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Deputy Director
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Dear Mr. Robertson,

I am a professional archaeologist with long-standing interest in the history and archaeology of the Pomo people of northern California and more specifically, Sonoma County. As a long-term former resident of Sonoma County and then as a landowner in the Salt Point area since 1979, I have maintained my interest in Pomo history during the years as I have followed an international career in heritage management and archaeology. My experience in cultural heritage assessment is extensive, starting with my service as State Archaeologist and State Historical Preservation Officer (SHIPO) of Idaho (where I read and assessed hundreds of EIRs) and continuing over the years with service on the Rhode Island Preservation Commission and RI National Review Board. I have worked both domestically and internationally for decades to enhance the quality and methods used in heritage assessment. As a neighbor to the Fairfax Conversion Project (SCH# 2004082094), my curiosity was naturally piqued about the potential impact on cultural resources. Consequently, I obtained a copy of the DEIR and also made a site visit to adjacent properties, with the permission of property owners, to examine the contexts in which the archaeological assessments were conducted.

My following remarks are divided into three sections. The first deals with archival resources and what they have to tell us about the location of important prehistoric and historic settlements in the area. The second section focuses on the knowledge that local citizens have about archaeological locales within an environment they have intimately known for decades. The third section examines the assessment methodologies and the proposed mitigation plan for archaeological resources.

Archival Sources

An examination of the anthropological literature, something that is not manifest in the DEIR, reveals that the Annapolis is a rich and hugely significant historical zone. It is perhaps one of the most extensive settlement areas associated with the Kashaya Pomo, a phenomenon that is documented by Samuel Barrett (1908), a UC Berkeley anthropologist who focused considerable attention on the Pomo, their language, and their historical communities. Using the testimony of living informants at the turn of the 20th century, Barrett recorded detailed testimonies about the locations of numerous Pomo settlements and encampments in northern California, including what he called the Gualala Division. A short review of these historical communities, many of which have their origins in great antiquity, is pertinent given the importance of the Barrett evidence. Barrett mentions a number of village sites, many of which cluster in the general Annapolis area. Among these are:

- Kōba'te: “on what is known as Biddle ridge north of the middle fork of Gualala river and at a point probably about two miles northeast of the confluence of that stream with the main branch of Gualala river” (Barrett 1908:225). These approximate distances would place the site on the northern outskirts of today’s Annapolis, within the orbit of the Fairfax Conversion.
- Ca'mlī: “in the mountains immediately north of the middle fork of Gualala river and at a point probably about three miles a little north of east of the confluence of that stream with the main branch of Gualala river. (Barrett 1908:225). The description provided by Barrett places this village site in general zone of the Fairfax Conversion.
- Ma'kawica:”in the mountains immediately north of the middle fork of Gualala river and at a point probably about a mile and a half a little north of the old village of Kōba'te. The site is about midway between Buckeye creek and the middle fork of the Gualala river” (Barrett 1908:225). Barrett’s description of this site places it in the zone of the Fairfax Conversion.¹

This extensive array of settlements documented by Barrett is one of the densest and most significant, interactive clusters of human habitation along the Sonoma coastal hinterland. It is puzzling that such critical evidence has not been mentioned, or given the prominence that it deserves in an assessment of cultural resources. Clearly, the Annapolis area is an archaeological zone of great importance, holding a priceless record of prehistoric and historical life on the Sonoma Coast hinterland.

The DEIR mentions only one historically documented site, quoting from the Neri report (Gifford and Kroeber 1939)—that the site of Kaba'tūi may have been in the vicinity of the Fairfax Conversion. Barrett has more to say about this settlement, referring to it as an encampment, viz: “in the mountains north of the middle fork of Gualala river and at a point about a mile and a half northwest of the old village of hībū'wī” (Barrett 1908: 226).

¹ The Barrett estimates are just that—estimates. While not precise, they do show that these sites bracket the development area, with some possibility that part of one may be located within the Artesa property. Cumulatively, this evidence is critical for demonstrating that the Beatty Ridge area is a highly sensitive cultural zone.

While the particular location is vague, it nonetheless amplifies the earlier point that this is a rich archaeological zone.

This quick review leaves one with the distinct impression that there has been a failure to incorporate key and very significant archival information about the prehistoric and historic settlements of the Kashaya Pomo people in Sonoma County. This does not meet professional standards. EIRs must show full and complete archival research that is comprehensive and exhaustive. This has not occurred in this case, and this failure is a major problem that may have significantly biased the assessment of cultural resources on the Fairfax Conversion. The extensive archival records indicate that there was every reason to use the most rigorous scientific inquiry possible to assess the significance of archaeological resources in the development zone.

Interviews with Local Residents

On July 23, 2009, I visited Annapolis and conducted oral interviews of local residents as well as visited several areas of archaeological interest contiguous to the Artesa property. According to one well-informed resident, there are at least four archaeological locales within 200 meters to the south of the Artesa-01 site (and in all likelihood, there are additional locations contiguous to the spring seepage in the vicinity). Using information recorded over the years by local informants, a map of observed archaeological resources shows ten (10) archaeological locales² either on the Artesa property or immediately contiguous to it.³ The likelihood of additional locales in the immediate area can only be ascertained through a systematic sampling program.

Archaeological Resources and the DEIR: Methodology and Mitigation Protocols

I present here summary remarks and evaluations on the assessment methodologies and the planned mitigations for cultural resources within the Fairfax Conversion. Let me start with what appears to be a fundamentally flawed methodology used in the assessment, something that subsequently influenced the proposed mitigation. I will first address the assessment methodologies and then the mitigation protocols.

