

16 July 2015

David E. Miller, AICP
Community Development
Housing & Redevelopment Director
City of Folsom
50 Natoma Street
Folsom, California 95630

RE: White Rock Springs Ranch (Folsom 138), Folsom South of US Highway 50 Specific Plan, Sacramento County

David:

RainTree Investment Corporation represents the project proponent for the development of the White Rock Springs Ranch property within the Folsom South of US Highway 50 Specific Plan (Attachment A, Figure 1). The White Rock Springs Ranch property consists of approximately 138 acres in the southeastern portion of the Folsom South of US Highway 50 Specific Plan (Attachment A, Figure 2). Portions of the Backbone infrastructure are included within the overall White Rock Springs Ranch property and were addressed through separate studies, the applicable portions of which are incorporated herein. In addition, subsequent to the preparation of the technical studies for White Rock Springs Ranch, on 19 May 2015, the applicant sought a lot line adjustment to reduce the project area size in the northwestern corner of the property. The lot line adjustment has no bearing on the cultural resources technical studies and does not result in a deviation from the conclusions reached by the analysis of the original ±138-acre property.

The White Rock Springs Ranch project is subject to compliance with relevant mitigation measures stipulated in the 2011 Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS) and permit conditions of the Section 404 Clean Water Act permit. Among other measures, both require compliance with the First Amended Programmatic Agreement (FAPA) to meet the requirements of the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its applicable implementing regulations. The White Rock Springs Ranch property is referred to as the "Folsom 138" project in cultural resources documentation.

The purpose of this letter report is to assemble the various cultural resources permit conditions and mitigation measures for the project, and to reconcile them with activities and studies carried out to date towards compliance with the same. Recommendations to the City for map conditions follow.

1.0 Reconciliation of FEIR/FEIS Mitigation Measures

The Mitigation Monitoring and Reporting Plan and FEIR/FEIS set forth the following mitigation measures that apply to the Specific Plan as a whole and to each individual property within, including White Rock Springs Ranch, Backbone Infrastructure, and other projects. Each mitigation measure is presented below in original form, followed by a reconciliation of each measure relative to work carried out to date. Documentation of compliance is provided on a CD in Attachment B, which contains confidential information about cultural resources locations and is not intended for public distribution. Attachment C provides a list of the acronyms used throughout this document.

1.1 Mitigation Measure 3A.5-1a: Comply with the Programmatic Agreement

This mitigation measure serves to integrate the CEQA process with the Section 106 NHPA and NEPA processes by requiring the execution of a Programmatic Agreement to lay out the process by which cultural resources will be identified and evaluated for eligibility to the CRHR and NRHP, and how impacts to significant resources will be avoided, reduced, or mitigated. Mitigation Measure 3A.5-1a is provided in its entirety, as follows:

The PA for the proposed project is incorporated by reference. The PA provides a management framework for identifying historic properties, determining adverse effects, and resolving those adverse effects as required under Section 106 of the NHPA. This document is incorporated by reference. The PA is available for public inspection and review at the California Office of Historic Preservation 1725 23rd Street Sacramento, CA 95816.

Timing: The PA shall be prepared and executed (signed) prior to issuance of any Federal permit or authorization for any aspect or component of the specific plan project.

Implementation: USACE (or designee) and the project applicant(s) of all project phases (as directed by USACE).

Enforcement: USACE and the project applicant(s) of all project phases (as directed by USACE), with oversight by the SHPO.

In 2011, and in accordance with 36 CFR 800.14, the USACE, in consultation with the California Office of Historic Preservation (OHP) and Advisory Council on Historic Preservation (ACHP), executed a PA to comply with Section 106 NHPA. The City of Folsom, as CEQA lead agency, served as a concurring party to the PA and was consulted in its development. In October 2013, the PA was amended by the signatories and was thereafter referred to as the First Amended Programmatic Agreement (FAPA). Execution of the original PA and FAPA occurred prior to issuance of the Federal permit and prior to authorization for any aspect or component of the project. Copies of the original PA and the FAPA, documenting full compliance with Mitigation Measure 3A.5-1a, are provided in Attachment B.

