



January 3, 2019

Olivia Ervin
Principal Environmental Planner
M-Group
1303 Jefferson Street, Suite 100 B
Napa, CA 94559

SUBJECT: Cultural Resource Study - 325 Yolonda Avenue and 2532 Santa Rosa Avenue, Santa Rosa, Sonoma County, California.

Dear Ms. Ervin,

In August 2018, EDS completed an updated Cultural Resources Study (CRS) for a proposed commercial and residential development project within two adjacent parcels that total 10.4 acres, including the 5.72-acre parcel located at 325 Yolonda Avenue with the Assessor Parcel Number (APN) 044-041-010, which contains a 1947 commercial building, and the 4.68-acre vacant parcel located at 2532 Santa Rosa Avenue within APN 044-071-002. At the time the CRS was completed, the proposed commercial and residential development project was being considered as a single project; however, there are currently two separate projects being considered, one within the property at 325 Yolonda Avenue and one within the property at 2532 Santa Rosa Avenue.

This memorandum was prepared to acknowledge that the two adjacent properties, 325 Yolonda Avenue and 2532 Santa Rosa Avenue, are no longer associated with one project but are now part of two separate projects (one project within each property), and to advise that the Conclusions and Recommendations provided in the CRS letter report dated August 8, 2018 pertains to either property, as a single project or as part of two distinct and separate projects.

Therefore, the Recommendations that pertain to the proposed project at 325 Yolonda Avenue, as well as the proposed project at 2532 Santa Rosa Avenue include:

1. EDS recommends that if any prehistoric or historic material is encountered by equipment operators during ground-disturbing activities that work be halted in the immediate vicinity of the discovery area until a qualified professional archaeologist is retained to inspect the material and provide further recommendations for appropriate treatment of the resource. Historic-era resources potentially include all by-products of human land use greater than 50 years of age, including alignments of stone or brick, foundation elements from previous structures, minor earthworks, brick features, surface scatters of farming or domestic type material, and subsurface deposits of domestic type material (glass, ceramic, etc.). Artifacts that are typically found associated with prehistoric sites in the area include humanly modified stone, shell, bone or other materials such as charcoal, ash and burned rock that can be indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains.
2. EDS also recommends that prior to commencement of project-related, ground-disturbing activities that project supervisors, contractors, and equipment operators are familiarized with the



types of artifacts that could be encountered during earth-disturbing activities and procedures to follow in the event that subsurface cultural resources are unearthed during construction. To accomplish this, a professional archaeologist should conduct a preconstruction cultural resource awareness training prior to commencement of ground-disturbing activities in order to familiarize the team with the potential to encounter prehistoric artifacts or historic-era archaeological deposits, the types of archaeological material that could be encountered within the project area, and procedures to follow in the event that archaeological deposits and/or artifacts are observed during construction.

3. EDS recommends that if an archaeological deposit is encountered during project-related, earth-disturbing activities and an archaeologist is not present, that all work within 25 feet of the discovery shall be redirected until the archaeologist assesses the find, consults with agencies as appropriate, and makes recommendations for the treatment of the discovery.

Although highly unlikely, if human remains are encountered within the Project Area during earth-disturbing activities, all work must stop in the immediate vicinity of the discovered remains and the County Coroner must be notified immediately. If the remains are suspected to be those of a prehistoric Native American, then the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" (MLD) can be designated to provide further recommendations regarding treatment of the remains. An archaeologist should also be retained to evaluate the historical significance of the discovery, the potential for additional remains to be present, and to provide further recommendations for treatment of the site in coordination with the MLD.

Please feel free to contact me if there are any questions related to this memorandum. Thank you.

Sincerely,

Sally Evans, M.A., RPA,
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