

3.4 Cultural Resources

This section of the EIR evaluates potential impacts to cultural resources associated with implementation of the proposed Golden State Natural Resources Forest Resiliency Demonstration Project (proposed project). This section describes the existing cultural resources conditions at feedstock source locations (Sustainable Forest Management Projects), proposed pellet processing facility sites in Northern California (Lassen Facility) and the Central Sierra Nevada foothills (Tuolumne Facility), and the export terminal in Stockton, California (Port of Stockton), and evaluates the potential for project-related impacts to cultural resources, considering proposed project design features that could reduce or eliminate associated impacts. Cultural resources are defined as prehistoric or historic-period archaeological resources, historic-period architectural resources, and historic period engineering features, including canals and railroad resources. This section also evaluates tribal cultural resources (TCRs), which are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that is listed or determined to be eligible for listing in the national or state register of historical resources or listed in a local register of historic resources.

3.4.1 Environmental Setting

3.4.1.1 Sustainable Forest Management Projects (Feedstock Acquisition)

The study area for cultural resources (archaeology and historic built environment) for the Feedstock Acquisition is undertaken at the programmatic level and is illustrated on Figures 2-1, Working Area (Lassen) and 2-2, Working Area (Tuolumne). The study area includes an extensive portion of California ranging from the Sacramento Valley located in Northern California to other areas of the state commonly referred to as the Sierras to the San Joaquin Valley. Due to the extent of the study area and the programmatic nature of the proposed work, preparation of site-specific studies would be impracticable at this time; however, the project design features (PDFs) require specified studies and avoidance measures in connection with each individual sustainable forest management project under this program. Subsequent processes are discussed in Section 3.4.4.1, Impact Analysis Methodology. Information in this section is limited to high-level cultural resources contextual information in the programmatic study area.

General Prehistoric Context

Various attempts to parse out information provided through recorded archaeological assemblages throughout California for the past 13,000 years have led to the development of numerous cultural chronologies. Some of these are based on geologic time, most are interpreted through temporal trends derived from archaeological assemblages, and others are interpretive reconstructions. The spatial extent and detail of these chronologies is also highly variable, with detail chronologies developed in some areas based on substantial numbers of radiocarbon dates, while other areas rely on cross-dating of stylistically distinct artifact styles or cultural patterns. However, each of these chronologies describes essentially similar trends in assemblage composition and cultural succession, with varying degrees of detail. California's archaeological assemblage composition is generally accepted as falling within the following overarching patterns: Paleoindian period, Archaic period, Emergent/Prehistoric period, and Ethnohistoric period.

General Ethnohistoric Period

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first written records of the Native American communities

throughout California come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century. The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005:32) by recording languages and oral histories. Ethnographic research did demonstrate that traditional cultural practices and beliefs survived among local Native American communities.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006:34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007). At present more than 200 Native American contacts are on the NAHC list. Native American tribal communities are anticipated to be important participants in the development of future Sustainable Forest Management Projects.

Historic Period Context

The study area includes some of California’s original 27 counties, which are Butte, Calaveras, El Dorado, Lassen, Mariposa, Modoc, Plumas, Sacramento, San Joaquin, Siskiyou, Shasta, Tehama, Trinity, and Tuolumne counties. These counties share common historical themes such as mining, logging, ranching and agriculture.

The Sierras contained the rich ore deposits and was at the heart of California’s gold rush, having been first discovered in El Dorado County at Sutter’s Mill in Coloma, California (Starr 2005:78–79). The discovery of gold ushered California into statehood. Mining operations could be found throughout the Sierras and along the American, Sacramento, and Feather rivers in northern California making mining the dominate industry during California’s early years of Statehood. Large portions of the study area are occupied by national forests including the El Dorado, Klamath, Lassen, Modoc, Plumas, and the Shasta. The readily available supply of lumber promoted the lumber industry, which fed the burgeoning development of cities, towns, and railroads. Logging operations were enhanced by the various railroads allowing for the transportation to the mills for processing (Copren n.d.:4; Lassen County 2024).

Many emigrants who arrived in California during the Gold Rush saw opportunities in more stable livelihoods such as ranching and farming and decided to stay in the Sacramento and San Joaquin Valleys rather than travel to gold fields. As mining waned, agriculture became the prominent industry for many of the counties in the study area. Grain production, vineyard cultivation, and orchards of fruit and nut trees could be found in just about all the counties in the study area (Tehama County Resource Conservation District 2006; Lassen County 2024; Shasta County Historical Society 2024; El Dorado County Historical Museum 2024; Amador County 2016:I-16). Lands not being cultivated were used for sheep and cattle grazing. By the 1860s, cattle population in California reached 1 million head and 40 percent was in the San Joaquin Valley (Burcham 1982). The completion of the Transcontinental Railroad in 1876 enticed more people to come to California by offering affordable rail fares and promises of fertile agricultural land. The arrival of the railroad also introduced transportation of agricultural products to large distribution centers throughout the United States and ensured the predominance of the Central Valley agricultural

industry for over the next century. By 1879, the agricultural industry employed more people than mining (Starr 2005:110). Throughout the 20th century and into the 21st century the agricultural industry remains a critical industry throughout the study area. In the 20th and 21st centuries, agriculture remained an important industry in the Sacramento Valley and Northern California region. Alfalfa hay, grain hay, barley, walnuts, almonds, olives being some of the most prolific agricultural products of the area (County of Modoc 2021; Tehama County 2019).

Tribal Cultural Resources

The study area for TCRs for the Feedstock Acquisition is illustrated on Figures 2-1 and 2-2. The study area includes an extensive portion of California ranging from the Sacramento Valley located in Northern California to other areas of the state commonly referred to as the Sierras to the San Joaquin Valley. Due to the extent of the study area and the programmatic nature of the proposed work, cultural resources, including TCRs are considered at the programmatic level. Subsequent cultural resources work will be required as individual Sustainable Forest Management Projects are developed, site specific analysis and consultation will be undertaken. Subsequent processes are discussed in section 3.4.4.1, Impact Analysis Methodology.

3.4.1.2 Northern California (Lassen) Facility

Dudek cultural resources specialists in archaeology and historic era-built environment conducted technical studies of the Lassen Facility site proposed for production of wood pellets. Information in this section is based on and summarized from the following technical studies:

- Archaeological Resources Inventory Report for Forest Resiliency Program Project, Lassen Site, Lassen County, California. Prepared for Golden State Finance Authority. Prepared by Dudek. Included as Appendix D1.
- Built Environment Inventory and Evaluation Report for Golden State Natural Resources Forest Resiliency Demonstration Project, Northern California (Lassen) Facility, Lassen County, California. Prepared for Golden State Finance Authority. Prepared by Dudek. Included as Appendix D2.

The effort to identify cultural resources in the Lassen Facility Project Area included a records search and a review of the archaeological, ethnographic, and historical literature; a Native American Heritage Commission (NAHC) Sacred Lands File Search; examination of historic maps; historical research; and field surveys. The following section provides abbreviated archaeology and built environment contexts, the methods used to identify cultural resources, and inventory and evaluation findings for the Lassen Facility regarding cultural resources.

Setting and Area of Potential Impacts

The Lassen site is shown in Figure 2-4, Project Site (Lassen). The project site is located in a rural setting, surrounded by widely scattered rural development and open space generally composed of cropland, sagebrush scrub, and wet meadow. The community of Nubieber is immediately northwest of the project area. A majority of the project site and surrounding area is undeveloped, though several structures are present in the northern portion project site and a track yard and water tower are present just north of the center of the project site. The Burlington Northern Santa Fe Railway Company railroad line parallels the eastern boundary of the project site and several railroad spurs intersect the area.

The Area of Potential Impact (API) is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of a cultural resource. Determination of the API is influenced by a

project's setting, the scale and nature of the undertaking, and the different kinds of effects that may result from the undertaking (Title 36 Code of Federal Regulations Section 800.16[d]).

