5.18 TRIBAL CULTURAL RESOURCES

This section describes existing conditions and potential impacts on TCRs as a result of construction, operation, and maintenance of the project. It presents the methods and results of cultural resources studies of the project area and of preliminary coordination and discussions with California tribes.

5.18.1 Environmental Setting

5.18.1.1 Outreach to Tribes

On October 11, 2019, Pacific Legacy contacted the NAHC on behalf of the applicant to request a search of the Sacred Lands File for the full length of the proposed project right-of-way in California. The NAHC responded on October 29, 2019, to report positive findings and urged contact with the Alturas Rancheria of Pit River Indians for further information (Appendix E). The NAHC also suggested contact with the following tribal representatives:

- Vi Riley, Cultural Resources Coordinator, Alturas Rancheria of Pit River Indians
- Alturas Rancheria, Tribal Administrator/Environmental, Alturas Rancheria of Pit River Indians
- Bernold Pollard, Chairperson, Fort Bidwell Indian Community of Paiute
- Kyle Self, Chairperson, Greenville Rancheria of Maidu Indians
- Paul Garcia, Chairperson, Honey Lake Maidu
- Ron Morales, Chairperson, Honey Lake Maidu
- Charles White, Tribal Administrator, Pit River Tribe of California
- Natalie Forrest-Perez, Tribal Historic Preservation Officer, Pit River Tribe of California
- Agnes Gonzalez, Chairperson, Pit River Tribe of California
- Deana Bovee, Chairperson, Susanville Indian Rancheria
- Grayson Coney, Cultural Director, Tsi Akim Maidu
- Gene Whitehouse, Chairperson, United Auburn Indian Community of the Auburn Rancheria
- Darrel Cruz, Cultural Resources Department, Washoe Tribe of Nevada and California

On behalf of the applicant, Stantec has reached out to the tribes listed in Table 5.18-1 regarding the proposed project. The proposed project's state lead agency, CPUC, will conduct consultation efforts consistent with Assembly Bill 52, and the proposed project's federal lead agency will conduct consultation efforts consistent with implementing regulation for Section 106 of the NHPA (36 CFR Part 800.3[c]).

Table 5.18-1 Consultation with Regional Tribes

Tribe	Date Mailed	Emailed	Date Emailed	Response	Follow-Up
Confederated Tribes of Warm Springs	3/25/2020	X	3/27/2020	C. Nauer responded to Robley Lason via email on April 7, 2020, and wants to consult. Expressed concern about potential effects to historic properties or cultural resources within the APE.	Keep notified. Wants to participate in site identification efforts.
Confederated Tribes of the Umatilla	3/25/2020	X	3/27/2020	-	-
Burns Paiute Tribe	3/25/2020	X	3/27/2020	Daine Teeman sent a response email to Robley Lawson on March 27, 2020, with attached documents. Stated that the Project's path in Oregon is entirely within their aboriginal lands. Wanted to arrange a time to speak about the Project. Email was forwarded to Shelly Tiley the same day for follow up. suggests also contacting warm springs, Fort Bidwell, Klamath Tribes	Suggested tribes were already contacted.
Washoe Tribe of Nevada and California	3/25/2020		n/a	Shelly received a phone call from the Washoe Tribe on March 31, 2020, saying that they received the letter for Neil Mortimer but he is no longer Chair. The letter was forwarded to the new Chair, Serrel Smokey.	-
Washoe Tribe of Nevada and California	3/25/2020	X	3/27/2020	Darrel Cruz (THPO) sent an email to Shelly Tiley on April 10, 2020 and attached a formal response letter that states that he is not aware of cultural resources within the Project area but wants to maintain consultation and wants to review the archaeological report.	-
Reno-Sparks Indian Colony	3/25/2020	X	3/27/2020	-	-
Reno-Sparks Indian Colony	3/25/2020	X	3/27/2020	-	-
Fort Bidwell Indian Community of Paiute	3/25/2020	X	3/27/2020	-	-

Tribal Cultural Resources

Tribe	Date Mailed	Emailed	Date Emailed	Response	Follow-Up
Pit River Tribe of California	3/25/2020		3/30/2020	Meeting with Pit River and Shelly Tiley held in person on February 28, 2020. Follow up letters and emails sent on March 25, 2020. Email sent to Shelly Tiley on April 21, 2020, from Raymond Lee Alvarez requesting tribal monitors, TERO, and free fiber optics. Tiley also received letter via email from Kyle Desautel (Pit River Tribal Administrator) on March 31, 2020 who sent documents. Sarah L. is going to contact Zayo for them to issue response	Wants to consult; also see important information on employment of tribal members etc. on tribal lands (TERO). Add this email to contact list: kdesautel@pitrivertribe.org.
Susanville Indian Rancheria	3/25/2020	X	3/27/2020	-	-
Honey Lake Maidu	3/25/2020		n/a	-	-
Honey Lake Maidu	3/25/2020	X	3/27/2020	-	-
Greenville Rancheria of Maidu Indians	3/25/2020	X	3/27/2020	-	-
Cedarville Rancheria of Northern Paiute	3/25/2020	X	3/27/2020	-	-
Alturas Rancheria of Pit River Indians	3/25/2020	X	3/27/2020	-	-
Klamath Tribes	5/4/2020	X	5/5/2020	Virtual meeting held by the BLM with Klamath on April 24, 2020.	Need to follow up with mailed and emailed letters.
Klamath Tribes	5/4/2020	X	5/5/2020	Email response received from Anderson on May 13, 2020. Notes that a meeting between Zayo and the Klamath Tribes Tribal Council in the future once the right-of-way is defined. Request sharing maps, and construction plans.	-

Notes:

APE = Area of Potential Effects

BLM = Bureau of Land Management

TERO = Tribal Employment Rights Office

THPO = Tribal Historic Preservation Officer

Zayo = Zayo Group, LLC

5.18.1.2 Tribal Cultural Resources

Stantec's background research and intensive pedestrian field survey of the APE resulted in the identification of three potential TCRs. However, formal consultation has not yet confirmed nor identified these resources.

