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19927

Chris Carson
Chief Business Official
Ross Valley School District
100 Shaw Drive
San Anselmo, CA 94960

Subject: Archaeological Letter Report for the Brookside School Pedestrian Bridge Replacement Project, San Anselmo, California

This letter report documents the negative findings of cultural resources inventory efforts conducted by Dudek for the Brookside School Pedestrian Bridge Replacement Project (Project), located in San Anselmo, Marin County, California. Ross Valley School District is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). All cultural resource fieldwork and reporting for this Project has been conducted by archaeologists meeting the Secretary of the Interior's Professional Qualifications Standards. A Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search request returned negative results. A Northwest Information Center (NWIC) records search indicated that no cultural resources have been recorded within the Project site. Intensive pedestrian survey did not identify any cultural resources within the Project site.

1 Project Location and Description

The 4,124 square foot Project site is located at Brookside Elementary School (Assessor's Parcel Number [APN] APN 005-111-56) in San Anselmo, Marin County, California (Figure 1). The Project is located in the southeastern portion of the Brookside School campus and approximately 125 feet east of Butterfield Road. As shown in Figure 2, Project Site and Vicinity, other on-campus buildings and features adjacent to the proposed bridge include a playground area and open space to the north, classroom buildings to the east, open space to the south, and parking Lot A to the west. The open space surrounding the bridge consists of Sleepy Hollow Creek. There is additional parking on campus in parking Lot B, which is 480 feet northeast of the bridge.

The Project proposes to replace the existing pedestrian bridge over Sleepy Hollow Creek on the Brookside Elementary School campus. The Project would involve removing the existing 44-foot-long pedestrian bridge and its abutments. The abutments rest on two foundations within the creek channel, which will remain in place. A new bridge with new abutments would be constructed on these existing foundations. The Project also includes improvements to the existing parking lot on the west side of the creek, adjacent to Butterfield Road.

2 Regulatory Context

While the Project as currently planned is subject only to state and local regulatory conditions, federal regulations are provided here for reference should they be relevant in the future.

2.1 Federal Regulations

2.1.1 National Historic Preservation Act (NHPA)

The NHPA established the National Register of Historic Places (NRHP) and the President’s Advisory Council on Historic Preservation (ACHP), and provided that states may establish State Historic Preservation Officers (SHPOs) to carry out some of the functions of the NHPA. Most significantly for federal agencies responsible for managing cultural resources, Section 106 of the NHPA directs that “[t]he head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP.” Section 106 also affords the ACHP a reasonable opportunity to comment on the undertaking (16 USC 470f).

36 Code of Federal Regulations, Part 800 (36 CFR 800) implements Section 106 of the NHPA. It defines the steps necessary to identify historic properties (those cultural resources listed in or eligible for listing in the NRHP), including consultation with federally recognized Native American tribes to identify resources with important cultural values; to determine whether or not they may be adversely affected by a proposed undertaking; and the process for eliminating, reducing, or mitigating the adverse effects.

The content of 36 CFR 60.4 defines criteria for determining eligibility for listing in the NRHP. The significance of cultural resources identified during an inventory must be formally evaluated for historic significance in consultation with the California SHPO to determine if the resources are eligible for inclusion in the NRHP. Cultural resources may be considered eligible for listing if they possess integrity of location, design, setting, materials, workmanship, feeling, and association. The criteria for determining eligibility are essentially the same in content and order as those outlined under the California Environmental Quality Act (CEQA), but the criteria under NHPA are labeled A through D (rather than 1–4 under CEQA).

Regarding criteria A through D of Section 106, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, cultural resources, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded or may be likely to yield, information important in prehistory or history [36 CFR 60.4].

The current cultural resources inventory is not designed to generate enough data to make eligibility recommendations on previously recorded cultural resources that are outside of the Project site, or newly discovered cultural resources; such determinations are typically made during a subsequent evaluation phase (e.g., excavations

at prehistoric sites). However, the survey was designed to generate enough information to provide informal assessments of eligibility to help guide management considerations.