The archaeological API is the maximum area of potential ground disturbance resulting from Project activities and includes the entirety of the approximately 290-acre site (see Figure 2, Area of Potential Impacts, in Appendix D1). The estimated maximum depth of disturbance is 15 feet below the existing ground surface.

The built environment API follows the maximum possible area of potential effects (direct and indirect) resulting from the proposed Project (see Figure 2, Project Site: Project Area and Built Environment API, in Appendix D2). The API includes all areas where Project activities are proposed. It also includes properties historically associated with the Project site that contain buildings and structures at least 45 years of age (constructed on or before 1976) that could be subject to indirect effects, including alteration of setting, noise, and construction-related vibration. The adjacent railroad line was included, as the line will be used to transport the product to market. These properties constitute the indirect API. Together, the combination of direct and indirect impacts is referred to throughout the remainder of this report as the Project API. In consideration of all potential effects to built environment properties, the Project API encompasses the extent of the proposed Project footprint and the associated buildings and structures of the railroad line, historically the Great Northern and Western Pacific (GNWP) Railroad's The Inside Gateway, Bieber Station. The railroad is now part of the Burlington Northern Santa Fe (BNSF) Rail line, but for the purpose of this report, it will be referred to by its historic name, GNWP.

The API contains two property groupings, Property. 1, Big Valley Lumber Company Site, and Property. 2, the GNWP Railroad: The Inside Gateway, Bieber Station, and Associated Properties. No other buildings or structures located within the API are known to be 45 years of age and/or rise to the level of consideration for formal evaluation under National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) criteria as part of assessing potential effects to historic properties for this Project.

Archaeological Context

California's archaeological assemblage composition is generally accepted as falling within the following overarching patterns: Paleoindian period, Archaic period, Emergent/Prehistoric period, and Ethnohistoric period. The most broadly applicable chronology for Northeastern California follows a similar framework, although elements of chronologies from the adjacent Plateau and Great Basin culture areas do play a more prominent role than elsewhere in California. Recent attempts to synthesize the various local and regional chronological schemes in the region have resulted in the following proposed cultural periods for northeastern California: Early Holocene (5000+ cal BC), Post-Mazama (5000-3000 cal BC), Early Archaic (3000-1500 cal BC), Middle Archaic (1500 cal BC - cal AD 700), Later Archaic (cal AD 700-1400), Terminal Prehistoric (cal AD 1400- contact).

A full prehistoric archaeological context is provided within Appendix D1.

Ethnohistoric Period (post-AD 1750)

The following ethnohistoric context is provided to help ground the considerations with regard to Tribal Cultural Resources for the Lassen Facility. The region surrounding the project site falls within the Achumawi tribal territory during the ethnohistoric period (Appendix D1). The Achumawi and their southern neighbors the Atsugewi—sometimes referred to together as the Pit River groups—occupied a large portion of northeastern California encompassing the Pit River drainage from the Big Bend and Montgomery Creek in the west to Goose Lake to the Warner Mountains in the east and from Mount Shasta and Goose Lake in the North to Mount Lassen and Eagle Lake in the south. The Achumawi territory can be broadly broken into two distinct ecological zones. The western,

downriver portion of the territory consists of wooded intermountain canyons and valley while the eastern, upriver portion of tribal territory consists of drier, higher elevation valleys with the plateau-basin ecology with the sagebrush and juniper, jackrabbit, and elk more associated with eastern Oregon and northwestern Nevada.

Together, Achumawi and Atsugewi make up the Palaihnihan language family, which is in turn a part of the larger Hokan language phylum (Appendix D1). Achumawi is comprised of a total of nine local dialects spoken along the Pit River (Appendix D1). The nine dialects form two dialectical clusters which conform more or less with the division between the ecological zones encompassed by the Achumawi tribal territory. Groups speaking the “downriver” dialects—Madesiwi, Itsatawi, Ilmawi, and Achumawi (proper)—occupy the intermountain canyons and valleys in the western portion of Achumawi territory and “upriver” dialects—Atwamsini, Astariwawi, Kosalektawi, Hammawi, and Hewisedawi—occupy the drier and higher elevation valleys to the east (Appendix D1). The dialect spoken in the immediate vicinity of the project area, was Atwamsini (also referred to as Atwamwi) spoken by the Big Valley Achumawi living in Big Valley which includes the areas surrounding Bieber and Nubieber (Appendix D1).

Although the area encompassed by the Achumawi tribal territory is quite large, habitation was concentrated in productive areas along streams and drainages, lakes, meadows, and marshes with much of the surrounding areas only occasionally visited for hunting or gathering but not settled (Appendix D1). Seasonal transhumance was commonplace, with winters spent in more densely populated settlements along rivers or valleys followed by dispersal in pursuit of various resources during the summer months (Appendix D1). Traditional features of the winter villages were small houses constructed from bark with sloping roofs over shallow excavations, and one or more larger semi-subterranean “sweat houses” (Appendix D1).

The Achumawi subsistence strategy was centered on fishing, hunting, and collecting vegetative resources, although the focal resources varied according to the local ecology. In the west-central portion of the territory, along the Pit River, the population was at its most dense and subsistence practices were most like the typical California pattern with a reliance on acorns, salmon, and deer as the staple foods. Further east— where oaks and salmon were scarce— the subsistence pattern was more similar to that of the plateau basin groups; root crops, particularly epos and cams, were the primary gathered food, non-anadromous fish were taken from local waterways, and the seasonally available waterfowl were a more substantial portion of the diet (Appendix D1). Common material goods included the sinew-backed bows and arrows, ground stone tools for processing vegetal foods, twined basketry, nets for fish and game, and many goods made from fibrous plants (Appendix D1). One practice unique to the region was the extensive use of pit traps for the taking of animals, particularly deer. Deer were caught with concealed pits excavated to a depth of two to three yards along deer trails (Appendix D1).

Sociopolitical organization also varied geographically, with western groups organized into autonomous tribelets while eastern groups formed hereditary bands (Appendix D1). In both cases the basic social unit functioned as an autonomous political unit but were socially connected with neighboring groups through intermarriage and common languages and dialect.

Historic Period Context

Post-contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Lassen County was never part of the efforts by the Spanish or Mexican to colonize California. Most of Spanish period settlement occurred in coastal areas, in Central and Southern California. Extensive land grants were later established in the interior areas of California during the Mexican Period. However, there is no indication any Mexican Ranchos were established in

Lassen County. Rather, the area was a significant residential and resource procurement area for the Achumawi (also Achomawi), Modoc, and Pit River Native American peoples (Appendix D1).

Euroamerican Settlement and Establishment of Lassen County

While Euroamericans were settling throughout California by the mid-1840s, little development is shown in Lassen County. The 1868 General Land Office (GLO) original survey map shows there are no Euroamerican settlements in Nubieber, and a single road, Fort Bidwell Road, is noted to the southwest of the API (Appendix D1).

One Euroamerican settler in the area was Peter Lassen, Lassen County's namesake. In 1839, Lassen emigrated to Oregon's Willamette Valley before relocating to California in 1840. In 1844, just 3 years before Mexico ceded California to America, Mexican Governor Manuel Micheltoarena granted Lassen the 22,206-acre Bosquejo Rancho, located to the southwest of the API (Appendix D1).

In 1850, Lassen sold portions of Rancho Bosquejo. In 1856, Lassen and Isaac Newton Roop gathered a quorum intent on creating a new territory. As a result of this gathering, the Territory of Nataqua was founded with Roop as the secretary and recorder and Lassen as surveyor. In 1859, Lassen was killed. In 1864, portions of Plumas and Shasta Counties were appropriated to form Lassen County. The town grew slowly as small towns were established in the 1870s and 1880s (Appendix D1).

Development of the Town of Nubieber

Nubieber, where the Project API is located, developed later in the county's history. In 1929, Byron S Greenwood purchased approximately 900 acres 2.5 miles from the Town of Bieber in Lassen County. The first residents of Nubieber were ranchers. To encourage settlement, Greenwood advertised that railroad workers could purchase any unsold Nubieber lot for half price (Appendix D1).

