

California State Parks

Root Creek Drainage Forest Fuels Management and Public Safety Improvement Project Initial Study/Mitigated Negative Declaration

Response to Comments Memorandum

INTRODUCTION

California State Parks (CSP) circulated the Root Creek Drainage Forest Fuels Management and Public Safety Improvement Project Draft Initial Study/Mitigated Negative Declaration (IS/MND), prepared pursuant to the California Environmental Quality Act (CEQA) and State CEQA Guidelines, for public and agency comments. The Draft IS/MND was circulated for a 32-day public review and comment period, which began on May 16, 2019 and closed on June 17, 2019.

This memorandum provides responses to comments received on the Draft IS/MND. The responses address environmental issues raised by the comments and elaborate or clarify text in the IS/MND where needed. Text corrections or additions in the IS/MND are also provided, either in response to comments or due to continuing project-related planning during circulation of the IS/MND. These corrections and additions clarify or correct text in the IS/MND and do not change the findings or significance conclusions of the environmental analysis. As explained herein, in light of the whole record, CSP finds that all potentially significant impacts would be clearly mitigated to less than significant, based on the substantial evidence in the IS/MND and this Response to Comments memorandum.

Consistent with the requirements of CEQA, CSP has considered all comments received in the Draft IS/MND. CEQA does not require a lead agency to prepare responses to public comments received on a Negative Declaration or MND; however, CSP has prepared this document to disclose all public and agency comment received and provide good-faith responses to those comments.

RESPONSES TO COMMENTS

Three comment letters were received on the Draft IS/MND during the public review period, and two comment letters were received after the comment period had closed. All five of the comment letters are provided and responded to herein. Comment letters are provided and responded to in chronological order by the date they were received; refer to Table 1 for an overview. Specific comments from each comment letter are included below with responses from CSP. Copies of the comment letters are provided in Appendix A.

Table 1 **List of Commenters**

Letter No.	Commenter	Date
1	Modoc Nation Blake Follis, Modoc Attorney General	May 17, 2019
2	Native American Heritage Commission Gayle Totton, Associate Governmental Program Analyst	May 20, 2019
3	California Department of Fish and Wildlife Amy Henderson, Environmental Scientist	June 14, 2019

Table 1 List of Commenters

Letter No.	Commenter	Date
4	Pacific Crest Trail Association Ian Nelson, Regional Representative	June 18, 2019
5	Pacific Crest Trail Association Ian Nelson, Regional Representative	June 20, 2019

Comment Letter #1: Modoc Nation

Comment 1-1: I have received notice of this project through other sources. Please update your records appropriately, and I look forward to discussing your CEQA analysis at Castle Crags.

Response 1-1: CSP is considering this comment to be a request to include the Modoc Nation on CSP's Northern Butte District (District) Assembly Bill 52 list (AB 52) list, per Public Resources Code Section 21080.3.1(b). CSP has added the Modoc Nation to their AB 52 list and will notify them of future CEQA projects occurring in the District, consistent with AB 52 requirements.

Comment Letter #2: Native American Heritage Commission

Comment 2-1: Cultural and Tribal Cultural Resources assessments are not documented. These should adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both mitigation of project-related impacts to tribal cultural resources. The lack of documented resources does not preclude inadvertent finds, which should be addressed in the mitigation measures.

Response 2-1: As discussed in Section 3.5.1, Environmental Setting, of the IS, a confidential records search (i.e., CHRIS search) for the project area was conducted at the Northeast Information Center (NEIC) on November 27, 2017. Five previously recorded historic resources were identified within the project area, which would be flagged to avoid adverse impacts to these resources. CSP also conducts its own cultural records searches, pursuant to Public Resource Code (PRC) Section 5024, and additional cultural resource surveys of the project area will be conducted. As described in more detail below, CSP developed Standard Project Requirements (SPRs) and mitigation measures that are included in the IS to avoid and minimize impacts to known and unknown cultural resources (including tribal cultural and historical resources). The SPRs include the following:

- ▲ Prior to the start of on-site construction work, a Cultural Resource Specialist will flag and/or fence all cultural resources with a buffer of 50 feet for avoidance during on-site project activities. The Cultural Resource Specialist will remove the fencing after project completion.
- ▲ If anyone discovers previously undocumented historical or archaeological resources during project construction, work within 50 feet of the find will be temporarily halted until the Cultural Resources Specialist designs and implements appropriate treatments in accordance with the Secretary of the Interiors Standards and Guidelines for historical or archaeological resource protection.

