

Dear Mr. Foote:

I wish to comment on the Initial Study for the proposed Geotechnical and Hydrogeologic Study at Santa Rosa Creek Beach [Cambria, California]. The Initial Study was signed by Mike Prater on your behalf on January 13, 2010. I am a Registered Professional Archaeologist (RPA) with more than 15 years of experience, and I have concerns regarding the conclusions drawn about the subset of Cultural Resources (Part II Environmental Checklist, Section 5, pages 9-10) and implied elsewhere in the proposed Negative Declaration for this project.

More specifically, the indications that there would be “No Impact” to significant historical resources (Section 5a), archaeological resources (Section 5b), paleontological resources (Section 5c), or human remains (Section 5d) appear to be entirely intuitive. Statements under the Impacts Discussion (pages 10 and 21) such as, “No known prehistoric or historic cultural resources are located within the proposed project area,” and “No known archaeological remains are located within the project site,” are wholly without supporting documentation or citations of qualified sources. Even if it were accurate to say that no “known” resources of these types are located in the project area, the discussion also fails to address the *potential* that unknown archaeological materials could be present (given that archaeological deposits are generally buried).

Moreover, the full extent of the area that would be disturbed by this project is not limited to the beach; it also includes haul roads, equipment staging sites, washing zones, and any other areas where ground disturbances related to the project might occur. In other words, a detailed Area of Potential Effects (APE) should be developed for the proposed project and approved by a governing body such as the U.S. Army Corp of Engineers. Any assessments that address cultural resources, therefore, should include the entire APE.

On what basis are the conclusions that there are “no known cultural, archaeological, or paleontological resources in the project area”? The boxes indicating “No Impact” in any Environmental Checklist should never be checked unless there is supporting documentation or qualified sources for such a determination. For this proposed project, the minimum level of supporting data should have included:

1. An archaeological/historical resources records search at the state-designated repository for this region, the Central Coast Information Center (CCIC), University of California, Santa Barbara.
2. A paleontological literature review by the University of California Museum of Paleontology (UCMP), Berkeley, or the Natural History Museum of Los Angeles County (NHMLAC), Vertebrate Paleontology
3. A consultation with the Native American Heritage Commission (NAHC), Sacramento and local Chumash and/or Salinan representatives.

None of these sources, or any other relevant qualified sources, are cited in the list of References on page 22 to substantiate conclusions of “No Impact” to cultural resources, as described by CEQA. Without this data, it is highly inaccurate and indeed misleading for Ms. Rudock to conclude (for the proposed Negative Declaration) that the discussion in the Initial Study has “been fully analyzed,” and that on the basis of the “whole record” (as required by CEQA), there is no substantial evidence that the project may have a significant effect on the environment. Clearly, important components of the whole record have been ignored, and I charge the Cambria Community Services District to truthfully rectify this through an objective third party (a qualified cultural resources consultant).

Sincerely,

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