The Great Northern and the Western Pacific officially joined on November 10, 1931. After the Project area was developed with the railroad, Nubieber's business district expanded dramatically. The business district continued to develop. In 1933, another fire decimated the town's business district (Appendix D1).

Nubieber survived its initial years because of business generated by the railroad. Freight loading and shipments through Nubieber further increased when the mills of the Stockton Box Co., the Big Valley Lumber Company, the Caldwell Mill, and the Red River Lumber Company relocated to Nubieber. Despite the influx of lumber companies, Nubieber's population struggled to grow. In 1940, Greenwood traded all unsold lots to E.L. Robertson in exchange for a 60-room apartment building in San Francisco. Nubieber's population never grew, and the outer roads fell into disuse (Appendix D1).

Great Northern operated the railroad and Bieber Station until the 1970s when Burlington Northern purchased the line and station. By 1999, only two mills remained. In 2001, the Big Valley Lumber Mill, which owned and operated the western portion of the API, was the last sawmill in Nubieber. When the Big Valley Lumber Mill closed, Nubieber's population was enumerated at 100 people. In 2021, Nubieber was home to 19 residents (Appendix D1).

Railroad Development in Lassen County/History of the API

The Western Pacific Railway Company (Western Pacific Railroad Company after 1916) was founded in San Francisco in 1903 under the direction of George J. Gould. The Western Pacific thrived as a passenger and freight line and rapidly developed transportation infrastructure across California. The Great Northern Railroad was founded

in 1889 by James J. Hill, who purchased and merged three railroad companies: the St. Paul and Pacific Railroad; St. Paul, Minneapolis, and Manitoba Railway; and the Montana Central Railroad. In the early 1900s, Western Pacific joined forces with the Great Northern Railroad company to expand into northeastern California (Appendix D1).

In 1927, the Great Northern reached an agreement with the Southern Pacific to operate trains on Southern Pacific tracks in southern Oregon and Northern California. In 1929, Arthur Curtiss James, a railroad financier, negotiated a joint line. The Great Northern and Western Pacific companies began talks to purchase the right-of-way from the Northern California-based McCloud River Railroad and local logging companies. In June 1930, the Interstate Commerce Commission approved the sale, and the companies began working towards the junction point in Nubieber, California (Appendix D1).

The Great Northern reached Nubieber in September of 1931 and constructed Bieber Station directly east of the railway. On the west side of the tracks, the Great Northern developed a track yard and several support structures (some of which remain in the API). On November 10, 1931, the Western Pacific reached Nubieber, completing the rail line known as The Inside Gateway. The railroads connected the region to statewide and national markets. Commercial and residential development boomed in Nubieber during the early 1930s (Appendix D1).

The Inside Gateway venture did not pan out as expected for Great Northern, Western Pacific, and the town of Nubieber. Passenger service on the GNWP Railroad never went into effect, hindering Nubieber's development. Shortly after the railroad began carrying freight, the Western Pacific sold their interest in the joint line to the Great Northern for trackage rights on the Bieber-Hambone line, which the company never used. The Great Northern continued to operate the railroad and Bieber Station until 1970, when the company merged with the Chicago, Burlington, and Quincy Railroad Company; the Northern Pacific Railway Company; and the Spokane, Portland, and Seattle Railway to create the Burlington Northern Railroad company. Burlington Northern continued to operate the former GNWP Railroad line until 1996. In 1996, Burlington Northern merged with the Atchison, Topeka, and Santa Fe Railway to become the BNSF Railway Company, which continues to operate the railroad that runs through Nubieber (Appendix D1).

Methods and Identification of Cultural Resources

CHRIS Records Search

The California Historical Resources Information System (CHRIS) repository covers the region in which the API is located. The North Central Information Center contains records for Lassen County while maintaining the official records of California Historical Resources Information System searches from previous cultural resources studies and recorded cultural resources for their respective areas. On September 30, 2021, at the request of Dudek, North Central Information Center staff conducted a records search at the North Central Information Center, California State University Chico, for the API. The records search consulted the California Historical Resources Information System base maps of previously recorded cultural resources and previously conducted cultural resources studies for the API and all areas within 1 mile thereof. Additional sources of information, including previously conducted cultural resources surveys and historic maps (U.S. Geological Survey and General Land Office), were selectively reviewed to determine areas with a high potential for the presence of historic- and prehistoric-period sites.

Summary of Archaeological Records Search Results

A records search was completed for the project API and a 1-mile buffer by staff at the NEIC at California State University Chico on September 30, 2021. The records search identified 3 previous studies performed within the

records search area, none of which intersect the API (Appendix D1). The records search did not identify any previously recorded cultural resources within the API. Eleven cultural resources have been recorded within 1 mile of the API. These include 9 prehistoric lithic scatters, one prehistoric habitation site, and one historic era site with razed structure foundations and residential refuse.

Summary of Built Environment Specific Records Search Results

The records search identified three previous studies performed within the records search area, none of which intersect the API and none of which include built environment properties. The record search also identified 10 previously recorded sites within 1 mile of the API. Based on these reports, no previously recorded built environment resources were found to be located within the API or within 1 mile of the API. For a list of previous archeological studies performed within the records search area, please refer to the Archaeological Resources Inventory Report for the Golden State Natural Resources, Gould Site, Lassen County, California (Archaeological Report) (Appendix D1).

Additional Building Development and Archival Research

Dudek conducted additional background research to identify the presence of other historic-era built environment properties that were not identified through the CHRIS record search sited within and adjacent to the proposed project area. This research included a search of the Built Environment Resources Directory (BERD), which identified no resources that overlapped the Project API and no resources adjacent to the Project API within 1 mile. Dudek also reviewed historic aerial photographs, historic newspapers, and historic Sanborn maps in addition to conducting archival research at the following repositories:

- California State Library
- Lassen County Historical Society
- Lassen County Assessor's Office
- Lassen Library District
- University of California, Davis
- Big Valley Museum of Lassen County
- Lassen County Building Department

Tribal Coordination

The NAHC was contacted by Dudek staff on September 28, 2021 to request a search of its Sacred Lands File. The NAHC responded on November 4, 2021 indicating that no Native American resources on file with the NAHC fall within the project API (Confidential Appendix B of Appendix D1). The NAHC provided a list of Native American tribal contacts who may have additional knowledge relating to cultural resources in the area. Golden State Finance Authority did not receive any tribal requests for notification under Assembly Bill 52 (AB 52) prior to release of the Draft Environmental Impact Report, and therefore the formal requirements of AB 52 were not triggered for this project. However, in accordance with the Native American Heritage Commission, Tribal Consultation Under AB 52: Requirements and Best Practices, GSFA initiated "non-AB 52 tribal consultation" by sending outreach notices and offers to meet and confer to each of the Tribes listed on the NAHC contact list for the Lassen, Tuolumne, and Stockton sites. The results of those meetings and collaboration have informed the information, analyses, and management strategies in this chapter.

Field Methods

Archaeology

Dudek archaeologists Nicholas Hanten and Gregory Wada conducted an intensive-level pedestrian survey of the northern, approximately 65-acre, portion of the project API October 15, 2021. Dudek archaeologists Elizabeth Sivell and Michael Mendiola conducted an intensive-level pedestrian survey of the remaining southern portion of the API on April 24, 2024. Both surveys used standard archaeological procedures and techniques (as outlined in Research Methods in Appendix D1). All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory.

During the 2021 survey, ground surface visibility was low (approximately 5%–20%) over much of the API due to vegetation ranging from 10 to 40 centimeters in height. Photos 1 and 2 show representative conditions within the API at the time of survey. Several areas within the API have been previously disturbed by development of the Big Valley Lumber Company Site and the adjacent Great Northern and Western Pacific railway. Soils outside of the developed portion of the API appeared to be relatively undisturbed, although some areas exhibited signs of cracking from alternating wet and dry conditions that could have caused mixing in the upper levels of the soil. Surface visibility was also low (varying from approximately 0%–50%) during the 2024 survey due to dense vegetation and standing water.

