

COLUSA INDIAN COMMUNITY COUNCIL

May 3, 2023

Alicia Forsythe
Kevin Spesert
P.O. Box 517
Maxwell, CA 95955

Dear Alicia Forsythe, Kevin Spesert, and other Sites Project Authority Government Representatives:

This letter is written on behalf of the Cachil DeHe Band of Wintun Indians of the Colusa Indian Community Council (CICC), a federally recognized Indian Tribe and sovereign government. Pursuant to California Government Code (GOV) Sections 6254(r) and 6254.10 and 54 U.S.C. Section 307103(a) of the National Historic Preservation Act (NHPA) (formerly Section 304 [16 U.S.C. 470w-3(a)]) of the NHPA), the Sites Project Authority shall not disclose this letter or any associated details or contents herein, in part or in whole, to any third parties (including, but not limited to, consultants and other local, state, and/or federal agency personnel) without the free, prior, informed, and express written consent of CICC.

CICC thanks Ali Forsythe and Kevin Spesert of the Sites Project Authority for traveling to, meeting with, and taking part in government-to-government consultation with CICC for the Sites Reservoir Project (Project) at the CICC Reservation on April 18, 2023. As Ms. Forsythe conveyed at this meeting, government-to-government consultation, which is an obligation and responsibility of the Sites Project Authority under the California Environmental Quality Act (CEQA) and its Assembly Bill 52 (AB52) additions for the Project, has been long overdue. As members of a federally recognized Native American Tribe, each CICC member holds dual status as citizens of both CICC, a sovereign and self-determined Indigenous Nation, and the United States of America. CICC expects all the rights conferred under this dual status to be honored and respected.

With ongoing government-to-government consultation, CICC expects the very serious concerns, issues, and insights regarding the elision of CICC from Project considerations that CICC shared with Ms. Forsythe and Mr. Spesert at the April 18th consultation meeting to be quickly and restoratively addressed. This must be done to begin to identify, outline, develop, and implement productive pathways that will ensure the full rights afforded to CICC are honored and concerns and insights adequately accounted for under all applicable and guiding laws, policies, regulations, Executive Orders (EOs), and Secretarial Orders (SOs), including but not limited to those guiding CEQA and its AB52 additions, the National Environmental Policy Act (NEPA), and the NHPA. CICC stresses to the Sites Project Authority that the foundational backbone of reasonable and good faith consultation must be reasonable and good faith compliance, with all of the rights under all guiding acts, stipulations, directives, orders, and mandates affirmatively afforded to CICC.

As shared by CICC during the April 18th consultation meeting and necessary to reiterate with this letter, it is highly concerning that there has been a joint effort at coordinating and integrating CEQA Environmental Impact Report (EIR) and NEPA Environmental Impact Statement (EIS) production and review absent reasonable and good faith considerations under either Act of how the Project may, per 40 Code of Federal Regulations (CFR) 1508.8, significantly directly, indirectly, and cumulatively impact CICC members, our historic and cultural resources (per 40 CFR 1502.16(g)), Tribal Cultural Resources (TCRs) (per Public Resource Code [PRC] 21074 *et seq.*), and the overall CICC “Human Environment.” CICC points the Sites Project Authority to 40 CFR 1508.14, which defines the “Human Environment” broadly and states that the:

Human environment shall be interpreted comprehensively to include *the natural and physical environment and the relationship of people with that environment* [emphasis ours].

CICC also brings to the Sites Project Authority attention that as part of efforts to integrate CEQA and NEPA review, guidance provided by the White House Council on Environmental Quality (CEQ) and the California Governor’s Office of Planning and Research (OPR) stresses that if NEPA/CEQA integration is planned, “State and Federal agencies should begin NEPA/CEQA procedures as early as possible in their planning processes in order to allow environmental considerations to influence project design. As always, these issues are subject to individual agency regulations regarding implementation of NEPA and CEQA, which could prescribe more stringent requirements than the general regulations” (CEQ and OPR 2014:20). As requested at the April 18th consultation and once again formally requested with this letter, CICC asks for all records and documentation of the timing of these processes of NEPA/CEQA integration, how they have influenced Project considerations and design, and demonstrations of how all local, state, and federal regulatory procedures have been met to date regarding NEPA and CEQA review.

