

October 29, 2003

Ron Metzler
Vice President, Planning and Development
Shea Homes
603 South Valencia
Brea, CA 92823-6346

Subject: Revised Cultural Resource Compliance Proposal for Coastal Development Permit
Application 5-03-029, Parkside Estates, City of Huntington Beach, California

Dear Mr. Metzler:

This letter responds to the proposed subsurface testing plan suggested within the "cultural resources" section of the California Coastal Commission letter of February 21, 2003, regarding CDP application 5-03-29 (Parkside Estates).

Sites CA-ORA-1308 and CA-ORA-1309 were discovered in 1991 and were originally reported as "possible" or "potential" archaeological sites based on the presence of an apparent concentration of shell (de Barros 1992). The status of the sites as actual archaeological deposits was questioned due to the lack of artifacts or midden soils. As stated by Dillon (1997:64), "If either or both sites can be determined as non-archaeological, then it ceases to have archaeological site status and as a consequence need not be mitigated in any way." Dillon continues by saying, "My initial impression of both sites was that they were amongst the worst candidates for archaeological site status of all the potential sites I have seen in California during 25 years of experience in archaeology." Dillon ultimately accepted their status as potential archaeological sites based on four lines of evidence briefly summarized below:

- Shells of multiple habitats are present and the bivalves present are not articulated.
- Presence of the shell concentration in a rather homogeneous area.
- Deposits do not appear to be spoil from the Wintersburg Channel based on comparisons with known spoils from that channel.
- Presence of a "ghost channel" in the vicinity of the deposits that may have acted to attract Native Americans to the area.

Dillon additionally discusses three hypotheses for non-archaeological deposition of the shell concentrations and then lists reasons he does not believe those hypotheses explain the sites.

10/29/03<<P:\SHO331\RevTest Proposal.wpd>>

Ultimately, however, no actual research has been done to quantitatively evaluate the nature of these deposits. In September 2003, LSA archaeologists Deborah K.B. McLean MA, RPA, and Ivan Strudwick MA, RPA, visited the project area and examined the mapped locations of the two archaeological sites. The entire lower elevation of the property is in active agricultural use, and the area had been recently planted, so surface visibility was over 98 percent for the lowland areas. While very limited shell was noted in the "site" area, similar shell fragments were also noted throughout the field. As discussed by Dillon and others, continuing agricultural activity on the parcel can be expected to change the surface manifestations of the site, and could also result in distribution of shell throughout the parcel. During the LSA field visit, distinct areas that exhibited higher shell concentrations could not be identified when compared with the "background noise" of shell distributed over the entire agricultural field. Throughout Dillon's analysis, and the analysis of de Barros (1991) and OCEMA (1996), one potential causal factor for the shell concentrations was not discussed. Farmers will often add shell to soil in areas as a soil amendment. It is herein postulated that another possible agent for the deposit could be from agricultural use of the area.

Shea Homes received a letter from the California Coastal Commission (CCC) dated February 21, 2003, which indicates that testing of the archaeological sites would be required to determine their importance (eligibility for listing on the California Register of Historical Resources), and that this testing program would require a separate Coastal Development Permit (CDP). This is consistent with the guidelines of the CCC for archaeological resources as adopted December 16, 1981. However, pursuing a CDP for archaeological testing presupposes that the shell concentrations actually represent archaeological sites, a conclusion that has not been supported by scientific research.

LSA is proposing to confirm whether or not the two shell concentrations represent archaeological deposits. We recommend researching this question through two experiments. The first will involve developing a statistical analysis of shell concentration within the areas described as CA-ORA-1308 and CA-ORA-1309 against other areas of the parcel and portions of nearby CA-ORA-83. Three randomly placed 1x1 meter squares will be placed on each of the three "sites" and in "non-site" areas. All shell fragments on the surface within these survey areas will be identified and counted, and a statistical comparison of the shell concentrations at each area will be conducted. Results are hypothesized to show that the density of the two small "sites" falls far short of that of CA-ORA-83, and in fact is statistically identical to the "non-site" areas, thus precluding CA-ORA-1308 and CA-ORA-1309 from being shell midden sites.

The second analysis will involve excavation of numerous four-inch auger holes in the areas described as CA-ORA-1308 and CA-ORA-1309. Total ground disturbance for the augering program will be kept below two square meters. All sediments from the augers will be screened and the concentrate examined for ecofacts and artifacts that would help to prove whether these concentrations represent actual archaeological sites. LSA believes that this work should be considered archaeological reconnaissance, which does not require a coastal development permit. As described in the 1981 Statewide Interpretive Guidelines, "Occasionally the reconnaissance will require some subsurface testing to determine or confirm the presence of an archaeological resource."

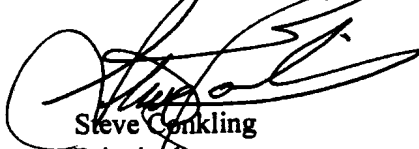
Based on analysis from the two experiments, LSA will be able to make one of three recommendations:

- The deposits do not represent unique concentrations of shell that can be attributed to Native American activity (i.e., the concentrations at the "site" locations are not statistically different from the background concentration of similar shell throughout the parcel).
- The results of the experiments remain inconclusive.
- The sites are proven to represent archaeological sites.

If the first conclusion can be supported, LSA recommends that no further cultural resource compliance work be completed for these areas and the project be allowed to proceed through the overall CDP process. If the other two conclusions are made, then further testing of the deposits will be required to evaluate the importance of the sites and allow recommendations as to their eligibility for listing on the California Register of Historical Resources. The further work to evaluate the sites will probably require development of a separate CDP as outlined in the CCC letter of February 21, 2003. LSA is prepared to initiate work on this process upon the authorization of Shea Homes. If you have further questions, or if LSA can provide any further support of your efforts, please contact me at (949) 553-0666 or by e-mail at steve.conkling@lsa-assoc.com.

Sincerely,

LSA ASSOCIATES, INC.



Steve Conkling
Principal
Cultural and Paleontological Resources Group