2.2 State Regulations

2.2.1 The California Register of Historical Resources

In California, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code [PRC] Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1(a)). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see California Code Regulations, Title 14, Section 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

2.2.2 California Environmental Quality Act

As described below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the

significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of an historical resource.

- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC Sections 21074(c); 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

2.2.3 California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended California Public Resources Code, Section 5097.94, and added California Public Resources Code, Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. California Public Resources Code, Section 21074, defines tribal cultural resources as follows:

1. "Tribal cultural resources" are either of the following:
 - a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - i. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - ii. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
2. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

3. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, including tribes that may not be federally recognized, and that have requested in writing that the lead agency notify them of proposed projects within such geographic area. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report (EIR).

Section 9 of AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” Section 6 of AB 52 added Section 21080.3.2 to the California Public Resources Code, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (California Public Resources Code Section 21080.3.2(a)). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (California Public Resources Code Section 21082.3(a)).

2.2.4 Native American Historic Cultural Sites

State law (California Public Resources Code, Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and established the NAHC. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy a Native American historic or cultural site that is listed or may be eligible for listing in the CRHR.

In the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the CEQA Guidelines (as incorporated from California Public Resources Code, Section 5097.98) and California Health and Safety Code, Section 7050.5, define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended on the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that the County Coroner or County-approved Coroner represented be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in California Public Resources Code, Section 5097.98 (14 CCR 15064.5(e)).

2.2.5 California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (Section 7050.5b). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (Section 7050.5c). The NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

3 Background Research

3.1 CHRIS Records Search Results

A California Historical Resources Information System (CHRIS) records search of the Project site and the surrounding ½-mile was completed by Dudek staff on January 21, 2026. This search included the NWIC’s collection of mapped prehistoric, historical, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the NRHP, California Inventory of Historical Resources/CRHR and listed OHP Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information.

Previously Conducted Studies

NWIC records indicate that sixteen (16) previous cultural resources technical investigations have been conducted with a ½-mile of the Project site. None of these reports intersect the current Project site (Table 1).

Table 1. Previous Technical Studies

| Report Number | Date | Title | Author |
|--|------|---|--------------|
| Reports within the Project site | | | |
| None | | | |
| Reports within ½ mile of the Project site | | | |
| S-002350 | 1980 | Archaeological reconnaissance of a parcel (APN 005-224-17) located between Sir Francis Drake Boulevard, Riviera Street and the terminus of Beverly Way in the City of San Anselmo, Marin County, California (letter report) | William Roop |
| S-002351 | 1980 | An archaeological reconnaissance of an approximately 40 acre parcel located in the City of San Anselmo. (letter report). | William Roop |