CICC reminds the Sites Project Authority that 40 CFR 1508.27(b)(8) stipulates that considerations must be given to how the NHPA Section 106 Process will inform NEPA review. As CICC has not yet even been engaged in Section 106 government-to-government consultation by any federal agency for the Project, we are perplexed by how the Sites Project Authority and its agency partners expect the current Revised EIR/EIS to achieve compliance with this NEPA stipulation let alone those for TCRs outlined at 21074 *et seq.* Although coordination and substitution processes exist for NHPA and Section 106 review (see 36 CFR 800.8; CEQ and ACHP 2013), neither process relieves agencies of their responsibilities under NEPA nor the NHPA. In this context, it is important to recognize that NEPA is much broader than NHPA insofar that assessments of and considerations for impacts to or effects on historic and cultural resources—whether they are defined as historic properties, properties of traditional and religious and cultural importance (PTRCIs), traditional cultural properties (TCPs), TCRs, “archaeological sites,” or otherwise—are not limited to those eligible or potentially eligible for listing on the California Register of Historic Resources (CRHR) or the National Register of Historic Places (NRHP).

As discussed during the April 18th consultation meeting and necessary to reiterate in this letter, this matter of our CICC ancestral places and the designation, minimization, and conflation of “resources” of archaeological and archaeologist interests and concerns as the full spectrum of

cultural resources that must be considered as part of EIR/EIS processes is highly problematic, exceedingly dispossessing, and simultaneously deficient and destructive in a multitude of ways. As CICC stated during the April 18th consultation meeting, and as we again bring to your direct attention with this letter, the Project area is enveloped by a CICC historic district and defined traditional cultural landscape, or TCL. Ms. Forsythe requested clarity on what comprises cultural landscapes, which CICC reminds Sites Project Authority are a type of TCR that requires consideration under CEQA review (PRC 21074(a)(1)). CICC points Ms. Forsythe and the Sites Project Authority to guidance from the Advisory Council on Historic Preservation (ACHP), which explains that “[t]here is no single defining feature or set of features that comprise” Native American TCLs. Rather:

Such places could be comprised of natural features such as mountains, caves, plateaus, and outcroppings; water courses and bodies such as rivers, streams, lakes, bays, and inlets; views and view sheds from them, including the overlook or similar locations; vegetation that contributes to its significance; and, manmade features including archaeological sites; buildings and structures; circulation features such as trails; land use patterns; evidence of cultural traditions, such as petroglyphs and evidence of burial practices; and markers or monuments, such as cairns, sleeping circles, and geoglyphs [ACHP 2012:4].

CICC also brings to the attention of the Sites Project Authority insights from different Native scholars who underscore the fundamental importance and absolute imperative of protecting and preserving TCLs for CICC and other Native peoples so that we may retain our capacities for collective continuance and viable futures *as Native peoples* (see Whyte 2018).

Indian tribes combine history and geography so that they have a “sacred geography,” that is to say, every location within their original homeland has a multitude of stories that recount the migrations, revelations, and particular historical incidents that cumulatively produced the tribe in its current condition [Deloria 1994:122].

American Indians ... share a cultural-historical relationship with the land. Their past and future is intertwined with it, as the fabric of their culture is woven of threads tied to places. The sacred locations are the foundation threads of the fabric, the warp, while the cultural connections are the weft threads [Watkins 2001:42].

Our history is written within our unique and specific cultural landscapes. These places hold the memories of our ancestors, speak to us in the present, and are crucial to our survival, as Indian people, into the future [Pablo 2001:18].

It is precisely for these reasons that the ACHP has been active since 2009 in “addressing identified hurdles in the Section 106 and National Environmental Policy Act (NEPA) processes when proposed projects may impact Native American traditional cultural landscapes” and has labored “to ensure that Native American traditional cultural landscapes are considered early in land management and project planning decisions” (ACHP 2011:1). Important for Project compliance obligations, the ACHP also stresses “that the size of such properties or the potential challenges in the management of them should not be considerations in the evaluation of their significance” (ACHP 2012:2). The CICC TCL and historic district that encompass the Project area are comprised of a diversity of contributing resources and

elements that have—so far to date—been wholly contextually neglected and destructively segmented in the Revised EIR/EIS. CICC highly suspects this is in no small part a product and outcome of inappropriate personnel without the correct and proper experience, training, education, sensibilities, and capacities for concern and insight leading the design, implementation, and findings of the studies informing EIR/EIS review.