Four previously unrecorded historic-era resources (LG-NH-1, GSNR-ES-001, GSNR-ES-002, and GSNR-ES-003) were discovered and recorded during the pedestrian survey.

Built Environment

Dudek Architectural Historian Erin Jones conducted a pedestrian survey of the API for historic built environment resources on September 21, 2021. The survey entailed walking the exteriors of all buildings and structures within Project API; documenting each building with notes and photographs; specifically noting character-defining features, spatial relationships, and observed alterations; and examining any historic landscape features on the property and adjacent parcels with properties that appeared more than 45 years old and appeared historically associated with the subject property. Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the subject property were taken with a digital camera. All field notes, photographs, and records related to the current study are on file at Dudek's office in Sacramento, California (Appendix D2).

Results of Identification and Evaluation Efforts

Archaeology

LG-NH-1

One previously unrecorded historic-era resource was located and recorded during the 2021 archaeological survey. LG-NH-1 is a moderately dense historic-era refuse scatter comprised of more than 200 cans of various types and 100 clear and green glass bottle fragments, several bricks, concrete pipe fragments, a metal post set in a concrete base, and other miscellaneous refuse. The site is located to the south and west of a small bank at the southern extent of a graded area adjoining the track yard, approximately 60m south of the water tower. Artifacts are generally concentrated close to the bank; however, artifacts are scattered over the field to the south and east suggesting

some degree of secondary dispersion of the deposit. In total, the site covers an area of approximately 65m by 35m in size, with an area of 2100 m².

The most common types of can in the assemblage are sanitary cans of various sizes (corrugated and smooth-sided) and flat-top beverage cans, however several oval and rectangular meat and fish cans, one tobacco can, and one cone top beverage can were also recorded. Several of the fish cans are embossed “NORWAY/NORVEGE” or “MONERE_/CAL USA.” In addition to non-diagnostic glass fragments, glass bottle necks, bases, and several complete or nearly complete bottles and jars were recorded, including several wine and liquor bottles. Six maker’s marks were identified on complete bottles or sufficiently intact bottle base fragments including marks from the Owens Illinois Glass Co., Hazel-Atlas Glass Co., W.J. Latchford Co., and what is possibly a Thatcher Glass Manufacturing Co. mark. In addition, three bottles were recorded with embossed “Gallo Flavor Guard” branding of various forms as was a sidewall fragment of a clear glass Coca-Cola bottle. Several other cans and bottles were also embossed with text (see Appendix D1 for details).

Diagnostic artifacts in the assemblage suggest that the site likely results from multiple depositional events, with the earliest deposit of materials dating to the late 1930s or early 1940s and later material dating to the early 1960s. The earlier component is evident from the presence of three Owens-Illinois Glass Co. “Diamond-OI” maker’s marks which was adopted in 1929 and phased out between 1954 and 1966 (Appendix D1). Single digit manufacturing codes on two of these bottles indicate production dates of 1936 and 1937. The W.J. Latchford Co. maker’s mark is also consistent with this timeframe, as the “L-in-oval” mark was used 1925-1939 (Appendix D1), and the bottle is embossed “WINE OVAL” at the heel, indicating production after the end of Prohibition in 1933. Evidence for a post-1958 component is provided by two green-glass Gallo “Flavor Guard” bottle bases. The Gallo Glass company began using the “Flavor-Guard” embossing after 1958, and the format of embossing on one of the bottles is consistent with the earliest configuration produced by the Gallo Glass Co (Appendix D1). Several other green glass wine bottle fragments are present in the assemblage, suggesting that additional Gallo bottles are in the assemblage although additional maker’s marks were not discovered during survey. The character of the can assemblage is also consistent with these dates as sanitary cans and flat-top beverage cans would have been common during this same period and the assemblage lacks can types that would have been indicative of earlier or later periods, such as pull tab cans.

Sufficient documentation was gathered through archaeological inventory efforts to evaluate this resource for NRHP and CRHR listing, for which the site was assessed to be not eligible. To be eligible for listing in the CRHR/NRHP, a site must have “yielded, or [have] the potential to yield, information important to the prehistory or history of the local area, California, or the nation” (PRC Section 5024.1; 14 CCR 4852). The site is not substantially associated with any specific significant events locally, regionally, or nationally (Criterion A/1); is not directly associated with the lives of any important people locally, regionally, or nationally (Criterion B/2); does not contain architecture (Criterion C/3); and, beyond the attributes captured through recordation, does not have the potential to yield information locally, regionally, or nationally (Criterion D/4). Refuse scatters of this type are common throughout the region, and the site does not represent a “unique” resource as defined under CEQA. Any data potential associated with site intersecting the API has been exhausted through recordation. As such, this resource is not eligible for listing in the NRHP/CRHR, and impacts/effects that would occur through planned project disturbances would be less than significant.

GSNR-ES-001

Discovered and recorded during the 2024 archaeological survey, GSNR-ES-001 is a small historic-era refuse scatter consisting of five cans and one clear glass bottle. This resource located at the top of the southwest side of an

earthen mound, covering an area of approximately 70 m². The artifact assemblage includes five cans with interlocking seams, three of which are sanitary cans and two are round food cans. The glass bottle is complete with an intact metal screw top lid. The bottle base includes an Anchor Hocking maker's mark ("anchor-H") which was in use from 1937 to 1968, although its use may have persisted until as late as 1980 (Appendix D1).

Sufficient documentation was gathered through archaeological inventory efforts to evaluate this resource for NRHP and CRHR listing, for which the site was assessed to be not eligible. To be eligible for listing in the CRHR/NRHP, a site must have "yielded, or [have] the potential to yield, information important to the prehistory or history of the local area, California, or the nation" (PRC Section 5024.1; 14 CCR 4852). The site is not substantially associated with any specific significant events locally, regionally, or nationally (Criterion A/1); is not directly associated with the lives of any important people locally, regionally, or nationally (Criterion B/2); does not contain architecture (Criterion C/3); and, beyond the attributes captured through recordation, does not have the potential to yield information locally, regionally, or nationally (Criterion D/4). Refuse scatters of this type are common throughout the region, and the site does not represent a "unique" resource as defined under CEQA. Any data potential associated with site intersecting the API has been exhausted through recordation. As such, this resource is not eligible for listing in the NRHP/CRHR, and impacts/effects that would occur through planned project disturbances would be less than significant.

GSNR-ES-002

Discovered and recorded during the 2024 archaeological survey, this resource consists of a historic-era refuse scatter comprised of two concentrations (C1 and C2) of cans, glass and ceramic fragments. The resource covers an area of approximately 938 m² situated in an open field. Each concentration contains more than 50 artifacts including sanitary cans with church key opening, food cans with key-wind openings, clear, amber, and opalescent milk glass fragments, and ceramic fragments. Two diagnostic artifacts were identified during survey, a complete clear glass bottle with a marker's mark of an "S" inside a circle and a complete wide mouth amber glass bottle with an Owens-Illinois maker's mark and "Abbot Lab, Made in U.S." embossed on the base. The maker's marks indicate that the assemblage dates between 1929 to 1960 (Appendix D1).

Sufficient documentation was gathered through archaeological inventory efforts to evaluate this resource for NRHP and CRHR listing, for which the site was assessed to be not eligible. To be eligible for listing in the CRHR/NRHP, a site must have "yielded, or [have] the potential to yield, information important to the prehistory or history of the local area, California, or the nation" (PRC Section 5024.1; 14 CCR 4852). The site is not substantially associated with any specific significant events locally, regionally, or nationally (Criterion A/1); is not directly associated with the lives of any important people locally, regionally, or nationally (Criterion B/2); does not contain architecture (Criterion C/3); and, beyond the attributes captured through recordation, does not have the potential to yield information locally, regionally, or nationally (Criterion D/4). Refuse scatters of this type are common throughout the region, and the site does not represent a "unique" resource as defined under CEQA. Any data potential associated with site intersecting the API has been exhausted through recordation. As such, this resource is not eligible for listing in the NRHP/CRHR, and impacts/effects that would occur through planned project disturbances would be less than significant.

