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Members of the Resource Development
Coordinating Committee
5110 State Office Building
Salt Lake City, Utah 84114

Michael R. Styler
Executive Director
Department of Natural Resources
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Richard J. Buehler
Director and State Forester
Dave Grierson
Sovereign Lands Coordinator
Division of Forestry, Fire & State Lands
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Re: Comments on Proposed Mineral Lease of 37,083 Acres of Sovereign Lands Near
Dolphin Island, Great Salt Lake.

Dear RDCC Members, Mr. Styler, Mr. Buehler and Mr. Grierson:

I write to provide the following comments on the nomination by Great Salt Lake Minerals (“Mining Company”) of 37,083 acres of Great Salt Lake sovereign lands for the mining of mineral salts. Mining Company seeks to lease over 37,000 acres in order to construct giant evaporation ponds on the mudflats and in shallow waters of Great Salt Lake, thereby converting huge areas of the Great Salt Lake Ecosystem into an industrialized mining operation.

My qualifications enable me to provide comments concerning potential impacts to the cultural resources, including prehistoric burial sites, surrounding Great Salt Lake should Mining Company’s proposed expansion be approved. I currently serve as Professor of Anthropology at Utah State University, where I have taught since 1988. I have conducted archaeological research since 1972, and have directed over 50 research projects in the western United States and the country of Jordan. My writings include over 50 published articles and 80 research reports. I have served as President of the Great Basin Anthropological Association and as editor of the journal *Utah Archaeology*.

Impacts to the lake’s cultural resources should be addressed in several ways prior to any approval of the proposed expansion. First, state agencies should conduct a thorough review of

existing site records, reports, and scientific studies, which comprise a sizable volume of information. Second, the state should survey all areas potentially subject to adverse effects from direct or indirect impacts to cultural resources. Third, the state should initiate consultation with the Northwestern Band of the Shoshone Nation, the primary tribal stakeholder for the northern reaches of Great Salt Lake.

With regard to areas with cultural resources most likely to be adversely impacted by the proposed expansion, Clyman Bay and Bear River Bay comprise two significant areas worthy of heightened scrutiny in the state's survey of Great Salt Lake cultural resources. For example, potential impacts from the proposed expansion in Clyman Bay will most likely result from alterations to existing roads and/or the construction of new roads, and from the indirect impacts of increased human activity along these access corridors. Existing cultural resource data suggest that most cultural resources are located on the alluvial fans and mountain flanks bordering the western shore of Clyman Bay.

Likewise, in the area around Bear River Bay, a sizable body of cultural resource data shows that the "uplands" east of the existing Mining Company ponds have some of the highest densities of Fremont-period archaeological sites in the state. Importantly, the entire area stretching eastward from Mining Company's eastern dikes all the way to Interstate 15 harbors hundreds of prehistoric human burials of Fremont age (A.D. 900 – 1300). The human remains in this area are Fremont. The archeological importance of these sites is well-established in the existing literature housed at the Utah Division of State History. Indeed, the density of prehistoric human burials in this area is one of the highest ever documented in the American West.

In addition, the area due north of Mining Company's northernmost ponds in Bear River Bay also exhibits a high frequency of prehistoric human burials. A preliminary study housed at the Utah Division of State History indicates that the human remains in this area are post-Fremont (post A.D. 1300). If so, these burials are likely to be lineal ancestors of the living tribes in the region. Such connection between pre-historic and living people demonstrates the need for not only further research, both regarding existing data and in field surveys, but also consultation with tribal members regarding these cultural resource sites.

I strongly urge members of the RDCC, the Department of Natural Resources, and the Division of Forestry, Fire and State Lands to conduct this research and consultation to ensure that Mining Company's proposed expansion will not harm cultural resource values and archeological sites in and around Great Salt Lake. Until this necessary information is gathered and examined, you should reject the proposed expansion.

Thank you for the opportunity to provide these comments. I request that you carefully consider them and provide a detailed response to each point.

/s/ Steven R. Simms

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