

**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

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**VIA ELECTRONIC MAIL**

Ms. Anastasia T. Leigh, Regional Environmental Officer  
U.S. Bureau of Reclamation, Mid-Pacific Regional Office  
2800 Cottage Way, Sacramento, CA 95825-1898

Subject: Section 106 Consultation for the North of Delta Offstream Storage/Sites Reservoir  
Feasibility Geotechnical Investigation Project, Glenn and Colusa Counties, California  
(19-MPRO-043)

Dear Ms. Leigh:

The State Historic Preservation Officer (SHPO) received your letter on August 27, 2019 initiating consultation on the above referenced undertaking to comply with Section 106 of the National Historic Preservation Act of 1966 (as currently amended) and its most recent implementing regulations found at 36 CFR Part 800. The U.S. Bureau of Reclamation (Reclamation) proposes to provide Federal funding to the Sites Project Authority (Authority) for a proposed geotechnical investigation undertaking. Reclamation is requesting concurrence with its finding of *no adverse effect to historic properties*. Submitted documentation is:

- Enclosure 1: REPORT: "Cultural Resources Sensitivity Analysis Report-North of Delta Offstream Storage/Sites Reservoir Feasibility Geotechnical Investigation Colusa and Glenn Counties California; August 2019." [By: J. Offermann, Horizon Water & Environment, LLC., Oakland, CA];
- Enclosure 2: Compact Disk with two REPORTS:
  - "North-of-the-Delta Offstream Storage Project-Draft Archaeological Inventory Report, Colusa and Glenn Counties, California; January 2013. [By: J. Offermann, URS Corporation, Sacramento, CA] [For: US Bureau of Reclamation, Mid Pacific Region, Sacramento, CA];
  - "North of Delta Offstream Storage Project Draft Built Environment Identification and Evaluation Technical Report, Glenn and Colusa Counties, California, March 2013." [By: J. Offermann, URS Corporation, Sacramento, CA] [For: US Bureau of Reclamation, Mid Pacific Region, Sacramento, CA].

The proposed project will entail non-invasive surface geologic mapping and surface geophysical investigations, and subsurface geotechnical investigations, which entails a total of 36 geotechnical exploratory borings (32 on land and four in the Sacramento River) and 20 cone penetrometer testings (CPTs). A detailed discussion of the project components is included with the supporting documentation (Enclosure 1: Section 1.2 Project Description).

The proposed project elements are situated in multiple locations as depicted on the Rail Canyon, Logan Ridge, Sites, Maxwell, Moulton Weir, and Colusa, California 7.5' quadrangle maps. Reclamation's area of potential effects (APE) includes about 16.1 acres cumulatively. All of the bore location activities, including site preparation, will be contained within an overall footprint no greater than 20 by 50 feet. The geophysical lines will not exceed a width of 20 feet. The vertical APE will be variable with the majority restricted to several inches for vehicle traffic, helicopter landing, etc. The maximum vertical APE will be a depth of 140 feet to account for the deepest impact from the 36 8.5-inch-diameter auger bores.

Historic properties identification efforts were done through an Authority contract with Horizon Water and Environment, LLC (Horizon). A prior number of technical studies have been conducted for the much broader North of Delta/Sites Reservoir Offstream Storage Project, which partially encapsulates the current geotechnical investigation. Reclamation found the following reports to be of particular pertinence: *North-of-the-Delta Offstream Storage Project Draft Archaeological Inventory Technical Report* and the *North-of-the-Delta Offstream Storage Project Draft Built Environment Identification & Evaluation Technical Report* (provided on compact disk). Although the current geotechnical project design was informed partially by the findings of the previous studies, the previous studies did not completely capture all of the current project footprint. Where access was attainable, additional surveys were conducted; however, eleven bore locations and one of the geophysical lines have not been surveyed to date. At those remaining twelve locations, due to landowner negotiations regarding access, Reclamation anticipates an exceedingly short window of time to both conduct on-the-ground identification efforts and then conduct the project's required geotechnical investigations; thus a traditional pre-project survey identification effort is not possible for these twelve particular locations and an alternate plan will be applied.

As a result, Horizon prepared a sensitivity analysis for the various project component's potential to encounter the presence of buried cultural resources. In addition, information was sought from the Native American community. Results indicate two of the unsurveyed proposed bore locations evince a high or very high sensitivity for the potential presence of buried cultural resources. The remaining locations exhibit a low to very low sensitivity. Reclamation states that, as a due diligence, the Authority has made an environmental commitment to attach both archaeological and tribal monitors to the geotechnical team. In locations not previously surveyed the monitors will conduct a quick targeted survey. Should any type of resources be identified, the work area will be relocated within the APE. Any needed adjustment of bore locations due to the presence of cultural resources will be documented and reporting notifications will be provided as required.