5.18.1.3 Ethnographic Study

The following sections present an overview of the ethnography of each region (i.e., Modoc Uplands, Madeline Plains, Honey Lake Basin, and Long Valley) traversed by the project alignment.

Modoc Uplands Ethnography and Ethnohistory

The most notable ethnohistoric reports for the Modoc Uplands related to Modoc/Achumawi and Euro-American (Indian-Anglo) relations during the 1800s include Milliken (2000), Ray (1963), Riddle (1914), Theodoratus Cultural Research (1981), and Woods and Raven (1985, 1992). These and other sources describe accounts of Indian-Anglo interaction, conflict, and social adjustment throughout Modoc and Pit River territory beginning during the early 1800s, as well as how Native Americans responded to these changes and how they continue to do so today. The Modoc and Pit River people still live in and near their ethnographic territories.

Early historical accounts of the Modoc and Pit River Indians come from the journals of John Work during his journeys in Pit River territory from 1831 to 1833. Other histories are based on early expeditions to establish trails and routes through Pit River territory, like the Klamath Falls-to-Sacramento Valley trail set by the Hudson Bay Company in 1829. Throughout the early 1800s, a great animosity prevailed between the Modoc and Pit River Indians and Euro-American explorers and settlers. The 1848 Gold Rush exacerbated these tensions, as thousands of Euro-Americans poured into California. Newspapers reported raids and further acts of retribution (Milliken 2000:16).

Language and Territory

The Modoc language is classified as a member of the Sahaptin-Chinook branch of the Penutian linguistic stock (Barrett 1910; Kroeber 1925). Although considered linguistically isolated (Ray 1963), the Modoc and their neighbors to the north, the Klamath *(?ewksiknii*, People of the Lake), share an almost identical dialect. The cultural position of the Modoc has been debated anthropologically. Kroeber (1925) originally associated them with the California culture area, but later found a Great Basin affiliation to be more accurate. Others place the Modoc culturally with the Plateau groups (WIRTH 1988).

Ethnographically, the Modoc occupied 5,000 square miles east of the Cascades in southern Oregon and Northern California. Formally, Modoc territory included Little Klamath Lake, Modoc Lake, Tule Lake, Lost River Valley, and Clear Lake, and ranged as far south as Goose Lake. Modoc tribal territory was divided into three areas: the Gumbatwas, "people of the west;" Kokiwas, "people of the far out country;" and Paskanwas, "river people" (Ray 1963). These divisions were purely geographical, not ethnic or political. The territorial boundaries between Modoc bands were quite fluid; however, the outer boundaries were

well-defined, and for other tribes to encroach these boundaries would certainly result in warfare (Ray 1963:201-211).

The 11 bands or tribelets that occupied the Pit River and its lesser drainages at the time of Euro-American contact are collectively designated the Pit River Indians and are divided into two linguistically related groups: the Achumawi and the Atsugewi. The Achumawi consist of nine mutually intelligible bands (Hammawi, Kosalektawi, Hewisedawi, Astariwawi, Atwamsini, Ajumawi, Illmawi, Itsatawi, and Madesi). Ethnographically, they held the northern part of Pit River territory (Merriam 1926:5). The Atsugewi comprised two bands, Atsuge and Aporige, and their ethnographic territory centered around Hat Creek and Eagle Lake (Kniffen 1928:303). Together, the Achumawi and Atsugewi languages make up the Palaihnihan branch of the Hokan linguistic superfamily (Olmsted 1966).

Ethnographic Pit River territory encompassed a relatively large area in northeastern California extending from Mount Shasta and Goose Lake near the Oregon border in the north to Mount Lassen and the Madeline Plains to the south, and from the Warner Mountains in the east to Montgomery Creek in the west (Kniffen 1928:300; Kroeber 1925:305; Merriam 1926:3). This vast region exhibits diverse environments and considerable differences in topography and habitat. North of the Pit River is high, dry lava country with marshy meadows, springs, and abundant pine and fir timber. Kniffen (1928:301) and Kroeber (1925:305) concluded that the region was not occupied permanently but was visited and used seasonally, such as for forays to Glass Mountain to obtain obsidian. Within the Pit River territory, Hewisedawi territory stretched from the southern portion of Goose Lake in the north to include Big Sage Reservoir in the southwest and the western slopes of the Warner Mountains in the east between Cedar and Fandango Peaks. Kosalektawi territory stretched from the area around the confluence of the north and south forks of the Pit River (the site of the present-day City of Alturas) to include Warren Peak to the southeast and Cedar Peak to the northeast (Bevill and Nilsson 2005). The main Kosalektawi village, identified by Kniffen as *Kosale'kta* and by Merriam as *Ko'se-al-lek'-tah*, was located at the site of the present-day City of Alturas (Kniffen 1928; Merriam 1926).

Northern Paiute territory stretched from present-day eastern Oregon and southwestern Idaho through northeastern California and northern Nevada—some 78,000 square miles. The Northern Paiute language is a Western Numic language of the Uto-Aztecan family. Twenty-one autonomous bands make up the Northern Paiute. The Surprise Valley area was inhabited by one of these bands, the Kidutokado, whose 5,000-square-mile territory spanned from the eastern slopes of the Warner Mountains across the present-day California–Oregon border to the northern end of Goose Lake, east to the border between Lane and Harney counties in Oregon, then southwest through the northwest corner of Nevada, and west to the Warner Mountains just south of Lower Alkali Lake (Stewart 1939).