GSNR-ES-003

Discovered and recorded during the 2024 archaeological survey, this resource is a historic-era refuse scatter comprised of cans and clear and amber glass fragments covering an area of approximately 282 m². There are no diagnostic artifacts within the site, however the cans show a significant weathering and are consistent with the

other historic-era assemblages nearby. Notable non-diagnostic artifacts in the assemblage include a clear glass bottle base with a circular suction scar at its center. There is also a ceramic fragment with rounded edge with holes on one side and a swirling/petal shaped pattern on the opposite side. Sufficient documentation was gathered through archaeological inventory efforts to evaluate this resource for NRHP and CRHR listing, for which the site was assessed to be not eligible. To be eligible for listing in the CRHR/NRHP, a site must have “yielded, or [have] the potential to yield, information important to the prehistory or history of the local area, California, or the nation” (PRC Section 5024.1; 14 CCR 4852). The site is not substantially associated with any specific significant events locally, regionally, or nationally (Criterion A/1); is not directly associated with the lives of any important people locally, regionally, or nationally (Criterion B/2); does not contain architecture (Criterion C/3); and, beyond the attributes captured through recordation, does not have the potential to yield information locally, regionally, or nationally (Criterion D/4). Refuse scatters of this type are common throughout the region, and the site does not represent a “unique” resource as defined under CEQA. Any data potential associated with site intersecting the API has been exhausted through recordation. As such, this resource is not eligible for listing in the NRHP/CRHR, and impacts/effects that would occur through planned project disturbances would be less than significant.

Built Environment

Dudek recorded and evaluated two properties that contain historic era (over the age of 45 at the time of survey) buildings and structures located in the API. These properties are the Big Valley Lumber Company Site (Property 1) and Great Northern and Western Pacific Railroad: The Inside Gateway, Bieber Station, and Associated Properties (Property 2). Locational information for these properties is illustrated in figures presented in the technical report prepared for this project site and can be found in Appendix D2.

Property 1, Big Valley Lumber Company Site

Property Description

Components that comprise the Big Valley Lumber Company Site are located within the current legal parcel boundaries of APN 001-270-087, 001-313-001, and 001-304-001. Note that these parcels are not part of the project site, but Property 1 is historically connected to the development of the overall site. Figure 4 of Appendix D2 shows specific locations of the 8 buildings associated with the Big Valley Lumber Company Site. The buildings are currently in use as a light-industrial buildings associated with the local logging industry. The subject property currently comprises eight components including five buildings and three structures. The subject property is bordered to the north by Lassen State Highway (State Route 299), to the west by a wire mesh fence supported by vertical wood posts, and to the east by the BNSF Railroad line, which was established by the Great Northern Railroad and Western Pacific Railroad companies in 1931. The property has two access points; the first may be accessed via a gate at the eastern terminus of Rosevelt Avenue, a short, paved road that deviates from Lassen State Highway. The second entrance is located at the eastern terminus of unpaved Washington Avenue. Aside from the buildings and structures listed in Table 3.4-1, the undeveloped areas of the site are covered in annual grasses and forbs.

Table 3.4-1. Summary of Buildings and Structures of Property. 1, Big Valley Lumber Company Site

Letter Identifiers for Buildings and Structures	Property. 1. Big Valley Lumber Company’s Buildings and Structures	Build Date
1A	Storage Barn A	c. 1970
1B	Storage Barn B	c. 1950

Table 3.4-1. Summary of Buildings and Structures of Property. 1, Big Valley Lumber Company Site

Letter Identifiers for Buildings and Structures	Property. 1. Big Valley Lumber Company's Buildings and Structures	Build Date
1C	Warehouse	c. 1950
1D	Propane Shelter	c. 1996
1E	Concrete Masonry Unit Structure	c. 2007
1F	Storage Barn C	c. 1970
1G	Shed	c. 2007
1H	Silo	c. 1950

NRHP/CRHR Evaluations

Period of Significance

A site visit, archival research, and a review of historic aerial photography indicates that the Big Valley Lumber Company, sited at 551000 Rosevelt Ave, was established in c. 1960 and was adapted and used for the following 30 years in a light industrial manner. Accordingly, the period of significance is defined as the establishment period of c. 1960.

Significance Evaluations

In consideration of Property. 1's history and requisite integrity, Dudek recommends the subject property is not eligible for listing in the NRHP and CRHR based on the following significance evaluation and in consideration of national and state eligibility criteria:

NRHP Criterion A: associated with events that have made a significant contribution to the broad patterns of our history.

CRHR Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Big Valley Lumber Company developed the subject property from c. 1960 to 1993 before the Gould Family Trust obtained ownership in the early 2000s and improved upon the existing facilities. Big Valley Lumber Company established its Nubieber Reload Station in c. 1960. The reload station, one of several owned by Big Valley Lumber Company, did not play a significant role in the relevant historic context of lumber production and processing in Nubieber and Lassen County. The Lassen County timber industry thrived in the early 1930s, leading the Great Northern and Western Pacific railroad companies to establish the GNWP Inside Gateway and partner with Nubieber lumber companies, including Big Valley Lumber Company. When the Big Valley Lumber Company took ownership of the subject property in c. 1960, the site continued to serve as a ubiquitous light-industrial property associated with the lumber industry. The property represents the continued development of the lumber industry in the county during the twentieth century.

Property. 1 was part of the local and regional lumber industry in Nubieber and Lassen County from c. 1960 to 2001, decades after the industry's initial establishment and economic rise in the area. Although Big Valley Lumber

Company utilized the Nubieber Reload Station as the last lumber-associated operation in Nubieber, the company did not make a significant contribution to the broad patterns of local history and cultural heritage. Big Valley Lumber Company's Nubieber Reload Station was a late example of lumber reload stations owned by Big Valley Lumber Company in Lassen County and indicates the company's continued investment in the lumber industry in the region. For these reasons, the subject property is recommended not eligible under NRHP Criterion A or CRHR Criterion 1.

NRHP Criterion B: associated with the lives of significant persons in our past.

CRHR Criterion 2: is associated with the lives of persons important in our past.

To be found eligible under Criterion B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which they are known. Archival research failed to indicate any such direct association between individuals that are known to be historic figures at the national, state, or local level and the subject property. The timber site represents the efforts of many individuals, rather than the significant work of a single important individual. Therefore, the subject property is not known to have any historical associations with people important to the nation's, state's, or county's past. Due to a lack of identified significant associations with important persons in history, the subject property is recommended not eligible under NRHP Criterion B or CRHR Criterion 2.

NRHP Criterion C: 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.

CRHR Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

In order for the subject property to meet NRHP eligibility requirements under Criterion C/CRHR, it must embody the distinctive characteristics of a type, period, or method of construction; demonstrate the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components lack individual distinction. The subject property buildings are ubiquitous and prefabricated industrial buildings that are considered utilitarian and do not represent a particular style of architecture. These are relatively common buildings that can be found at various industrial/manufacturing sites throughout the country. Furthermore, the buildings and structures are not known to be the work of an important architect, builder, engineer, or designer, and are not known to have been built using an innovative construction technique. Additionally, the buildings do not embody distinctive characteristics of a type, period, or method of construction. Archival research failed to indicate the designer or architect of these buildings, and due to the ubiquitous style, they are very unlikely to be the work of a master and do not possess high artistic value. Consequently, the subject property is recommended not eligible under NRHP Criterion C or CRHR Criterion 3.

NRHP Criterion D: have yielded, or may be likely to yield, information important in history or prehistory.