| | | | |
|-----------|------|--|--|
| S-013217 | 1990 | An Archaeological Survey for the AT&T Fiber Optics Cable, San Francisco to Point Arena, California | Thomas M. Origer |
| S-013217a | 1990 | Archaeological findings regarding a selection of a route through Novato for the AT&T Fiber Optics Cable (letter report) | Thomas M. Origer |
| S-013217b | 1991 | An archaeological study of revised portions of the AT&T route near Santa Rosa and Sausalito (letter report) | Thomas M. Origer |
| S-013217c | 1991 | Archaeological study of AT&T revised fiber cable routes (letter report) | Thomas M. Origer |
| S-013217d | 1992 | Archaeological survey of alternative fiber optics cable routes, Point Arena (letter report) | Thomas M. Origer |
| S-020778 | 1998 | Review of Historic Resources for Site SF-342-01, Joint Pole Mount at End of Ridgeway Ave., Fairfax, Marin County, CA (50001 56D/98) (letter report) | Sunshine Psota |
| S-035561 | 2007 | Town of San Anselmo FMA Home Evaluations, FMA-PJ-09-CA-2007-003 (letter report) | Alessandro Amaglio |
| S-037864 | 2005 | National Register of Historic Places Evaluation Report, Butterfield Cell Site Project, San Anselmo, California | CitTitle Text20 Text21 Text22 Elizabeth L. Dwinell |
| S-038726 | 2011 | Archaeological Assessment Report for the San Anselmo Creek Stabilization Project, Town of Fairfax, Marin County, California (letter report) | John Holson |
| S-043124 | 2013 | Phase I Cultural Resources Evaluation for the Ross Valley Sanitary District Sewer Rehabilitation FY 2014 Project, Marin County, California | |
| S-044134 | 2011 | Architectural Survey, Evaluation and Finding of Effect for the Butterfield Cell Site, Marin County. (Bureau Veritas Project No. 33111-011074.00; PL. No. 1974-35) | Allison Vanderslice |
| S-045694 | 2013 | Archaeological Testing and Monitoring Program, Fair-Anselm Creek Bank Stabilization Project, Fairfax, Marin County, California | Cassidy DeBaker and Thomas Martin |
| S-046058 | 2014 | Archaeological Monitoring Summary Report for 31037031 Gas Main Replacement Oak Knoll Project, San Anselmo, Marin County | Esme A. Hammerle |
| S-047223 | 2015 | Historic Property Survey Report, Safe Routes to Schools Project, 04-MRN-San Anselmo, Marin County, California | Kara Brunzell |
| S-047223a | 2015 | Archaeological Survey Report, ASR Short Form for Local Assistance Projects, Safe Routes to Schools Project, 04-MRN-San Anselmo, Marin County, California | William Roop |
| S-047974 | 2015 | FCC Form 621 Collocation Submission Packet: BA00337A (SF337 Sir Francis Drake), 1509 Sir Francis Drake Boulevard, San Anselmo, CA 94960 | Carrie D. Wills and Kathleen Crawford |
| S-047974a | 2015 | Cultural Resources Records Search Results for T-Mobile West, LLC Candidate BA00337A (SF337 Sir Francis Drake), 1509 Sir Francis Drake Boulevard, San Anselmo, Marin County, California (letter report) | Carrie D. Wills, Kathleen A. Crawford, and Cher L. Peterson |

| | | | |
|-----------|------|---|---------------------------------|
| S-047974b | 2015 | FCC_2015_1117_005; BAO0337A (SF337 Sir Francis Drake) 1509 Sir Francis Drake Boulevard, San Anselmo, Collocation | Julianne Polanco |
| S-050024 | 2017 | Phase I Cultural Resources Evaluation for the Ross Valley Sanitary District FY 2016-2017 Gravity Sewer Improvements Project, Marin County, California | |
| S-050027 | 2017 | Phase I Cultural Resources Evaluation of the FY 2016/2017 Gravity Sewer Improvement Project, Marin County, California | Juliana Quist and Allen Pastron |
| S-051211 | 2017 | Historic Resource Evaluation, 1573 Sir Francis Drake Boulevard, Fairfax, Marin County, California 94930 (APN 002-213-10) | Alice P. Duffee |

Previously Identified Cultural Resources

No previously recorded cultural resources intersect the proposed Project site. Eleven (11) previously recorded cultural resource are located within a ½-mile of the proposed Project site (Table 2). Resources within the ½-mile buffer include six historic bridges, three historic buildings, a prehistoric habitation site, and the multicomponent Mount Tamalpais.