1.2 Mitigation Measure 3A.5-1b: Perform an Inventory and Evaluation of Cultural Resources for the California Register of Historic Places, Minimize or Avoid Damage or Destruction, and Perform Treatment Where Damage or Destruction Cannot be Avoided

This mitigation measure requires the completion of analyses that document and evaluate the cultural resources within the project area, and guide the management of these resources in a manner that meets the goals of CEQA and NHPA. This process, detailed below, mirrors the procedures stipulated in the FAPA. As such, implementation of the relevant procedures in the FAPA co-complies with Mitigation Measure 3A.5-1b. Table 1, below, presents the status of compliance with this requirement for the White Rock Springs Ranch property. Compliance is further supported by documentation in Attachment B, and full technical studies and confidential reports generated in compliance with the PA and subsequent FAPA are on file with the City of Folsom. Mitigation Measure 3A.5-1b states:

Management of cultural resources eligible for or listed on the CRHR under CEQA mirrors management steps required under Section 106. These steps may be combined with deliverables and management steps performed for Section 106 provided that management documents prepared for the PA also clearly reference the CRHR listing criteria and significance thresholds that apply under CEQA. Prior to ground disturbing work for each individual development phase or off-site element, the applicable oversight agency (City of Folsom, El Dorado County, Sacramento County, or Caltrans), or the project applicant(s) of all project phases, with applicable agency oversight, shall perform the following actions:

- Retain the services of a qualified archaeologist to perform an inventory of cultural resources within each individual development phase or off-site element subject to approval under CEQA. Identified resources shall be evaluated for listing on the CRHR. The inventory report shall also identify locations that are sensitive for undiscovered cultural resources based upon the location of known resources, geomorphology, and topography. The inventory report shall specify the location of monitoring of ground-disturbing work in these areas by a qualified archaeologist, and monitoring in the vicinity of identified resources that may be damaged by construction, if appropriate. The identification of sensitive locations subject to monitoring during construction of each individual development phase shall be performed in concert with monitoring activities performed under the PA to minimize the potential for conflicting requirements.
- For each resource that is determined eligible for the CRHR, the applicable agency or the project applicant(s) for any particular discretionary development (under the agency's direction) shall obtain the services of a qualified archaeologist who shall determine if implementation of the individual project development would result in damage or destruction of "significant" (under CEQA) cultural resources. These findings shall be reviewed by the applicable agency for consistency with the significance thresholds and treatment measures provided in this EIR/EIS.
- Where possible, the project shall be configured or redesigned to avoid impacts on eligible or listed resources. Alternatively, these resources may be preserved in place if possible, as suggested under California Public Resources Code Section 21083.2. Avoidance of historic properties is required under certain circumstances under the Public Resource Code and 36 CFR Part 800.
- Where impacts cannot be avoided, the applicable agency or the project applicant(s) of all project phases (under the applicable agency's direction) shall prepare and implement treatment measures that are determined to be necessary by a qualified archaeologist. These measures may consist of data recovery excavations for resources that are eligible for listing because of the data they contain (which may contribute to research). Alternatively, for historical architectural, engineered, or landscape features, treatment measures may consist of a preparation of interpretive, narrative, or photographic documentation. These measures shall be reviewed by the applicable oversight agency for consistency with the significance thresholds and standards provided in this EIR/EIS.
- To support the evaluation and treatment required under this mitigation measure, the archaeologist retained by either the applicable oversight agency or the project applicant(s) of all project phases shall prepare an appropriate prehistoric and historic context that identifies relevant prehistoric, ethnographic, and historic themes and research questions against which to determine the significance of identified resources and appropriate treatment.
- These steps and documents may be combined with the phasing of management and documents prepared pursuant to the PA to minimize the potential for inconsistency and duplicative management efforts. Mitigation for the off-site elements outside of the City of Folsom's jurisdictional boundaries must be coordinated by the project applicant(s) of each applicable project phase with the affected oversight agency(ies) (i.e., El Dorado and/or Sacramento Counties, or Caltrans).

Timing: Before issuance of building permits and ground-disturbing activities.

Implementation: The applicable oversight agency and the project applicant(s) (at the agency's direction) of all project phases.

