

THE CALIFORNIA HERITAGE MANAGEMENT PLAN:

LESSONS FROM DEVELOPING

THE SANTA BARBARA COUNTY PILOT PLAN

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ABSTRACT

In a pilot program funded the the California Office of Historic Preservation, archaeologists and historians with interests in the cultural resources of Santa Barbara County recently attempted to develop a regional element of the California Heritage Management Plan that could serve as a model for other regions of the state. While aspects of the resulting element are actually in use in Santa Barbara County, the element is too incomplete to serve as a model for other regional plans. Still, it provides some lessons and insights important to the ongoing efforts to develop a state plan.

INTRODUCTION

During the last five years the California Office of Historic Preservation (OHP) has initiated efforts to develop a state plan for managing California's diverse cultural resources. Such a plan is mandated by National Historic Preservation Act if states are to receive federal matching funds for historic preservation. Seeing that planning efforts by states was sporadic and unsystematic, the Department of Interior, through its Division of State Plans and Grants, issued in 1980 a publication that presents a model for the development of state plans (HCRS 1980). This model, referred to as the Resource Protection Planning Process, or "RP-3," has already been used by several states to develop plans, and it has served as a basis for thinking about what a plan for California should look like as well. Further guidance in state plan development is presented in the Secretary of Interior's Standards and Guidelines for Preservation Planning (National Park Service 1983).

In a few words, a state plan as viewed by the federal government should set forth a structure for making decisions regarding the treatment of cultural resources, and it should explicate the criteria by which such decisions are made. Furthermore, the plan should articulate with the larger context of land-use decision-making by providing a framework which

ensures that cultural resources are considered. While the RP-3 model has a specific structure and makes a series of assumptions about how the significance of cultural resources are to be evaluated, it is meant to be adapted to particular needs found in state and local situations (HCRS, Forward).

California's formal efforts to develop a state plan began in 1983 with a contract issued by OHP to David Fredrickson to develop a framework for the state plan (Fredrickson and Raab 1984). In collaboration with Mark Raab, this effort led to the selection of Santa Barbara County as a specific region for the development of a pilot plan because of an active concern with cultural resources in local government land-use decision-making, the presence of federal agencies such as Los Padres National Forest concerned with management of cultural resources, and perhaps most importantly, the specific interest in the development of a plan among public historians and archaeologists with long-term investments in the study of the region's cultural resources.

The development of the Santa Barbara County pilot plan began with a three-day workshop headed by Mark Raab in January 1985. Representatives of a wide variety of constituencies concerned with cultural resources attended this workshop, and out of it major elements of a framework for the pilot plan emerged. Through a series of subsequent meetings, a working group of approximately ten historians and archaeologists emerged that helped to prepare the different parts of the Santa Barbara County pilot plan. A draft of the pilot plan document was submitted to the OHP in October 1985. Importantly, those who wrote the historic and archaeological elements of the pilot plan, and who otherwise helped in formulating perspectives embodied in the plan, were all volunteers.

The Santa Barbara pilot plan consists of three basic parts: the User's Guide, the Historic Resources Element, and the Archaeological Element. The User's Guide presents a framework for considering cultural resources in land-use planning at the county level. An important component of the User's Guide is the section entitled "Technical and Professional Standards," which specifies guidelines for undertaking investigations to generate information regarding cultural resources when such investigations are mandated by law, specifically CEQA. The Historic Resources and Archaeological Elements are basically frameworks for identifying the significance of cultural resources. A third element, the Native American Element, was intended to be included, but for a variety of reasons it was not able to be prepared in time for submission of the document to OHP, and a draft of this element still does not exist.