Implementation of these SPRs would avoid impacts to known cultural resources and establish a protocol to halt work and avoid damage to resources, upon discovery of unknown cultural or tribal cultural resources. Furthermore, Mitigation Measure CU-1 requires that a qualified Cultural Resources Specialist conduct pre-construction surveys prior to prescribed burning in areas where cultural resources are likely to be found, such as along flat areas or near stream beds. If any cultural resources are found, the Cultural Resource Specialist will flag and/or fence all cultural resources with a buffer of 50 feet for avoidance during on-site

project activities. With the incorporation of the SPRs and mitigation measures into the project, any unknown cultural resources that are discovered during project implementation would be protected in place and avoided.

As discussed in Section 3.17.1 of the IS, no tribes requested in writing prior to release of the IS/MND to be informed about projects in the area, per Assembly Bill 52 (AB 52). CSP requested a Sacred Sites/Lands File Search by the NAHC, which was received by CSP on 12/4/2017. The search did not yield any traditional cultural properties or sacred tribal sites, but a list of those tribes potentially interested in the project were provided. CSP provided notification of the project on 12/11/2017 with an invitation for consultation to the California Native American tribes that were provided by the NAHC. Follow-up calls and emails were made between January and April 2018. No communication or request for consultation was received from any of the notified tribes as a result of CSP's invitation to consult. CSP has documented all outreach to tribes that occurred for the project in Appendix B, "Tribal Consultation Log," of this document. Accordingly, there are no known tribal cultural resources, as defined in PRC Section 21074, known to CSP to be within the project area.

Comment 2-2: SPR conditions for inadvertent finds of human remains in section 3.5.2 (d) (pg. 3-36) is inaccurate.

- Paragraph 2 states that the CSP Sector Superintendent (or authorized representative) will contact the coroner AND the NAHC. The NAHC must wait for notification from the coroner before proceeding. While the monitor can notify their tribe of the find, that tribe may not be named as the MLD for the project.
- In paragraph 3, the NAHC will be contacted by the Coroner and will identify the MLD tribe and contact them. Tribes do not make this determination.

Please refer to California Health and Safety Code§ 7050.5 and Public Resources Code§ 5097.98 for the process of determining if human remains are Native American and designating a Most Likely Descendent.

Response 2-2: Per NAHC's recommendation, CSP has reviewed the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Text revisions have been made to page 3-36 of the IS/MND to more accurately describe the process in the event that human remains are discovered during project implementation. Please refer to Section 1.1.6, "Text Revision 1:Cultural Resources," below for the updated text related to inadvertent finds of human remains.

Comment 2-3: Agencies should be aware that AB 52 does not preclude them from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at <http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultationCalEPAPDF.pdf>, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices."

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

Response 2-3: CSP appreciates the summary of processes related to requesting items from the NAHC and recommendations related to AB 52. Refer to response 2-1 above for an overview of the outreach to tribes that was conducted for the project. The comment does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment 2-4: A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Response 2-4: CSP appreciates the information provided as an attachment to the comment letter. The comment does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment Letter #3: California Department of Fish and Wildlife

Comment 3-1: The California Department of Fish and Wildlife (Department) has reviewed the Initial Study/Mitigated Negative Declaration (MND) dated May 2019, for the above referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. The Project proposes to conduct forest fuel treatments within the Root Creek Drainage and reestablish a secondary emergency access road exiting Vista Point. The Project includes hand and mechanical thinning, prescribed burns, pile burns, ongoing vegetation management and herbicide application, grading to reestablish the secondary emergency access road, and a culvert replacement in Root Creek.

Response 3-1: The comment confirms a shared understanding of the project and does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment 3-2: Based on the mitigation measures incorporated into the Project, the Department has no comment. If the Project description changes in any way or additional biological resource information becomes available, the Department should be notified and provided an opportunity to offer comments regarding the updated information. The Department requests that copies of the preconstruction surveys be sent to the following address: California Department of Fish and Wildlife, ATTN: CEQA, 601 Locust Street, Redding, CA 96001. If any special-status species are found during surveys, the Department requests that CNDDB forms be filled out and sent to Sacramento and a copy of the form be sent to the Regional office at the above address. Instructions for providing data to the CNDDB can be found at <https://wildlife.ca.gov/Data/CNDDB/Submitting-Data>.

Response 3-2: CSP appreciates the comments provided and will keep CDFW informed as the project moves forward. The comment does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment Letter #4: Pacific Crest Trail Association

Comment 4-1: I understand the need for such a project at CCSP. And, I'll follow up with some more detailed comments on letterhead but in the meantime I have a couple questions. As far as I can tell, the document does not contain any mitigation measures specific to the PCT? I do see in the Post Management Repair section that begins on page 2-9 references to flush cutting stumps and repairing soil displacement. However, it is difficult to discern how much cutting there will be within sight of the PCT.

