

Cameron Meadows Cultural Resources

RRPA commissioned a survey by Peak and Associates. State regulations prohibit publishing this report.

CULTURAL RESOURCES WITHIN THE CAMERON MEADOWS PROJECT AREA

Peak and Associates, Inc. March 22, 2023

Of particular interest:

Page 4

We know in the case of Cameron Meadows that cultural resources are present, so it appears that a study meeting federal requirements will need to be prepared.

Page 7

Although the Preliminary Application form references a June 17, 2022 survey report, a check of the NCIC files revealed no additional report on any part of the property had been filed with their facility. The 1997 work by Peak & Associates is the only available documentation.

Page 8

Although normally prehistoric sites are determined significant through formal test excavations, enough information was gathered in the shovel test effort to conclude that the sites are likely to prove to be significant. We believe the sites had long-term occupancy.

There were artifacts in the sites that are made from non-local materials, and would have had to be traded in to the local site inhabitants. All three sites are then considered of value in learning more about issues such as trade patterns in the region, and in the address of research questions regarding the lifeways of the people of the region.

A detailed survey was carried out by ECORP that was commissioned by the developer. State regulations prohibit publishing this report.

Cultural Resources Inventory and Evaluation Report for Cameron Meadows

ECORP consulting, Inc. December 2022

Of interest in this report are the following sections:

Page 68

6.3 Recommendations

Based on the findings of this cultural resources inventory, testing program, and evaluation, ECORP recommends the following measures. The following measures should be incorporated into mitigation measures within the environmental document.

6.3.1 Avoidance

6.3.2 Construction Monitoring

A detailed review of the above report was commissioned by RRPA

Cultural Resources Inventory and Evaluation Report for Cameron Meadows:

A Review of the ECORP Consulting, Inc. (“ECORP”) report, December 2022

January 16, 2024

See: Review of EORP Cultural Resources Report

Of particular interest:

Page 1

Is this a federally reviewed report? If so, which agency? We ask, because the study does not appear to meet Corps of Engineers guidelines but does seem to require a Corps permit. In particular, the Corps requires the consultant to send an initial letter to the Native American groups, and ECORP failed to make any contact with Native American groups, even for an excavation.

Page 2

Conclusions

It also seems too convenient to conclude that all three prehistoric sites are eligible for the NRHP and the CRHR, but then give the project proponents a green light to destroy portions of one site to fit the development plan.

There is no map showing what is to be preserved and what will be lost if the County agrees to the destruction of portions of a significant resource with no justification, other than working better for the developer's plans. A map showing the extent of the planned destruction of a part of a significant resource should be included in the site forms.

The sites cannot be preserved without active means undertaken by the project proponent well in advance of initiation of construction. This needs to be discussed with the local Native groups, and an agreement document developed providing access to the groups to visit and check up on the sites as well as a defined preservation program. If destruction of the site continues to be proposed, data recovery excavations must be undertaken in coordination with the Nisenan and Wopumnes groups