CICC brings to the Sites Project Authority attention that CICC recently made a direct request for an appropriately trained and trusted ethnohistorian and ethnographer employed by one of the named consulting companies, HDR, to assist with ensuring CICC concerns were more adequately accounted for and considered and to support the Sites Project Authority with its compliance obligations and responsibilities by facilitating the April 18, 2023, consultation meeting. CICC requires a full and transparent accounting and detailed documentation of what decisions were made, precisely why, and explicitly by whom, that resulted in the Tribally requested and appropriately trained subject matter expert to not facilitate or take part in the April 18th consultation meeting. CICC must now suspect that this subject matter expert is also not currently employed as part of the consultant team working for the Sites Project Authority to help guide and fulfill compliance responsibilities to assess significant direct, indirect, and cumulative impacts and adverse effects of the Project using the best available information and in methodologically and conceptually competent and adequately informed ways. Instead, the Sites Project Authority and its consultant team somehow felt it appropriate to send individuals with training and backgrounds in archaeology to take part in the April 18th consultation meeting. There must be full transparency and accountability of how and why these decisions were made and by whom to begin building productive pathways to compliance, as these efforts serve as signs and symptoms to CICC that the Sites Project Authority—or at least its consultant team as currently led, directed, and comprised—view compliance processes less as collaborative efforts than zero-sum games when it comes to Tribal rights and concerns. It is vital that the Sites Project Authority be fully cognizant of how these acts recall, regenerate, and function as enduring attempts to exclude, contain, and erase the people of CICC by settler colonial society and governance.

On June 18, 2019, California Governor Gavin Newsom signed EO N-15-19, presenting the first formal State governmental recognition “that the State [of California] historically sanctioned over a century of depredations and prejudicial policies against California Native Americans.” In its preamble, the State offers contextual acknowledgement that:

[I]n the early decades of California’s statehood, the relationship between the State of California and California Native Americans was fraught with violence, exploitation, dispossession and the attempted destruction of tribal communities, as summed up by California’s first Governor, Peter Burnett, in his 1851 address to the Legislature: “[t]hat a war of extermination will continue to be waged between the two races until the Indian race becomes extinct must be expected”;
... [T]he State of California’s laws and policies discriminating against Native Americans and denying the existence of tribal government powers persisted well into the twentieth century....

Through exclusionary practices and governmental and corporate actors who seek to neglect, undermine, or ignore through silence, deflection, and/or equivocation the full rights afforded to CICC and other Native American Tribes, policies and practices of discrimination and the denial of existence of our Tribal

government powers, political self-determination, and knowledge sovereignty are regenerated and reproduced in the twenty-first century, from yesterday, throughout today, and into tomorrow. In and through the actions and events outlined in this letter and discussed during the April 18th consultation meeting, ongoing Project acts of omission, alienation, marginalization, and attempted erasure—both through exclusionary governmental and regulatory processes and in the destruction and evisceration of our TCL that may and can occur because of inadequate information and negligence in compliance reviews and considerations—cause severe harms and stress in and on our Tribal communities. Scientific studies have shown how these processes of social marginalization and emotional and psychological stress on human bodies can and do threaten mental health, weaken immune systems and inflammatory responses, cause the decline and dysfunction of the prefrontal cortex and the hippocampus, and influence increased rates of cancer incidence, cancer progression, and diabetes (Dai et al., 2020; Williams, 2018).

For these reasons, CICC emphasizes to the Sites Project Authority in the strongest possible terms the necessity of recognizing that natural resources *are* cultural resources to and for the members of CICC, and that in neglecting Tribal knowledges and sciences and “dissecting and shelving of entities and phenomena” as they are in the current Revised EIR/EIS, “Indigenous experiences [become] mutilated by a scientific classificatory matter-of-fact-ness that refuse[s] the metaphysical imperative” (Marker 2018:458). Such enduring practice in environmental and cultural resource review processes “has been and continues to be an act of systemic erasure and trauma” (UAIC 2022:7) that “perpetuate[s] the same acts and practices of governmental and colonial-settler marginalization and violence that have continually worked to ethnically cleanse Native peoples from Native lands and waters of the United States” (Panteah 2021:4). In parallel, CICC must remind and underscore to the Sites Project Authority that values of “research potential” for Western-trained archaeologists in general, and those practicing within the realm of the Cultural Resources Management (CRM) industrial complex in particular, relate predominantly to the exceedingly narrow interests, values, concepts, methods, and concerns of the archaeological discipline.

