



PEAK & ASSOCIATES, INC.
CONSULTING ARCHEOLOGY

January 16, 2024

Cultural Resources Inventory and Evaluation Report for Cameron Meadows: A Review of the ECORP Consulting, Inc. (“ECORP”) report, December 2022

Issues

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.

Shouldn't this be more properly called a re-survey and re-recording of the sites? ECORP used Peak & Associates forms and drawings with little original mapping or preparation of new forms by ECORP. At least give credit where credit is due and cite the source of what you are including as an original page or map prepared by Peak & Associates.

ECORP first correctly identifies the area as being within the territory of the Nisenan in section 3.2.1 in their text (2022:10). ECORP states the project area is within “Sierra Miwok” territory (section 3.3.1) (2022:11). Looking at maps provided in many other sources about the Nisenan, the inclusion of the Sierra Miwok section is clearly inappropriate. Maps in the 1978 Smithsonian volume indicate that Sierra Miwok territory is south of the North Fork of the Cosumnes River, many miles south of the project area. Even more important, there are several named villages near the project site, with information readily available in various sources on the Nisenan. These sites could be campsites used by the people based in the nearby village sites, and would help to interpret the site locations and excavation findings.

In the ECORP report Cameron Park is called a “City” on page 1, and a census-designated area on page 7. It is not difficult to guess which is correct (or to look it up on line?). Since the CEQA review is by the County of El Dorado, maybe they should be credited as the reviewing agency?

The ECORP report project description is a scant paragraph on page 1—it cannot be left to the imagination what will be involved, and the possible effects to cultural resources. A complete project description is essential, particularly for both a Corps-reviewed and CEQA project. A map showing the proposed development in detail should be included.

The input of the Native American groups would be important to include, their assessment of significance for prehistoric period sites and what means need to be undertaken for resource protection. Is the setting of the sites important? This needs to be discussed with the Native American groups.

Although not federally recognized, the Wopumnes group is becoming more important in the City of Placerville and the County. This group cares about all bedrock mortars, and may have different ideas about resource preservation and future protection of the resources.

It is hoped that the County will make up for the lack of contact by ECORP, solicit comments from Native American groups, and include them in the process.

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. The eligible sites should be preserved in their entirety. That should be the main concern, not writing off parts of an eligible property to suit development needs. Consider what is best for the resources, not for the developer? How about the possible loss of a couple of lots to make this happen?

As development marches farther and farther into the rural landscape, many sites have been affected. Preservation for further research of the small campsite type sites becomes more important all the time.

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 most serious omission is the lack of a method of preserving these significant resources. Fencing? Engineered pathways? Another method? The sites will immediately be vandalized and lost with the hugely increased population of neighbors in their new houses on and near the site areas.

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.