



November 3, 2003

Lynn Warner

Case Planner, file ER 03-0007

City of Oakland Planning Division

250 Frank H. Ogawa Plaza, Suite 3330

Oakland, CA 94612

Re: Comments on the Uptown Mixed-Use Redevelopment Project DEIR

Dear Ms. Warner:

I have been asked to comment on the draft EIR for the above referenced project. I am an archaeologist with over 30 years experience in urban settings in Northern California. I was the archaeologist charged with recovering the remains of San Jose's first Chinatown (1850-1887) when the Fairmont Hotel and Silicon Valley Financial Center buildings were constructed. These buildings were on the site of an extensive Chinese American community not dissimilar to the early Oakland community. In the area of a single large urban block, we found dozens of significant historic archaeological features. Only the extensive pre-project planning that identified the potential archaeological deposits and developed a program for systematic recovery when discoveries were made prevented significant delays in these projects. Without a similar level of planning, you will undoubtedly face delays and problems during the construction of the proposed project.

Archaeological monitoring can be an appropriate approach to the recovery of archaeological features, but considerable planning is required for the monitoring process to succeed. Several examples of factors that must be considered:

1. Monitoring must be adequate to the magnitude of the project.
2. The monitor must be able to stop excavation in areas where discoveries are made.
3. The Project Archaeologist must be able to commit additional resources as soon as discoveries are made.
4. Recovery of archaeological features needs to be undertaken efficiently in order to avoid project delays.
5. Lack of cooperation from the project sponsor will only increase the cost of archaeology and the amount of delay from archaeological recovery processes.

If these factors are not fully considered, the project will not proceed efficiently, historic resources will be unnecessarily damaged or lost, and a part of the historic fabric of Oakland will be rent.

I strongly encourage a reexamination of the archaeological monitoring program to insure that adequate attention has been paid to the identification and recovery of archaeological features in a timely and efficient manner. Any other approach assures either the loss of important cultural sites, or unnecessary delays in construction of the project.

It is possible to undertake this project with no delays due to archaeological or historic discoveries, and to still find and recover any encountered features or sites. Any other approach will absolutely insure additional expenses, time delays, negative publicity, and a host of other problems.

I emphasize again that casually assuming that the presence of an archaeological monitor will adequately address the potential problems is an approach absolutely guaranteed to cause delays and problems. When problems surface, additional delays will ensue as decisions are made and approaches developed. Thorough archaeological planning prior to initiation of earth disturbing activities will insure a minimum of surprises during the construction project.

Thank you for this opportunity to comment on the draft EIR for this project. If I can answer any questions, please contact me at 707-762-2573.

Sincerely,

William Roop
Partner, ARS

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