While, at times, archaeological interests and concerns may align with those of CICC, they by no means can address or encompass the full spectrum of interconnected significance, function, meaning, integrity, capacities, and uses of ancestral places that may be reductively designated and minimized in their recordings as “archaeological.” Archaeologists may offer opinions on the CRHR and/or NRHP eligibility or ineligibility of CICC places and material culture under Criterion 4 of the CRHR and Criterion D of the NHPA through the lenses of their disciplinary valuations, interests, methods, and concerns, but they cannot—both because of the lack of proper training and the absence of informed cultural knowledge—make authoritative, valid, or sound statements of overall non-eligibility for the NRHP or CRHR under any of their four respective eligibility Criteria. Neither do they have ownership nor possession over “information potential” (see Parker and King 1998) under Criterion 4 for the CRHR or Criterion D for the NRHP. All ancestral places recorded or designated as “archaeological” associated with the Project area are in need of evaluations and assessments through CICC systems of knowledge and science production to determine CRHR and NRHP eligibility under all four Criteria—both as standalone sites and as contributing resources to the extant CICC historic district and defined TCL—in order to achieve compliance with the sequential procedures that guide CEQA review and the NHPA Section 106 process.

CICC requests the details and a full accounting of archaeological evaluations that have been conducted to date for these ancestral places, as they do not appear to be provided in the “Sites Reservoir Project Cultural Resources Report” produced by ICF in November of 2021. This report cites several previous studies, and CICC finds the statement on page 30 that “[o]f the 105 archaeological sites identified in the ADI-A, one has been evaluated for NRHP eligibility” extremely curious, if not confounding, as pages 13-14 note and outline that “cultural resources studies were conducted for the Project from 2001 to 2020.” If no evaluations were provided for the NRHP or CRHR in over two decades of studies associated with Project operations outside of one “archaeological site,” CICC requires detailed explanations of precisely why. Moreover, it is necessary to note that archaeological notions and practices of “mitigation” are themselves often directly and cumulatively destructive to the integrity of our ancestral places, in violation of Tribal treatment and stewardship protocols, and that the designation of an “Area of potential direct impact for archaeology,” or ADI-A, is exceedingly nescient and inappropriate. Ancestral places, including those that may be designated and recorded as “archaeological” are part of—and intimately connect to—the total human environment, and impacts to how these places interconnect and interrelate as well as visual and auditory disturbances that may occur to them must be considered as part of the entire Area of Potential Effects (APE), not just ground disturbance to arbitrary grids and artificially bounded and isolated containers archaeologists superimpose on space and time.

Given the actions and events outlined to date, CICC must make the Sites Project Authority aware of the absolute inappropriateness, destructiveness, and counter productiveness of having archaeologists make authoritative claims on our ancestral places, define or take the lead on *cultural* resources studies, and/or contribute to communications and/or consultations on any matters outside the narrow limits of archaeological domains unless they are Tribally certified and/or explicitly approved to do so through processes of free, prior, and informed consent by the Tribe. CICC points the Sites Project Authority to guidance from the California Office of Historic Preservation (OHP) and its *Technical Assistance Series #6: California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)* (Technical Assistance Series #6), which advises:

When trying to determine if a resource is eligible for the California Register, you may find it easier to first determine a resource’s eligibility for the National Register. Then, if you find it ineligible for the National Register—and keeping in mind the differences between the two programs—move on to determine if it may in fact be eligible for the California Register as a result of these differences [OHP n.d.:1].

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Bulletin 15; NPS 1997:13 n.5) states that information and guidance on traditional cultural values and their associations to historic properties and PTRCIs should be sought from *National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Bulletin 38; Parker and King 1998). Notably, *Appendix II* of Bulletin 38: *Professional Qualifications: Ethnography* does not identify archaeological education, experience, or training as valid qualifications for identifying, evaluating, or assessing aspects of traditional religious and cultural significance for places or the living community-place relationships they support and convey.

Archaeology, both by name and in discipline, is heavily concerned with and focused on matters of the *past*, even if this concern and focus may inform and have implications for the present and future. It appears that CICC must make clear that information and implication for the present and future are qualitatively different than providing the appropriate conceptual and methodological trainings, tools, experiences, education, and sensibilities to be able to respectfully, competently, and adequately account for the numerous ways in which our inheritance and heritage resources—whether they are termed historic and cultural resources, TCRs, historic properties, PTRCIs, TCPs, “archaeological sites,” or otherwise—tangibly and intangibly hold and convey intersecting and intertwining spatio-temporal layers and socio-spatial dimensions of traditional religious and cultural importance. Archaeological training and education are also wholly insufficient to account for how different aspects and relations of integrity of and to our inheritance and heritage places are elemental in maintaining CICC’s cultural identity and heritage practices *as a people and a Tribe* as the past, present, and future enfold and unfold.