Response 4-1: As described in Section 2.5.1, "Root Creek Drainage Forest Management Plan and Fuels Reduction," of the IS, objectives of the Forest Management Plan include large tree development (i.e., growth) and maintenance of forest heterogeneity. Specific treatment best management practices and desired condition guidelines are provided, which include retaining certain types of trees, such as old growth remnants and guidance related to the size of forest gaps. As discussed in Section 3.1, "Aesthetics," criterion c, short-term changes to visual character and quality may result where thinned and burned areas would be visible from trails and other public access points. Fuels treatment activities would have long-term beneficial effects on scenic resources by reducing the risk of a catastrophic wildfire, which would degrade the existing landscape through burning of the forest crown. Additionally, the project is intended to promote large tree

growth, forest heterogeneity, and overall forest health, which would enhance the visual character and quality of the project area by resulting in more open and diversified views associated with the thinning of the currently overstocked forest. As noted on Page 2-9, CSP will flush cut stumps, return displaced soils to natural topography, and use woody surface materials to cover exposed soils to minimize impacts. The document does not contain mitigation measures specific to the PCT, because no significant impacts to the PCT were identified from project implementation. Refer to Section 1.1.7, "Text Revision 2," below for new text that has been added to the Draft IS to minimize potential visual impacts of the project to PCT users.

Comment 4-2: And, specific to the emergency access road. If I am interpreting the document correctly, it looks as though the road will be cleared to a 16-foot width except where it coaligns with the PCT for more than 600 feet it will be cleared to a 10-foot width. Is that correct?

Response 4-2: The road would be cleared to a 10-foot width where it coaligns with the PCT up to Vista Point. The comment does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment 4-3: All that said, I do have some concerns as to the inevitable visual impacts the project will have on the Pacific Crest National Scenic Trail. A couple things come to mind. I think a field visit as soon as our schedules allow will be helpful for both of us. And, in studying the project area maps/aerial photos I'm thinking there may be a viable PCT reroute opportunity to avoid the 600 plus foot sharing of the emergency access road.

Response 4-3: Refer to response to comment 4-1 above. The project is intended to promote large tree growth, forest heterogeneity, and overall forest health resulting in more open and diversified views associated with the thinning of the currently overstocked forest. CSP will continue to coordinate with the Pacific Crest Trail Association on this project as it relates to the PCT and is open to discussing potential PCT rerouting. In addition, prior to initiation of construction activities and/or prescribed burns, the local Pacific Crest Trail Association representative will be contacted so notifications can be posted on the Pacific Crest Trail Association's website.

Comment 4-4: Lastly, what is the timeline for this process? I assume the Park will take some time to review and address comments received. And, when would project implementation begin?

Response 4-4: CSP is reviewing and responding to all comments received on the IS. CSP's decision-making body will consider the proposed MND together with all comments received during the public review process and adopt the MND along with the MMRP before project implementation can begin. As described in Section 2.5.1, "Root Creek Drainage Forest Management Plan and Fuels Reduction," of the IS, forest thinning activities and prescribed burning would typically occur October through March, and could begin as early as October 2019. The comment does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment Letter #5: Pacific Crest Trail Association

Comment 5-1: I am writing in regards to the Root Creek Forest Fuels Management Project at Castle Crags State Park on behalf of the Pacific Crest Trail Association. As the primary private partner in managing the Pacific Crest National Scenic Trail, the PCTA works closely with agency staff in the maintenance and management of the PCT. We have a long-standing working partnership with California State Parks as the PCT passes through five California State Parks including Castle Crags State Park in Northern California.

Response 5-1: The comment confirms a shared understanding of the long-standing relationship between the Pacific Crest Trail Association and CSP and does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

Comment 5-2: I understand and appreciate the need for forest thinning in the vicinity of Vista Point. Reading through the Initial Study document for the Root Creek project I see there are a number of post management repair activities being proposed for the project as outlined on page 2-9, including flush cutting stumps. However, I ask that the Park consider some additional language specific to the felling operations in the PCT corridor within 300' of the PCT. Flush cutting stumps will certainly minimize visual impacts. In addition, if leave tree marking is to be utilized on the project I would ask that cut tree marking be used within 300' of the PCT. And, please consider utilizing hand felling crews within 300' feet of the trail. Finally, crossing of the trail by machines should be limited to designated crossings.

Response 5-2: Per the Pacific Crest Trail Association's recommendations, CSP has added text to the Draft IS/MND on page 2-7 to help to further minimize potential visual impacts of the project to PCT users. Please refer to Section 1.1.7, "Text Revision 2," below for the text additions related to minimizing visual impacts to PCT users.