Subsistence and Settlement Patterns

Modoc and Achumawi subsistence regimes reflected a strong riverine orientation, and fishing provided the staple food (Kniffen 1928:302; Woods and Raven 1992:7). The early spring sucker run was an important component of the Modoc "seasonal round." Trout, tui chub, minnows, and freshwater mussels were plentiful for the Modoc along Lost River and for the Achumawi along Pit River and Goose and Eagle Lakes. The Achumawi kept salmon dried in slabs or ground into meal for year-round consumption

(Kroeber 1925:309). Voegelin (1942:180) reports that fishing places more than hunting grounds were owned and guarded by the Achumawi.

The Pacific Flyway migration route for waterfowl meant that lakes and marshes always held multiple species of waterfowl, regardless of the season. Ducks, geese, and swans were present in the winter, while pelicans, loons, and gulls were in residence year-round, making the latter group a reliable resource at any time. Terrestrial faunal resources included deer and small game, such as quail and squirrels, and occasionally elk and bear. Game was captured using various strategies including nets, blinds, and drives, and game capture represented both individual and communal pursuits (Woods and Raven 1985:6).

Both groups exploited a variety of plants for food, medicine, cordage, and basket-making. Camas bulbs were collected from the bottomlands, water lily seeds were found around the lakes, and various grass seeds, nuts, and fruits were collected in the hills and mountains. Tule was a plentiful and reliable resource. Plants were used for dietary, medicinal, clothing, and basketry uses. Tobacco was the only cultivated crop among the Achumawi and was smoked in both tubular pipes and two-piece wood and stone pipes (Voegelin 1942:92).

Well-watered areas were important to both groups. The Modoc made their permanent winter villages mainly near the shores of Tule, Lower Klamath, and Clear lakes, as well as along the Lost River (Kroeber 1925; Ray 1963). For the Achumawi, plentiful resources were found near water courses, namely the Pit River and marshy tules and areas around Goose and Eagle lakes. Kniffen (1928:302) called these areas "centers of attention" because they supported the largest indigenous populations. Winter villages for both groups comprised between three and seven permanent, semi-subterranean, earth-covered structures. The smoke hole doubled as rooftop-entrance, and each house was typically inhabited by an average of five members of a single family.

Fishing forays began from the villages in March (WIRTH 1988). Fishing camps were semi-permanent with less elaborate mat-covered structures built in shallow pits or temporary tule structures (Kroeber 1925:328). The oldest type of Modoc structure is the summer dome-shaped house made from tule mats covering a frame of willow poles (Ray 1963:156-157).

At the conclusion of the fish runs, groups moved to epos harvesting areas, and by June or July, the family groups scattered into smaller camps to collect camas roots (WIRTH 1988). Temporary sun shelters were constructed by covering poles with tule mats, weeds, or grasses. Circular windbreaks made from sagebrush were temporary shelters that could be constructed in a hurry to provide shelter from the elements. Other structures included utility huts, sun shelters, windbreaks, and sweat lodges. Utility huts were separate cooking areas adjacent to the main dwelling that were also used for storage, women's work areas, and menstrual and birthing huts (Ray 1963).

This seasonal round of movement for the Modoc and the Achumawi resulted in the formation of numerous sites where different recurrent activities took place. Seasonal base camps may have been occupied for several weeks or months, with temporary resource procurement camps occupied anywhere from one to several nights. These small camps may have been surrounded by numerous task-specific sites such as butchering or stone tool manufacturing areas, hunting blinds, or milling sites. At each of

these locations, evidence was left behind that forms the foundation of many ethnographic period archaeological deposits (Gates 2007).

In the case of the Northern Paiute, including the Kidutokado, subsistence followed seasonal and geographic patterns, but the approach was more dispersed and dedicated to foraging. The spring brought spawning fish and bird eggs; the summer, seeds; and the fall, pine nuts. Hunting contributed to the diet year-round, though to a lesser extent than gathering and fishing. Small game and deer were hunted throughout the year (Delacorte et al. 1997). Early ethnographic studies by Stewart (1939, 1941) identified distinct bands within Northern Paiute territory, each of which was typically named for a prominent food source in the area. The Kidutokado were named for the woodchuck on which their diet relied (Stewart 1939).

Technology and Material Culture

The technology and material cultures of the Modoc and the Achumawi were very similar, with only minor differences, often resulting from the preference for locally available raw materials, particularly obsidian. This correspondence is not unexpected given the interaction of the groups and the general similarity of their economic pursuits. Similar technological elements between these groups may represent similar adaptive strategies and are useful to examine as ethnographic analogies when attempting to understand regional prehistory.

The Modoc and the Achumawi employed a diverse range of implements used for hunting large and small game; gathering plants, roots, bulbs, seeds, and fruits; fishing; and processing food. The hunting toolkit included bone and antler tools; flaked stone knives, scrapers, and projectile points; and bows and arrows. Bones and antlers from large animals were important for making tools for cutting and scraping. Sections of antlers were used to flake obsidian to make projectile points. Knives, scrapers, and projectile points were made from obsidian, basalt, and chert. Hunting bows were made from either yew or juniper, and arrows were formed from willow and worked with pumice stone.

Gill-nets with attached tule floats, dip nets, two-pronged spears, hooks and lines, and clubs were used for fishing. Nets enabled them to catch large amounts of suckers at once, and points were attached to shafts to spear individual fish. Chubs, minnows, trout, and eels were caught using gorgets, a bone sharpened on both ends and hung by string tied in the middle. Spears with two prongs were also used for spearing fish from banks, and spears with multiple prongs were used from canoes and rafts. The spear points were made from split pieces of deer leg bone or worked pieces of mountain mahogany. The fish were split, hung on pine racks, and dried for winter storage.

Simple rafts were the main mode of transportation for the Modoc. The Modoc and Achumawi constructed rafts of pine, juniper, and willow-bark planks lashed onto pine frames using tule rope. Canoes made from cedar, pine, or fur were burned and carved using stone tool adzes. Paddles were usually long and narrow, serving as both paddle and oar (Heizer and Whipple 1971; Olmsted and Stewart 1978). Canoes were an expensive item for the Modoc because suitable trees were only present in the extreme eastern part of Modoc territory.

