

Appendix C

Cultural Resources Assessment

TECHNICAL MEMORANDUM

Date: November 27, 2023

To: Nate Antepenko, Associate Planner, 4Creeks, Inc.

From: Consuelo Sauls, MA, RPA, Archaeologist

Subject: **Cultural Resources Technical Memorandum for Sherwood South Tentative Subdivision Project, City of Tulare, Tulare County, California**

Introduction

Taylored Archaeology has conducted a records search for the Sherwood South Tentative Subdivision Project (Project). The proposed Project will consist of a 238-unit single-family residential development located in the City of Tulare, Tulare County, California. The purpose of the records search is to identify all previously recorded cultural resources within the Project area. It entails a review of all previously recorded archaeological sites and historic properties situated within a half-mile radius of the surrounding area.

The Project is currently undergoing environmental evaluation under the California Environmental Quality Act (CEQA) with the City of Tulare serving as lead agency.

Project Location

The Project site is approximately 59 acres of rural land and is located at the northeast corner of West Bardsley Avenue and Enterprise Street (Road 84) in southwest City of Tulare. The Project site consists of Tulare County's Assessor's Parcel Numbers 168-090-010, 168-147-018 and 168-090-011 (Figure 1).

The Project site is in Township 20 South, Range 24 East, Section 9 on the United States Geological Survey (USGS) 7.5-minute series Tulare, California topographic quadrangle map (Figure 2).

Methodology

Taylored Archaeology researched potential cultural resources within the Project vicinity by requesting a cultural resources records search from the Southern San Joaquin Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS) at California State University, Bakersfield and reviewing records in relationship to the Project area. The records search covered the Project area and all land within a 0.5-mile radius of the Project and included a review of the following sources: the Archaeological Resources Directory, the National Register of Historic Places, the California Registry of Historic Resources, the California Points of Historical Interest, the California Historical Landmarks, the California State Historic Resources Inventory, and a review of cultural resources reports on file with the SSJVIC. Archival research of available historic maps, historic aerial photographs, records, and databases was additionally conducted.

Records Search Results

The SSJVIC provided the results of the cultural resources records search (File No. 23-465) for the Project on November 15, 2023 (Attachment B).

The SSJVIC records search revealed one cultural resource report within the Project boundary as shown in Table 1: Schmidt 2010 (TU-01426). Further review of the report revealed that TU-01426 is an archaeological pedestrian survey which previously surveyed a 30-meter diameter area around two deteriorated pole locations on the Project site. The survey resulted in negative findings.

Table 1
Previous Cultural Resource Reports within the Project Area

| Report Number | Author(s) | Date | Report Title | Study |
|---------------|------------------|------|---|-----------------------------|
| TU-01426 | James J. Schmidt | 2010 | Archaeological Letter Report: 2010 Deteriorated Pole Replacement Project; Logan, Windt, Wilbur, Elk, Sargent, Aurora, and Glover 12kV Distribution Lines, Tulare County, California | Archaeological Field Survey |

Eleven cultural reports, as shown in Table 2, were listed as being conducted within a 0.5-mile radius of the Project boundary. Self 1995 (TU-00041) is a literature review of different regions of Fresno County and Riley and Berry (TU-00444) is a Caltrans archaeological field survey report which resulted in negative findings.

Mitchell 1957 (TU-01190) is a narrative book account of the 1851 Mariposa War and not relevant to the Project area.

Whitley and Azpitarte 2018 (TU-01830) and Riley and Berry 1991 (TU-00444) are archaeological survey reports conducted approximately 0.04 miles north of the Project site. Reports Szeto 1998 (TU-01043), Losee 2005 (TU-01266), Parr 2009 (TU-01389), Leach Palm et. al. 2010 (TU-01498), Schmidt 2011 (TU-01534), Parr 2010 (TU-01591) and Whitley and Robert Azpitarte 2022 (TU-01961) are archaeological survey reports that resulted in negative findings for cultural resources within a 0.5-mile of the Project boundary.

Table 2
Previous Cultural Resource Reports within a 0.5-mile radius of the Project Area

