

Squaxin Tribe Comments from 2019 DAHP Summit on Improving Cultural Resource Reporting

Cultural Resource Report Issues and Recommendations for Improvement

Cultural Resource Report Issues

1. Not providing proper literature review (ie: ignoring sites and minimal research)
2. Referencing sources irrelevant to the project area's location and not providing in text citations.
3. Poor summarization of a project area's Ethno-historical and historical context
 - a. Sometimes these sections can minimize or ignore the cultures that are living there/were living there
 - b. They can sometimes ignore and/or minimize how rich these cultures are/were
 - c. Sometimes these summarizations are factually wrong
 - i. ie: Squaxin Island Tribe signing the Point No-Point Treaty
4. Not providing field method specifications (ie: transect spacing, average shovel test pit depths, low tide depth, how site boundaries were determined, justify why areas of an APE were not surveyed, and etc.)
5. Not including photographs of shovel test unit profiles with measurements and no overview photographs of a project areas.
6. Maps: Need a 1:24K Topographic Overview Map, maps of all shovel test pits as GPS points, and a defined APE map
7. Summarization of all known cultural resources and investigations within 1 to 2 miles of the project location
8. Not inviting them to participate on the fieldwork component of a study
9. Some reports do not contain recommendations of cultural resource eligibilities or project effect
10. Not asking the Tribes and the DAHP to comment on draft versions of the cultural resource report
11. Support and help each other to protect these finite resources

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Cultural Resource Report Issue Recommendations/Suggestions

1. Write a brief detailed summary of research sources with dates (ie: historic map dates, photograph dates, summarizing academic sources, and etc.). This section should give the reader a good idea of what resources were reviewed to understand the history of the project area.
2. All references should be from the general region (ie: not using Columbia Plateau or Great Basin references for the Puget Sound, unless relevant to findings). All non-original ideas should be cited. The Society for American Archaeology has a good reference guide for how to cite other peoples work.
3. Sometimes these sections can minimize or ignore the cultures that are living there/were living there, some advice to help the writer:
 - a. Ask the Tribe, state, or federal agencies for their assistance if needed
 - b. Don't be lazy when writing this section-RF Statement
 - c. For the historical context section summarize the board patterns of history in that region (big historical people, major events, and etc.)
 - d. Fact check these historical summarizations.
4. Self-explanatory, however, all survey transect spacing's should be stated, areas where surveys cannot be conducted should be explained and justified, all subsurface depths should be documented.
5. A cultural resource report should have at least one photo of shovel test pit with a measuring device in metric
 - a. This helps reviewers understand the sediments you were working in and why certain shovel test pits were not tested further.
6. These maps help all parties in a project understand where the project is, the full extent of a project, and where cultural resources are located in comparison to the full undertaking.
 - a. Two decent mapping software is ArcGIS and Google Earth.
7. Look at WISSARD and tabulate what cultural resources and studies that have been conducted are near the project location. This helps to possibly narrow down the possibilities of what cultural resource can be found in a project area. This also helps with understanding what cultural resources that might be poorly understood or poorly delineated.
8. This can help to build trust with the Tribes. Additionally, do not be afraid to ask the Tribes about TCPs during this phase.
9. Make it clear in a report about what is being recommended as eligible for listing and if the project effect could potential cause an adverse effect to cultural resources. This should be clearly stated in the Abstract/Summary and the Management Recommendation section.

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- a. It should also be noted that efforts to avoid and minimize adverse impacts to cultural resources/historic properties should be strongly considered before jumping headlong into mitigation
 - i. Mitigation should always be a last resort
- 10. Notify Tribes and the DAHP about report drafts and ask them for comments. This avoids project delays and helps to build trust with the Tribes.
- 11. At the end of the day, we collectively are the last and sometimes only voice advocating the protection of these finite resources. Do not be afraid to ask a follow collage for help with report reviews, project effect determinations, avoidance and mitigation plans, and etc.