Baskets, moccasins, and house mats were made from tule reeds, cattails, or cattail rushes. Bone awls were used for weaving these baskets and mats. The strong and water-resistant fiber of the nettle plant was used to make the bottom of baskets and for stringing beads. Mortars and pestles were used to process dried meat and cattail roots. Large mortars were made of vesicular lava, and smaller ones were made from lighter, porous volcanic material.

Intergroup Relations

Modoc trade networks may have been in place as early as 5,000 BC. They traded with the Shasta tribe for *Olivella* and dentalium shells, and later traded for colored sandstone and clay, jade, soapstone, and serpentine from the Klamath River. Slaves captured during warfare with neighboring tribes were traded with the Klamath, and the Modoc likely reciprocated with animal skins and basketry. Obsidian quarried from Glass Mountain was traded throughout Northern California (Raven 1984).

The Achumawi were geographically positioned to serve as a trade conduit between peoples to the west and east. Even groups with whom there was conflict, such as the Modoc, were part of the trade network (Milliken 2000:16). Oak trees were abundant along the Pit River, and dried acorn mash was a traded commodity. Objects that indicated wealth among the Achumawi included magnesite cylinders, dentalia, and clamshell beads. Clamshell disk beads were regularly used for currency (Kroeber 1925:311, Woods and Raven 1992:10).

Madeline Plains Ethnography and Ethnohistory

Language and Territory

In addition to the Kosalektawi, whose territory included the area around the present-day City of Alturas, the Hammawi band of Achumawi also inhabited the Madeline Plains area. Hammawi territory spread out from the valley of the south fork of the Pit River, centered around the present-day town of Likely, including Grouse Mountain to the northwest, Scheffer Mountain and Signal Butte to the north, Warren Peak in the northeast, and the Jess and West Creek valleys in the east (Bevill and Nilsson 2005; McGuire and Nelson 2002).

Ethnographic Mountain Maidu territory spanned an area that stretched from Mount Lassen in the west to the Honey Lake Basin in the east, and south along the Diamond Mountains to the Sierra Buttes, including the area around Lake Almanor. This land includes rugged uplands, rivers, marshes, and open flats. The Mountain Maidu were one of three groups—the Nisenan or Southern Maidu, the Northeastern or Mountain Maidu, and the Konkow—that made up the Maiduan language family, which was related to fellow Penutian languages such as Miwok, Ohlone, Wintun, and Yokuts (McGuire 2007).

The Madeline Plains and Honey Lake area was also inhabited by the smallest of the Northern Paiute bands, the Wadatkuht, whose territory ran from the present-day California–Nevada border along the eastern edge, through the present-day town of Doyle and the Diamond Mountains, then northwards to Horse Lake and McDonald Peak and eastwards to the state line (Delacorte et al. 1997; Riddell 1960).

Subsistence and Settlement Patterns

Hammawi and Mountain Maidu subsistence patterns resembled those of the Modoc and the Achumawi (Section 5.18.1.3, Ethnographic Study). The Maidu gathered numerous fruits, nuts, and roots, including wild plums, strawberries, serviceberries, manzanita, elderberries, pine nuts, walnuts, acorns, yarrow, wild onions, and carrots. The Maidu also hunted waterfowl and collected crabs and duck and goose eggs in wetland areas and around Honey Lake (Shapiro et al. 2005). In particular, Maidu men used dogs to help them in hunting bears for meat and for hides to use in rituals (Delacorte et al. 1997; McGuire 2007; Shapiro et al. 2005).

Maidu villages contained around seven semi-subterranean multifamily houses from 20 to 40 feet in diameter, each holding up to 35 people; during the summer months, when families sallied from the winter villages, they built open-sided pole-and-brush structures (Delacorte et al. 1997). The large houses were built in a conical shape around five structural poles covered with slabs of cedar bark (Evans 1978; Shapiro et al. 2005).

As mentioned previously, Northern Paiute subsistence was more dispersed and dedicated to foraging while still following geographic and seasonal patterns. The spring brought spawning suckers up Long Valley Creek and into Paiute nets; it also brought duck eggs. The summer brought roots and seeds, while acorns (particularly in the Diamon Mountains) and pine nuts were plentiful in the fall. The hunting of deer and small game contributed to the diet year-round, though to a lesser extent than gathering and fishing; a communal antelope drive took place in the spring (Riddell 1960). As mentioned previously, Stewart (1939, 1941) identified the Northern Paiute bands, each of which was typically named for the salient source of food in its area. The wada-seeds of the plants of genus *Suaeda* (including seepweeds and sea-blites) gave the Wadatkuht ("wada-eaters") their name. Wadatkuht winter villages comprised a small number of houses, often fewer than 10, located near water. The conical pole framework was covered by mats of tule or other kinds of brush. During the summer, families constructed simple temporary shelters and windbreaks when they dispersed from the village.

Technology and Material Culture

The technology of the Hammawi and Mountain Maidu resembles that of the Modoc and the Achumawi (Section 5.18.1.3, Ethnographic Study). The Mountain Maidu and the Northern Paiute both used stone projectile points for hunting game and knives and scrapers for processing. They used spears, hooks, nets, and poisons for fishing in lakes and rivers. For processing plant resources, they used groundstone tools, including bedrock mortars and pestles, as well as handstones and milling slabs. The Maidu made nets for fishing, traps for hunting game, and mats from tule. They used willow to make twined conical baskets, seed beaters, children's cradles, and hopper baskets (Shapiro et al. 2005).