| Report Number | Author(s) | Date | Report Title | Study |
|----------------------|--|-------------|---|--|
| TU-00041 | William Self | 1995 | Class I Overview, Santa Fe Pacific Pipeline Partners, L.P., Proposed Concord to Colton Pipeline Project | Archaeological Literature Review |
| TU-00444 | Lynn Riley and Monte Berry | 1991 | Negative Archaeological Survey Report for the Grade Crossing Protection and Truck Turnout Additions to Route 137 | Archaeological Field survey |
| TU-01043 | Andy Szeto | 1998 | Follow-up to Section 106 Consultation for PCS Antenna Sites in the California, Central Valley | Archaeological Field Survey |
| TU-01190 | Annie R. Mitchell | 1957 | Jim Savage and the Tulareño Indians | Book; No survey of Project area |
| TU-01266 | Carolyn Losee | 2005 | Collocation Submission Packet, FCC Form 621 for Telecommunications Site # AWS_006159-A "Tulare" | Archaeological Field Survey |
| TU-01389 | Robert E. Parr | 2009 | Cultural Resource Assessment for the Replacement of Seven Deteriorated Power Poles on the Southern California Edison Company Aurora, Elk, Merryman, Milk, Redbanks, and Sargent 12kV Circuits, Tulare County, California | Archaeological Field Survey |
| TU-01498 | Laura Leach-Palm, Paul Brandy, Jay King, Pat Mikkelsen, Libby Seil, Lindsay Hartman and Jill Bradeen | 2010 | Cultural Resources Inventory of Caltrans District 6 Rural Conventional Highways in Fresno, Western Kern, Kings, Madera, and Tulare Counties. | Archaeological and Architectural/Historical field survey |
| TU-01534 | James J. Schmidt | 2011 | Archaeological Letter Report: Twin Butte, Rinker, Soda Springs, and Elster 12 kV, and Vestal-Glenville- Greenville-Greenhorn-KR3/Vestal-Porterville-Terra Bella-66kV 2011 Deteriorated Pole Replacement Projects (WO 6051-4800, T-4828, S-4834, T-4850, T-4868, T-4871, and 51-TD512860), Tulare County, California | Archaeological Field Survey |

| Report Number | Author(s) | Date | Report Title | Study |
|-----------------|---------------------------------------|------|---|-----------------------------|
| TU-01591 | Robert E. Parr | 2010 | Cultural Resource Assessment for the Replacement of Seven Deteriorated Power Poles on the Southern California Edison Company Wilbur, Winot, Linder, Aurora, and Tuggle 12kV Circuits, Tulare County, California | Archaeological Field Survey |
| TU-01830 | David S. Whitley and Robert Azpitarte | 2018 | Phase I Survey/Class III Inventory, Soult's MWC Water System Improvement Project, Tulare County, California | Archaeological Field Survey |
| TU-01961 | David S. Whitley and Robert Azpitarte | 2022 | Phase I Survey/Class III Inventory PNP Matheny Pipeline Project, Tulare County, California | Archaeological Field Survey |

Two cultural resources, as shown in Table 3, were previously recorded within a 0.5-mile radius of the Project area. Resource P-54-004632 was a former railroad segment of the Atchison, Topeka and Santa Fe Railroad that was located approximately 0.17 miles north of the Project site. This segment was not evaluated for potential eligibility for listing in federal, state, or local historic registries. Preliminary review of historic aerial photographs shows the railroad was present in 1994 and removed sometime between 1994 and 2003 (Google Earth 2023). Resource P-54-005358 is a historic era ditch called Hooper Ditch, a segment of the ditch runs along the northern portion of the Project boundary. Hooper Ditch was evaluated in 2018 and was recommended as eligible for listing in the National Register of Historic Places (NRHP) under Criterion A and in the California Register of Historic Resources (CRHR) under Criterion 1, as both an individual historic property and as a component of the Tulare Irrigation Historical District (Whitley and Carey 2018).

**Table 3
Previous Recorded Cultural Resources within a 0.5-mile radius of the Project Area**

| Resource Number | Age Association | Resource Type | Resource Description | Distance from Project Boundary |
|--------------------|-----------------|---------------|-----------------------------|--|
| P-54-004632 | Historic | Structure | Railroad | 0.17 miles north |
| P-54-005358 | Historic | Structure | Hooper Ditch- canal segment | Along the northern portion of Project boundary |

Archival Research

A review of available USGS 7.5-minute topographic maps of the Paige, CA quadrangle from 1927, 1950, 1951, 1950 photorevised 1969, 2012, 2015, 2018, and 2021 showed the Project site was historically utilized for agricultural purposes (USGS). Topographic maps show the Hooper Ditch crossing the western portion of the Project site in 1927, 1950, and 1951. A single structure is depicted at the southwestern portion of the Project site in the 1927 topographic map along present-day West Bardsley Avenue. By 1950 and 1951, a second structure is depicted along West Bardsley Avenue in the western portion of the Project site. The 1950 photorevised 1969 topographic map depicts the Hooper Ditch alignment changing to its

present-day location and orientation running east to west along the northern portion of the Project site. Topographic maps between 2012 to 2021 show the Project site in its current form. The portion of Hooper Ditch along the northeastern boundary of the Project site appears to still be the original alignment, while the portion of Hooper Ditch along the northwestern boundary of the Project site appears to have been realigned between 1951 and 1969.