CRHR Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

This report was limited to historical resources that are part of the built environment. Criterion D generally applies to archaeological resources but may apply to a built environment resource in instances where a resource may contain important information about such topics as construction techniques or human activity. This is unlikely to

be true for Property 1. Therefore, the property is not recommended eligible as a built environment resource under Criterion D.

Please see the Archaeological Report, Appendix D1, for information on archaeological resources in the API.

Integrity Discussion

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (NPS 1997) states that the integrity of a property is based upon the historical significance and character defining features of that property, and that “only after significance is fully established can you proceed to the issue of integrity.” Upon conclusion that the subject property, historically sited as 551000 Roosevelt Avenue, does not meet any of the required criteria for significance, the property’s current state of integrity is inconsequential. As such, no assessment of integrity is provided in this evaluation.

Property 2, The GNWP Railroad: The Inside Gateway, Bieber Station, and Associated Properties

Property Description

The GNWP Railroad: The Inside Gateway, Bieber Station, and Associated Properties (Property. 2) are located in Nubieber, California. The associated 15 buildings, structures, and features are located within the current legal parcel boundaries of APNs ,001-270-086, 001-270-079, 001-370-003, 001-400-003, and 001-490-002. See Figure 5 of Appendix D2 for specific building locations. The facility currently carries the address of 653-800 Washington Avenue. Table 3.4-2 identifies the components associated the railroad within the API.

Table 3.4-2. Summary of Property. 2: GNWP Railroad Buildings, Structures, and Features

Letter Identifiers for Associated Attributes	Property. 2. Attributes Associated with the GNWP Railroad	Date Constructed
2A	Segment of the Great Northern and Western Pacific Railroad and Spur Lines	1931
2B	Water Tower	1931
2C	Track Yard	1931
2D	BNSF Railroad Administrative Office	c. 1995
2E	Railroad Depot	c. 1970
2F	Metal Storage Containers	c. 2001
2G	Shipping Container Storage Building	2005
2H	Mechanical Infrastructure	c. 2019
2I	Shipping Container Storage Building	c. 2019
2J	Railroad Lodging	c. 1939
2K	Ditch K	c. 1939
2L	Ditch L	c. 1939
2M	Ditch M	c. 1939
2N	Electrical Shed	c. 2016
2O	Shed	c. 2010

NRHP/CRHR Evaluations

Period of Significance

A site visit, archival research, and a review of historic aerial photography indicates that Property. 2, in Nubieber, California, was established in 1931. The subject property is the site of the confluence of the Great Northern and Western Pacific railroads and was celebrated at the time of its completion. The period of significance is defined as its completion date, its most significant historic period, 1931.

Significance Evaluations

In consideration of Property. 2's requisite integrity, Dudek recommends the subject property is not eligible for listing in the NRHP and CRHR based on the following significance evaluation and in consideration of national and state eligibility criteria:

NRHP Criterion A: associated with events that have made a significant contribution to the broad patterns of our history

CRHR Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

At the local level, Property. 2 was instrumental to the early growth and development of the City of Nubieber as the confluence of the Great Northern and Western Pacific railroads. The establishment of the railroad played a critical role in the early planning, development, and initial growth of Nubieber. While the subject property is of historic age and does represent a significant site for both Nubieber and the Great Northern and Western Pacific Railroads, the property no longer retains integrity to convey its significance. One of the most notable elements of integrity that is lost is the integrity of setting. Significant demolition of primary buildings, including the original depot building; the removal of original railroad spurs; introduction of new buildings; and changes in use all impact the property's ability to convey significance from its time as a 1931 hub of transportation and commerce. The subject property also lacks temporal cohesiveness due to the demolition and addition of buildings since its initial construction.

The loss of this overall integrity of setting adversely affects the subject property, as this collection of buildings and structures is no longer able to convey its shared history. Additionally, the change in setting from an active railroad depot to a lumber processing property has also greatly impacted the integrity of feeling, association, and setting of railroad-related properties on the site. In summary, Property. 2 is not able to convey its association with significant events occurring within the context of Nubieber, nor is it able to convey its significance within the broad patterns of history of the Great Northern and Western Pacific Railroad lines in Lassen County, the State of California, or the nation. Accordingly, Dudek recommends the subject property is not eligible under NRHP/CRHR Criterion A/1.

NRHP Criterion B: associated with the lives of significant persons in our past.

CRHR Criterion 2: is associated with the lives of persons important in our past.

To be found eligible under Criterion B/2, the property must be directly tied to an important person and the place where that individual conducted or produced the work for which they are known. Archival research failed to indicate any such direct association between individuals that are known to be historic figures at the national, state, or local level and the subject property. Property. 2 represents the collective efforts of many individuals, rather than the work of any single individual. Therefore, the subject property is not known to have any historical associations with people

important to the nation's, state's, or county's past. Due to a lack of identified significant associations with important persons in history, the subject property is recommended ineligible under NRHP Criterion B or CRHR Criterion 2.

NRHP Criterion C: 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.

CRHR Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Property 2 is composed of ubiquitous and prefabricated industrial buildings that are considered utilitarian and do not represent a particular style of architecture. These are relatively common buildings that can be found at various rail-related, industrial, and manufacturing sites throughout the country. Furthermore, the buildings and structures are not known to be the work of an important architect, builder, engineer, or designer, and are not known to have been built using an innovative construction technique. Additionally, the buildings do not embody distinctive characteristics of a type, period, or method of construction. Archival research failed to indicate any designers or architects of these buildings, and due to the ubiquitous style, they are unlikely to be the work of a master and do not possess high artistic value. Consequently, the subject property is recommended not eligible under NRHP Criterion C or CRHR Criterion 3.

NRHP Criterion D: have yielded, or may be likely to yield, information important in history or prehistory.

CRHR Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

This report was limited to historical resources that are part of the built environment. Criterion D generally applies to archaeological resources but may apply to a built environment resource in instances where a resource may contain important information about such topics as construction techniques or human activity. This is unlikely to be true for Property 2. Therefore, the built environment components of the subject property are recommended not eligible under Criterion D.

Please see the Archaeological Report, Appendix D1, for information on archaeological resources in the API.

Integrity Discussion

Property 2 was analyzed against the seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. The site retains its integrity of location, as it has not been moved. However, the integrity of setting has been compromised with the demolition of adjacent buildings, new constructions, and substantial changes in use. This change of use, from an active railroad depot to a lumber shipping site, has adversely affected the site's integrity of setting, feeling, and association. Much of the integrity of design, materials, and workmanship is lost, as replacement materials have been added throughout since its completion in 1931, including replacement of the historic depot building and demolition of many of the original rail related infrastructure. As a result, the integrity of feeling is not intact, as the subject property is unable to convey the feeling of a 1931 railroad depot. Historic association is defined as the direct link between an important historic event and a historic property. The subject property is unable to show its historic association when observing the site, as the majority of the property's historic features and character has not survived to the present day. The subject property does not possess integrity to convey its significance to its temporal period.

Eligibility Summary

Property 1, the Big Valley Lumber Company Site is not eligible for listing in the NRHP or the CRHR, due to a lack of historical associations and architectural merit. As such, the Big Valley Lumber Company Site is not a historical resource under CEQA.

Property 2, the GNWP Railroad: The Inside Gateway, Bieber Station, and Associated Properties was found not eligible for listing in the NRHP or the CRHR due to a lack of integrity and is therefore not considered a historical resource under CEQA.

Tribal Cultural Resources

The effort to identify TCRs at the Lassen Facility project site included, as described above, a records search and a review of the archaeological, ethnographic, and historical literature; a Native American Heritage Commission (NAHC) Sacred Lands File Search; tribal engagement; examination of historic maps; historical research; and field surveys. No TCRs have been identified within the project site.