Comment 5-3: As stated on page 2-11, the PCT utilizes the old roadbed for 670 feet. And, I appreciate narrowing the clearance on that section from 16' to 10'. However, perhaps this project could also be an opportunity to reroute the PCT off of the road bed altogether. In figure 2-4, it looks as though there might be a viable route to diverge from the existing route and continue west below Kettlebelly Ridge to the PCT where it makes the final ascent of the ridge.

Response 5-3: CSP will continue to coordinate with the Pacific Crest Trail Association on this project as it relates to the PCT and is open to discussing potential PCT rerouting. The does not raise an issue regarding the environmental analysis of the project impacts in the Draft IS/MND; therefore, no additional response is required.

TEXT REVISIONS TO THE INITIAL STUDY

Revisions and additions to the text of the Draft IS/MND have occurred in response to comments and due to continued project-related planning that occurred during the public review period. Where text edits have been made, the original text from the Draft IS/MND is provided below, followed by the revised text. These corrections and additions clarify or correct text in the IS/MND and do not change the findings or significance conclusions of the environmental analysis.

Text Revision 1: Cultural Resources

On page 3-36 of the IS/MND, text revisions have been made to more accurately describe the process in the event that human remains are discovered during project implementation. The original text from the Draft IS/MND is as follows:

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact. As previously described, several native groups inhabited the vast area of northern Shasta County, where the project area is located, including the Okwanuchu Shasta, Wintu, Achumawi and Modoc people. Therefore, human remains could be located within the project area. The project includes grading activities during reestablishment of the emergency access road, which could encounter human remains, if present. The following SPRs would be implemented in the case that human remains are discovered during project activities:

- ▲ In the event that human remains are discovered, work will cease immediately in the area of the find and the project manager/site supervisor will notify the appropriate CSP personnel. Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered with soil. The CSP Sector Superintendent (or authorized representative) will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage

Commission (or Tribal Representative). If a Native American monitor is on-site at the time of the discovery, the monitor will be responsible for notifying the appropriate Native American authorities. The local County Coroner will make the determination of whether the human bone is of Native American origin.

- ▲ If the Coroner determines the remains represent Native American interment, the Native American Heritage Commission (NAHC) in Sacramento and/or tribe will be consulted to identify the most likely descendants and appropriate disposition of the remains. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98). No human remains or funerary objects will be cleaned, photographed, analyzed, or removed from the site before determination.
- ▲ If it is determined the find indicates a sacred or religious site, the site will be avoided to the maximum extent practicable. Formal consultation with the State Historic Preservation Office and review by the Native American Heritage Commission/Tribal Cultural representatives will occur as necessary to define additional site mitigation or future restrictions.

The text has been revised to:

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact. As previously described, several Tribal groups inhabit the vast area of northern Shasta County, where the project area is located, including the Okwanuchu Shasta, Wintu, Achumawi and Modoc people. Therefore, Native American human remains could be located within the project area. The project includes grading activities during reestablishment of the emergency access road, which could encounter human remains, if they are present. The following SPRs would be implemented in the case that human remains are discovered during project activities:

- ▲ In the event that human remains are discovered, work will cease immediately in the area of the find and the project manager/site supervisor will notify the appropriate CSP personnel. Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered with soil. The CSP Sector Superintendent (or authorized representative) will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code. The local County Coroner will make the determination of whether the human bone is of Native American origin.
- ▲ If the Coroner determines the remains are Native American, the Native American Heritage Commission (NAHC) will be consulted to identify the Most Likely Descendants (MLD). After identifying the MLD, the NAHC will contact the appropriate Native American tribe about the find. Work will not resume in the area of the find until proper disposition is complete (PRC §5097.98), in consultation with the MLD.
- ▲ If it is determined the find indicates a sacred or religious site, the site will be avoided to the maximum extent practicable. Formal consultation with the State Historic Preservation Office and review by the Native American Heritage Commission/Tribal Cultural representatives will occur as necessary to define additional site mitigation or future restrictions.

Text Revision 2: Visual Resources

Per the Pacific Crest Trail Association's recommendations, CSP has added text to the Draft IS/MND on page 2-7 to help to further minimize potential visual impacts of the project to PCT users. The original text from the Draft IS/MND is as follows:

Forest thinning would be an ongoing task in the park and would generally occur from October through mid-March (depending on weather conditions), and be applied over the entire Root Creek Drainage (except where slopes are too steep, or within 50 feet of a water course). Depending on staffing levels, thinning activities would occur, on average, 5 days a week, for 5-10 hours per day. Equipment would include

chainsaws, pole saws, mcleods (a hand tool similar to a rake, but one end can cut roots), and possibly a mechanical tree feller. The following seasonal constraints and best management practices (BMPs) would be in place for all activities:

- ▲ The felling of trees would occur outside the migratory bird nesting season (March 15 - September 1) unless a bird focused survey is conducted by a CSP biologist, ensuring no nesting birds would be directly or indirectly harmed or disturbed by the tree felling;
- ▲ Existing nests/tree hollows along with designated perch trees, screening trees, and replacement trees shall be left standing and unharmed;
- ▲ If active or occupied nests for the following species are located, refer to Article 9 of the California Forest Practice Rule for establishment of buffers and avoidance measures: Peregrine falcon, osprey, golden eagle, bald eagle, northern goshawk, great blue heron and great egret;
- ▲ During operations, no operator shall place, discharge, or dispose of or deposit any material including, but not limited to soil, silt, bark, slash, sawdust or petroleum into any water body;
- ▲ Where mineral soil is exposed by tree felling operations on approaches to watercourses, these areas shall be stabilized to the extent necessary to prevent discharge of soils into the waterbody; and
- ▲ Dirt roads may not be used by heavy trucks or motorized equipment during and immediately after significant precipitation so as not to result in significant sediment discharge.

The text has been updated to:

Forest thinning would be an ongoing task in the park and would generally occur from October through mid-March (depending on weather conditions), and be applied over the entire Root Creek Drainage (except where slopes are too steep, or within 50 feet of a water course). Depending on staffing levels, thinning activities would occur, on average, 5 days a week, for 5-10 hours per day. Equipment would include chainsaws, pole saws, mcleods (a hand tool similar to a rake, but one end can cut roots), and possibly a mechanical tree feller. The following seasonal constraints and best management practices (BMPs) would be in place for all activities:

- ▲ Within 300 feet of the PCT corridor, removal of trees (14 dbh and smaller) will occur via hand crews, to the extent feasible, to reduce visual impacts to the PCT. If large mechanical equipment is required, all efforts will be made to keep the equipment off of and outside the viewshed of the PCT.
- ▲ No equipment or vehicles will be parked or staged within the PCT corridor.
- ▲ Leave tree markings will consist of flagging and will be removed once work is complete. Paint will only be used to mark take trees.
- ▲ The felling of trees would occur outside the migratory bird nesting season (March 15 - September 1) unless a bird focused survey is conducted by a CSP biologist, ensuring no nesting birds would be directly or indirectly harmed or disturbed by the tree felling;
- ▲ Existing nests/tree hollows along with designated perch trees, screening trees, and replacement trees shall be left standing and unharmed;
- ▲ If active or occupied nests for the following species are located, refer to Article 9 of the California Forest Practice Rule for establishment of buffers and avoidance measures: Peregrine falcon, osprey, golden eagle, bald eagle, northern goshawk, great blue heron and great egret;

- ▲ During operations, no operator shall place, discharge, or dispose of or deposit any material including, but not limited to soil, silt, bark, slash, sawdust or petroleum into any water body;
- ▲ Where mineral soil is exposed by tree felling operations on approaches to watercourses, these areas shall be stabilized to the extend necessary to prevent discharge of soils into the waterbody; and
- ▲ Dirt roads may not be used by heavy trucks or motorized equipment during and immediately after significant precipitation so as not to result in significant sediment discharge.

Text Revision 3: Cultural Resources

Text has been added to page 3-34 and 3-35 to include updates related to historic resources within the project area. The following text has been added:

In addition, there are two historic resources within the project area: a potential wagon road (CA-SHA-1571H) and a railroad logging grade/spur (CA-SHA-2655H). The potential wagon road is an abandoned dirt road near Vista Point parking lot and no historic artifacts have been found. The railroad spur is an earthen grade composed of cuts and fills, and is currently along the PCT alignment; no ties, hardware, or rail is present. As described in CSP's Section 5024 cultural resources evaluation, the emergency access road would overlap with the wagon road and a portion of the railroad spur. Development of the emergency access route would improve the existing conditions of the road bed and spur, which are currently disconnected and overgrown. The project also includes replacement of a failing culvert along the lower section of the road and Root Creek. Furthermore, the emergency access road would be a linear feature with no changes to the road bed other than some clearing and vegetation removal to improve the road for use by CSP staff. CSP would also implement SPRs to avoid impacts to previously undocumented historic resources during project construction, if discovered. Therefore, there would be no impact to these resources, which is also noted in the PRC Section 5024 cultural resources evaluation.

Appendix A

Comment Letters

From: Blake Follis <blake.follis@modoctribe.com>
Sent: Friday, May 17, 2019 7:39 PM
To: Walsh, Brian@Parks <Brian.Walsh@parks.ca.gov>
Subject: Castle Craggs

Mr. Walsh,

I have received notice of this project through other sources. Please update your records appropriately, and I look forward to discussing your CEQA analysis at Castle Craggs.