Enforcement: 1. For all project-related improvements that would be located within the City of Folsom: City of Folsom Community Development Department; 2. For the two roadway connections in El Dorado Hills: El Dorado County Development Services Department; 3. For the detention basin west of Prairie City Road: Sacramento County Planning and Community Development Department; and 4. For the U.S. 50 interchange improvements: Caltrans.

Table 1. Mitigation Measure 3A.5-1a Compliance for the White Rock Springs Ranch

FAPA Stipulation	Status of Compliance: White Rock Springs Ranch	Status of Compliance: Backbone Infrastructure	Remaining Work To be Completed
<p>Stipulation 1: Professional Qualifications Standards</p>	<p>Requirement satisfied by Lisa Westwood, RPA, who exceeds Secretary of the Interior’s Professional Qualifications Standards for prehistoric and historic archaeology, as specified in 36 CFR 61.</p>	<p>Same</p>	<p>None</p>
<p>Stipulation 2: Specific Plan Area of Potential Effects and Pre-Project Resolution of Adverse Effects (Cultural Context)</p>	<p>The USACE delineated the APE for the entire Specific Plan Area on 13 August 2009. SHPO concurred on 19 October 2009. USACE approved the PHPS on 8/5/2011.</p>	<p>Same</p>	<p>None</p>
<p>Stipulation 3: Review of Preliminary Historic Properties Synthesis</p>	<p>USACE circulated the PHPS to SHPO, tribes, and parties; received comments, and circulated final PHPS on 4/27/2012. No comments were received on second circulation; therefore, the USACE declared the PHPS final on 5 June 2012 and notified all parties of such.</p>	<p>Same</p>	<p>None</p>
<p>Stipulation 4: Revision of the Preliminary HPS (now the Historic Properties Management Plan [HPMP])</p>	<p>In conjunction with the development of the FAPA, the USACE revised the PHPS and approved it as an HPMP in September 2013. The HPMP, an attachment to the FAPA, was approved by SHPO with the execution of the FAPA on 3 October 2013.</p>	<p>Same</p>	<p>None</p>

FAPA Stipulation	Status of Compliance: White Rock Springs Ranch	Status of Compliance: Backbone Infrastructure	Remaining Work To be Completed
<p>Stipulation 5: Development and Review of Project-Specific Historic Property Treatment Plans</p>	<p>USACE made a Finding of Adverse Effect for the White Rock Springs Ranch on 03 March 2014 via the preparation of a Finding of Effect (FOE) report, which presented project modifications to avoid resources where feasible. SHPO concurred on the FOE on 21 April 2014. The USACE prepared and consulted on an HPTP on 21 July 2014. SHPO concurred on the HPTP on 30 October 2014.</p> <p>Implementation of pre-construction mitigation requirements in the HPTP has been completed (data recovery of site P-34-906, two interpretive panels, and updated HPMP), and documentation is pending approval by the USACE and SHPO.</p>	<p>USACE made a Finding of Adverse Effect and consulted with SHPO on 4 September 2013 on a FOE and HPTP. SHPO concurred on the DOE and HPTP on 7 October 2013.</p> <p>None of the mitigation requirements from the Backbone HPTP apply to the White Rock Springs Ranch.</p>	<p><u>White Rock Springs Ranch</u>: Obtain approval from the USACE on the data recovery report and curation for P-34-906, interpretive panels, and updated HPMP; record a conservation easement over the white rocks site; ensure geoarchaeological monitoring during construction, as described in the HPTP; and carry out contractor awareness training.</p> <p><u>Backbone</u>: N/A</p>
<p>Stipulation 6: Technical Reports</p>	<p>The USACE approved the non-Backbone White Rock Springs Ranch inventory and evaluation report and consulted with SHPO on 18 December 2013. SHPO concurred with the technical studies on 8 January 2014.</p>	<p>The USACE approved the inventory report, evaluation plan, and evaluation plan on 30 November 2012. SHPO concurred with all technical studies on 7 October 2013 after circulation.</p>	<p>None</p>
<p>Stipulation 7: Annual Reporting</p>	<p>This is an administrative requirement for the USACE only.</p>	<p>Same</p>	<p>USACE will prepare and circulate an Annual Report in October 2015. No action necessary by applicant or City.</p>
<p>Stipulation 8: Permissions to Proceed With Construction</p>	<p>This is an administrative requirement for the USACE only.</p>	<p>Same</p>	<p>USACE will issue a NTP in accordance with Stipulation 8.3.b after implementation of the HPTPs. No action necessary by applicant or City.</p>