3.4.1.3 Central Sierra Nevada (Tuolumne Facility) Site

Dudek cultural resources specialists in archaeology and historic era-built environment conducted technical studies of the Tuolumne Facility site proposed for production of wood pellets. Information in this section is based on and summarized from the following technical studies:

- Cultural Resources Inventory Report for the Forest Resiliency Program Project SPI Keystone, Tuolumne County, California. Prepared for Golden State Finance Authority. Prepared by Dudek. January 2022. Included as Appendix D3.
- Built Environment Inventory and Evaluation Report for Golden State Natural Resources Forest Resiliency Demonstration Project, Central Sierra Nevada (Tuolumne) Site Tuolumne County, California. Prepared for Golden State Finance Authority. Prepared by Dudek. May 2021, and Revised in July 2023. Included as Appendix D4.

The effort to identify cultural resources in the Tuolumne Facility Project Area included a records search and a review of the archaeological, ethnographic, and historical literature; a Native American Heritage Commission (NAHC) Sacred Lands File Search; examination of historic maps; historical research; and field surveys. The following section provides abbreviated archaeology and built environment contexts, the methods used to identify cultural resources, and inventory and evaluation findings for the Tuolumne Facility regarding cultural resources.

Setting and Area of Potential Impacts

The proposed Tuolumne wood pellet processing site is located at 12001 La Grange Road approximately 10 miles southwest of the community of Jamestown, in Tuolumne County, California, and in the western foothills of the Sierra Nevada Mountain Range (see Figure 2-7, Project Location (Tuolumne)). The Tuolumne site is located immediately southeast of the junction of State Route 108 and La Grange Road.

The API is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties. Determination of the API is influenced by a project's setting, the scale and nature of the undertaking, and the different kinds of impacts that may result from the proposed project.

The archaeological API is the maximum area of potential ground disturbance resulting from project activities and includes the entirety of the approximately 59-acre project site, as well as an additional 8 acres historically associated with the mill, for a total of 66.5 acres (see Figure 2, Project API, in Appendix D3). The estimated maximum depth of disturbance is 15 feet below the existing ground surface.

Delineation of the API for Built Environment follows the maximum possible API (direct and indirect) resulting from the proposed Project (see Figure 2 of Appendix D4). As such, the API slightly extends outside the proposed Project site boundary and encompasses Property 1's historic boundary, which was comprised of four APNs including 063-190-056, 063-350-004, 063-350-005, and 063-190-051 (69.86 acres); and Property 2, a segment of the Sierra Railroad – Mainline, Keystone Segment which ran 0.5 miles. Although not located directly within the proposed Project footprint, the railroad segment is included in the built environment API because there are potential uses for the railroad being considered in the development of this Project. Two properties are included in the API and discussed in detail in this study. Property 1 consists of the following APNs (063-190-056, 063-350-004, 063-350-005, and 063-190-051). Historically, the mill property was one single parcel that encompassed all of the above-listed current APNs. Property 2 is the Sierra Railroad – Mainline, Keystone Segment, located about 10 miles southeast of Jamestown in rural Tuolumne County, south of the intersection of State Highway 108/120 and La Grange Road. There is no APN assigned to Property 2.

Archaeological Context

Prehistoric Era

The most recent attempt to develop a cultural chronology for the Central Sierras involved the analysis of single component archaeological assemblages from Alpine, Amador, Calaveras, and Tuolumne Counties to develop an internally-consistent chronology for the region based on radiocarbon dates, obsidian hydration analyses, a projectile point typology based on metrical attributes, and diagnostic shell beads. The resulting chronology consists of five periods: the Early Archaic (11,500-7,000 calibrated years before present [cal BP]), the Middle Archaic (7,000-3,000 cal BP), the Late Archaic (3,000-1,100 cal BP), the Recent Prehistoric I (1,100-610 cal BP), and Recent Prehistoric II (610 cal BP to 100 BP). A full prehistoric archaeological context is provided within Appendix D3.

Ethnohistoric Period (post-AD 1750)

The following Ethnohistoric overview is included here as a baseline academic summary to provide context for Tribal Cultural Resources discussions. During the ethnographic period in California, the foothills of central and southern Sierra Nevada were occupied by various Miwok, Western Mono (or Monache), and Foothill Yokut speaking groups (Appendix D3). The region surrounding the Project API would have been in Sierra Miwok tribal territory during the ethnohistoric period (Appendix D3). This group inhabited the western foothills of the Sierra Nevada Mountains, roughly bounded by the eastern plains of the Central Valley to the west, the Cosumnes River to the north, the Sierra crest to the east, and the Chowchilla River to the south. Ethnographic work writes of a relatively high population of indigenous inhabitants in this region, with the early work of Stephen Powers in the 1870s noting that, when accounting for all of the discrete groups, the Miwok were “by much the largest nation in California, both in population and in extent of territory” (Powers 1877, in Appendix D3).

The language spoken by the Sierra Miwok is one of the five classified languages of the Miwok family, with several distinct regional dialects, all of which derived their linguistic roots from a common Penutian stock. The language falls into two distinct branches: Western Miwok, which is subdivided into Coast and Lake Miwok, and Eastern Miwok, which includes Bay, Plains, and Sierra Miwok. Lexostatistical calculations suggest that the two branches of the

Miwok language began to diverge at approximately 500 BC (Appendix D3). Sierra Miwok is further subdivided into three distinct dialects: Northern Sierra Miwok, Central Sierra Miwok, and Southern Sierra Miwok—with Central Sierra Miwok would have been spoken in the vicinity of the API. The extent to which these Sierra Miwok dialects reflect regional differences in socio-political factors is unknown as the dialects were not named and lacked sociopolitical correlates (Appendix D3).

Subsistence and settlement practices among the Sierra Miwok included a reliance on acorns as a staple food and a seasonal transhumance with occupation of permanent or semi-permanent lower elevation residential bases during the winter months and more dispersed high elevation temporary camps during the summer. Each permanent winter residence was occupied by a *vena*, a group of patrilineally related families, that served as the primary social and political unit of the societies (Appendix D3). Decisions on where to locate settlements were largely predicated on the timing of acorn procurement but were also influenced by seasonal temperature and weather patterns. In the late spring and summer months, small groups and families generally dispersed into higher elevations to hunt game and pursue roots, greens, and pine nuts, among others. Beginning in late summer and fall, groups began aggregating into moderately sized villages (e.g., 10-15 people) at or below the snow line, at which point acorns were collected and stored for consumption through the winter.

The intensive exploitation of acorn is a unique aspect of the California culture area and requires specialized technologies and extensive processing in order to be incorporated as a major component of the diet. Abundant and seasonally reliable, they store well and require very little search and procurement time, however, they entail an enormous amount of processing time. Because of their high tannic acid content—which can be poisonous in large doses—acorns must be ground into meal and leached to be consumed in bulk. As in the rest of the state, mortars and pestles were the primary means of processing acorns, in the Sierra Nevada in particular, the abundant bedrock outcrops present throughout the region were utilized as bedrock mortars for acorn processing (Appendix D3). Acorn crops were generally collected in fall, after falling from the tree, and stored for use over the winter and early spring. While the preferred species of oak varied regionally and across the state, black oak (*Q. kelloggii*), blue oak (*Q. douglasii*), and interior live oak (*Q. wislizeni*) tended to be staples of subsistence across the Sierras.

Historic Period Context

Historical Overview of Tuolumne County

Spanish Period (1769–1822)

European exploration into Central California and what would later become Tuolumne County began in 1602 with a Spanish envoy mission into Monterey Bay by Sebastián Vizcaíno. Don Gaspar de Portolá, the Governor of Baja, embarked on a voyage in 1769 to establish military and religious control over the area. In July of 1769, Padre-Presidente Franciscan Fr. Junípero Serra, founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823, including Mission Santa Cruz. In 1777, San José became the first pueblo or town settlement in Spanish California, located on the eastern bank of the Guadalupe River and the closest mission to Tuolumne County. The area remained agriculturally based with early colonists planting corn, beans, wheat, hemp and flax and in addition to setting out small vineyards and orchards. In 1810, a civil war had erupted in Mexico (Appendix D3).

