their months long backlog, the additional records search information will be incorporated into a revised report.") This language will need to be removed once current records search data is provided.

LSA also has the following general comments (which do not require response):

Setting (II C and D). This section is *much* more than adequate; in fact, given the negative results of both records search and survey within the project area, it could be condensed.

Conclusion. The second revision of the Cultural Resources Assessment for the Menifee Riverwalk Project is generally consistent with current Cultural Resources Management standards and practices and is generally more than adequate again, *as a draft report*. LSA noted some deficiencies, along with other minor issues, which do not require a response.

Once the deficiencies are resolved, the report will be sufficient and can potentially be finalized for CEQA compliance purposes.