



United States Department of the Interior

BUREAU OF RECLAMATION
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VIA ELECTRONIC MAIL ONLY

Mr. Reid Nelson
Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
Attn: Dr. John Eddins

Subject: National Historic Preservation Act (NHPA) Section 106 Consultation for the Shasta Dam and Reservoir Enlargement Project (SDREP) Paleoflood Studies, Archaeological Monitoring Plan and Methodology, Shasta County, California (I 8-NCAO-086.002)

Dear Mr. Nelson:

Through previous correspondence, the Bureau of Reclamation initiated consultation with you regarding the commencement of SDREP pre-construction activities. These activities consist of studies to inform final design for raising the crest of Shasta Dam by 18.5 feet, as well as work related to environmental permitting and NHPA Section 106 compliance for the dam raise and reservoir expansion, including the development of a programmatic agreement (PA) to govern the Section 106 process during SDREP construction. As discussed in our previous correspondence, the California State Historic Preservation Officer (SHPO) has provided written notification that her office will not engage in consultation with Reclamation regarding the SDREP due to prohibitions delineated in California Public Resources Code Section 5093.542. As such, Reclamation is consulting with your office in lieu of the SHPO regarding all undertakings associated with the SDREP, including those proposed during the pre-construction period.

As part of pre-construction work, Reclamation currently is proposing to conduct paleoflood studies on various river terraces along the Sacramento, McCloud, and Pit rivers in Shasta County (Enclosure 1: Figure 1). The proposed studies, which involve excavating test pits on these river terraces, will be conducted by geologists from Reclamation's Technical Services Center (TSC) located in Denver, Colorado. Data collected through these studies will be used to better understand the nature and magnitude of past flood events on these rivers, information that is critical for SDREP planning and final design. The proposed studies constitute an undertaking requiring compliance with Title 54 USC § 306108, commonly known as Section 106 of the NHPA, and its implementing regulations at 36 CFR Part 800. With this correspondence, we are initiating consultation with you regarding this undertaking and seeking your concurrence with our proposal to use archaeological monitoring of the geologic pit excavations to complete historic properties identification efforts pursuant to 36 CFR § 800.4(b).

TSC geologists initially identified 42 potential pit locations for study. Based on information generated through preliminary Section 106 review (described further below), the maximum number of proposed test pits has been reduced to 30. The current undertaking involves excavating up to 30 geologic test pits using hand tools (i.e., shovels and pick axes). The dimensions of each test pit will be up to 3 feet wide by 3 feet long by 3 feet deep. The geologists will document soil stratigraphy in each pit, and may collect samples of charcoal, wood, and/or other organics for radiocarbon dating prior to backfilling. Reclamation has determined the APE for the undertaking consists of each of the 30 proposed 3 feet wide by 3 feet long by 3 feet deep pit locations and a surrounding buffer of approximately 200 feet. The buffered area is included in the APE to allow for flexibility in final pit placement. The locations and legal descriptions comprising the APE are shown on Figures 1 and 2 (Enclosure 1).

Efforts to date to identify historic properties have consisted of records searches covering the APE and surrounding 1/8-mile radius through the Northeast Information Center (NEIC) of the California Historical Resources Information System, the Bureau of Land Management Redding Field Office (BLM), and the U.S. Forest Service Shasta Trinity National Forest (USFS). Reclamation also initiated consultation efforts with federally recognized Indian tribes and non-federally recognized Native American organizations and individuals identified as potentially having knowledge of or concerns with cultural resources in the APE (see below).

Briefly, Reclamation cultural resources staff completed a desktop review of the NEIC, BLM, and USFS records search results, comparing all locations proposed by the TSC geologists for study with the locations of known cultural resources. Due to the close proximity of some proposed pit locations to such resources, 12 pit locations were eliminated from consideration. Currently, 30 geologic test pit locations are proposed. These include 21 Priority 1 locations and 9 Priority 2 locations. Priority 1 locations are those identified by TSC geologists as having the greatest potential to yield suitable paleoflood data. Excavation and sampling in Priority 1 locations will be completed first. Priority 2 locations will be sampled only after work within Priority 1 locations has concluded and if more data is required to achieve research goals.