Table 2. Previous Cultural Resources

| Primary ID | Trinomial | Resource Name | Age | Description |
|--|-----------|---|-------------|--|
| Resources within the Project site | | | | |
| None | | | | |
| Resources within ½ mile of the Project site | | | | |
| P-21-001344 | - | Arroyo Avenue Bridge | Historic | Bridge |
| P-21-001347 | - | Broadmoor Bridge | Historic | Bridge |
| P-21-001348 | - | High School Bridge | Historic | Bridge |
| P-21-001349 | - | Morningside Drive Bridge | Historic | Bridge |
| P-21-001351 | - | Mountain View Bridge | Historic | Bridge |
| P-21-001353 | - | Pastori Bridge | Historic | Bridge |
| P-21-002278 | - | Home of Lord Charles Snowden Fairfax; Other - Site of Birds' Nest Glen; Other - Pastori Villa | Historic | Single family property; Landscaping |
| P-21-002620 | - | Fair-Anselm Plaza | Prehistoric | Habitation debris |
| P-21-002700 | - | Other - 1509 Sir Francis Drake Boulevard; 7th Day Adventist Church | Historic | Religious building |
| P-21-003010 | - | 1573 Sir Francis Drake Blvd; Other - "Old Timer's Tavern" | Historic | Commercial Building |

| | | | | |
|-------------|---|-----------------|--------------------------|-------|
| P-21-003157 | - | Mount Tamalpais | Prehistoric, Historic | Other |
|-------------|---|-----------------|--------------------------|-------|

3.2 Review of Historical Maps and Aerial Imagery

Dudek consulted historic maps and aerial photographs to understand development of the Project site and surrounding properties. Historic aerial photographs, available from 1946, 1952, 1968, and 1982, and historic topographic maps, available from 1897, 1900, 1905, 1907, 1910, 1913, 1922, 1928, 1932, 1940, 1941, 1945, 1950, 1954, 1955, 1961, 1962, 1966, 1969, 1975, and 1980, were inspected to observe previous development in the Project site (NETR 2026). The 1946 aerial image shows development along Butterfield Road and Rosemont Avenue west of the Project site, and private residences with potential orchards just east of the Project. The 1952 image first depicts a building complex at the location of the Brookside Elementary School within the Project site, and the 1982 image first depicts a parking lot over the western portion of the Project site.

The 1941 topo map is the first to show a detailed view of the Project site, concurring with the aerials in its depiction of Butterfield Road and Rosemont Avenue with several buildings in the vicinity of the Project site. The 1954 topo shows further development in the area along Butterfield Road and Sleepy Hollow Creek. The 1955 topo map is the first to depict structures at the current location of Brookside Elementary School. The subsequent topo maps concur with the aerials and show the continued development of this San Anselmo neighborhood. Brookside Elementary School is the only development depicted within the Project site in both the aerial imagery and topographic maps. No additional development or landscape features within the Project area are discernable.

Since the complex of buildings that is now Brookside Elementary School was first constructed sometime between 1946 and 1952, these buildings meet the Office of Historic Preservation’s (OHP) minimum age standard and may be considered historic built environment resources. These historic buildings do not intersect the Project site, but the adjacent bridge, paved areas, playgrounds, and parking lot are within the Project site’s boundaries. The exact age of the pedestrian bridge is unknown, as it is not visible in the aerial images or topographic maps, however based on the age of the surrounding development, the structure may be old enough to qualify as a historical resource.

3.3 NAHC and Tribal Correspondence

Dudek requested a NAHC search of their Sacred Lands File on February 4, 2026 for the Project site and a ½ mile buffer (Appendix B). Results for this search were provided by the NAHC on February 5, 2026. Results were negative. A list of traditionally culturally affiliated Native American tribal representatives who may have additional information related to cultural resources in the area was provided as part of this search. In the interest of ensuring efficient and direct consultation between the District and tribes, Dudek has not followed up by contacting the tribes directly.

Should the proposed Project be subject to compliance with Assembly Bill 52 (PRC Section 21074), which requires consideration of impacts to “tribal cultural resources” as part of the CEQA process, the CEQA lead agency would be required to notify any groups who are traditionally or culturally affiliated with the geographic area of the Project (who have requested notification) of the proposed Project. Because Assembly Bill 52 is a government-to-government process, all records of correspondence related to Assembly Bill 52 notification and any subsequent consultation are the responsibility of the lead agency.