The Northern Paiute used bows and arrows, corrals, traps, and other enclosures made of brush, branches, and rocks when hunting game such as deer, antelope, and desert bighorn sheep (Fowler and Liljeblad 1986). They also hunted grouse, waterfowl, marmots, rabbits, porcupines, ground squirrels, and insects using stone projectile points, knives, and scrapers during the process (Stewart 1941). Their approaches to fishing depended on the locale—lake fishing called for hooks and lines, spears, and gill nets, while river fishing required platforms, weirs, and basket traps in addition to nets and spears. Tule

was used in various applications from rafts and fishing nets to mats, roofing material, bags, and clothing. Willow bark and branches went into making baskets, hats, and children's cradles (Fowler and Liljeblad 1986; Stewart 1941; Steward and Wheeler-Voegelin 1974).

Honey Lake Ethnography and Ethnohistory

The Honey Lake Basin falls within the ethnographic territory of the Mountain Maidu and the Wadatkuht (Section 5.18.3, Ethnographic Study).

Honey Lake Basin in the Historic Period

The Honey Lake Basin has a colorful and storied history. Located in southeastern Lassen County, it was first settled by pioneer Isaac Roop in 1854. Roop had visited the area in 1853 and returned the following year to build a log cabin and a store on the newly opened Nobles Emigrant Trail, an offshoot of the California Trail (Hoover et al. 2002:149). In 1855, Peter Lassen and his traveling companions also built a cabin in the Honey Lake Basin, which was occupied until it burned down in 1896 (Stoll 2004:68). Geographic isolation and the ambiguous, as-yet-unsurveyed border area between California and the Utah Territory contributed to 20 of the original settlers, including Roop and Lassen, forming the "Territory of Nataqua" in 1856 (Davis 1942; Hoover et al. 2002). The territory was 240 miles long and 155 miles wide and included residents of the Carson, Eagle, and Washoe Valleys in present-day Nevada. Ironically, the territory failed to include the Honey Lake Basin, which led to a great deal of ridicule for the founders (Davis 1942:225). In 1857, Nataqua Territory residents petitioned Congress for separation from Utah and official recognition as a territory, and in 1858, while awaiting a decision on their petition, formed a local government, electing Roop as the territory's governor in 1859 (Hoover et al. 2002:149). In 1861, when Congress created the Nevada Territory, the Honey Lake Basin became embroiled in a territorial dispute between Nevada's newly formed Lake County and California's Plumas County that resulted in both counties holding elections in the basin. Territorial tensions escalated in 1863, resulting in a skirmish between Honey Lake residents and Plumas County officials, known as the Sagebrush War. A truce was called after two men were wounded, and in 1864 Lassen County was created, at last settling the issue (Hoover et al. 2002:149).

Early economic and population growth in the Honey Lake Basin was slow, with few permanent settlers outside of the upper end of the valley near Susanville until the late nineteenth century. Susanville (formerly Rooptown), was named after Isaac Roop's daughter and is the Lassen County seat. The Susanville Post Office was established in 1860, and the city was incorporated in 1900 (Durham 1998). Susanville is where Roop and his party first settled upon arrival to the area, and Roop's original log cabin still stands in Susanville's city park (Hoover et al. 2002:149). Slow growth in the area was caused in part by its remote location, severe wet/dry weather cycles that affected water levels in Honey Lake and impacted the raising of livestock and crops, and by violent clashes between settlers and local Native American groups who resisted the arrival of newcomers to their native lands (Stoll 2004:69-71).

While ranching and agriculture, timber, and railroads played a significant economic role in the development of the Honey Lake Basin, much like the Modoc Uplands and Madeline Plains regions discussed above, water management also played a central role and was crucial to the success of those other industries.

Long Valley Ethnography and Ethnohistory

Language and Territory

The Washoe language is a member of the Hokan linguistic stock, which includes Pomo, Yuman, and Palaihnihan (d'Azevedo 1986; Downs 1966; Kroeber 1925). The Washoe were thus distinguished from other tribes of the Great Basin, all of whom spoke Numic languages. Ethnographically, Washoe territory centered on Lake Tahoe, from Antelope Valley on the present-day California-Nevada border to Long Valley in the south and the Honey Lake area in the north. Outside of central settlement areas, the Washoe shared resources in their territory with other neighboring groups, including the Wadatkuht of the Honey Lake Basin (d'Azevedo 1986).

Subsistence and Settlement Patterns

Washoe subsistence regimes incorporated a seasonal round of hunting and gathering, making use of resources available in both the Sierra Nevada Range and the Great Basin (Moratto 1984). Numerous streams and lakes offered access to trout, suckers, and mountain whitefish in great numbers. Early spring brought roots and bulbs, such as bitterroot, camas, and wild onion. Spring also marked the arrival of migratory waterfowl such as ducks, which were hunted and their eggs collected. Seeds and nuts were gathered through the summer and into the fall, with particular emphasis on acorns for groups living near the Diamond Mountains, such as those in Long Valley, or pine nuts for those living in more arid areas to the east (Delacorte et al. 1997). Supplemental foods came from hunting, as single hunters or small groups pursued game like antelope, deer, rabbits, and mountain sheep (Moratto 1984; Delacorte 1997).

Permanent settlements were generally located on high ground in the vicinity of large valleys with access to a wide array of resources. Conical houses 12 to 15 feet in diameter were constructed of a cedar bark covering over a framework of wooden poles; each might hold seven people or more. During parts of the year, small groups or entire families might establish temporary dome-shaped structures of brush while away from the permanent settlement in search of resources. Washoe groups at times ranged as far as Mono Lake in the Sacramento Valley (Barrett 1917; Delacorte et al. 1997; Moratto 1984).

Technology and Material Culture

Not unlike other groups in northeastern California, the Washoe used a variety of implements in their fishing, hunting, and gathering activities. They employed hook and line, nets, spears, and traps to catch fish. They used flaked stone arrows and bows for hunting. Groundstone implements, including handstones, milling stones, mortars, and pestles, were used to process botanic materials. Willow provided fiber for cordage and basket weaving (Barrett 1917).