Upon receipt, OHP decided to obtain the opinions of reviewers representing a wide variety of interests in cultural resources. In June 1986, a questionnaire eliciting responses on how well the document met the goals of preservation planning was

sent to each reviewer along with a copy of the document. Of the nearly 300 distributed, only 35 questionnaires were returned (Kreutzberg 1987). On the basis of these responses and their own review of the draft pilot plan, OHP decided to rethink how a state plan should be developed. A task force was created within OHP, and their efforts are ongoing. As of this writing, however, no strategy has emerged for continuing the development of a state plan.

SHORTCOMINGS OF THE SANTA BARBARA PILOT PLAN

Responses to the questionnaires sent out by OHP became available to the creators of the pilot plan in November 1987. The respondents were widely varying in their opinions about the utility of the pilot plan. Some thought it was a great start and presented a useful format; others were extremely critical, to the point of accusing the writers of the document of serving only their own interests in conceiving the structure and content of the plan. The majority of reviewers who took the time to prepare detailed comments thought the pilot plan left a lot to be desired and could not be applied very effectively beyond the county, especially when federal projects were involved.

Despite my being one of the principal contributors to the plan, I find myself in agreement with many of the criticisms of the pilot plan, although at the time the document was submitted I had a much more positive attitude toward it. In general, I have to agree that it is not a fully fleshed-out plan, either in structure or content. The most fundamental problem with the plan is its lack of clearly stated objectives; that is, the plan does not specify carefully what is to be accomplished through use of the plan. Tied to this shortcoming, the audience for which the plan was written is not apparent. Some parts of the plan appear written for the land-use planner in local government, but other parts are more oriented toward consultants who collect and evaluate information about cultural resources. Another significant problem with the plan is its failure to consider all kinds of cultural resources. What is frequently called "folklife" is not considered, for instance, and even some important categories of material heritage are not discussed, natural landmarks and museum collections being obvious examples. Similarly, only a few of the many forms of significance attributed to cultural resources are considered. Nothing is said, for instance, about the educational value of certain cultural resources. Lastly, the plan does not present a framework for building upon the current base of information on the nature and location of cultural resources.

In addition to these obvious shortcomings of the pilot plan, some reviewers also noted that "contexts" of cultural resources have not been developed adequately, this being particularly obvious in the prehistoric element. In terms of the Secretary of Interior's Standards and Guidelines "context" refers to the relationship a "property" has to other similar properties with regard to information organized on the basis of a "cultural theme

and its geographical and chronological limits" (National Park Service 1983). Many reviewers also noted that no mechanism was presented in the pilot plan for determining thresholds of significance so that decisions regarding what is and is not significant can be made. I have reservations about the validity of both of these criticisms, and I shall discuss why later on.

FACTORS INFLUENCING THE DEVELOPMENT OF THE PILOT PLAN

In order to understand why the Santa Barbara pilot plan developed in the manner it did, one must understand first something about cultural resource management in the county, both the manner in which the county government deals with cultural resources threatened by land development and the kinds of people who appreciate and study cultural resources. In important ways the pilot plan builds upon an existing set of procedures and takes into consideration the concerns of those who are most intimately interested in those categories of cultural resources considered in the plan.

In the first place, Santa Barbara County is blessed with a relatively low rate of land development in comparison to counties of the state in large metropolitan areas. Although relatively large-scale projects do occur, for instance various aspects of offshore oil development, these are relatively sporadic (aside from the recent spate of activity related to oil development). As a result, county government is not so overwhelmed with the volume of projects that it can not give particular attention to the details of how cultural resources should be considered on a project-by-project basis. Added to this, the population of Santa Barbara County has a long tradition of being concerned with historic preservation, largely because of the visible Mission Period legacy and the artistic productions of the aboriginal Chumash Indians inhabiting the area. As a result, relatively greater attention is devoted to cultural resources than is usually found in county governments. With regard to archaeological resources, for example, one of the planners in the county's Environmental Review Division has a Masters degree in archaeology, and the deputy director of the Department of Environmental Review spent many years as an archaeologist prior to entering county government. These two individuals provide considerable expertise to the county's management of cultural resources.

