

APAC ENVIRONMENT STANDING COMMITTEE REPORT
PROJECT FRONTIER CULTURAL RESOURCES REVIEW – April 19, 2023
Principal Reviewers: Melinda Peak, Robert Williams

OBSERVATION: Carson Creek watershed is a drainage component of the Deer Creek system. A number of prehistoric period sites of many types have been reported in the drainage area. Deer Creek is known to have burial sites and village sites present. More survey efforts on Carson Creek could reveal the presence of additional sites. Carson Creek should not be dismissed as a minor drainage with culturally unimportant implications.

APPLICATION DEFICIENCIES: The application does not address the archaeological survey elements of the EDC approved entitled "Guidelines f; or Cultural Resource Studies."

A review of the Project Frontier application suggests that a records search has been conducted; one remark notes the presence of bedrock mortars. Beyond the vague reference to a records search without a discussion of an onsite inspection, there are many questions about the project site:

- Did an archaeologist survey or re-survey the property relative to this proposed development on the property?
- Did they re-record the site?
- Did they test to see if there was an associated cultural deposit (Insert: or to determine site boundaries)?
- What measures are proposed to protect this resource from the thousands of workers gaining access to the site?

More importantly, there is no presented evidence that inquiries were made to the Native American Heritage Commission to check the Sacred Lands files. No consultation is reported with local Native American groups on whether these sites or others on the property are tribal cultural resources. One example of archeological markers is the presence of bedrock mortars. Again, this would be easy to understand with the proper studies and appropriate environmental documents. But without that requirement, the County could easily be challenged for the lack of an EIR.

ADDITIONAL REGIONAL IMPLICATIONS: The rush to develop the land heading southward from Project Frontier could readily impact the remaining cultural sites.

CONCLUSION: There is a need for consultation with concerned local Native American groups to understand the effects of such resources and to determine any mitigation measures that may be necessary for these resources. That will not happen unless a neutral firm prepares an EIR with proper technical studies, and without apparent existing involvement with the project proponent or other close relationships with local tribal entities.