5.18.2 Regulatory Setting

Approximately 42.6 miles of the proposed alignment pass through federal lands (40.75 miles of BLM lands, 1.76 miles of USFWS lands, and 0.09 miles of Modoc National Forest lands); 5.4 miles are on California state lands (including 2.7 miles of California Department of Fish and Game lands, 2.7 miles of State Lands Commission holdings, and 0.01 mile of other state lands); and the remaining 145.7 miles pass through private or local municipal landholdings.

5.18.2.1 Federal

National Environmental Policy Act

Encroachment onto federal lands would require discretionary authorization from the respective administering agencies. These encroachment authorizations would likely be in the form of "special use permits." BLM is the NEPA lead agency for the project, with BIA and U.S. Forest Service acting as NEPA cooperating agencies.

NEPA (40 CFR 1500-508) requires that federal projects take into account effects on historic and cultural resources. NEPA Section 1500.1 states the following:

> *(a) The National Environmental Policy Act (NEPA) is our basic national charter for protection of the environment. It establishes policy, sets goals (section 101), and provides means (section 102) for carrying out the policy. Section 102(2) contains "action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act. The regulations that follow implement section 102(2). Their purpose is to tell federal agencies what they must do to comply with the procedures and achieve the goals of the Act. The President, the federal agencies, and the courts share responsibility for enforcing the Act so as to achieve the substantive requirements of section 101.*
>
> *(b) NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.*
>
> *(c) Ultimately, of course, it is not better documents but better decisions that count. NEPA's purpose is not to generate paperwork--even excellent paperwork--but to foster excellent action. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment. These regulations provide the direction to achieve this purpose.*

Following NEPA Section 1500.2:

> *Federal agencies shall to the fullest extent possible:*
>
> *(a) Interpret and administer the policies, regulations, and public laws of the United States in accordance with the policies set forth in the Act and in these regulations.*
>
> *(b) Implement procedures to make the NEPA process more useful to decision makers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. Environmental impact*

> *statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.*
>
> *(c) Integrate the requirements of NEPA with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively.*
>
> *(d) Encourage and facilitate public involvement in decisions which affect the quality of the human environment.*
>
> *(e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.*
>
> *(f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.*

National Historic Preservation Act

The project would cross lands managed by federal agencies. Zayo must obtain permits to construct and operate the project through lands managed by these agencies, and the issuance permits are considered federal undertakings subject to the provisions of Section 106 (54 USC Section 306108) of the NHPA and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). Section 106 of the NHPA requires federal agencies to consider the effects of their proposed actions (undertakings) on historic properties and provides the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. Because the project would cross lands under the direct jurisdiction of several federal land-managing agencies, these agencies must be consulted and must comply with Section 106 requirements. The federal lead agency and cooperating agencies would require that Zayo provides the information that they deem necessary to meet their Section 106 obligations.

Regulations at 36 CFR Part 800 provide a process for satisfying the requirements of Section 106 that involves identifying historic properties, determining the effects of an undertaking on historic properties, and resolving adverse effects on historic properties. These activities occur within a consultation process involving the federal agency or agencies, SHPO, and other participants as defined at 36 CFR Part 800.2. BLM is identified as the lead agency for Section 106 compliance for the project.

National Register of Historic Places

Regulations listed in 36 CFR Part 800.16 define a "historic property" as any prehistoric or historic period district, site, building, structure, or object listed in or eligible for listing in the NRHP. Cultural resources that cannot be avoided by a project must be evaluated according to NRHP criteria listed under 36 CFR Part 60.4, which states the following:

Tribal Cultural Resources

> *The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and*
>
> *(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or*
>
> *(b) that are associated with the lives of persons significant in our past; or*
>
> *(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
>
> *(d) that have yielded, or may be likely to yield, information important in prehistory or history.*
>
> *A cultural resource that meets one or more of the above criteria and retains integrity sufficient to convey its significance may be determined to be eligible for listing in the NRHP.*

A property of traditional or Native American religious and cultural importance, known as TCP per Section 101(d)(6)(A) of the NHPA, can also be evaluated for eligibility and listed in the NRHP. The TCP must be a physical property or place, must retain integrity, and must meet one of the four basic NRHP criteria per 36 CFR Part 60.4. Such properties are usually found to be NRHP-eligible under 36 CFR 60.4(a) or for their association with important events that have made contributions to the broad patterns of local or regional Native American history. The identification and evaluation of TCPs involves obtaining information from contemporary tribes regarding traditional values that are represented by cultural resources. The TCP concept is presented in National Register Bulletin 38 (Parker and King 1990). A TCP is defined as property eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (a) are noted in that community's history, and (b) are important in maintaining the continuity of the community (Parker and King 1990:1).

A cultural landscape is a geographic area, including both cultural and natural resources, associated with an historic event, activity, or person or exhibiting other cultural or aesthetic values (Birnbaum 1993). One of the types of cultural landscapes is an ethnographic landscape, which Birnbaum (1996:5) describes as a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, sacred religious sites, and massive geological features. Small plant communities, animals, subsistence and ceremonial grounds are often components of heritage resources.

The evidence of human activity associated with cultural landscapes is examined through eleven landscape characteristics, which are land uses and activities, patterns of spatial organization, response to the natural environment, cultural traditions, circulation networks, boundary demarcations, vegetation related to land use, buildings/structures/objects, clusters, archaeological sites, and small scale elements.

Tribal Cultural Resources

Consultation is a significant part of the Section 106 process, and regulations under 36 CFR Part 800.2(c)(2) outline the steps that federal lead agencies must take in consulting with federally recognized tribes on tribal and other lands. Non-federally recognized tribes with concerns about an undertaking's effects on historic properties are often invited to participate as "additional consulting parties" under 36 CFR Part 800.2(c)(5).