Reclamation identified the Colusa Indian Community Council (Cachil Dehe), the Cortina Band of Indians, the Enterprise Rancheria of Maidu Indians, the Grindstone Rancheria of Wintun-Wailaki, the Mechoopda Indian Tribe of Chico Rancheria, the Paskenta Band of Nomlaki Indians, and the Yocha Dehe Wintun Nation as Indian tribes who might attach religious and cultural significance to historic properties and sent letters on June 10, 2019, inviting their participation in the Section 106 process. After a small project design change and a 500-foot extension of one of the geophysical lines, additional letters were sent on August 13, 2019, describing the design change. To date, the Cachil Dehe and the Yocha Dehe Wintun Nation have responded requesting to further consult on the anticipated upcoming Sites Reservoir Project. The Yocha Dehe expressed no concerns or identified any resources within the context of the current geotechnical project. Cachil Dehe stated concerns that this project could impact archaeological/cultural sites, though they did not identify specific sites within the APE, and have requested tribal monitoring. Through California AB52 consultations with the Authority, the Yocha Dehe, the Cachil Dehe, and the Grindstone Rancheria of Wintun-Wailaki have reported a three-tribe compact to work together regarding cultural resources. The Authority has made a commitment to include tribal monitoring and is currently negotiating for such monitoring with the involved tribes. Reclamation states that it will continue to consult with the Yocha DeHe and Cachil Dehe, and make any notifications as required. Should any other concerns subsequently arise, Reclamation will also work to address them and will follow-up with required notifications.

Through the above documented efforts, Reclamation has identified one National Register of Historic Places (NRHP) eligible resource, the Glenn-Colusa Canal (P-11-000605) within the project APE. Bore TRRPGP will be placed on the outer edge of this canal's levee. The canal is recommended as being NRHP eligible under Criterion A due to its association with the development of irrigation and farming in the Sacramento Valley, and under Criterion C as a good example of an early 20th century water conveyance system. Because a complete evaluation of the Glenn-Colusa Canal is outside current project scope, for current project purposes only, Reclamation proposes to treat the Glenn-Colusa Canal as eligible under both Criterion A and C. Reclamation applied the criteria of adverse effect [36 CFR § 800.5(a)(1)] and the Secretary of the Interior's Standards for the Treatment of Historic Properties [36 CFR § 68.3(a)] to the proposed project scope and finds that the proposed project will result in no significant alterations to the historic characteristics and features that make the Glenn-Colusa Canal potentially eligible for the National Register. The proposed boring will be conducted entirely within the outer levee fill material and the hole will be back-filled upon completion and the levee returned to its pre-project contours and visual appearance.

Based on a review of geologic processes, past land use, and the scope of current project activities, Reclamation finds that the project is a *no adverse effect to historic properties affected* outcome and seeks concurrence with its effect finding for this undertaking. Following OHP review of the documentation, the following comments are offered.

- *I compliment Reclamation and the Authority on their efforts to provide an inclusive and robust monitoring plan to address the unsurveyed locations that exist within the project;*
- *Pursuant to 36 CFR 800.4(a)(1), there are no objections to the discontinuous APE as defined and documented;*
- *Pursuant to 36 CFR 800.4(b), Reclamation has documented a reasonable and good faith effort to appropriately identify historic properties within the area of potential effects;*
- *Pursuant to 36 CFR 800.4(c)(2), **I do not object** that, for the purposes of this undertaking only, Reclamation will treat the Glenn-Colusa Canal water conveyance system as an eligible district under Criterion A for the theme of development of irrigated agriculture and farming in the Sacramento Valley, and under Criterion C as a good example of a local and intact early canal system;*
- *Reclamation finds that the proposed undertaking will result in no adverse effect to historic properties. Pursuant to 36 CFR 800.5(c)(1), **I do not object.***

Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800 (as currently amended). Should you require further information, please contact Jeanette Schulz at [Jeanette.Schulz@parks.ca.gov](mailto:Jeanette.Schulz@parks.ca.gov) or her desk phone is: (916) 445-7031.

Sincerely,



Julianne Polanco  
State Historic Preservation Officer