FAPA Stipulation	Status of Compliance: White Rock Springs Ranch	Status of Compliance: Backbone Infrastructure	Remaining Work To be Completed
<p>Stipulation 9: Project-Specific Public and Native American Involvement</p>	<p>United Auburn Indian Community, Shingle Springs Band of Miwok Indians, Wilton Rancheria, and the Folsom Historical Society serve as concurring parties to the FAPA and received all technical studies and documentation completed under the PA and FAPA to date. A summary of consultation was sent to the tribes on 16 September 2013. Consultation is ongoing.</p>	<p>Same</p>	<p>None</p>
<p>Stipulation 10: Modifications and Additions to Off-Site Infrastructure</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Stipulation 11: Discovery of Unanticipated Historic Properties</p>	<p>Procedures for management of unanticipated discoveries are set forth in the HPTP and will be disseminated through contractor awareness training.</p>	<p>Same</p>	<p>Contractor awareness training is a mitigation measure in all of the HPTPs that will be satisfied prior to ground-disturbing activities.</p>
<p>Stipulation 12: Curation</p>	<p>Curation requirements are specified in the HPTP. This includes curation of a representative sample, with the balance offered to the historical society.</p> <p>Artifacts have been selected and prepared for curation and are awaiting approval of the data recovery report from the USACE before the balance is offered to the historical society and before curated artifacts are transferred to the curation facility.</p>	<p>None of the sites in the Backbone with collections occur on this property.</p>	<p>Curation of artifacts is a mitigation measure in the White Rock Springs Ranch HPTP that will be satisfied prior to ground-disturbing activities.</p>
<p>Stipulation 13: Treatment of Human Remains and Associated Objects</p>	<p>Procedures for management of unanticipated discoveries are set forth in the HPTP and will be disseminated through contractor awareness training.</p>	<p>Same</p>	<p>Contractor awareness training is a mitigation measure in the HPTPs that will be satisfied prior to ground-disturbing activities.</p>
<p>Stipulation 14: Dispute Resolution</p>	<p>This is an administrative requirement for the USACE only.</p>	<p>Same</p>	<p>None</p>

FAPA Stipulation	Status of Compliance: White Rock Springs Ranch	Status of Compliance: Backbone Infrastructure	Remaining Work To be Completed
Stipulation 15: Amendments, Noncompliance, and Termination	This is an administrative requirement for the USACE only.	Same	None
Stipulation 16: Duration of the FAPA	This is an administrative requirement for the USACE only.	Same	None
Stipulation 17: Effective Date	The FAPA is valid from 3 October 2013 to 3 October 2023	Same	USACE will initiate consultation on extending or revising the FAPA no later than 3 October 2022. No action necessary by applicant or City.

As shown in Table 1, above, the White Rock Springs Ranch development area is in full compliance with the requirements in the FAPA and Mitigation Measure 3A.5-1b. Applicable mitigation specified in the White Rock Springs Ranch HPTP will be carried out to the satisfaction of the appropriate agencies prior to ground-disturbing activities associated with the on-site development area.

1.3 Mitigation Measure 3A.5-2: Conduct Construction Personnel Education, Conduct On-Site Monitoring if Required, Stop Work if Cultural Resources are Discovered, Assess the Significance of the Find, and Perform Treatment or Avoidance as Required.

