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July 22, 2010

Mr. Gerry Haas  
Associate Planner  
Placer County CDRA  
3091 County Center Drive  
Auburn, CA 95603

Re: Celebration Community Fellowship Project  
Response to Appeal Letter (PMPA20070467)

Dear Mr. Haas:

In the technical report by GeoEngineers, site GEO-01-09 is considered eligible for listing on the NRHP under Criterion A, as important to local Native Americans, and pursuant to Section 106 of the NHPA ( 36 CFR 800), adequate protection measures to avoid adverse effects by construction of the CCF church are detailed in the report. Protection measures include avoidance of any physical destruction or damage by establishment of an exclusion area (Environmental Sensitive Area [ESA]), as well as construction monitoring by an osteologist and Native American monitor as outlined in the appended Monitoring and Treatment Plan. Consultation with Tsi-Akim Tribe representatives, including the MLD representatives, indicated the Tribe's cultural preference for avoidance of the sensitive area of site GEO-01-09 on the northwestern edge of the proposed project—the designated ESA.

The technical aspects of the report by GeoEngineers, including survey coverage, testing, analysis and interpretation, meets professional standards. Survey was conducted at an intensive-level (transect spacing at 15 meters or less); subsurface testing was accomplished to identify the horizontal and vertical extent of the site, to evaluate its NRHP eligibility, and to assess the site's integrity. Units were carefully placed within and radiating outward from pothunted areas; based on the artifact recovery and evidence of compromised integrity, there was no need for additional disturbance to achieve the objectives of site testing. Evidence of historic/modern disturbance is abundant throughout the entire extent of site GEO-01-09, including looting and apparent truncation of the site by construction of Highway 40/Interstate 80. Natural processes, such as bioturbation and episodic flooding by the wetland swale, had little impact on site integrity. There is no midden or calcined soil to provide evidence of the former presence of a prehistoric village, cemetery, or cry site cremations; there is no evidence of bedrock milling within the project area. All fragmented human remains were recovered from levels that were mixed with historic artifacts (plastic buttons, square and cut nails, ceramic sherds, railroad spike); no human remains were recovered from intact deposits. The presence of mixed cultural material (prehistoric, historic/modern) to a

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depth of 70 cm below the surface is attributed to its displacement during highway construction. As stated in the report, the "concentration of artifacts on the northwest edge of the site suggest that if a prehistoric village or occupation area existed, it lies further to the west and under what is now I-80 and the concentration on the northwest edge represents a secondary deposit from the construction of Highway 40 and I-80." Further, although there is a well-documented site west of CCF that has each of the cultural features (milling stations, kitchen midden, round house site, pit house sites) described on the last page of the Tribe's appeal, similar features have not been identified or documented within 600 feet of site GEO-01-09; nor has a stone quarry been documented within 2,000 feet to the north-northwest (north side of I-80) of site GEO-01-09.

Please let me know if you have any questions regarding this response.

Respectfully submitted,



Cindy J. Arrington, MS, RPA  
Cultural Resources Specialist