

March 13, 2017

Stephen Bryne, RPA
163 Cedar St.
Ventura, CA 93001

Ms. Shannon Allen, AICP
Planning and Development Department, Current Planning Division
City of Berkeley
2120 Milvia Street
Berkeley, CA 94704

RE: Public Comment for the Draft Environmental Impact Report for the 1900 Fourth Street Project,
State Clearinghouse Number 2016022038

Dear Ms. Allen,

I'm commenting on the Draft Environmental Impact Report (DEIR) for the 1900 Fourth Street Project (project). I'm commenting as a Registered Professional Archaeologist who has worked in California since 1991.

Regarding the archaeological site CA-ALA-307, I was the Project Archaeologist for the for the archaeological work conducted by Garcia and Associates on behalf of the City of Berkeley Planning Department and Public Works Department for capital improvement projects in West Berkeley during 2001 and 2002. As a part of this project, CA-ALA-307 was spatially defined and evaluated for listing in the California Register of Historical Resources and the National Register of Historic Places. In addition, I was a co-author of the academic paper entitled, "Why Here? Settlement, Geoarchaeology, and Paleoenvironment at the West Berkeley Site (CA-ALA-307)" (Dore et al 2004).

The findings of the DEIR are based on the Archeo-Tec (2014) report. However, I feel that the Archeo-Tec report is flawed. The Archeo-Tec (2014) report, while it appears to support the project, do not agree with nearly all of the earlier archaeological findings, including Archeo-Tec's own (2012) results, regarding this important prehistoric site.

The Archeo-Tec report (2014) states, "The archaeological testing program (consisting of test trenches and large areal exposures) determined that shellmound materials identified within the parking lot during an earlier testing program (in 1999 and 2000, consisting of exploratory borings) are in secondary deposition...It appears that the current boundaries of CA-ALA-307, do not extend onto the project site."

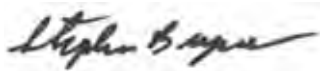
This statement is in direct opposition to earlier archaeological findings, i.e. Archeo-Tec (2012), Dore and Bryne (2002), and Dore et al. (2002). Dore et al. (2002) stated, "An approximate boundary of CA-ALA-307, based on interpretation of Nelson's maps from ca. 1909 and the Laramie findings, revealed that the majority of the Spenger's parking lot block might contain intact shellmound deposits."

For example, the earlier Archeo-Tec report (2012:3) states, "Based on the results of past archaeological investigations in and around Spenger's Parking lot site, it is evident that they property lies within the historical boundaries of the West Berkeley Shellmound (CA-ALA-307)."

The Archeo-Tec (2014) report concludes, somewhat confoundingly, “It is the conclusion of the Principal Investigator that development within the Spenger’s Parking Lot site will not result in adverse impacts to CEQA-significant prehistoric or historic period cultural resources. However, it cannot be eliminated with absolute certainty that significant historic and/or prehistoric period cultural materials exist within the Spenger’s Parking Lot site.”

CA-ALA-307 has been recommended as being eligible for inclusion in the National Register of Historic Places (NRHP) (Dore and Bryne 2002). Therefore, any effect by the project on this National Register eligible site, would be an adverse effect. Also with respect to the NRHP eligibility evaluation of CA-ALA-307, the DEIR states that “GANDA’s study also evaluated the Shellmound for its eligibility for listing in the National Register of Historic Places, based on cultural deposits identified outside of the current Project site.” This is not correct. The Garcia and Associates eligibility recommendation, done on behalf of the City of Berkeley, recommended the entire site (not the shellmound in isolation) of CA-ALA-307 eligible for listing based on a wide range of information that included archaeological data from *within* the parcel.

Sincerely,



Stephen Bryne

Registered Professional Archaeologist

References Cited

Archeo-Tec

- 2012 Summary of Previous Historical/Archaeological Research and Findings with Respect to the Possible Development of the Property Commonly Known as the “Spenger’s Parking Lot,” Located in West Berkeley, Alameda County, California
- 2014 A Report on Archaeological Testing Conducted within the Spenger’s Parking Lot, bounded by University Avenue, Hearst Avenue, Fourth Street and the Tracks of the Union Pacific Railroad, City of Berkeley, Alameda County, California. Report prepared by Archeo-Tec, Oakland, California.

Dore, Christopher and Stephen Bryne.

- 2002 Cultural Resources Inventory, Significance Evaluation, and Effects Assessment for the Capital Improvement Projects in Public Streets in the West Berkeley Redevelopment Area, City of Berkeley, Alameda County, California. Report submitted to the City of Berkeley.

Christopher D. Dore, Stephen Bryne, Michael McFaul, and Gary L. Running IV.

2004 Why Here? Settlement, Geoarchaeology, and Paleoenvironment at the West Berkeley Site (CA-ALA-307). *Society for California Archaeology Proceedings* 17.