In addition, archaeologists and historians at UCSB have been heavily involved with cultural resource management since the early 1970s. Both groups of scholars have participated in contracts for cultural resource studies mandated by state and federal law, and over the years they have worked closely with the county government in developing procedures for dealing with cultural resources threatened by land development. Significantly, they have brought to the development of a county plan the viewpoints of academicians interested in the values of the resources to their respective disciplines.

One could say that Santa Barbara County already had a viable plan for dealing with cultural resources prior to initiating the development of the pilot plan for OHP, or perhaps more correctly, the Santa Barbara County government has been using for some time a set of procedures which ensured that cultural resources were considered in a responsible and relatively comprehensive fashion. Implicitly the pilot plan took this into consideration by not bothering to include aspects of a plan that did not appear necessary in light of current practices, and as a consequence the pilot plan seems rather incomplete with regard to procedure.

What seemed most important to the authors of the plan was the development of the intellectual framework for identifying and discussing the significance of cultural resources, since no such framework existed in the county's General Plan or elsewhere. This framework would be used by anybody involved in evaluating cultural resources, whether researcher or planner, and it would give recognition to those aspects of archaeology and history that have been important to those with long-term vested interests in them. Also important to the authors was a refinement of existing guidelines for carrying out cultural resource studies so that the quality of information being collected by contractors was consistently high.

The participants in the development of the pilot plan, in particular the archaeologists, also were responding to their considerable frustration with the model of state planning promulgated by the federal government, that is, the so-called RP-3 model. This model takes a strongly geographical approach and establishes context of resources in terms of "study units," which are defined as a set of similar resources grouped into categories having geographic and temporal boundaries. With regard to prehistoric resources, study units are meant to include all those sites pertaining to a particular developmental period of a particular cultural tradition. In essence, the RP-3 model forces archaeologists to use the culture-historical orientation typical of American archaeology prior to ca. 1960 and refuses to recognize that archaeological resources have values in addressing theoretical issues that have become important in the last couple decades. The approach used in the Archaeological Element attempts to avoid this constraint of the RP-3 model by defining "context" of archaeological resources in terms of their various potentials for addressing specific research problems.

The participants in the pilot plan development also recognized the fundamental problem of defining thresholds of cultural resource significance mandated by state and federal law. To the practicing historian or archaeologist the dichotomy between significant and not significant has never made much sense because significance to research encompasses such a wide variety of research potentials that are usually noncomparable. Furthermore, one can recognize almost infinite degrees of variation within just one kind of research potential. In truth, the reason why thresholds of significance were not defined in the

pilot plan is that the issue of which cultural resources are and are not significant has never been a serious problem in Santa Barbara County, largely because the scope of resources considered significant is relatively broad. The only problems that have arisen have been when archaeologists without vested research interests in the region, and with divergent philosophies toward historic preservation, do evaluations. These problems point up an important fact about significance evaluations: they vary not so much because of the nature of the resources but because of differences in the viewpoints of those making the significance evaluations.

LESSONS WORTH CONSIDERING IN STATE PLAN DEVELOPMENT

As the state planning effort moves forward, some lessons should be gleaned from the Santa Barbara County pilot plan and the experiences of those who participated in its development. Despite its inadequacies as a general model of a regional plan, there are aspects of it worth careful consideration. Furthermore, those who developed the pilot plan spent many hours discussing the concept of regional planning, and the document reflects some of the insights that should have relevance to new attempts. Below I list what I feel are the most important lessons coming out of the draft pilot plan and the process of its development.

1. As the bulk of archaeology done in California is at the local government level in compliance with CEQA, state planning must recognize that it is the needs of local governments that must be addressed first and foremost. This is especially important when it is recognized that many local government planners either are ignorant about what cultural resources are or refuse to give them proper consideration. Many local governments, in particular city governments, are not even aware of the existence of OHP's regional Information Centers and the services they can provide. Others have no idea of the proper professional qualifications of contractors who carry out cultural resource assessments.