This mitigation measure requires the development and dissemination of a contractor awareness training program at the start of construction to advise contractors about the procedures that must be followed in the event of an unanticipated discovery, with or without an on-site archaeological monitor during construction activities. It also details the procedures by which unanticipated discoveries are evaluated in the field for further management, if required. The measure co-complies with the requirements of the HPTP and reads as follows:

To reduce potential impacts to previously undiscovered cultural resources, the project applicant(s) of all project phases shall do the following:

- Before the start of ground-disturbing activities, the project applicant(s) of all project phases shall retain a qualified archaeologist to conduct training for construction workers as necessary based upon the sensitivity of the project APE, to educate them about the possibility of encountering buried cultural resources, and inform them of the proper procedures should cultural resources be encountered.
- As a result of the work conducted for Mitigation Measures 3A.5-1a and 3A.5-1b, if the archaeologist determines that any portion of the SPA or the off-site elements should be monitored for potential discovery of as-yet-unknown cultural resources, the project applicant(s) of all project phases shall implement such monitoring in the locations specified by the archaeologist. USACE should review and approve any recommendations by archaeologists with respect to monitoring.
- Should any cultural resources, such as structural features, unusual amounts of bone or shell, artifacts, or architectural remains be encountered during any construction activities, work shall be suspended in the

vicinity of the find and the appropriate oversight agency(ies) (identified below) shall be notified immediately. The appropriate oversight agency(ies) shall retain a qualified archaeologist who shall conduct a field investigation of the specific site and shall assess the significance of the find by evaluating the resource for eligibility for listing on the CRHR and the NRHP. If the resource is eligible for listing on the CRHR or NRHP and it would be subject to disturbance or destruction, the actions required in Mitigation Measures 3A.5-1a and 3A.5-1b shall be implemented. The oversight agency shall be responsible for approval of recommended mitigation if it is determined to be feasible in light of the approved land uses, and shall implement the approved mitigation before resuming construction activities at the archaeological site. Mitigation for the off-site elements outside of the City of Folsom's jurisdictional boundaries must be coordinated by the project applicant(s) of each applicable project phase with the affected oversight agency(ies) (i.e., El Dorado and/or Sacramento Counties, or Caltrans).

Timing: Before and during ground-disturbing activities.

Implementation: Project applicant(s) of all project phases.

Enforcement: 1. For actions taken to satisfy the requirements of Section 106: the SHPO and USACE; 2. For all project-related improvements that would be located within the City of Folsom: City of Folsom Community Development Department; 3. For the two roadway connections off-site into El Dorado Hills: El Dorado County Development Services Department; 4. For the detention basin west of Prairie City Road: Sacramento County Planning and Community Development Department; 5. For the U.S. 50 interchange improvements: Caltrans.

The White Rock Springs Ranch HPTP was authored by a qualified professional archaeologist, based on the results of the inventory, evaluations of eligibility, and the determination of effect, and approved by the agencies with SHPO concurrence. Among other measures, the approved HPTP requires the development and delivery of a contractor awareness training program to educate construction personnel on the measures by which unanticipated discoveries will be managed.

The White Rock Springs Ranch HPTP includes specific measures for contractor awareness training, measures to manage unanticipated discoveries, and require archaeological monitoring in specific locations. Therefore, Mitigation Measure 3A.5-2 has been satisfied in full for the White Rock Springs Ranch development area. Mandatory contractor awareness training for all ground disturbing activity associated with the project will reduce the impact to less than significant.

1.4 Mitigation Measure 3A.5-3: Suspend Ground-Disturbing Activities if Human Remains are Encountered and Comply with California Health and Safety Code Procedures.

This mitigation measure specifies the procedures that must be followed in the unlikely event of an unanticipated discovery of human remains during construction activities, with or without a monitor present during construction. The measure reads as follows:

In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, including those associated with off-site elements, the project applicant(s) of all project phases shall immediately halt all ground-disturbing activities in the area of the find and notify the applicable county coroner and a professional archaeologist skilled in osteological analysis to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or public lands (California Health and Safety Code Section 7050.5[b]).

If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination (California Health and Safety Code Section 7050[c]). After the coroner's findings are complete, the project applicant(s), an archaeologist, and the NAHC-designated MLD shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting on notification of a discovery of

Native American human remains are identified in Section 5097.9 of the California Public Resources Code.

