



## MEMORANDUM

To: Lake County

From: Brad Stoneman  
Kimley-Horn and Associates, Inc.

Date: July 14, 2021

Subject: Cultural Resources Evaluation

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To Katherine Schaefer:

Per your request and that of the Planning Commission, the following information is provided to respond to questions raised during and after the Planning Commission Hearing for the Sourz HVR project under Use Permit 21-10.

A cultural resources report (Cultural Resources Evaluation of a Portion of a Parcel at 11650 High Valley Road, Clearlake Oaks – APN 006-004-07 – 649.28 acres) was prepared for the proposed project. On July 1<sup>st</sup>, 2020, Mr. Eli Hagoel, one of the current owners of the property, had requested that Archaeological Research conduct a cultural resource investigation to support the potential use of the site for cannabis cultivation. Cultivation was proposed to occur on approximate 85 acres within the parcel. The cultural resources report was prepared and subsequently dated August 2, 2020. The report included the result from a survey of approximately 290 acres of APN 006-004-07.

The purpose of the investigation was to locate, describe, and evaluate any archaeological or historical resources that may be present within and surrounding the project area. In addition, the report assessed the impacts that might occur as a result of ground disturbance activities associated with cannabis cultivation and processing.

It should be noted that the survey area included all areas in which cultivation and cultivation related activities would occur. No disturbance or project improvements occurred or are proposed for areas beyond the boundaries of the area surveyed. In other words, the survey area fully encompasses all areas that would be used by the proposed project. The survey areas also encompassed areas outside of locations proposed for disturbance.

As part of the work effort, the study area was examined on foot using a transect sweep method with transects spaced 8 to 10 meters apart. The ground surface was examined for historic and prehistoric cultural materials and features. On July 15th, 2020 a letter was sent out to the Native American Heritage commission regarding the project, associated record search, and seeking comment from any interested tribal parties. Furthermore, In December of 2020, as part of the cultural resources survey, all 11 tribes in Lake county were notified of the project per AB52 and no comments were received. Two

subsequent notifications from the County to tribal representatives were made. No responses from these efforts were received.

The Cultural Resources evaluation did identify a previously located resource area. This site is outside of all areas proposed for cultivation and improvements and would not be disturbed as part of the project. In addition, there were isolated artifacts and historic features located, but these were not part of a larger deposit of cultural material. These feature also did not meet any of the criteria to be considered, "significant" historic resources as defined in the California Public Resources Code.

The Cultural Resources Report provided the recommendations that were included as Mitigation Measure CR-1 and Mitigation Measure CR-2 to the Initial Study/Mitigated Negative Declaration (IS/MND) prepared.

In addition, as part of the Staff Report for the project, a Condition of Approval (COA) was included that requires employee training. This COA reads as follows:

*All employees shall be trained in recognizing potentially significant artifacts that may be discovered during ground disturbance. If any artifacts or remains are found, the culturally affiliated Tribe shall immediately be notified; a licensed archaeologist shall be notified, and the Lake County Community Development Director shall be notified of such finds. Mitigation measure CUL-2.*

Through the incorporation of the listed mitigation and COA, impacts to unknown cultural resources were disclosed in the Initial Study/Mitigated Negative Declaration (IS/MND) for the project and would be less than significant.

This finding is still valid. In addition, the applicant has not performed any work outside the previously surveyed 290 acres. Where some of the clearing of previous pastureland did occur outside the proposed cultivation area, these locations were within the 290-acre survey area. Lastly, all future work for the proposed drying/storage structures require verification of flagging and work area boundaries by County staff prior any ground disturbance. This, along with presence of an cultural resource monitors, employee education, would ensure all future ground disturbance would be within the boundaries of the project as proposed and if any resources are located, they are properly treated in accordance with County policy and State law.

Sincerely,

Brad Stoneman