5.18.2.2 State

California Environmental Quality Act

For projects financed or approved by public agencies, CEQA requires that the effects of a project on historical resources be assessed. "Historical resources" are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, or scientific importance.

Under CEQA guidelines, an impact is considered significant if a project will have an effect that may change the significance of a resource (PRC Section 21084.1). Actions that would change the significance of a historical resource include demolition, replacement, substantial alteration and/or relocation of historical properties. Before the significance of impacts can be determined and mitigation measures developed, the significance of cultural resources must be determined.

PRC Subsection 21074 defines TCRs as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion on the CRHR or included in a local register of historical resources. Examples of TCRs include a location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world; and a location where Native American religious practitioners have historically gone and are known or thought to go today to perform ceremonial activities in accordance with traditional cultural rules of practice.

TCR is a term defined at PRC Section 21074.

> *(a) "Tribal cultural resources" are either of the following:*
>
> > *(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
> >
> > > *(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
> > >
> > > *(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*
> >
> > *(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

> *(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*
>
> *(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).*

"Effects on tribal cultural resources" are described at PRC Section 21084.2. A project that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. Therefore, Section 21084.3 states the following:

> *(a) Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.*
>
> *(b) If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided in Section 21080.3.2, the following are examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:*
>
> > *(1) 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, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.*
> >
> > *(2) 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:*
> >
> > *(A) Protecting the cultural character and integrity of the resource.*
> >
> > *(B) Protecting the traditional use of the resource.*
> >
> > *(C) Protecting the confidentiality of the resource.*
> >
> > > *(3) 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.*
> >
> > *(4) Protecting the resource.*

A basis for defining the significance of historical resources under CEQA may be found in PRC 5024.1, Title 14 CCR Section 4850.3. CRHR was established "to identify the state's historical resources and indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." Historical resources may be listed in the CRHR if they meet the eligibility criteria for listing in the

register as defined at PRC 5024.1, Title 14 CCR Section 4850.3. According to CEQA Guidelines Section 15064.5(a) (3), "a resource shall be considered by the lead agency to be 'historically significant' if the resource has integrity and meets at least one of the criteria for listing in the California Register of Historic Resources."

Integrity describes the degree to which a resource's defining characteristics persist, and it is assessed in terms of retention of location, design, setting, materials, workmanship, feeling, and association. To maintain integrity, a resource must possess at least some of these aspects. A historical resource may have lost sufficient integrity to be eligible for listing in the NRHP and yet still be eligible for listing on the CRHR. A resource may have lost its historic character and yet still be eligible for listing on the CRHR if it has the potential to yield significant scientific or historical information or specific data.

A project that may cause a substantial adverse change to the significance of a historical resource is considered to have a significant adverse impact on the environment (CEQA Guidelines Section 15064.5[4][b]). A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired (CEQA Guidelines Section 15064.5[4][b][1]).

California Register of Historical Resources

CEQA requires lead agencies to consider the potential impacts of a project on historical resources. "Historical resources" may include but are not limited to any object, building, structure, site, area, place, record, or manuscript that is considered historically or archaeologically significant (PRC Section 5020.1). Generally, a resource would be considered historically significant if it is listed or is eligible for listing in the CRHR. Per PRC Section 5024.1, a resource may be listed as a historical resource in the CRHR if it meets any of the following criteria:

(1) It is associated with events that have made a contribution to the broad patterns of California history;

(2) It is associated with the lives of persons important in our past;

(3) It embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important individual or possesses high artistic values; or

(4) The resource has yielded, or may be likely to yield, important information in prehistory or history.

These criteria mirror those NRHP criteria found under 36 CFR Part 60.4. The CRHR was created to identify important cultural resources and to indicate what properties would be subject to protection from substantial adverse change to the extent prudent and feasible. Certain resources are automatically included in the CRHR, including California properties listed or determined to be eligible for listing in the NRHP, California Historical Landmarks numbers 770 and above, and California Points of Historical Interest.

Tribal Cultural Resources

Per CEQA Guidelines Section 15064.5[b], project activities may have a significant impact on the environment if they would cause a substantial adverse change in the significance of a historical resource. Activities that could result in a substantial adverse change include demolition, replacement, substantial alteration, or relocation of the resource. Steps that must be implemented to comply with CEQA Guidelines include the identification of cultural resources that may be impacted by a project; the evaluation of cultural resources that cannot be avoided by a project based on established thresholds of historical, architectural, archaeological, cultural, or scientific importance; the evaluation of the effects of a project on historical resources; and the development and implementation of measures to mitigate the effects of the project on historical resources or unique archaeological resources as defined under PRC Section 21083.2.

The State Office of Historic Preservation (OHP) has broad authority under federal and state law regarding the implementation of historic preservation programs within California. The SHPO comments on effect determinations and the eligibility of cultural resources for listing in the NRHP and CRHR.

The California Governor's Office of Planning and Research offers guidance on procedures to identify historical resources, evaluate their importance and potential for listing in the CRHR, and estimate potential impacts on historical resources. The advice series strongly recommends that Native American concerns and the concerns of other interested parties be solicited as part of the cultural resources inventory. In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains.

5.18.2.3 Local

Lassen County General Plan

Lassen County's General Plan does not discuss cultural resources (Lassen County 1999, as amended).

Modoc County General Plan
Historic and Cultural Resources

Prehistoric and historic archaeological sites of the Native American Modoc and Achumawi are central to the understanding and interpretation of the Native American cultural heritage of Modoc County. Early settler-Indian battle sites, many of which are registered as State Historical landmarks, give testimony to the historical interactions and conflicts between Native American culture and Euro-American culture (Modoc County 1988, as amended).

Sierra County General Plan

Cultural Resources Goal: Identify and protect the cultural, historical and archaeological resources of Sierra County recognizing that the historic structures, archaeological sites, and cultural resources centered upon the County's agricultural, mineral and forest setting is the link to the County's past and should continue to define the future.