3.4 Review of Setting and Archaeological Sensitivity

Potential for yet identified cultural resources in the vicinity was reviewed against geologic and topographic GIS data for the area and information from other near-by projects. The “archaeological sensitivity,” or potential to support the presence of a buried prehistoric archaeological deposits, is generally interpreted based on geologic landform, environmental parameters (i.e., distance to water and landform slope), and an area’s history of use.

The Project site is intersected by Sleepy Hollow Creek and is underlaid by Quaternary alluvium and marine deposits. Slopes within the Project site vary from 0 to 9 percent (USDA 2026). There are three soil types mapped within the Project site: Xerorthents, Urban Land, and Blucher series silt loam (USDA 2026). The majority of the Project site (45%) is mapped as Xerorthents, which are extremely shallow skeletal soils (orthents) with limited moisture availability (xeric) that usually form in regions with arid environments and significant erosion (USDA 2026). The Project also has a large percentage (40%) of Urban Land, which are highly variable soils that form in the built environment and are either created or altered by human activity (USDA 2026). Only 2% of the Project site is composed of Blucher series silt loam, which consists of deep, somewhat poorly drained soils formed in alluvium from mixed sources (USDA 2026). Based on how these soils are formed, they have low potential for intact subsurface cultural deposits.

In consideration of this information, the majority of the Project site is considered to have low to moderate potential to support the presence of intact buried archaeological deposits.

4 Results

4.1 Intensive Pedestrian Survey

On February 6, 2026, Dudek archaeologist Victoria Martin conducted an intensive pedestrian survey of the Project site using standard archaeological procedures and techniques that meet the Secretary of Interior’s Standards and Guidelines for cultural resources inventory. Exposed ground surface was observed for surface artifacts, undisturbed areas, archaeological deposits, and historic structures. Periodic boot scrapes were employed to expose additional ground surface. Evidence of artifacts and archaeological deposits were also opportunistically sought after in animal burrows and other areas with disturbed soils. Transects were spaced no more than 10 meters apart and were walked over the entirety of the Project site.

Approximately 60% of the Project site is paved and had no open ground visible. In unpaved areas along the banks of Sleepy Hollow Creek, visibility was still limited to less than 20% due to dense brambles, oak trees, and seasonal grasses. At the time of survey, Sleepy Hollow Creek was low and the creekbanks were easily accessible. Observed soils consisted of grey-brown silty loam with a thick cover of oak duff and grey sandy silt with poorly sorted rounded gravels at the creek bank.

The Project area includes a wooden pedestrian bridge, roughly 42 feet long by 6.5 feet wide, built over Sleepy Hollow Creek. The walking platform is constructed entirely of wooden planks, and the bridge is supported by metal poles and anchored to concrete foundations on either side of the creek. The bridge is in poor condition and is sagging in the middle of the walkway, which can be seen most clearly in the separated wooden supports on the underside of the walkway. Several metal pipes and one PVC pipe are attached the southern side of the bridge.

Immediately north and abutting the concrete foundation on the west side of the creek is a concrete block retaining wall, roughly 12 feet long and obscured by vegetation to the north. On the eastern creekbank, there is a crude retaining wall constructed from logs held in place by heavy metal cable.

Two historic isolates were identified just outside of the Project area during survey, a sherd of white and blue transferware (3x2x0.25") and a fragment of clear bottle glass with the words "SCO DAIRY CO" (1.5x0.8x0.2"). Both isolates were found on the eastern side of the creek bed underneath the pedestrian bridge. The Project site is littered with modern refuse, including cans and plastic food wrappers.

Outside of modern debris, no cultural material was observed, and no archaeological resources were identified within the Project site during the survey.

