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Richard Grasseti  
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7008 Bristol Drive  
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December 16, 2009

Dear Mr. Grasseti:

RE: REVIEW OF THE AUGUST 6, 2009 ORIGER REPORT FOR THE ARTESA/FAIRFAX  
TIMBER HARVESTING PLAN, SONOMA COUNTY, CALIFORNIA

At your request I have completed a review of the most recently submitted archaeological report for the Artesa project. Authored by Thomas Origer, it is entitled "an Archaeological Survey Report for the Artesa/Fairfax Timber Harvesting Plan Sonoma County, California. It was logged into the Northwest Information Center in Rohnert Park on December 1, 2009, file no. S-36197.

This letter is my second review of archaeological field documents produced for the Artesa project since 2000. On July 21, 2009 I supplied your office with a review of the extant reports produced by Max Neri and Thomas Origer, done over a period beginning in 2000 and extending into 2008 when Tom Origer had taken over the archaeological research.

Up through 2008 Mr. Origer had been tasked with reviewing the original Neri findings and was asked to re-inspect some of his recorded site locations in order to evaluate them for National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) eligibility. Mr. Neri had found a series of prehistoric and historic sites and several isolated artifacts and what he called "Noted finds". In the end Mr. Origer concluded that only 4 of Neri's original 6 archaeological sites were potentially eligible for inclusion on the NRHP and/or CRHR, and in testing one of them, Artesa-6/H, concluded that only portions of it were potentially eligible. By 2008 the timber harvest plan had been crafted to protect all of these locations from destruction.

The conclusions of my review of the original Neri reports was that the property hadn't been adequately surveyed, and that further archaeological field inspections might lead to an expanded inventory of both historic and prehistoric cultural resources. Up through the summer of 2009 it appeared that there had been no further effort to re-inspect the property.

In fact, it turns out that around the time I contacted Mr. Origer for my July report, he had

been retained to re-inspect the entire project area. I have reviewed the new Origer report on file at the NWIC. It includes a summary of all of the previous report and contains archaeological site forms produced either by Neri or Origer through the summer of 2009. In the summary of findings presented below, I am unable to cite page numbers, since the copy of the current Origer report on file at the NWIC lacked either a table of contents or page numbers.

It is clear from the most recent report that Mr. Origer did in fact complete a comprehensive re-survey of the entire project area, re-inspecting the original discoveries of Mr. Neri, and recording additional historical resources which will be discussed below. The report once again presents evaluations of NRHP and/or CRHR eligibility for the resources discovered either by Neri or Origer.

In the original two Origer reports, he recommended that the significant archaeological sites (Artesa 01,02,04, 05) be protected, and it appears that plans then available showed them protected behind fences and/or in open space areas. His 2008 report also contained a comprehensive set of protection measures to assure that they would be preserved, and to insure that archaeological mitigation (data retrieval) be done in those instances when they couldn't be preserved and/or when new, unexpected materials were encountered during construction outside of the mapped locations of the inventory as it was understood by 2008.

The latest Origer report contains a summary of the original Neri report findings, along with the findings of Origer's re-inspection and/or evaluation of the significance of these finds. In addition it discusses new materials found by Origer during his re-survey this summer. These are summarized below:

#### ARTESA PARKING SITE

This site was judged to be potentially eligible for inclusion on the NRHP and CRHR. Evidently plans for construction in the general area weren't known by Mr. Origer when he wrote the report—he ends his discussion about it with the following “If development is planned in the area of this site it should be evaluated”.

#### BAILING WIRE SITE

This site was also deemed potentially eligible for listing. While he was under the impression that it was in an excluded (protected) area, he recommended that it be evaluated if this turned out not to be true.

#### ARTESA CROSSING SITE:

This site was also thought to be eligible for listing. If it couldn't be preserved, evaluation was recommended.

#### END OF DAY SITE

This site was also potentially eligible for listing. If protection couldn't be assured, evaluation was

recommended.

#### ARTESA FENCE FRAGMENTS

Origer's assessment after recording these remnants was that they were not eligible for listing, and not worthy of further evaluation.

#### ARTESA ROAD

This site was thoroughly recorded by Origer, and deemed not eligible for listing. No further evaluation was recommended.

Origer's original assessment of the Neri discoveries are once again presented, with no changes, with the exception of Artesa 6/H, where he did additional work, and found elements (historic sheet scatters and dump sites) which by themselves would be eligible for listing. Once again, no further work was recommended at this location because the area had been excluded for development by 2008. In this past summer's work, Mr. Origer also had considerable contact with Native American representatives, who discussed his findings and recommendations with him and evidently supported them.

#### DISCUSSION

As of August 6, 2009, the date of the latest Origer report, the author did not know what was going to happen regarding potential project development on the above mentioned archaeological sites which he felt were potentially eligible for inclusion on the National Register and the California Historic Register. His report was restricted to a recommendation that evaluation (normally done through hand excavation) be done of the resources if avoidance of damage to them couldn't be guaranteed. If evaluation is done which demonstrates eligibility, then the project sponsor is responsible for coming up with a mitigation plan.

By the time the 2008 report was produced by Origer, he had been assured that the resources found eligible by him would be protected from any project related destruction. In the event that additional resources were found, or inadvertent damage was done to the eligible resources, the Origer report contained a list of mitigation requirements which included additional data retrieval through hand excavation.

The latest report also includes a comprehensive section entitled Protection Measures. As for the potentially eligible newly recorded resource areas, Mr. Origer did not make any recommendations other than the need to evaluate them (through excavation) if they couldn't be protected by the project sponsor. Given the above, it is my opinion that the EIR now in circulation is not complete, since it lacks the following:

- Ô any discussion of the newly discovered cultural resource areas
- Ô any discussion or demonstration that they are being preserved by project redesign
- Ô any discussion of their CRHR or NRHP eligibility based upon evaluation (excavation) work done since their discovery, necessary if preservation can't be assured.

Ô any meaningful discussion of relevant mitigation measures (such as additional hand excavation to retrieve data) based upon the evaluation reports, assuming that the resource areas can't be preserved from harm.

Sincerely,

Miley Paul Holman  
Holman & Associates