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"SINCE THE BEGINNING"

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July 21, 2009

Grassetti Environmental Consulting
7008 Bristol Drive
Berkeley, CA 94705

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Dear Mr. Grassetti:

RE: REVIEW OF THE CULTURAL RESOURCES SECTION OF THE ARTESA PROJECT DRAFT EIR

At your request I have completed a review of the cultural resources section of the Artesa Draft EIR produced by Raney Planning and Management, Inc. The studies cited include the original study done by Max Neri in 2001 and 2004, and two subsequent studies done by Tom Origer & Associates in 2006 and 2008. The cultural resources section summarizes the findings of the original Neri reports during which he recorded a total of 6 archaeological and/or historical sites, and then presents work done by Origer over a subsequent two year period at the locations of most of the archaeological sites recorded by Neri.

For the record I have not reviewed any of the original reports, rather just the summary presented in the EIR. The summary states that Neri conducted a complete inspection of the project area, resulting in the recording of specific resource locations. There is no mention of what if any mitigation measures were developed from the Neri studies.

By 2006 however, the issue of how to mitigate impacts to the recorded cultural resources was important: Tom Origer was retained twice to re-inspect the locations of the Neri work. Origer returned to the locations of Artesa-02,03,05 and 06/H to accurately record their aerial extent and depths, and to conduct minor archaeological excavations to provide a partial evaluation of their scientific worth: were they eligible for inclusion on the National Register of Historic Places and/or the California Register of Historic Resources?

The EIR states that the Origer work resulted in the elimination of two of the original sites, Artesa-03 and 06/H based upon their lack of significance. The EIR goes on to state in the mitigation section that further impacts to the significant sites will be avoided: in consultation with an archaeologist, buffer zones would be created around the recorded site locations and a program of archaeological field monitoring during construction would be done to insure that the recorded sites would be protected, and that any new discoveries during construction would be identified, evaluated and impacts mitigated according to CEQA guidelines.

By the time I had finished reading the summary, I was confused about the nature of the work done on site by Mr. Origer. Did he actually go back and re-survey the entire project area, or was his work restricted to a re-inspection of the resource areas first noted by Neri? Mr. Origer did do some additional historical archival research which resulted in the discovery of additional possible residential sites near the saw mill, and his testing in the vicinity of the saw mill turned up evidence of historic archaeological materials: sheet scatters and possible dump areas were identified. The EIR summary dealt with the possibility of the discovery of additional historical material by developing mitigation measures which required the development of a monitoring plan: should anything be found during construction related monitoring, CEQA required archaeological evaluation and mitigation measures would be followed to reduce impacts to a less-than-significant level.

I called Mr. Origer to discuss the mitigation measures of the summary with him and to ask if he had conducted a complete re-inspection of the project area to search for additional unidentified archaeological resource areas, both prehistoric and historic in nature. Mr. Origer commented that the mitigation measures, as currently written, sounded adequate. He also denied that he had been retained either in 2006 or 2008 to conduct a re-inspection of the entire project area—his work up to that time was restricted to obtaining additional information about the resources originally recorded by Neri for planning purposes. According to the summary, the sites Artesa-01,02,04 and 05, all of them eligible for inclusion on the California Register, would be protected by avoidance. The two sites found ineligible by Origer (03 and 06/H) would not be protected along with several areas where he had found small amounts of stone artifactual materials. The summary’s monitoring plan would handle the identification, evaluation and mitigation plan for any new resources which might be found during grading operations.

My principal concern with the EIR summary is its implication that the property has been adequately inventoried for both historic and/or historic resources to date, and that based on the existing archaeological record, any additional discoveries of cultural resources can wait until archaeological monitoring is done during construction.

I have problems with this assumption for a number of reasons:

- There is no way presently to gauge the effectiveness of the Neri survey done in 2001 and 2004. Did he do a credible enough job to identify in particular all of the prehistoric site locations inside the project borders? A review of his original reports may contain sufficient information to judge the adequacy of his effort, but I suspect it won’t be found there.
- I have looked at maps of the area, and have some personal experience with the Annapolis area. The current project area is covered in large areas by duff and other forms of dense vegetation. It is my experience that a visual reconnaissance, not augmented by some form of mechanical removal of the ground cover, would cause a field archaeologist to miss the more subtle archaeological site indicators which might exist inside the project area: Neri did record several examples of “flake scatters” which were confirmed by Origer during his subsequent visits. Origer, however, utilized shovel test units (stu’s) and other forms of excavation to both test these deposits and to better define their aerial extent. I believe in all of these cases, the Origer studies led to the development of maps which showed the deposits to be larger than originally recorded.
- Finally, almost 9 years have passed since the initial Neri study. In that time, field conditions could have changed dramatically which would facilitate new discoveries. A new

comprehensive field inspection of the entire project area is more than likely to define additional prehistoric deposits at a minimum and possibly add to the inventory of historic deposits. I don't know of a survey of a problematic area like Artesa (due to the extent of ground cover over native soils) where a re-survey years later didn't increase the archaeological inventory. I think every professional archaeologist in Northern California has experienced this when his or her work was done over by someone else years later. Certainly it has happened to me.

The types of archaeological sites re-inspected by Origer appear to be thin deposits of archaeological materials suggesting that activities in addition to the production or modification of stone artifacts was on-going. The ground stone suggests that a more varied form of habitation was taking place in prehistoric times. Since only one of the original sites (Artesa-01) showed a real deep deposit, I must assume that the project area could contain additional examples of the shallow multi-use archaeological deposits similar to those re-examined by Origer. Making use of the gentle slopes of the project area, the Native population could have moved camp sites frequently, leading to the development of large but thin deposits of archaeological material.

It is important that the testing done by Origer found that the three "scatters" found by Neri were eligible for inclusion on the California Register and worthy of protection as individual resource areas. If a new comprehensive field survey of the project area were done and additional examples of these types of resource areas were discovered, there may be a sufficient number of them to warrant recording them along with the existing prehistoric resource areas as an archaeological district, rather than as individual and unrelated examples of prehistoric use.

In short, I don't think that the existing inventory of the property is adequate to justify the mitigation measures currently in the draft EIR. A more systematic survey should be done to complete the inventory and to determine if there is grounds to define an archaeological district. Additional discoveries should not be limited to archaeological monitoring of construction activities, since this approach could ultimately result in the easily avoided destruction of the resources.

If an archaeological district can be justified, this may also require a change in the existing mitigation measures. For example, additional discoveries may not be avoidable by the project development, requiring in-field evaluation to devise responsible mitigation measures. Individual archaeological sites tend to require mitigation specific to that location, without consideration to the potential larger constellation of archaeological resources. In the case of an archaeological district, the sum of the parts is larger than the total (or however that is said?)—the required testing and mitigation strategy required by CEQA could be considerably different than that presented in the current draft EIR, which would nullify the existing mitigation approach.

Sincerely,

Miley Paul Holman
Holman & Associates