Information about the currently proposed pit locations, excavation priority, recorded cultural resources in the immediate vicinity, and associated land ownership is provided in Table 1 (Enclosure 2). The locations of proposed geologic test pits in relation to recorded cultural resources are depicted on Figures 2-13 (Enclosure 1). Two proposed pit locations (Pit 12 and Pit 13) are located within the boundaries of the Lake Britton Archaeologic District, a historic property included in the National Register of Historic Places (NRHP). A total of 151 prehistoric sites are located within the Lake Britton Archaeological District, the boundaries of which include a 15-mile-long section of the Pit River canyon. None of the prehistoric sites comprising this district are located in or within 1/8-mile of the APE for this undertaking.


Pursuant to 36 CFR § 800.3(f)(2), Reclamation identified the following federally recognized Indian tribes that might attach religious and cultural significance to historic properties in the APE: the Enterprise Rancheria Estom Yumeka Maidu Tribe, the Greenville Rancheria, the Paskenta Band of Nomlaki Indians, the Pit River Tribe, the Quartz Valley Indian Community, and the Redding Rancheria. In an attempt to gather information about historic properties of concern, in accordance with 36 CFR § 800.4(a)(4), Reclamation sent letters describing the undertaking to these Indian tribes in August and October 2018. Reclamation also sent letters in August and October 2018 to the following non-federally recognized Native American organizations and individuals that may have cultural resources concerns in the APE: the Nor-Rel-Muk Nation, the

Shasta Indian Nation, the Shasta Nation, the Tasman Koyom, the Winnemem Wintu Tribe, the Wintu Tribe of Northern California, the Wintun Educational and Cultural Council, and Mr. Howard Wynant. To date, Reclamation has received no responses regarding this undertaking.

To complete historic properties identification efforts, Reclamation proposes to rely on archaeological monitoring of the geologic test pit excavations. Using archaeological monitoring as a method to identify historic properties is not standard practice for NHPA Section 106 compliance; however, it can be appropriate in some situations (e.g., where issues related to accessibility or certain resource concerns are present). Since the proposed undertaking involves numerous remote and discontinuous project locations, complicated logistics for coordinating multiple rights of entry, known cultural resources in the vicinity of several proposed geologic pits, and accelerated SDREP project timelines, Reclamation believes using archaeological monitoring in the manner proposed for the current undertaking is warranted. Through telephone and email communications on November 29, 2018, Reclamation discussed our proposed reliance on archaeological monitoring with Advisory Council on Historic Preservation (ACHP) Program Analyst, Dr. John Eddins. Dr. Eddins indicated that, dependent on his review of Reclamation's methodology for monitoring, the ACHP is comfortable with having an archaeologist monitor the geologic test pit excavations.

As requested, enclosed please find Reclamation's proposed archaeological monitoring plan and methodology for this undertaking (Enclosure 3). We request your review of the above and enclosed information and your concurrence with the archaeological monitoring plan and methodology as proposed. We also invite your comments on the delineation of the APE and the appropriateness of our historic properties identification efforts to date. Through the use of archaeological monitoring as conditioned in our monitoring plan and methodology, Reclamation will fulfill agency requirements to identify historic properties for the undertaking. Additionally, through use of the proposed methodology, adverse effects on historic properties from the undertaking will be avoided. If you have any comments or questions concerning the undertaking or monitoring plan, please contact Ms. Joanne Goodsell, Archaeologist, at (916) 978-4694 or jgoodsell@usbr.gov.

Sincerely,



Anastasia T. Leigh
Regional Environmental Officer

Enclosures - 3

cc: Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, California 95816
(w/o enclosure)