



Comments from Bear River Band of the Rohnerville Rancheria for the:

Marina Center Draft EIR

This is an exhaustive and thorough document that clearly defines the impacts related to the project. Following are specific comments regarding the mitigation measures related to this project.

Mitigation Measures E-2a and E-2b are not considered adequate mitigation measures by the Bear River Band.

E-2a:

1. The training of the construction crew should occur but should not be relied upon for site identification.
2. There should be a Native American monitor present during all ground disturbing activities in the areas defined as sensitive within the DEIR.
3. Monitoring shall not be used as a mitigation measure in and of itself. Monitoring shall be used as a tool after a complete sub-surface archaeological assessment of the sensitive areas has been completed.
4. A complete archaeological assessment of the sub-surface of the APE shall include standardized shovel test units and backhoe trenches within all sensitive areas. Hand excavations shall occur prior to mechanical excavations.
5. The best option for the Bear River Band of the Rohnerville Rancheria regarding the discovery and mitigation of significant cultural resources is to create a conservation easement.

E-2b:

1. All work shall be halted within 100' of any human burial until such time that the burial can be determined to be a single individual by a professional archaeologist. If a burial is discovered during project implementation it is more than likely that it will be part of a larger complex of burials.

Sincerely,


Nick Angeloff THPO
Bear River Band of the Rohnerville Rancheria

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DEPARTMENT OF
COMMUNITY DEVELOPMENT