Upon the discovery of Native American remains, the procedures above regarding involvement of the applicable county coroner, notification of the NAHC, and identification of an MLD shall be followed. The project applicant(s) of all project phases shall ensure that the immediate vicinity (according to generally accepted cultural or archaeological standards and practices) is not damaged or disturbed by further development activity until consultation with the MLD has taken place. The MLD shall have at least 48 hours after being granted access to the site to inspect the site and make recommendations.

A range of possible treatments for the remains may be discussed: nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants, or other culturally appropriate treatment. As suggested by Assembly Bill (AB) 2641 (Chapter 863, Statutes of 2006), the concerned parties may extend discussions beyond the initial 48 hours to allow for the discovery of additional remains. AB 2641(e) includes a list of site protection measures and states that the project applicant(s) shall comply with one or more of the following requirements:

- ▶ record the site with the NAHC or the appropriate Information Center,
- ▶ use an open-space or conservation zoning designation or easement, or
- ▶ record a document with the county in which the property is located.

The project applicant(s) or its authorized representative of all project phases shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance if the NAHC is unable to identify an MLD or if the MLD fails to make a recommendation within 48 hours after being granted access to the site. The project applicant(s) or its authorized representative may also reinter the remains in a location not subject to further disturbance if it rejects the recommendation of the MLD and mediation by the NAHC fails to provide measures acceptable to the landowner. Ground disturbance in the zone of suspended activity shall not recommence without authorization from the archaeologist. Mitigation for the off-site elements outside of the City of Folsom's jurisdictional boundaries must be coordinated by the project applicant(s) of each applicable project phase with the affected oversight agency(ies) (i.e., El Dorado and/or Sacramento Counties, or Caltrans).

Timing: Upon the discovery of suspected human remains.

Implementation: Project applicant(s) of all project phases.

Enforcement: 1. For all project-related improvements that would be located within the City of Folsom: City of Folsom Community Development; 2. For the two roadway connections in El Dorado Hills: El Dorado County Development Services Department; 3. For the detention basin west of Prairie City Road: Sacramento County Planning and Community Development Department; 4. For the U.S. 50 interchange improvements: Caltrans.

The White Rock Springs Ranch HPTP includes specific measures for the management of unanticipated discoveries involving human remains. Therefore, Mitigation Measure 3A.5-2 has been satisfied in full for the White Rock Springs Ranch development area. The implementation of unanticipated discovery measures to address human remains for all ground disturbing activity associated with the project will reduce the impact to less than significant.

2.0 Summary

The FEIR/FEIS for the Folsom South of US Highway 50 Specific Plan Project, which includes but is not limited to White Rock Springs Ranch property and its associated infrastructure, requires compliance with four cultural resources mitigation measures, summarized in Table 2. A reconciliation of compliance activities with the requirements of the FEIR/FEIS indicates the following.

Table 2. Summary of Compliance Status

Mitigation Measure	Status
3A.5-1a: Comply with the Programmatic Agreement	Compliant
3A.5-1b: Inventory, Evaluate for CRHR; Assess Effect, and Mitigate for Impacts	Compliant after approval of applicable mitigation documentation (pending)
3A.5-2: Contractor Awareness Training and Unanticipated Discovery	Compliant after carrying out contractor training at start of construction
3A.5-3: Human Remains Discovery Procedures	Compliant after carrying out contractor training at start of construction

3.0 Recommendations

Based on the reconciliation presented above, ECORP makes the following recommendations to the City of Folsom for conditions of approval. These conditions are intended to be consistent and coordinated with the USACE in order to satisfy the overall requirements of the FEIR/FEIS.

Condition Number	Mitigation Measure	Condition of Approval
1	3A.5-1b	Prior to grading within the White Rock Springs Ranch area, the applicant shall demonstrate proof of compliance that the following applicable mitigation from the White Rock Springs Ranch HPTP, as determined in consultation with the USACE, was implemented as appropriate: data recovery report and curation of artifacts for P-34-906, interpretive panels, and updated HPMP; record a conservation easement over the white rocks site; ensure geoarchaeological monitoring during construction, as described in the HPTP; and carry out contractor awareness training. Final proof of compliance is defined as written compliance verification from the USACE.
2	3A.5-1a 3A.5-2 3A.5-3	Prior to grading activities, the applicant shall retain a qualified professional archeologist to prepare and disseminate a contractor awareness training program for all construction supervisors. The sensitivity training program will provide information about notification procedures when potential archaeological material is discovered, procedures for coordination between construction personnel and monitoring personnel, and information about other treatment or issues that may arise if cultural resources (including human remains) are discovered during project construction. The training shall be carried out each time a new contractor will begin work in the project area, and a minimum of once at the start of each construction season by that contractor. The qualified archeologist shall submit the completed training attendance roster and a copy of the training materials to the City and USACE within 48 hours of delivery of the training program.