5 Summary and Management Recommendations

No archaeological resources were identified within the Project site as a result of the current study. No previously recorded, potentially significant resources were identified within the Project site or surrounding area by the CHRIS record search and the NAHC SLF search yielded a negative result. Archaeological survey did not result in the identification of archaeological resources. Both background research and archaeological survey identified extensive disturbance within the Project site. Additionally, the area has low potential for significant resources to be present based on the soils. The exact age of the bridge was not determined, however there is the possibility that the structure is old enough to qualify as a historic built environment resource. Accordingly, it is recommended that the bridge be assessed by a qualified architectural historian. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during Project construction are provided below.

5.1 Unanticipated Discovery of Archaeological Resources

All employees should be alerted to the potential to encounter archaeological material. In the event that cultural resources (sites, features, or artifacts) are exposed during work activities for the proposed Project, all ground disturbing work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Significance shall be assessed by the qualified archaeologist pursuant to CEQA requirements (14 CCR 15064.5(f); PRC Section 21082) prior to making a determination regarding if/when further earth-disturbing activity may occur in the area. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

5.2 Unanticipated Discovery of Human Remains

Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the potential remains are human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, the County Coroner shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant (MLD) of the deceased Native American. The MLD shall provide recommendations on next steps after being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

If you have any questions about this report, please contact me at nhanten@dudek.com

Sincerely,



Nicholas Hanten, MA, RPA
Archaeologist

cc: Adam Giacinto, MA, RPA, Dudek
Att: NADB Information
Appendix A: Figures
Appendix B: NWIC Records Search Information (Confidential)
Appendix C: NAHC SLF Search

References Cited

NETR (National Environmental Title Research LLC) 2026. *Historic Aerials*. Accessed January 22, 2026.

<http://www.historicaerials.com/>.

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National Archaeological Database (NADB) Information

Authors: Victoria Martin, MA, RPA; Nicholas Hanten, MA, RPA; Adam Giacinto, MA, RPA

Consultant Firm: Dudek

Project Name: Brookside School Pedestrian Bridge Replacement

Project Proponent:

Report Date: March 2026

Report Title: Archaeological Resources Letter Report for the Brookside School Pedestrian Bridge Replacement Project, San Anselmo, California

Type of Study: Intensive Archaeological Inventory

Resources: None

USGS Quads: San Rafael, CA

Acreage: Approximately 0.1

Lead Agency: Ross Valley School District

Keywords: Ross Valley School District; Brookside Elementary School; Intensive Pedestrian Survey

Appendix A

Figures



SOURCE: Esri World Imagery; Open Street Map 2023; USGS NHD 2026

DUDEK



0 50 100
| Feet

FIGURE 2
Vicinity Map

Brookside Elementary School Pedestrian Bridge Project

Appendix B

NWIC Records Search Information (CONFIDENTIAL)

Appendix C

NAHC SLF Search

**NATIVE AMERICAN HERITAGE COMMISSION**

February 5, 2026

Victoria Martin
Dudek**Via Email to: vmartin@dudek.com**CHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Isaac Bojorquez
Ohlone-CostanoanPARLIAMENTARIAN
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Stanley Rodriguez
KumeyaayCOMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño IndiansCOMMISSIONER
VacantCOMMISSIONER
VacantEXECUTIVE SECRETARY
Andrew Alejandro
Paskenta Band of
Nomlaki Indians**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov**Re: Tribal Consultation Under CEQA, Brookside School Pedestrian Bridge Replacement Project, Marin County**

To Whom It May Concern:

Pursuant to your request, attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Additionally, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on the information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

Additionally, the NAHC recommends that agencies include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File check conducted through the Native American Heritage Commission.

4. Any ethnographic studies conducted for any area including all or part of the APE; and
5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why consultation is vital.

This information will aid tribes in determining whether to request formal consultation. If consultation is requested, having the information beforehand will help to facilitate the process.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions or require additional information, please contact me at Mathew.Lin@nahc.ca.gov

Sincerely,

Mathew Lin

Mathew Lin, MPP
Cultural Resources Analyst

Attachment