Sincerely,

Blake Follis, Esq.
Modoc Attorney General

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May 20, 2019

Trish Ladd
California Department of Parks and Recreation
400 Glen Drive
Oroville, CA 95966

Also sent via e-mail: trish.ladd@parks.ca.gov

RE: SCH# 2019059070, Castle Crags State Park Root Creek Drainage Forest Fuels Management and Public Safety Improvement Project, Community of Castella; Shasta County, California

Dear Ms. Ladd:

The Native American Heritage Commission (NAHC) has reviewed the Mitigated Negative Declaration prepared for the above referenced project. The review included the Introduction and Project Description; and the Environmental Checklist, section 3.5, Cultural Resources and section 3.17, Tribal Cultural Resources prepared by Ascent Environmental for the California Department of Parks and Recreation. We have the following concern(s):

1. Cultural and Tribal Cultural Resources assessments are not documented. These should adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources. **The lack of documented resources does not preclude inadvertent finds**, which should be addressed in the mitigation measures.
2. SPR conditions for inadvertent finds of human remains in section 3.5.2 (d) (pg. 3-36) is inaccurate.
 - Paragraph 2 states that the CSP Sector Superintendent (or authorized representative) will contact the coroner AND the NAHC. The NAHC must wait for notification from the coroner before proceeding. While the monitor can notify their tribe of the find, that tribe may not be named as the MLD for the project.
 - In paragraph 3, the NAHC will be contacted by the Coroner and will identify the MLD tribe and contact them. Tribes do not make this determination.

Please refer to California Health and Safety Code § 7050.5 and Public Resources Code § 5097.98 for the process of determining if human remains are Native American and designating a Most Likely Descendent.

Agencies should be aware that AB 52 does not preclude them from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton

Gayle Totton, B.S., M.A., Ph. D
Associate Governmental Program Analyst

Attachment
cc: State Clearinghouse

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for “tribal cultural resources”⁵, that now includes “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.”⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code §65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18).¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project’s impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency’s environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code §21084.3 (b).¹⁷ An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code §65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of “preserving or mitigating impacts to places, features, and objects described §5097.9 and §5091.993 of the Public Resources Code that are located within the city or county’s jurisdiction. Government Code §65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Public Resources Code §5097.9 and §5097.993.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city’s or county’s jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

- A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Region 1 – Northern
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 14, 2019

Trish Ladd
California Department of Parks and Recreation
400 Glen Drive
Oroville, CA 95966

Subject: Review of the Initial Study/Mitigated Negative Declaration for the Castle Craggs State Park Root Creek Drainage Forest Fuels Management and Public Safety Improvement Project, State Clearinghouse Number 2019059070, Shasta County

Dear Ms. Ladd:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study/Mitigated Negative Declaration (MND) dated May 2019, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. The Project proposes to conduct forest fuel treatments within the Root Creek Drainage and reestablish a secondary emergency access road exiting Vista Point. The Project includes hand and mechanical thinning, prescribed burns, pile burns, ongoing vegetation management and herbicide application, grading to reestablish the secondary emergency access road, and a culvert replacement in Root Creek.

Based on the mitigation measures incorporated into the Project, the Department has no comment. If the Project description changes in any way or additional biological resource information becomes available, the Department should be notified and provided an opportunity to offer comments regarding the updated information. The Department requests that copies of the preconstruction surveys be sent to the following address: California Department of Fish and Wildlife, ATTN: CEQA, 601 Locust Street, Redding, CA 96001. If any special-status species are found during surveys, the Department requests that CNDDDB forms be filled out and sent to Sacramento and a copy of the form be sent to the Regional office at the above address. Instructions for providing data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Conserving California's Wildlife Since 1870

Trish Ladd
California Department of Parks and Recreation
June 14, 2019
Page 2

If you have any questions, please contact me at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,



Amy Henderson
Environmental Scientist

cc: Trish Ladd
California Department of Parks and Recreation
Trish.Ladd@parks.ca.gov

State Clearinghouse
state.clearinghouse@opr.ca.gov

Amy Henderson
California Department of Fish and Wildlife
Amy.Henderson@wildlife.ca.gov

From: [Ladd, Trish@Parks](mailto:Ladd.Trish@Parks)
To: [Lily Bostrom](#)
Subject: FW: Castle Crags Root Creek Project IS/MND
Date: Thursday, June 20, 2019 9:27:31 AM
Attachments: [image001.png](#)

From: Ian Nelson <inelson@pcta.org>
Sent: Tuesday, June 18, 2019 10:14 AM
To: Ladd, Trish@Parks <Trish.Ladd@parks.ca.gov>
Subject: RE: Castle Crags Root Creek Project IS/MND

Hello Trish-

I understand the need for such a project at CCSP. And, I'll follow up with some more detailed comments on letterhead but in the meantime I have a couple questions. As far as I can tell, the document does not contain any mitigation measures specific to the PCT? I do see in the Post Management Repair section that begins on page 2-9 references to flush cutting stumps and repairing soil displacement. However, it is difficult to discern how much cutting there will be within sight of the PCT.

