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December 5, 2006

Mr. Luis Osorio, Senior Planner
Planning Department
COUNTY OF MONTEREY
RESOURCE MANAGEMENT AGENCY
168 West Alisal Street, 2nd Floor
Salinas, CA 93901

RE: PEER REVIEW OF CULTURAL RESOURCES INVESTIGATIONS FOR THE FERRINI RANCH SUBDIVISION

Dear Luis:

Per our scope of work on the Ferrini Ranch Subdivision EIR, PMC has peer-reviewed the cultural resources report titled *Project Review and Evaluation for the Proposed Ferrini Ranch Development, South of Salinas, Monterey County, California* (Archaeological Consulting 2006) that was completed for the area encompassed by the proposed Ferrini Ranch Subdivision for the project applicant. The purpose of the report was to determine potential cultural resources impacts associated with the proposed project, determine the significance of the resources, and develop an Archaeological Mitigation and Monitoring Plan. The report presents a summary of previous cultural resources investigations within boundaries of the Ferrini Ranch Subdivision, identifies four sites in the project area, and presents recommendations for mitigating potential project related impacts to the four sites in the project area.

Recommendations

PMC makes the following recommendations for the cultural resources report titled *Project Review and Evaluation for the Proposed Ferrini Ranch Development, South of Salinas, Monterey County, California* prepared on behalf of the project applicant.

1. **Setting/Methodology:** The summary of previous cultural resources investigations in the project area is comprehensive and the description of the four sites in the project area highlights their potential significance in regional archaeology and their cultural sensitivity (i.e., burials were previously discovered at the sites). The cultural resources investigations presented in the current report do not include: a current archaeological records search; current survey of the project area; a current description of

the project site (e.g., identification of any changes in the area since completion of the original surveys that were conducted over twenty-five years ago); a description of the current integrity of the Ferrini Ranch complex; updated site records; or a sacred lands search and consultation with the Native American community. In addition, the recommended mitigation measures to reduce impacts to the sites in the project area appear to be inconsistent and the rationale for the measures is unclear based on the extent of previous investigation within known site boundaries. Without updated site records, sacred lands search and consultation with the Native American community it is difficult to determine if mitigation measures are appropriate.

The current report for the Ferrini Ranch Subdivision identifies recent archaeological investigations in the project area, but does not include a recent archaeological records search for the project area. The original reports for the project area were completed over twenty-five years ago. PMC recommends that a new archaeological records search for the project area be conducted to identify any recent archaeological investigations conducted within and near the project area. Similarly, it appears prudent to conduct current pedestrian surface survey across parts of the project area (e.g., developable areas) to identify any changed conditions and verify previous results of the survey that was conducted over twenty-five years ago (e.g., status of stage line structure). The survey should also include a visit to all sites in the project area and the report should include a current description of the integrity of the Ferrini Ranch complex and site record updates for all sites in the project area that could be used to support recommended mitigation measures. In addition, the current report states that burials were recovered from sites in the project area, but does not include a sacred lands search or consultation with the Native American community. Therefore, PMC recommends that a sacred land search or consultation with the Native American community due to the previous discovery of burials at sites with project boundaries.

2. **Mitigation Measures/Recommendations:** The current cultural resources report identifies four sites within project boundaries, sites CA-MNT-3 and CA-MNT-4/267 are identified as significant sites that appear eligible for inclusion in the National Register of Historic Places (NRHP). These sites are located at the intersection of Highway 68 and San Benancio Road and include the Ferrini Ranch complex. Lots 1-6, 12, 13-18 and associated infrastructure (e.g., roads, sewer lines, and a landscape berm) identified on the vesting tentative map for the proposed Ferrini Ranch Subdivision are located within the boundaries of sites CA-MNT-3 and CA-MNT-4/267. Site CA-MNT-4/267 appears to be the more significant site based on its potential to provide information relevant to regional archaeology.

   The recommended mitigation measures presented in the current cultural resources report for the project include avoidance, monitoring, capping lots

with sterile soils, and data recovery. Avoidance (i.e., relocating) and completion of a "cultural resources mitigation plan" that includes monitoring, data recovery, and artifact analysis are recommended for Lots 13-18. Capping with sterile soils, monitoring, data recovery, and deed restrictions to insure compliance with mitigation measures, and completion of a cultural resources mitigation plan are recommended for Lots 1-6 and 12. PMC is uncertain why the mitigation measures are not consistent for the two sites and why this report does not include the Archaeological Mitigation and Monitoring Plan, which was one of the main purposes of the report. The area encompassed by Lots 1-6 and 12 is within boundaries of site CA-MNT-4/267 that appears to be more significant than site CA-MNT-3, but the mitigation measures (i.e., capping with sterile soils and completion of a cultural resources mitigation plan) are less restrictive than the recommended mitigation measures for Lots 13-18 that are within boundaries of site CA-MNT-3.

The mitigation measures presented in the report are acceptable measures to reduce impacts to archaeological sites. Avoidance is usually the preferred measure and data recovery is recommended if sites cannot be avoided, and if avoidance is feasible then data recovery is usually unnecessary. At this time, it is uncertain whether avoidance of Lots 13-18 and potentially 1-6 and 12 is feasible. PMC expects that avoidance is not a feasible mitigation measure and that data recovery would likely be a feasible mitigation measure. Since approximately 80 cubic meters of soil was previously excavated at sites CA-MNT-3 and CA-MNT-4/267, any additional excavation needs to be justified. Therefore, PMC recommends that the consultant provide rationale for recommending data recovery and describe the methodology (e.g., trenching and/or manual excavation and number of excavation units) to be used for data recovery.

The mitigation measure presented in the report for site CA-MNT-661 is not acceptable. Simply relocating a bedrock mortar without at least minimal excavation (e.g., four 50cm x 50 cm shovel probes) is not an acceptable archaeological mitigation measure.

Summary

In summary, the cultural resources report titled *Project Review and Evaluation for the Proposed Ferrini Ranch Development, South of Salinas, Monterey County, California* (Archaeological Consulting 2006) presents a summary of previous cultural resources investigations within boundaries of the proposed Ferrini Ranch Subdivision, identifies four sites in the project area, and presents recommendations for mitigating potential project related impacts to the four sites in the project area. However, PMC recommends that the report include the following: 1) current record search; 2) current pedestrian surface survey; 3) sacred lands search and Native American consultation; 4) updated site records; and 5) detailed rationale for

implementation of the recommended mitigation measures to reduce project related impacts to cultural resources.

The rationale for implementation of recommended mitigation measures is particularly important because of the previous excavations at sites CA-MNT-3 and CA-MNT-4/267. The mitigation measures may be appropriate, but require justification. For example, it appears that feasible mitigation measures might include: trench excavations in areas of deep excavation for installation of infrastructure; completion of an inadvertent discovery plan that includes monitoring of excavations within site boundaries and implementation of protocols (e.g., recovery and analysis of artifacts) if intact deposits of cultural resources are encountered; or designation of the area as open space or park land. Therefore, it must be clear why certain mitigation measures are more appropriate and/or more feasible than others.

Please do not hesitate to contact me if you have any questions regarding my review of the cultural resources report titled *Project Review and Evaluation for the Proposed Ferrini Ranch Development, South of Salinas, Monterey County, California* (Archaeological Consulting 2006) or would like to discuss my recommendations.

Sincerely,

PACIFIC MUNICIPAL CONSULTANTS

John G. Nadolski

John Nadolski, M.A.
Cultural Resources Program Manager