2. Perhaps the most serious problem with CEQA-mandated archaeological investigations is their inconsistent quality, in part because of the problems just mentioned but also because of the uneven training of professionals who undertake cultural resources studies. As a result, decision-making by local governments concerning the destiny of cultural resources is frequently made on the basis of inadequate information about their nature and potential value. The Technical and Professional Standards proposed in the Santa Barbara County pilot plan are meant to address this problem. Ideally, such standards should be developed at the state level and promulgated by the Office of Historic Preservation. The fundamental nature of this problem is exemplified by the failure of many local governments to require that a records check be made at the local OHP Information Center to determine whether known cultural resources occur in areas proposed for land development.

3. It is important to recognize that the needs of OHP and federal land use agencies, where expertise in cultural resources is high, are quite different than the needs of local governments who are concerned mostly with private landowners and who may have little access to expertise in cultural resources. Consequently, a state plan may have to include sections focused on these different needs.

4. A state plan should not follow slavishly the RP-3 model, and it should consider innovative refinements in the definition of "context" used in the Secretary of Interior's Guidelines. Taken at face value, neither considers how archaeological resources relate to the scientific practice of archaeology. Aside from this significant shortcoming, the federal approach to historic preservation is not completely applicable to states where numerous local governments make most of the decisions regarding the disposition of cultural resources.

5. Clear recognition should be given to the scientific value of cultural resources, and scientific value should not be equated with culture historical reconstruction. Understanding the nature of prehistoric or historic cultural systems and the determinants of their variations is simply not a matter of filling in gaps in a spatio-temporal framework. To address the needs of the scientific study of resources, significance must be defined much more broadly than is traditionally the case in California.

6. There has been an effort in the last few years to develop "programmatic" means of treating categories of cultural resources, low-density flake scatters being an example. While minimum standards for dealing with particular kinds of cultural resources are certainly justified, any such programmatic treatment procedures must be tied to the research and other values of the resources. This is so because the informational potential of the resources, whether this potential is regional or discipline-wide in scope, must serve as justification for a programmatic procedure. Omitting sound justifications inevitably will result in programmatic procedures being used in a mechanistic fashion, with little consideration by the user of how data are translated into information relevant for decision-making.

7. The definition of significance thresholds may not be so necessary an element in a plan as many would argue. Any threshold, no matter how explicitly defined, will be fundamentally arbitrary with regard to scientific significance. It is more important that a plan present a comprehensive means of identifying cultural resources and assessing the different kinds of significance pertaining to them. Even if all cultural resources were assumed to be significant, decisions regarding their disposition are influenced by a large number of factors having nothing to do with their significance. Such factors include the importance attributed to the development that would affect the resource, the interests of the public in local

historic preservation, and, of course, the quality of information about the nature of the resource.

CONCLUSION

If the efforts to develop a pilot plan for Santa Barbara County are any indication, we in California have a long and difficult road ahead of us. When one considers the time and effort that went into a relatively incomplete regional plan, the magnitude of the task at the state level seems almost insurmountable. Perhaps the next task to accomplish in light of the Santa Barbara experience is to establish a series of explicit goals that feasibly can be reached in a reasonable amount of time. These goals should be defined in terms of greatest needs, that is, in terms of how the most favorable impact of historic preservation can be reached for the amount of time and effort available in the foreseeable future.

The development of a state plan also might take advantage of effective policies and procedures that already exist in practice, both at the local and state levels. California already does have a heritage management plan, however incomplete and inconsistent it may be. An initial task might be to inventory the policies and procedures already in place in various local governments and state agencies and to select those that should be part of a codified state plan. In this regard, one might view those aspects of the Santa Barbara Heritage Resources Plan that have been working effectively in helping the county to manage these resources as once such body of policies and procedures worth a close look.

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