Condition Number	Mitigation Measure	Condition of Approval
3		The collecting, digging or removal of any artifact or other prehistoric or historic object located in public or open space areas, and the disturbance of any archaeological site or historic property, is prohibited and notice of such shall be included in the Covenants, Codes, and Restrictions (CC&R's) of all Homeowner's Associations. A copy of the CC&R's shall be submitted to the City.
4	3A.5-1a	If grading activities will occur in areas determined to require geoarcheological monitoring (see Attachment B of the White Rock Springs Ranch HPTP for areas requiring geoarcheological monitoring), the applicant shall retain a qualified professional geoarchaeologist who has a graduate degree in the specialized discipline, possesses a demonstrated ability to carry research to completion, and has at least 24 months of professional experience and/or specialized training in geoarchaeology. The geoarchaeologist shall monitor ground-disturbing activities in the areas shown in red cross-hatch below down to 1.5 meters below the surface. The monitoring geoarchaeologist shall submit proof of monitoring in the form of daily field monitoring logs to the City and USACE within 48 hours of completion of monitoring activities.

If you have any questions, you may reach me at (916) 782-9100 or by email at lwestwood@ecorpconsulting.com.

Sincerely,



Lisa Westwood, RPA
ECORP Consulting, Inc.

cc:
RainTree Investment Corporation

Attachments:

- Attachment A – Maps
- Attachment B – Documentation of Compliance
- Attachment C – List of Acronyms

