



records, to date there have been 220 archeological reports prepared for development in the Carmel Point area. The reports were prepared for a variety of projects, and staff reviewed 215 available archaeological reports. Exhibit B provides additional detail per the request of the Commission at the October 31, 2018 hearing. The original records for each project that required an archaeological assessment and/or proposed a basement were reviewed and summarized in Exhibit B. Exhibit C is a redacted version of the Breschini summary report. Exhibits D and E provide additional examples of redacted archaeological reports.

The archaeological reports with significant resources found were mostly in the CA-MNT-17 registered site. In the cases where midden soil was identified, 3 reports yielded human remains. Other reports showed additional resources such as shell fragments, pigmented cobble stones, fire-cracked rock, bone fragments, and projectile points. All reports stated a preliminary assessment was done, with only 3 of them reporting an official monitoring plan document. However, almost every project that identified resources during excavation had an Initial Study prepared prior to starting construction with a Mitigation Monitoring Plan. Two projects did not adopt a Mitigation Monitoring Plan but had found significant resources under the Preliminary Assessment. In several cases, the recommended additional reporting did not occur, and the mitigation did not protect the resource.

Carmel's key policy on Archaeological Resources is such that when development is proposed for parcels where archaeological or other cultural sites are located, project design *shall be required which avoids or substantially minimizes impacts to such cultural sites.*

#### *Policy Considerations*

Given the documented archaeological importance of the Point, should Monterey County proceed with potentially pursuing a comprehensive Historic Resources (HR) site overlay, and/or consider the larger neighborhood eligible for listing on the California Register of Historic Resources as well as the National Register of Historic Places as an archaeological district? Monterey County has not made a determination on whether the Point, as a whole is an "historic resource" as described by CEQA Guidelines Section 15064.5, and has not pursued elevated official status of the Point. Instead, the County's practice has been to analyze the potential effects of proposals on archaeological resources on a case-by-case project basis.

Should other policy issues be considered, such as requiring all projects located on the Point to conduct more intensive Extended Phase 1 archaeological investigations (e.g., Geoprobos), when deeper excavations are proposed?

There are several options available to help protect the resources at the Point, and staff awaits direction from the Commission on how to proceed.

#### DISCUSSION:

See the attached summary table and spreadsheet and a redacted version of the Breschini and Haversat Report referenced during the October 31st hearing (Exhibits A-C). Exhibits D and E provide additional examples of redacted archaeological reports for individual projects at Carmel Point.

#### OTHER AGENCY INVOLVEMENT: N/A

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The following attachments are on file with the RMA:

Exhibit A - Project summary table

Exhibit B - Project review spreadsheet

The following attachments are on file and will be distributed by County Counsel's Office:

Exhibit C - Redacted Breschini and Haversat Report  
Exhibit D - Redacted Doane and Haversat Archaeological Report  
Exhibit E - Redacted Breschini and Haversat Archaeological Report

cc: Front Counter Copy; Planning Commission; Brandon Swanson, RMA Services Manager; Christina McGinnis, RMA Services Manager; California Coastal Commission; Carmel Area Land Use Advisory Committee; Luis J. Miranda Ramirez, Ohlone/Costanoan-Esselen Nation; Anthony Lombardo, interested party; Chris Adamski, interested party; Monterey County List of Historical/Archaeological Consultants dated 11/24/2018; State Historic Preservation Office, Pietro Family Investments, property owners; Robert Carver, interested party; Barbara Rainer, interested party; The Open Monterey Project (Molly Erickson); LandWatch (Executive Director); John H. Farrow; Janet Brennan; Project File REF 180041.