A review of available historic aerial photographs from 1956 to present day showed the Project site similarly utilized for row crops until it was converted to an orchard in 2012 (NETROnline 2023; Google Earth Pro 2023). The 1956 aerial photograph showed the Hooper Ditch and a rural residence in similar configuration to those depicted on the 1927 to 1951 topographic maps. In 1969 Hooper Ditch is shown in a similar alignment to present day. The rural residence on the Project site appears to have been demolished sometime between 2006 and 2009 and was replaced by a small stormwater retention basin in 2012.

Conclusion and Recommendations

Based on the removal of the railroad segment near the Project site and its distance from the Project site, the Project will have no impact on P-54-004632. However, the Project may potentially result in impacts to Hooper Ditch (P-54-005358). Hooper Ditch was evaluated in 2018 and was recommended as eligible for listing in the NRHP under Criterion A and in the CRHR under Criterion 1, as both an individual historic property and as a component of the Tulare Irrigation Historical District (Whitley and Carey 2018). Upon review of this cultural record, Taylored Archaeology supports this eligibility recommendation for Hooper Ditch (P-54-005358).

No other evidence of cultural resources within the Project boundary was found during this investigation.

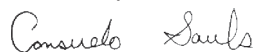
Taylored Archaeology therefore recommends the following:

Potential Project impacts to Hooper Ditch should be further evaluated by an architectural historian.

In the event of accidental discovery of unidentified archaeological remains during development or ground-moving activities in the Project area, all work should be halted in the immediate vicinity (within a 100-foot radius) until a qualified archaeologist can identify the discovery and assess its significance.

If human remains are uncovered during construction, the Tulare County Coroner is to be notified to investigate the remains and arrange proper treatment and disposition. If the remains are identified on the basis of archaeological context, age, cultural associations, or biological traits to be those of a Native American, California Health and Safety Code 7050.5 and PRC 5097.98 require that the coroner notify the Native American Heritage Commission within 24 hours of discovery. The Native American Heritage Commission will then identify the Most Likely Descendent who will be afforded an opportunity to make recommendations regarding the treatment and disposition of the remains.

Sincerely,



Consuelo Sauls, M.A., RPA 41591505
Archaeologist

Attachment A: Project Maps

Attachment B: Records Search Results Letter

6083 N Figarden Dr., Ste. 616, Fresno, CA 93722
559.797.1572 / csaulsarchaeo@gmail.com

References

Google Earth Pro.

2023 Google Earth Software, Google, Inc.

NETROnline

2023 "Historic Aerials". <https://www.historicaerials.com/> Accessed November 27, 2023.

United States Geological Survey (USGS)

1927 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

1950 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

1951 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

1969 *Paige, California, Quadrangle Map, 1950, photo revised 1969*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

2012 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

2015 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

2018 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

2021 *Paige, California, Quadrangle Map*. 7.5-minute series. U.S. Geological Survey, Denver, Colorado.