LIST OF ATTACHMENTS

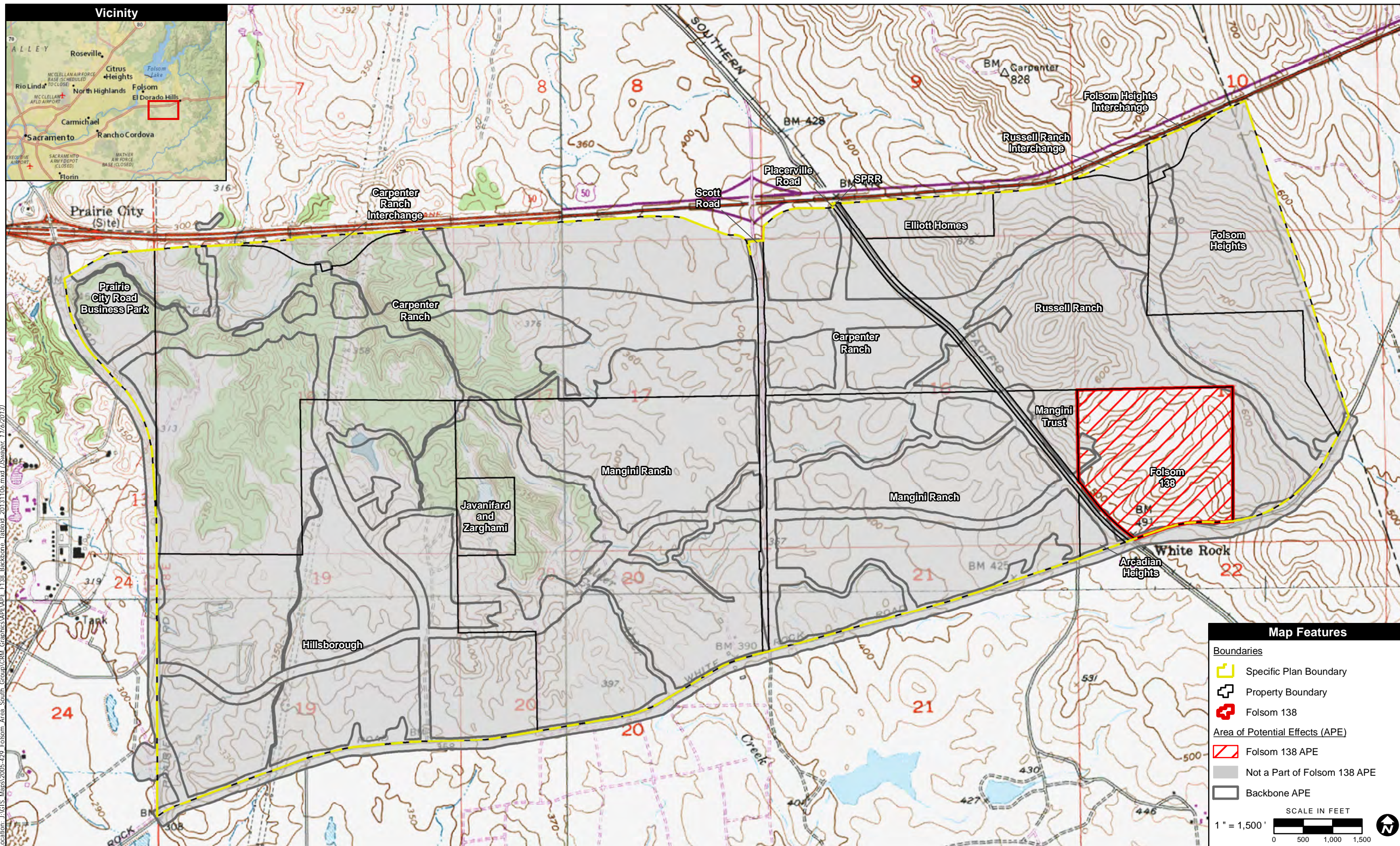
Attachment A – Map

Attachment B – Documentation of Compliance (CD)

Attachment C – List of Acronyms

ATTACHMENT A

Map



Location: J:\GIS_Maps\2008-429_Folsom_Area_South_Group\CRM_Graphics\APE\VAPE_F138_Backbone_Tabloid_20131106.mxd (J.Swager, 11/6/2013)

Map Features

Boundaries

- Specific Plan Boundary
- Property Boundary
- Folsom 138

Area of Potential Effects (APE)

- Folsom 138 APE
- Not a Part of Folsom 138 APE
- Backbone APE

SCALE IN FEET

1" = 1,500'

0 500 1,000 1,500

**Area of Potential Effects for the Folsom 138 (White Rock Springs Ranch Project (SPK-2008-00326)
Within the Folsom South of US Highway 50 Specific Plan Project**

USGS 7.5' Quadrangles: Buffalo Creek, Clarksville, Folsom & Folsom SE
Vicinity: National Geographic World Basemap (ESRI Online 11/6/2013)
Map Date: 11/6/2013



ATTACHMENT B

Documentation of Compliance (CD)

This Attachment contains information on the specific location of cultural resources. This information is not for publication or release to the general public. It is for planning, management and research purposes only. Information on the specific location of prehistoric and historic sites is exempt from the Freedom of Information Act and California Public Records Act.

ATTACHMENT C

List of Acronyms

List of Acronyms

Acronym	Definition
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
Caltrans	California Department of Transportation
CD	Compact Disc
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CC&R's	Covenants, Codes, and Restrictions
CRHR	California Register of Historical Resources
DOE	Determination of Effect
EIR/EIS	Environmental Impact Report/Environmental Impact Statement
FAPA	First Amended Programmatic Agreement
FEIR/FEIS	Final Environmental Impact Report/Final Environmental Impact Statement
FOE	Finding of Effect
HPMP	Historic Properties Management Plan
HPS	Historic Properties Synthesis
HPTP	Historic Property Treatment Plans
MLD	Most Likely Descendent
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NTP	Notice to Proceed
OHP	Office of Historic Preservation
PA	Programmatic Agreement
PHPS	Preliminary Historic Properties Synthesis
RPA	Registered Professional Archaeologist
SHPO	State Historic Preservation Officer
SPA	Specific Plan Area
USACE	United States Army Corps of Engineers