Given the privileging in cultural studies of archaeology, archaeologists, and settler colonial timelines and valuations of space and place to date for the Project, it is imperative for CICC to bring to the Sites Project Authority’s full attention several interrelated concerns documented by different Native American Tribes, Indigenous archaeologists, and other critically minded archaeologists in recent years regarding archaeological disciplining and practice, concerns which are wholly shared by CICC.

Lack of archaeological evidence for a site or place does not constitute proof that a Tribally identified historic property of religious and cultural significance is not present. It simply means that one line of evidence is not present. Archaeological methods and Tribal methods of identification must not be conflated, as doing so can lead to the undermining of Tribal knowledge and the preservation and protection of Tribally identified historic properties [UAIC 2022:6].

Without reflexivity and the broadening of the epistemological boundaries of the [archaeological] discipline, archaeologists ... easily slip into narratives about the past that uphold colonialist, imperialist, androcentric, and ethnocentric values, leaving little space for others (nonwhite and/or nonmale people) in these narratives [Nelson 2020:224].

[A]n insidious whiteness ... has wreaked havoc on our discipline [of archaeology] since its founding and rests among us today, albeit in different forms, whether we choose to acknowledge it or not. As the struggle for decolonization and equity continue within the field, I argue that we ignore the many-headed hydra of whiteness and White supremacy at our own peril. Furthermore, avoiding whiteness has consequences for critical pedagogical practice, whereby racist ideas of the past are reinforced in new generations of students. This discussion of archaeology’s racist roots is not, therefore, an airing of grievances but a call to reconsider and change how we practice, produce knowledge and teach.... A reckoning with whiteness and White supremacy in archaeology is long overdue [Reilly 2022:2].

Structural racism impacts the practice of archaeology, the sites that we commemorate, and the narratives that we construct... [and t]he dearth of

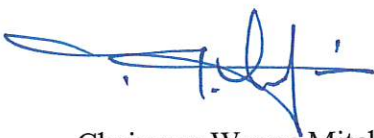
preserved and commemorated historical sites that are associated with marginalized people impacts our public historical narratives. It perpetuates previous forms of structural racism in the ways we remember and memorialize the past [Schumann 2019:255].

[N]egligence in [NHPA and NEPA processes and guidance] consideration and recognition is indelibly entangled in racist perspectives and practices that structurally underpinned—and continue to largely guide and dictate—the development and formation of historic preservation values and approaches in the United States ...[;] which are continually reproduced in dominant cultural resource management practices today.... [And] structural racism against ... [Native American tribes] is reinforced and reproduced in NHPA and NEPA laws and practices when narrow disciplinary archaeological interpretations and disciplinary perspectives and values are privileged in the identification and evaluations of ancestral/archaeological sites (resources) and effects/impacts to their integrity [Panteah 2021:9].

At our April 18th consultation meeting, Ms. Forsythe expressed the desire and need for the Sites Project Authority to be a good neighbor for the next 100 years. CICC expects these sentiments to be foundational and to become structurally entrenched in and institutionally scaffolded by appropriate actions and respect. In the spirit of meaningful and good faith consultation, the April 18th consultation meeting and this letter have worked to identify and outline preliminarily pathways toward these goals.

While CICC is greatly appreciative of the Sites Project Authority for the April 18, 2023, consultation meeting, we feel it necessary to once again underscore that a foundational backbone of reasonable and good faith consultation is ongoing reasonable and good faith compliance. CICC looks forward to receiving the information requested on April 18th and with this letter, and to furthering government-to-government consultation in good faith and meaningful ways. CICC is committed to reasonable, meaningful, and good faith consultation and fulfilling all of the opportunities and rights afforded to us to meet our protection, preservation, and stewardship obligations for the lands, airs, waters, and other heritage resources that comprise our traditional cultural land/waterscapes. These geographies are our inheritance from our ancestors, and protecting and preserving their integrity and capacities are fundamental to maintaining and sustaining our histories, stories, ceremonies, practices, traditional knowledge and sciences systems, identities, and opportunities for viable and collective futures as a unique, sovereign, and self-determined Tribe and people.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wayne Mitchum Jr.", with a long horizontal flourish extending to the left.

Chairman Wayne Mitchum Jr.

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