Whitley, David S. and Peter A. Carey

2018 Phase I Survey/Class III Inventory, Soult's MWC Water System Improvement Project, Tulare County California.

ATTACHMENT A

Project Maps

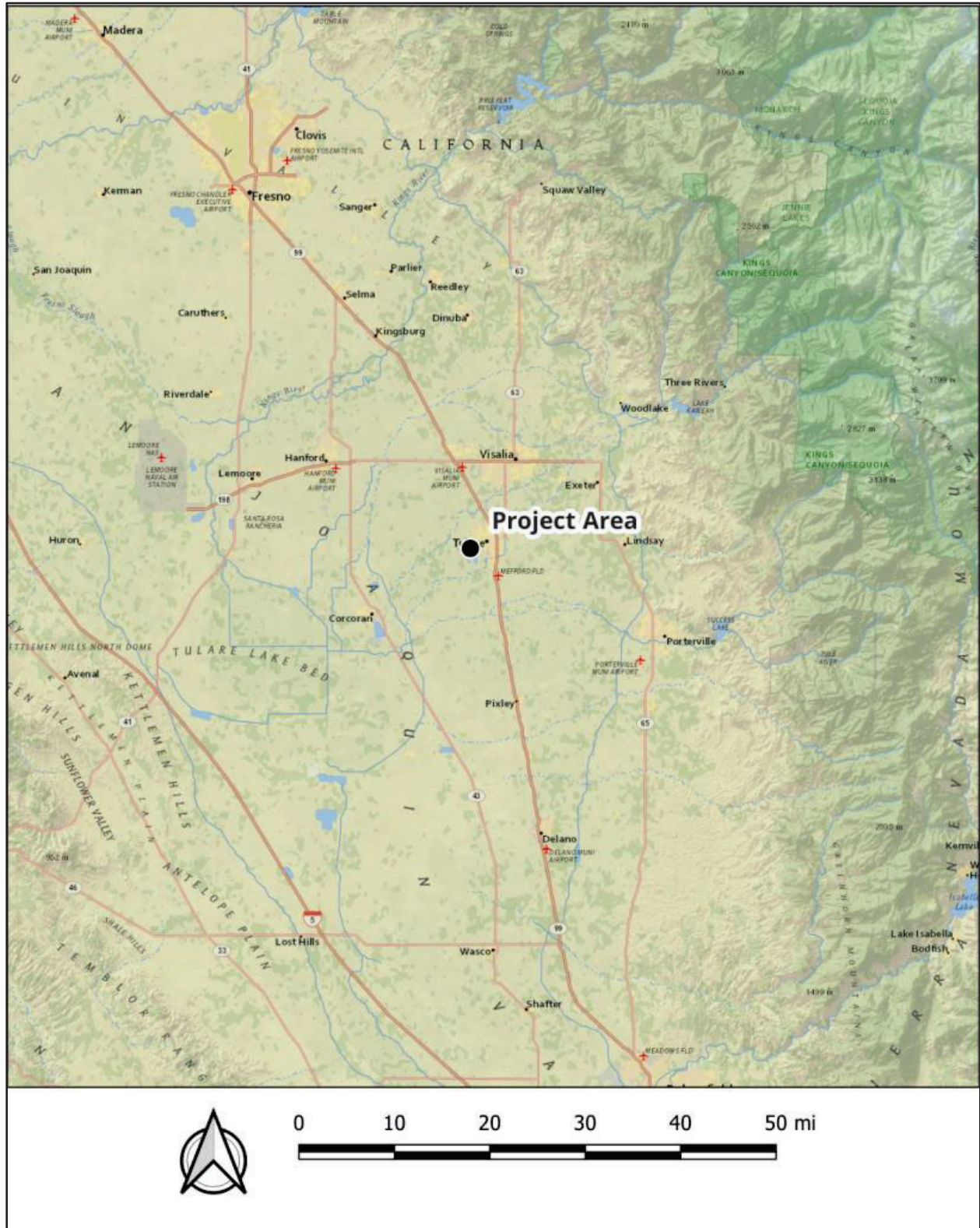


Figure 1 Project vicinity in Tulare, California

6083 N Figarden Dr., Ste. 616, Fresno, CA 93722
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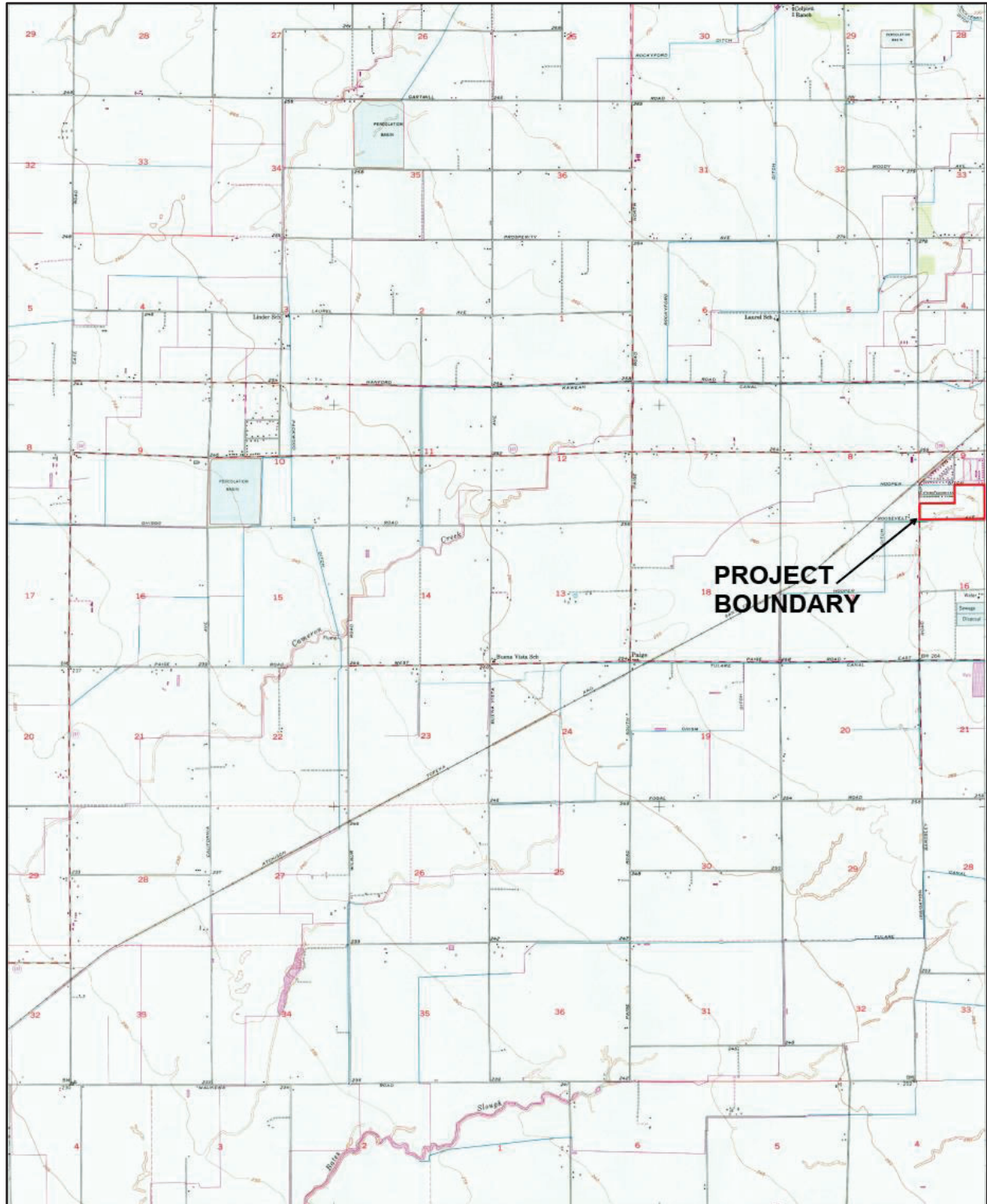