Since all of the County's cultural resources have not been (and may never be) located, it is important to recognize areas with potential sensitivity for cultural resources (Sierra County 1996, as amended).

5.18.3 Impact Questions

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)	TBD	TBD	TBD	TBD
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	TBD	TBD	TBD	TBD

Note:

TBD = To Be Determined: The CPUC will conduct outreach with eligible tribes under Public Resources Code Section 21080.3.1 once the application is complete.

5.18.4 Impact Analysis

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Impact to be determined by CPUC. The CPUC will consult with eligible tribes under PRC Section 21080.3.1 once the application is complete. Impacts on TCRs are not addressed in this PEA because under AB 52, the CPUC must identify these resources during consultation. However, the applicant conducted outreach and informal coordination with Native American tribes requesting information regarding the potential for sensitive Native American resources, including TCRs. Federal and state

registers were also reviewed to identify any TCRs that are already formally listed. Results of the records searches indicate that Native American cultural resources that there might be TCRs that are known within or in the immediate vicinity of the project area. A potential impact would occur if an TCR is located within the ADI. The applicant would avoid known TCRs to the greatest extent possible with APM CR-1 and APM CR-2. Possible avoidance measures include rerouting the alignment in or near the US 395 road shoulder in areas of fill or prior disturbance or directionally boring and placing the fiber optic line conduit under sites to a minimum depth of 2 meters below surface or 1 meter below maximum depth of known resource.

Where resources cannot be avoided per APM CR-1 and APM CR-2, archeological test excavations and data recovery limited to areas of impact may be implemented. While informal consultation with the tribes did not identify any potential TCRs, CPUC will conduct formal consultation under AB 52 to determine potential TCRs within the project area (APM TCR-1). If necessary, the applicant will retain a professional ethnographic consultant to undertake a detailed recordation of any locations considered important to the tribe (APM TCR-2). As outlined in Section 5.5, Cultural Resources, APMs CR-1 through CR-8 and APM TCR-1 through TCR-2 would avoid impacts to potential TCRs.

b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impact to be determined by CPUC. The CPUC would consult with eligible tribes under PRC Section 21080.3.1 once the application is complete. Impacts on TCRs are not addressed in this PEA because under AB 52, the CPUC must identify these resources during consultation. However, the applicant conducted outreach and informal coordination with Native American tribes requesting information regarding the potential for sensitive Native American resources, including TCRs. Federal and state registers were also reviewed to identify any TCRs that are already formally listed. Results of the records searches indicate that Native American cultural resources that might be TCRs are known within or in the immediate vicinity of the project area. However, the lead agency has not yet conducted formal consultation under AB 52, and thus, no TCRs have been identified per Section 5024.1: the lead agency shall consider the significance of the resource to a California Native American tribe. A potential impact would occur if an TCR is located within the ADI. The applicant would avoid known TCRs to the greatest extent possible with APM CR 1 and APM CR 2. Possible avoidance measures include rerouting the alignment in or near the US 395 road shoulder in areas of fill or prior disturbance or directionally boring and placing the fiber optic line conduit under sites to a minimum depth of 2 meters below surface or 1 meter below maximum depth of known resource.

Where resources cannot be avoided per APM CR 1 and APM CR 2, archeological test excavations and data recovery limited to areas of impact may be implemented. While informal consultation with the tribes did not identify any potential TCRs, CPUC will conduct formal consultation under AB 52 to determine potential TCRs within the project area (APM TCR-1). If necessary, the applicant will retain a professional ethnographic consultant to undertake a detailed recordation of any locations considered important to the tribe (APM TCR-2). As outlined in Section 5.5, Cultural Resources, APMs CR-1 through CR-8 and APM TCR-1 through TCR-2 would avoid impacts to potential TCRs.

5.18.5 Draft Environmental Measures

Applicant Proposed Measures

APM TCR-1: Consultation

If necessary, the applicant will assist the California Public Utilities Commission CPUC in Assembly Bill (AB) 52 consultation with Native Americans regarding traditional cultural values that may be associated with archaeological resources. Archaeological or other cultural resources associated with the project may have cultural values ascribed to them by Native Americans. The applicant will assist the CPUC during consultation with Native Americans regarding evaluations of resources with Native American cultural remains.

APM TCR 2: Prepare Ethnographic Study on TCR

If necessary, the applicant will retain a professional ethnographic consultant to undertake a detailed recordation of any locations considered important to the tribe. The recordation will commence prior to construction and will include photographic documentation of pre- and post-construction conditions of any identified culturally sensitive location.

The information gathered as a result of field, interview, and research tasks will be compiled into a report that will be transmitted to the Tribe. The Tribe will have the right to submit the report to the California Historical Resources Information System. Detailed recordation of any ethnographic location in this manner will create a photographic and written record of the cultural resource prior to construction of the proposed project, resulting in partial compensation for project impacts.

APM CR-1: **Avoid and Minimize Impacts to Significant or Potentially Significant Cultural Resources.**

See Section 5.5, Cultural Resources.

APM CR-2: Design Avoidance.

See Section 5.5, Cultural Resources.

APM CR-3: Conduct a Pre-Construction Worker Education Awareness Program.

See Section 5.5, Cultural Resources.

Tribal Cultural Resources

APM CR-4: Evaluate the Significance of All Cultural Resources That Cannot Be Avoided.

See Section 5.5, Cultural Resources.

APM CR-5: Implement Measures to Minimize Impacts to Significant Archaeological Sites.

See Section 5.5, Cultural Resources.

APM CR-7: Prepare and Implement a Construction Monitoring and Unanticipated Cultural Resources Discovery Plan

See Section 5.5, Cultural Resources.

APM CR-8: Inadvertent Discovery of Human Remains Unanticipated Discovery.

See Section 5.5, Cultural Resources.