

Humboldt Wind Energy Project Planner
County of Humboldt Planning Department
3015 H Street
Eureka, CA 95501

June 10, 2019

I am a retired professor of anthropology and archaeology from Michigan State University with more than 40 years of teaching experience in those fields. Since the 1960s, my field of research has been California archaeology. I am co-author of one of the first syntheses on the subject, *The Archaeology of California*, published in 1984, and one of the founders of the Society for California Archaeology.

I am writing in regard to Section 3.6 of the Humboldt Wind Energy Project Draft EIR, concerning the significance of potential Native American prehistoric and historic sites in the Monument Ridge and Bear River Ridge areas where wind turbines are being proposed. I would like to discuss some archaeological research in Yurok territory that I conducted in the Siskiyou Mountains that has relevance to the Monument and Bear River Ridge areas in Wiyot territory.

In 1978 I led a research project for the proposed Gasquet-Orleans (G-O) Road across the Siskiyou Mountains. Logging companies wanted to build a road to open the area for timber harvesting. Seventeen alternate routes were proposed, with the proposition that at least one of them might avoid legally-protected archaeological sites. I brought a crew of twenty archaeology students from Michigan State University to examine all the proposed routes to see if any of them might be built without destroying archaeological sites. Our crew was accompanied by an observer chosen by the Yurok Tribal Council, James Stevens, to make sure we respected cultural remains. None were affected by our studies. We discovered and recorded more than 80 Yurok sites in the area. Our surveys determined that every proposed route would damage archaeological remains and the G-O Road was not built.

Several sites found along the crestlines of the Siskiyou Mountains are likely relevant to any evaluation of the Monument and Bear River Ridge as a location for wind turbines. Section 3.6 of the Humboldt Wind Energy Project Draft reports that several archaeological sites were recorded in the region, although none were reported along the crestlines. In the Siskiyou Mountains, a comprehensive on-the-ground site survey found about a dozen sites along precipitous mountain crestlines. Some were religious sites marked by stone circles (called tseksels), built for ritual purposes. Such religious sites were located in very high places—such as mountain crests--where sweeping, unobstructed views could be had of the surrounding landscape. It was here that men and women came for meditation and renewal, or to mark important coming-of-age ceremonies. Sites on mountain crestlines also provided a view of such landmarks as Mount Shasta, held sacred by many California Indian groups, including the Wiyot.

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Other crestline sites were campsites for hunters, who made or modified stone tools on site and butchered game animals. Much of this information was recorded by the ethnographer Alfred Kroeber, who published it in his classic *Handbook of the Indians of California* (1923).

The Monument and Bear Ridge area is partly in the traditional region of the Wiyot, and partly in that of the Sinkyone. Although they do not belong to the same language group as the Yurok, they shared similar cultural and ecological patterns. It is likely, therefore, that important archaeological religious sites may well exist along the crestlines and upper slopes of Monument and Bear River Ridges. One way to find out is to look for them.

The Humboldt Wind Energy Project DEIR does not indicate whether this area has been systematically surveyed for archaeological remains. Since the proposed wind turbines are very large and the impact of installing them will have a substantial impact on the landscape, it is necessary to conduct a comprehensive archaeological survey of the entire project area, and not just the footprint where each turbine and its compaction zone will be located. It must also include the areas ridgelines and side slopes and the 100-foot-wide, 25-mile-long swath created when trees and vegetation are cleared so that lines can be erected to deliver power to the Bridgeville substation--and all the ancillary areas affected by the project.

For example, access roads up to 100 feet wide are proposed from Highway US 101 up to the ridges so that massive trucks, weighing 100 tons or more, can haul segments of the huge wind turbines to the ridge-top construction sites. As many of 60 such massive turbines are proposed. The roads will follow the Bear River for several miles. River terraces have been a favored site for many Native American historic and prehistoric villages, so road construction and use could destroy or damage such sites, if they exist.

There is no evidence that this area has been systematically surveyed for archaeological remains, but such surveys must be done for legal as well as ethical reasons. Since such sites are protected under law, it should be necessary to comply with these laws, laws that prohibit sites from being damaged or destroyed. I therefore strongly propose that appropriate archaeological surveys be conducted of the entire project area to determine that no such destruction will take place, in compliance with California and federal laws that protect such sites.

If no such surveys are undertaken, I cast my vote for Alternate 1, the “No Project” option, as outlined in the DEIR.

Sincerely,

Dr. Joseph L. Chartkoff
Professor Emeritus
Ferndale, California



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(Cont.)