Figure 2 Project location on the USGS Paige, CA 7.5-minute quadrangle

6083 N Figarden Dr., Ste. 616, Fresno, CA 93722
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Figure 3 Aerial view of the Project boundary

ATTACHMENT B

Records Search Results



11/15/2023

Consuelo Sauls
Taylored Archaeology
6083 N. Figarden Dr. Ste. 616
Fresno, CA 93722

Re: Sherwood South Tentative Subdivision Map
Records Search File No.: 23-465

The Southern San Joaquin Valley Information Center received your record search request for the project area referenced above, located on the Paige USGS 7.5' quad. The following reflects the results of the records search for the project area and the 0.5 mile radius:

As indicated on the data request form, the locations of resources and reports are provided in the following format: custom GIS maps GIS data

| | |
|-----------------------------------|--|
| Resources within project area: | None |
| Resources within 0.5 mile radius: | P-54-004632, 005358 |
| Reports within project area: | TU-01426 |
| Reports within 0.5 mile radius: | TU-00041, 00444, 01043, 01190, 01266, 01389, 01498, 01534, 01591, 01830, 01961 |

- Resource Database Printout (list):** enclosed not requested nothing listed
- Resource Database Printout (details):** enclosed not requested nothing listed
- Resource Digital Database Records:** enclosed not requested nothing listed
- Report Database Printout (list):** enclosed not requested nothing listed
- Report Database Printout (details):** enclosed not requested nothing listed
- Report Digital Database Records:** enclosed not requested nothing listed
- Resource Record Copies:** enclosed not requested nothing listed
- Report Copies:** enclosed not requested nothing listed
- OHP Built Environment Resources Directory:** enclosed not requested nothing listed
- Archaeological Determinations of Eligibility:** enclosed not requested nothing listed
- CA Inventory of Historic Resources (1976):** enclosed not requested nothing listed

Caltrans Bridge Survey: Not available at SSJVIC; please see <https://dot.ca.gov/programs/environmental-analysis/cultural-studies/california-historical-bridges-tunnels>

Ethnographic Information:

Not available at SSJVIC

Historical Literature:

Not available at SSJVIC

Historical Maps:

Not available at SSJVIC; please see <http://historicalmaps.arcgis.com/usgs/>

Local Inventories:

Not available at SSJVIC

GLO and/or Rancho Plat Maps:

Not available at SSJVIC; please see <http://www.glorecoords.blm.gov/search/default.aspx#searchTabIndex=0&searchByTypeIndex=1 and/or http://www.oac.cdlib.org/view?docid=hb8489p15p;developer=local;style=oac4;doc.view=items>

Shipwreck Inventory:

Not available at SSJVIC; please see <https://www.slc.ca.gov/shipwrecks/>

Soil Survey Maps:

Not available at SSJVIC; please see <http://websoilsurvey.nrcs.usda.gov/app/WebSoilsurvey.aspx>

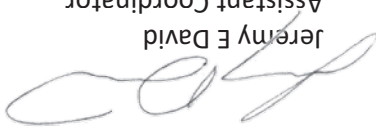
Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of CHRIS Data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archaeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Office, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Invoices for Information Center services will be sent under separate cover from the California State University, Bakersfield Accounting Office.

Thank you for using the California Historical Resources Information System (CHRIS).