And, specific to the emergency access road. If I am interpreting the document correctly, it looks as though the road will be cleared to a 16 foot width *except* where it coaligns with the PCT for more than 600 feet it will be cleared to a 10 foot width. Is that correct?

All that said, I do have some concerns as to the inevitable visual impacts the project will have on the Pacific Crest National Scenic Trail. A couple things come to mind. I think a field visit as soon as our schedules allow will be helpful for both of us. And, in studying the project area maps/aerial photos I'm thinking there may be a viable PCT reroute opportunity to avoid the 600 plus foot sharing of the emergency access road.

Lastly, what is the timeline for this process? I assume the Park will take some time to review and address comments received. And, when would project implementation begin?

I look forward to working with you during this important process.
Thank you for your time,
-Ian

Ian Nelson
Regional Representative
Northern California/Southern Oregon
PCTA Saw Program Coordinator
Pacific Crest Trail Association
POB 458
Medford, OR 97501



Trish Ladd
Environmental Scientist
California State Parks
Northern Buttes District
400 Glen Drive
Oroville, CA
95966

Dear Ms Ladd,

I am writing in regards to the Root Creek Forest Fuels Management Project at Castle Crags State Park on behalf of the Pacific Crest Trail Association. As the primary private partner in managing the Pacific Crest National Scenic Trail, the PCTA works closely with agency staff in the maintenance and management of the PCT. We have a long-standing working partnership with California State Parks as the PCT passes through five California State Parks including Castle Crags State Park in Northern California.

I understand and appreciate the need for forest thinning in the vicinity of Vista Point. Reading through the Initial Study document for the Root Creek project I see there are a number of post management repair activities being proposed for the project as outlined on page 2-9, including flush cutting stumps. However, I ask that the Park consider some additional language specific to the felling operations in the PCT corridor within 300' of the PCT. Flush cutting stumps will certainly minimize visual impacts. In addition, if leave tree marking is to be utilized on the project I would ask that cut tree marking be used within 300' of the PCT. And, please consider utilizing hand felling crews within 300' feet of the trail. Finally, crossing of the trail by machines should be limited to designated crossings.

As stated on page 2-11, the PCT utilizes the old roadbed for 670 feet. And, I appreciate narrowing the clearance on that section from 16' to 10'. However, perhaps this project could also be an opportunity to reroute the PCT off of the road bed altogether. In figure 2-4, it looks as though there might be a viable route to diverge from the existing route and continue west below Kettlebelly Ridge to the PCT where it makes the final ascent of the ridge.

I look forward to working with you and the Parks staff on this important project. And, I hope we can find some time to get in the field this season as the process moves forward.

