

April 16, 2008

Mr. Gary Warkentin
14725 Alton Parkway
Post Office Box 57057
Irvine, California 92618

Subject: Peer Review of the Cultural Resources Study of the Stone Bridge at Foothill Parkway, City of Corona, Riverside County, California (LSA Project No. RBF0806)

Dear Mr. Warkentin:

LSA Associates, Inc. (LSA) is under contract to RBF Consulting, Inc. (RBF) to conduct a peer review for the Foothill Parkway project, located in the City of Corona, County of Riverside, California. Specifically, LSA reviewed the February 15, 2008, revised addendum to the cultural resources study that was previously completed by SWCA Environmental Consulting. The revised addendum was reviewed for adequacy and compliance with the California Environmental Quality Act (CEQA) by LSA architectural historian Casey Tibbet M.A., who meets the Secretary of the Interior's Professional Qualification Standards for architectural history.

In determining adequacy for CEQA purposes, this review relied on the guidance provided by the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* and focused primarily on whether or not appropriate methodology was used and reasonable, clearly presented findings backed by logic and supporting evidence are provided.

METHODS

According to the *Secretary of the Interior's Guidelines for Identification*, "archival research and survey methods should be carefully explained so that others using the gathered information can understand how the information was obtained and what its possible limitations or biases are. Sources should include, but not be limited to, historical maps, atlases, tax records, photographs, ethnographies, folklife documentation, oral histories and other studies, as well as standard historical reference works, as appropriate." Based on this, additional information needs to be added to the Methods section of the revised addendum. Specifically, the architectural field survey methodology needs to be included, and the discussion regarding archival research needs to provide more specificity regarding the types of sources consulted. The last sentence of the Methods section, regarding the evaluation, should be moved to the Evaluation section.

RESULTS

This section provides good information about the archaeological and architectural survey results but does not include the results of the archival research that are instead included in the Evaluation section.

It would be more logical and easy to follow if all of the results (survey and research) were included in the Results section. In addition, the archival research should be organized in a manner that identifies the important historic themes, chronological periods, and geographical area for the historic context. Development of a historic context is critical for understanding the potential significance of a resource and provides the necessary supporting evidence for the significance evaluation. Guidance for developing a historic context can be found in the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation*.

In the first paragraph of the Results section, it is noted that the large water tank, which appears to be less than 45 years of age, "was not found to be significant and does not warrant further consideration." This statement is somewhat confusing because it suggests that the tank was evaluated and found not to be significant, when in actuality, it did not need to be evaluated because it appears to be of modern origin. This should be clarified.

EVALUATION

As stated above, the historical information provided in this section should be moved to the Results section and information regarding the types, numbers, and construction methods of stone footbridges in the area should be added to support the significance evaluation.

The evaluation should include a brief discussion of the California Register of Historical Resources (California Register) criteria and how integrity plays a role in the significance evaluation. In addition, each criterion should be addressed in the evaluation discussion so it is clear that each was considered during the evaluation process. The local criteria (Corona Municipal Code, Title 17, Chapter 17.63 Historic Resources) should also be discussed since a "resource included in a local register of historical resources" as well as a resource that is "identified as significant in an historical resource survey" (conducted in compliance with 5024.1(g) of the Public Resources Code) under national, state, or local criteria is considered a "historical resource" under CEQA. Although the local criteria are relatively stringent in comparison to those of other local preservation ordinances, the bridge may qualify as a local Landmark.

The evaluation itself includes a very good discussion of the integrity of the bridge. However, integrity alone does not necessarily make a resource significant. Based on the data presented, it is not clear that the bridge is eligible for the California Register. Because there is no supporting evidence in the archival research results for the assertion that the bridge "possesses high artistic values" and is "an exceptional example of an increasingly rare type of resource," the determination of significance is not strong enough to support this assertion.

RECOMMENDATIONS

Based on LSA's review of the February 15, 2008, revised addendum to the cultural resources study that was previously completed by SWCA Environmental Consulting, we offer the following recommendations:

Revise Methods section to:

- Include architectural field survey methods;

- Include more specific archival research sources; and
- Remove information about the evaluation.

Revise Results section to:

- Include the archival research results;
- Develop a historic context that identifies important themes, chronological periods, and geographical areas;
- Include a discussion of the types, numbers, and construction methods of stone footbridges in the area; and
- Clarify that the tank was not evaluated because it appears to be of modern origin.

Revise the Evaluation section to:

- Move the historical background information to the Results section;
- Provide a brief discussion of each of the California Register criteria and how integrity plays a role in the significance evaluation;
- Address each of the California Register criteria in the evaluation discussion. Specifically, include detailed justifications for why the bridge meets or does not meet each criterion;
- Discuss the City of Corona's criteria; and
- Base the evaluation on evidence provided in the Results section.

If you have any questions or comments, you can contact me at (951) 781-9310 or by e-mail at Casey.Tibbet@lsa-assoc.com.

Sincerely,

LSA ASSOCIATES, INC.



Casey Tibbet, M.A.
Architectural Historian/Project Manager