Sincerely,

Jeremy E David
Assistant Coordinator



November 18, 2025

David Duda
4Creeks, Inc.
324 S. Santa Fe St., Suite A
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ldavid.duda@4-creeks.com

Dear David Duda,

Enclosed is a copy of the November 2025 Historic Architectural Hooper Ditch Evaluation on Assessor's Parcel Numbers 168-090-010 and 168-147-018 for the Sherwood South Tentative Subdivision Project (Project) in Tulare County, California. Per our prior communication on November 5, 2025, you requested a historic architectural evaluation of the Hooper Ditch to determine the proposed Project's impacts to the ditch as a potential historic resource under the California Environmental Quality Act (CEQA).

Amber Long, under contract to Taylored Archaeology, conducted an Evaluation, Significance and Integrity Review Memorandum of the Hooper Ditch on November 17, 2025. Ms. Amber Long meets the Secretary of Interior's Professional Qualifications for History and Architectural History. She evaluated the Hooper Ditch for its eligibility for inclusion in the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR).

This investigation determined the Hooper Ditch dates to at least 1927. The ditch has not maintained its historical integrity. Evaluation of the Hooper Ditch determined it is not eligible as a historical resource for inclusion in the NRHP under Criteria A, B, C, and D, and in the CRHR under Criteria 1, 2, 3, and 4.

Due to its loss of historical integrity, the Hooper Ditch does not meet the definition of a historical resource under CEQA, or a historic property under Section 106 of the National Historic Preservation Act. No further investigation or analysis regarding the Hooper Ditch is warranted.

Please let me know if you have any further questions.

Sincerely,

A handwritten signature in blue ink that reads "Consuelo Y. Sauls".

Consuelo Y. Sauls, M.A., RPA # 41591505
Archaeologist



November 17, 2025

Consuelo Sauls
Taylored Archaeology
6083 N. Figarden Dr., Ste. 616
Fresno, CA 93722

RE: Significance, Integrity Review, and Update of the Hooper Ditch Evaluation, Tulare County, California

Dear Ms. Sauls,

This letter provides a review and update of the historic significance and integrity of the Hooper Ditch in Tulare County, a component of the Tulare Irrigation District (TID), in Section 9, Township 20 South, Range 24 East of the USGS *Paige* 7.5-minute topographic quadrangle map. A section of the ditch will be impacted by the Sherwood South subdivision project, which has prompted this review. The Hooper Ditch is an original part of the Tulare Irrigation District, which was established in 1889 (Hattersley-Drayton, 2024). Previous studies have determined that the Hooper Ditch is potentially eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). The findings of those studies are summarized below, and a new significance and integrity review is provided.

PREVIOUS STUDIES

Three previous studies included a portion of the Hooper Ditch. The ditch was evaluated by ASM Affiliates, Inc. in 2018, and those findings were used to inform studies prepared by Taylored Archaeology in 2023 and Karana Hattersley-Drayton in 2024.

March 2018

Phase 1 Survey/Class III Inventory, Soultis MWC Water System Improvement Project, ASM Affiliates, Inc.

ASM Affiliates, Inc. conducted a Class III cultural resources inventory and a Phase 1 survey for the Soultis Mutual Water Company Water Improvement Project, immediately west of the City of Tulare, in Section 9, Township 20 South, Range 24 East of the USGS *Paige* 7.5-minute topographic quadrangle map. The study was intended to comply with Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA). ASM conducted a records search, tribal outreach, field survey, and identified the Hooper Ditch within the project area (Figure 1). The segments of the Hooper Ditch that were within the project area were recommended potentially eligible for listing in the NRHP as an individual resource and as a contributing component of the Tulare Irrigation District, if a historic district was determined to be present in the future.

The report provided an overview of the different names of the canal. On the 1892 Thomas H. Tompson Tulare County map it is the Kaweah Canal. It follows the norther border of Section 9 and is now called the Kaweah Ditch/Cameron Creek. The 1927 USGS *Paige* 7.5-minute topographic quadrangle map shows an unnamed water conveyance in the southwest corner of

Section 9. ASM states that it was later labelled as the Hooper Canal. ASM concluded that the Hooper Ditch is part of the early TID, but the exact construction date is unknown. J. W. Hooper owned land in Section 17 where the ditch ended according to the 1892 map.

Hooper Ditch is shown, but not labelled, in the 1927 and 1942 USGS *Paige* 7.5-minute topographic quadrangle maps. It is labelled Hooper Ditch on the 1951 USGS *Paige* 7.5-minute topographic quadrangle map and all subsequent maps. On the TID map, it was shown as the Lemos Ditch extending east, and Hooper Ditch extending west and south. The ditch was rerouted, lengthened, and shortened between 1927 and 1963. ASM noted at least 3 periods of alteration. They determined that the TID would likely be eligible as a historic district and treated it as such for the purposes of evaluating the Hooper Ditch. The segments of Hooper Ditch in the project area were considered significant for its contribution to broad patterns of history, particularly the themes of *Development of Irrigated Agriculture in the San Joaquin Valley, 1852-1964*, and *Technological Innovation in Irrigated Agriculture in California, 1852-1964*, prepared by the California Department of Transportation (2000). The association of the Hooper Ditch with these themes resulted in a recommendation as potentially eligible individually and as a contributor to a potential historic district under NRHP/CRHR Criteria A/1. Integrity was not addressed.