Sincerely,
Ian Nelson
Regional Representative
PCTA



Appendix B

Tribal Consultation Log

Title	Name	Company Name	Phone	Email	Website	Address Line 1	City	State	ZIP Code	Phone	Email Follow-Up	Response
Chairperson	Mickey Gemmill Jr.	Pit River Tribe of California	(530) 335-5421	None listed	http://pitrivertribe.org/	36970 Park Avenue	Burney	CA	96013	1/19/2018	4/26/2018 (letter)	1/19/18 Follow up call to Pit River THPO. Left message indicated a letter and maps were sent to her and the Chair and ask to contact me if any issues. Nothing has been received to date. 4/26/18 Follow up letter and map sent to Natalie Forest-Perez Pit River Tribe new THPO. She indicated that she would forward to Madesi Band Representative and would email back if there were any input. Nothing back has been received to date.
Cultural Resource Representative	Brandon Harrison	Pit River Tribe of California - Madesi Band	(209) 597-7469	None listed	http://pitrivertribe.org/madesi/	36968 Park Avenue #R	Burney	CA	96013	1/19/2018	NA	Follow up consultation was made through Tribal THPO to discuss at Tribal Council meeting. Nothing back has been received to date. Original project letter sent 12/11/2017
Chairperson	Kyle Self	Greenville Rancheria	(530) 284-7990	kself@greenvillerancheria.com	https://www.greenvillerancheria.com/maidu_tribe_history.aspx	P.O. Box 279	Greenville	CA	95947	1/19/2018	NA	1/19/18 Follow up call to Lacy Miles, Greenville Rancheria Cultural Representative. Indicated if there were concerns would get back to us. Nothing received to date.
Chairperson	Frieda Bennett	Quartz Valley Indian Community	(530) 468-5907	frieda.bennett@qvir-nsn.gov	http://www.qvir.com/	13601 Quartz Valley Road	Fort Jones	CA	96032	1/26/2018	1/26/2018	1/26/18 Follow up email sent to Frieda Bennett – undeliverable message. Called and spoke to Ms. Bennett. She indicated there was a meeting on Monday, presumably 1/29/18, and will bring it up. Nothing has developed since.
Chief	Caleen Sisk	Winnemem Wintu Tribe	(530) 275-2737	winnememwintutribegmail.com	http://www.winnememwintu.us/	14840 Bear Mountain Road	Redding	CA	96003	NA	1/26/2018	1/26/18 Follow up email sent to Caleen Sisk. No phone is listed on NAHC list. No response has been received to date. Original project letter sent 12/11/2017
Cultural Resources Director	Kelli Hayward	Wintu Tribe of Northern California	None listed	None listed	https://wintutribegmail.com/about/	P.O. Box 995	Shasta Lake	CA	96019	1/26/2018	NA	1/26/18 Follow up call to James Hayward. According to phone message is out of office until further notice. Message also indicates Louis Davies is taking call and works in Cultural Resources office. Called her number 530-225-8979 ext 1111 and left message we were seeking input for the project. No response received to date. Original project letter was sent 12/11/2018
Chairperson	Jack Potter Jr.	Redding Rancheria	(530) 225-8979	None listed	http://www.redding-rancheria.com/	2000 Redding Rancheria Road	Redding	CA	96001	1/26/2018	NA	1/26/18 Follow up call to James Hayward. According to phone message is out of office until further notice. Message also indicates Louis Davies is taking call and works in Cultural Resources office. Called her number 530-225-8979 ext 1111 and left message we were seeking input for the project. No response has been received to date. Original project letter was sent 12/11/2018
Chairperson	John Hayward	Nor-Rel-Muk Nation	(530) 410-1125	norermuk@com-pair.net	None listed	P.O. Box 1967	Weaverville	CA	96093	NA	1/26/2018	1/26/18 Follow up email sent to Nor-Rel-Muk. No response received to date.
Representative	Bill George	Pit River Tribe of California - Atsuge Band	(530) 410-4786	None listed	http://pitrivertribe.org/	P.O. Box 216	Burney	CA	96013	1/26/2018	NA	Follow up consultation was made through Tribal THPO to discuss at Tribal Council meeting. No response has been received to date. Original project letter sent 12/11/2017
Cultural Resource Representative	Marv Mike	Pit River Tribe of California - Ajumawi Band	(530) 917-9687	None listed	http://pitrivertribe.org/	P.O. Box 3	Fall River Mills	CA	96028	1/26/2018	NA	Follow up consultation was made through Tribal THPO to discuss at Tribal Council meeting. Nothing back has been received to date. Original project letter sent 12/11/2017
Representative	Everado Dela Torre	Pit River Tribe of California - Aporige Band	(530) 249-6678	None listed	None listed	P.O. Box 125	Nubieber	CA	96068 (The NAHC incorrectly lists zipcode as 960101)	1/26/2018	NA	Follow up consultation was made through Tribal THPO to discuss at Tribal Council meeting. Original project letter sent 12/11/2017
Cultural Resource Program Manager	James Hayward Sr.	Redding Rancheria	(530) 242-4543	jamesh@redding-rancheria.com	https://wintutribegmail.com/about/	2000 Redding Rancheria Road	Redding	CA	96001	1/26/2018	NA	1/26/18 Follow up call to James Hayward. According to phone message is out of office until further notice. Message also indicates Louis Davies is taking call and works in Cultural Resources office. Called her number 530-225-8979 ext 1111 and left message we were seeking input for the project. No response received to date.
Chairperson	Roy V. Hall Jr.	Shasta Nation	(530) 468-2314	None listed	http://www.shastaindiannation.org/	P.O. Box 1054	Yreka	CA	96097	NA	NA	12/19/17 Shasta Nation letter undeliverable and sent back. Address sent to PO Box 1054 Yreka, CA 96097. This is the same on NAHC list. It is believed Mr. Hall may have passed.
Interim Pit River Cultural Information Officer	Brenda Heard	Pit River Tribe of California	(530) 335-5421	None listed	None listed	36970 Park Avenue	Burney	CA	11/14/2162	1/26/2018	NA	Follow up consultation was made through Tribal THPO to discuss at Tribal Council meeting. Original project letter sent 12/11/2017