Assessment Methodologies

It is not apparent why the post-Neri investigations by Origer and Associates were restricted, with the exception of sites-01 and -04, to sites documented by Neri. There are numerous warning signs in the Neri reports as quoted by Origer. For example, it is mentioned that “Ground visibility was generally fair in the wooded areas, and fair to poor in the grassy meadow areas. Numerous roads and skid trails were present throughout the wooded and grassy areas and provided the best opportunity for observing project soils.

² The term locale is used because there has not yet been a formal archaeological determination, using the criteria in the DEIR, of “site” status. Most, however, appear to meet such criteria.

³ For reason of confidentiality, I have not included this map in these comments. It is available by special request to authorized agencies.

The areas of high archaeological sensitivity were investigated completely using pedestrian transects spaced between 20 and 30 meters, and random hoe scrapes” (DEIR 5.3:17). Fair to poor ground visibility in an area with sometimes deep duff compels methods that go much further than random hoe scrapes. Additionally, the bias introduced by depending on roads and skid trails for surface exposures is problematic. Finally, the use of transect intervals and locations are vague and imprecise. Given that there are no indications of a scientifically adequate survey method used by Neri, restrictions on the scope of the Origer investigations—to documented only designated sites—were inappropriate, simply amplifying the idea that the Neri-designated resources are the only archaeological resources present on the parcel.

Given the archaeological importance of the Annapolis area and the demonstrable failure to conduct a rigorous scientific assessment of heritage resources on the Artesa property, additional assessment using much more rigorous methods is imperative. At a minimum, in an area that has been subjected to mechanical alterations in the past (such as cut and fill), low-impact, sub-surface investigations are compelling. I strongly recommend a complete re-evaluation of the methodology to incorporate scientific standards that will ensure that sites are less likely to be overlooked because of low visibility on the surface. Using the principles demonstrated by Handsman and Lamb (1995), sampling transects in contexts with smaller sites must be responsibly spaced, e.g., 10 meter intervals, possibly less. Moreover, sampling methods should incorporate sub-surface examination on a flagged grid in a manner that has low impact, e.g., bucket augers, with provisos to expand assessment using STUs to confirm auger results. Furthermore, in such a sensitive setting, there is a strong justification for the use of remote sensing, possibly a magnetometer transect survey, to locate areas of human habitation that involved burning, e.g, burned rock (chert processing), hearths, and other such features.

Mitigation Protocols

The DEIR presents mitigation protocols [3.5-3(a)] for archaeological sites that require a Pomo tribal representative and a consulting archaeologist to be present during “grading” activities, but it unfortunately fails to require that such representatives be present during ALL earth moving activities. Moreover, the mitigation protocols stipulate that machine operators will be trained to recognize artifacts and will report any findings to said representatives. These are not adequate protocols. The mitigation fails to mention that vineyard conversions entail deep ripping of the soil, a ground-disturbing process that instantaneously destroys the integrity of archaeological sites, particularly smaller sites with low visibility. In such a sensitive cultural context, monitoring *alone* without rigorous and systemic survey, poses high risk to sub-surface archaeological resources—a risk that can be significantly reduced by employing sub-surface testing during a new survey assessment. Monitoring should be seen as a secondary, back-up protocol to more intensive sub-surface investigations.

Secondly, the idea that machine operators will be objective observers of archaeological objects ignores a strong conflict of interest that such individuals have as employees of contractors working for the developer [protocol 3.5-3(b)]. It also questionably assumes

that such individuals can observe small objects in the midst of dust and moving earth while mounted on large machines. Assuming that monitoring has a back-up role to play in such a sensitive archaeological zone, the consulting archaeologist(s) and Pomo tribal representative should be present at all times in the location of each operating machine.

After having read the DEIR, and having observed the Artesa-01 site from continuous property, it is not clear why sub-surface investigations did not occur on the periphery of this site, given its size and argued importance. The demarcated limits must be seen as just that—preliminary and tentative—until such time as a systematic sub-surface inquiry can define its precise extent and ancillary remains such as residences. Middens in this region have been shown to be spatially related to residential units; this site likely does not stand alone, but is rather a part of a larger array of satellite sites. Additional assessments are also suggested in light of the questionable mitigation suggested for seasonal road use in the area.

Concluding Observations

- There are hearsay accounts circulating that additional sites have been discovered on the Artesa property in Annapolis since the DEIR was published for comment, and if such reports are accurate, this additionally points to deficiencies of the survey and sampling strategies thus far employed.
- The DEIR treatment of archaeological resources treats each of the defined sites as discrete rather than part of a larger constellation of sites through deep time, with perhaps strong social interaction during historic times. Provisionally, it would appear that the local documentations, the evidence from Samuel Barrett's 1908 listing of Pomo sites, and the preliminary and incomplete DEIR evidence all point to the very real possibility that the Artesa property or Fairfax Conversion is located in the midst of a significant complex of Native American archaeological sites. This in turn suggests that all concerned parties should be considering *an archaeological district* for nomination to the National Register of Historic Places (NRHP), a process that automatically leads to listing on the California Register of Historical Resources (CRHR).
- Finally, the Artesa sites are of great interest to Goal OS-9 of the Sonoma County General Plan, viz: Preserve significant archaeological and historical sites, which represent the ethnic, cultural, and economic groups that have lived and worked in Sonoma County. In the larger scope of opportunities to address the long-marginalized history of Native peoples in Sonoma County, the archaeological resources on the Artesa property and surrounding properties provide an unusual opportunity to preserve and expand knowledge about a little known past that continues to suffer rapid erosion.

Should you like additional information or want to discuss my comments, I can be reached at schmidtp@ufl.edu. Until August 4, I can be contacted at (707) 847-3838.

Yours sincerely,

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Professor of Anthropology and Archaeology
University of Florida

Cc: Reno Franklin, Tribal Historic Preservation Officer, Stewarts Point Rancheria

Additional Sources Cited

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