Figure 1 Project area showing Hooper Ditch, courtesy of ASM Affiliates, 2018.

November 2023
Cultural Resources Technical Memorandum for Sherwood South Tentative Subdivision
Taylored Archaeology

Taylored Archaeology prepared a technical memorandum for the Sherwood South Tentative Subdivision Project, that included Hooper Ditch (Sauls, 2023). The effort included a records search and archival research. A review of the 1927 USGS *Paige* 7.5-minute topographic

quadrangle maps from 1927, 1950, and 1951, revealed that the Hooper Ditch crossed the western portion of the project site (in the southwest quadrant of Section 9, Figure 2). The 1950 USGS *Paige* 7.5-minute topographic quadrangle map, photo revised in 1969, shows that the Hooper Ditch was realigned to the present configuration. The section of the Hooper Ditch along the northwestern boundary of the project area retains its original alignment, while the rest of the ditch within the project area was realigned between 1951 and 1969. Taylored Archaeology reviewed the 2018 evaluation of Hooper Ditch and supported the eligibility recommendations. They concluded that the proposed project could impact the Hooper Ditch and recommended further evaluation by an architectural historian.



Figure 2 Project Area showing Hooper Ditch in blue, courtesy of Taylored Archaeology, 2023.

June 2024

**Historic Review Addendum: Soult's & Lone Oak Tracts Wastewater Improvements Project
Karana Hattersley-Drayton**

Architectural Historian Karana Hattersley-Drayton prepared a *Historic Review Addendum: Soult's and Lone Oak Tracts Wastewater Improvements Project* in 2024. Hattersley-Drayton reviewed the 2018 report and prepared a brief historic context for the Soult's and Lone Oaks Tracts including the history of the TID. The report notes that the Hooper Ditch is depicted on the 1892 Tulare Atlas map but not identified (Figure 3). The report concluded that the segment of Hooper Ditch in that project area appeared eligible for listing on the NRHP and the CRHR as remnants of a late 19th century irrigation system. Integrity was not addressed.

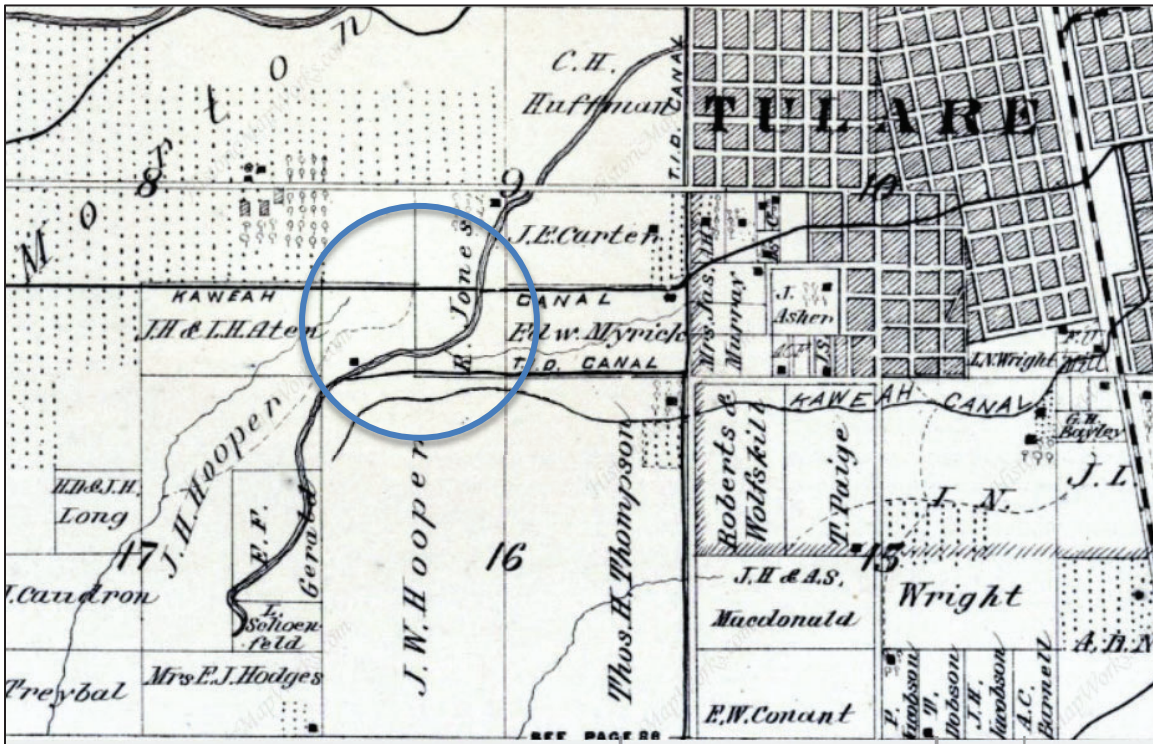


Figure 3 1892 Tulare Atlas map.

SIGNIFICANCE AND INTEGRITY REVIEW

Previous studies determined the Hooper Ditch to be potentially eligible for listing on the NRHP/CRHR under Criterion A/1 individually, and as a contributor to the potential Tulare Irrigation District, if it is determined to be a historic district. The Hooper Ditch is associated with the theme of *Development of Irrigated Agriculture in the San Joaquin Valley, 1852-1964*. Recent guidance from the California State Historic Preservation Officer has been to evaluate segments of a linear feature within the context of the system as a whole. As such, individual segments do not have separate eligibility conclusions. The following analysis considers the significance and integrity of the entirety of the Hooper Ditch.

SIGNIFICANCE

Criterion A/1.

Ditches were the earliest type of conveyance systems in the San Joaquin Valley and the TID was an early irrigation district, built in 1889. The control over irrigation transformed the valley into an agricultural hub and changed the face of the valley. National Park Service guidance states that simple association with a trend or theme is not enough to qualify as significant under this criterion unless the property's specific association with the trend or theme is important (National Park Service, 1995). The 2018 ASM report considered the ditch to be a relatively unimportant part of the TID (Whitley & Azpitarte, 2018, p. 29). No information has been discovered in the archival record to indicate an important and significant association of the

Hooper Ditch with the themes of *Development of Irrigated Agriculture in the San Joaquin Valley, 1852-1964*, and *Technological Innovation in Irrigated Agriculture in California, 1852-1964*.

Therefore, the Hooper Ditch is **not individually significant** under Criterion A/1.

If the TID were determined to be a historic district under Criterion A/1, the Hooper Ditch **would be significant as a contributing feature** of a TID historic district, as the district does have an important and significant association with the themes.

Criterion B/2.

To be significant under Criterion B/2, a person must have made specific contributions that can be identified and documented (National Park Service, 2022). The criterion is restricted to properties that were illustrative of those contributions. The archival research completed in the previous studies does not identify a particular person who made specific contributions and the property is not illustrative of the contributions of a person. Therefore, the Hooper Ditch is **not significant** under Criterion B/2.

Criterion C/3.

Hooper Ditch is not the best example of an early water conveyance ditch. It does not have unique values, nor is it the earliest, best preserved, largest, or sole surviving example of the water conveyance property type. It is not a design innovation of evolutionary trends in engineering. Hooper Ditch is not associated with a figure of acknowledged importance in the design field or by an unknown person whose workmanship is distinguishable from others by its style and quality. To be significant under Criterion 3, a property must embody the distinctive characteristics of the type, period, or method of construction, represent the work of a master, possess high artistic value, or be a component of a historic district (National Park Service 2022, 17). Therefore, the Hooper Ditch is **not significant** under Criterion C/3.

Criterion D/4.

This criterion is most relevant for archaeological sites, but it can be applied to built environment resources if further study has the potential to yield more information that cannot be obtained from other sources. The Hooper Ditch is a common property site and further study would not provide addition information about history or prehistory. Therefore, the Hooper Ditch is **not significant** under Criterion 4.

INTEGRITY

The integrity of a resource is only assessed when a resource is determined to be significant under one of the criteria above. The Hooper Ditch is not individually significant under any criteria, but it is significant as a contributor to a potential historic district under Criterion A/1. The following integrity analysis is for the Hooper Ditch as a contributor to a potential historic district only.



The Hooper Ditch does not retain integrity of **location**, **design** or **setting** because it has been realigned at least three times. It does not retain integrity of **materials**, **workmanship**, or **feeling** because segments have been upgraded and routed underground, changing the original form of the ditch. It does retain integrity of **association** to the history of water conveyance in the San Joaquin Valley. The significant loss of integrity means that the Hooper Ditch no longer retains the integrity necessary to convey its significance under Criterion A/1. Therefore, it is **not eligible for listing on the NRHP/CRHR**. The Hooper Ditch does not meet the definition of a historical resource under CEQA, or a historic property under Section 106 of the NHPA.

Please reach out with any questions. I can be reached at info@longhps.com or (805) 748-7992.

Sincerely,



Amber Long, M.A.
Owner | Principal Architectural Historian
Long Historic Preservation Services, LLC

References

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