Mexican Period (1822–1848)

After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants. The secularization of the Missions meant that all communal mission property was placed in a trust with the intention of being returned to the local Native American population. Extensive land grants were established in the interior during this period. Tuolumne County remained relatively cut-off from the secularization and colonization occurring in the coastal cities of San Jose and Monterey. Few accounts of the County from pre-1848 survive rather the area was a significant residential and resource procurement area for the Central Sierra Miwok (Appendix D3)

American Period (1848–Present)

The Mexican American War ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period. Tuolumne was designated as 1 of the 27 original counties of California in 1850. In Tuolumne County, historic activity began soon after the widely publicized discovery of gold in 1848. By the Gold Rush period (1848–1855), the Central Sierra Miwok's territory had been intruded on several times and the number of tribes reduced. Villages were either abandoned or had their inhabitants forcibly removed, leading to the consolidation of many villages over time (Appendix D3).

After the discovering of gold in the area by either Benjamin F. Wood in Jamestown or on Mormon Creek by a group of Mormons, miners invaded the region. By the mid-1860s the mining industry in the County leveled off and many families moved to other settlements resulting in the County's population decreasing by nearly 50% between 1860 and 1870. Starting in the late 1880s, mining technology advanced and there was an infusion of foreign capital into the County allowing for a second Gold Rush. Along with mining and agriculture, the timber industry emerged as a dominant force in the County (Appendix D3).

The timber industry provided the momentum needed to develop the Sierra, Sugar Pine, West Side, and Cherry Valley railways. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock. The Sierra Railroad between 1893 and 1920 was closely associated with the quartz mining era in California that peaked in Tuolumne County during this time (Appendix D3).

The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and exportation. The West Side Flume and Lumber Company, later renamed the West Side Lumber Company, reincorporated in 1899, and the Standard Lumber Company, incorporated in 1901, were the County's two largest lumber operations opening planning mills and box factories. The Sierra Railroad had connections to the Santa Fe and Southern Pacific railroads in Oakdale allowing it to be part of the national rail network (Appendix D3). By World War I, the mines once again became inactive with many people moving to the San Francisco Bay Area to work in war-related industries. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942 (Appendix D3).

Tuolumne County experienced several decades of growth between 1970 and 1990 with the population increasing from 22,169 to 48,456. The lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999. By 2000, the population leveled off with the County retaining its tight knit reputation established early in its history (Appendix D3).

History of the API

The area that encompasses the API, known as Keystone, began development in 1898 when the Sierra Railroad rerouted away from its original mainline from Don Pedro to go around the Keystone Area. The new route was chosen to avoid boxcar buildups created by a lack of siding trackage built to allow some train cars or boxcars to move off the side, while others stayed on the track. This new line ran parallel to the original mainline and offered both passenger and freight travel. By the 1920s, Sierra's mainline stations Arnold, Paulsell, Keystone, and Black Oak were retired as passenger stops (Appendix D3).

Between the 1920s and the early 1960s, the project area remained undeveloped with the Sierra Railroad (Property 2) running along the property's western boundary. In 1963, Sequoia Pine Mills Inc., a subsidiary of Great Western Lumber Company of Downey began developing the site on La Grange Road just off Highway 108 as a lumber mill. The company's total investment in the development of the property was \$750,000 including the construction of a temporary office. The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock. Throughout the 1960s, Fibreboard purchased many of the lumber mills in Tuolumne County and had a large presence in the area. By 1969, two single-family Ranch style residences had been constructed in the northwest corner of the property located at 12055 and 12051 La Grange Road. These two residences were likely used as housing for managers and workers at the Keystone mill. Also, in 1969 the company sponsored the first passenger train on the Sierra line since 1963 on a trip from Jamestown to Sonora (Appendix D3).

The Fibreboard Corporation had their headquarters in Walnut Creek, California, and besides wood products, the corporation had interests in synthetic building materials, industrial insulation, and ski resorts. In October 1990, a permit was issued to allow the construction of a bark processing plant at Keystone. The Keystone plant operated as a typical bark processing plant, which generates decorative bark and mulch products for landscaping from conifers processed through a sawmill. By the mid-1990s, the company owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. Fibreboard at the time was the largest private employer in Tuolumne County. Despite the business's success, the industry's survival was threatened by environmental restrictions and bureaucratic bottlenecks in the U.S. Forest Service. Timber profits decreased by 1995 with \$12.7 million compared to \$18.5 million the year before. The company's stock jumped 28% in June 1995 after the announcement that it was "exploring the possible sale" of its Wood Products division based in Tuolumne County, including its mill at Keystone (Appendix D3).

In 1994, Fibreboard's Keystone property was subdivided, creating a separate parcel for its bark processing plant. This plant is currently occupied by American Wood Fibers at 12015 La Grange Road and operates as a producer of specialty forestry products including large and small animal bedding, wood shavings, industrial wood flour, premium wood pellet products, firewood, soil and compost. Throughout the 1990s, the property had multiple buildings constructed on site to facilitate the plant's production including a warehouse, storage buildings, offices, and garages (Appendix D3).

By 1995, the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities at Standard, Chinese Camp, and Keystone in Tuolumne County and Red Bluff in Tehama County for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned the company at the time. SPI maintained ownership of the mills at Standard, Chinese Camp, and Keystone and continued to thrive due to owning trees on 1.5 million privately owned acres throughout California. In 2011, two years after closing its Standard mill because of tight lumber supply and weak demand, the 91-year old mill reopened as a sawmill employing 110 people. In Tuolumne County, SPI employed 256 people, including 122

at the cedar fencing plant near Chinese Camp and 24 people at the Keystone landscaping bark plant. In 2014, SPI's Keystone parcel was subdivided again with the division of two single-family residential parcels from the main parcel along La Grange Road. Keystone remained as SPI's only bark plant until 2020, when the company opened the Lincoln Bark Plant in Lincoln California and Sonora Bark Plant in Sonora, California. By the end of 2020 on-site operations had ceased (Appendix D3).

Methods and Identification of Cultural Resources

CHRIS Records Search

Staff at the Central California Information Center performed a records search for the API and a 1-mile buffer surrounding the API on December 10, 2020. Results of the cultural resources records search indicated that 11 previous cultural resources studies have been conducted within 1 mile of the Project area between 1979 and 2019. Of these, one study intersects a portion of the API. Information Center records indicate that a total of four previously recorded cultural resources fall within 1 mile of the Project area. A comprehensive records search is presented in and appended to the "Cultural Resources Inventory Report for the Forest Resiliency Program Project SPI Keystone, Tuolumne County, California" (Appendix D3). One of the previously documented built environment resource, the Sierra Railroad - Mainline, Keystone Segment (P-55-000347) came back in the records search results and described below (Appendix D3).

Results of the cultural resources records search indicated that 11 previous cultural resources studies have been conducted within one mile of the Project API. Of these, one study intersects the Project API.

Summary of Archaeological Specific Records Search Results

Information Center records indicate that a total of four previously recorded cultural resources fall within one mile of the Project API; one of these resources (P-55-000347) discussed above, intersects the Project API. The remaining three archeological resources recorded in the surrounding one-mile area include a multi-component site that contains both historic era refuse and features, as well as a prehistoric habitation site; one additional prehistoric habitation site; and a historic era wall.

Summary of Built Environment Specific Records Search Results

P-55-000347

P-55-000347 has been recommended for the NRHP as part of the Sierra Railroad Historic District. However, it is unclear if the property was ever formally listed. The Sierra Railroad - Mainline and its components including Sierra Road, Paulsell Station, Cooperstown Road, Keystone, Chinese Station/Montezuma, Woods Creek, Sullivan Creek, Standard, Black Oak Road, and Ralphs Station were evaluated in 2008 by JRP Historical Consulting LLC. The Sierra Railroad - Mainline begins in Oakdale (Stanislaus County) on the south side of East H Street, between South Sierra and South Yosemite Avenues, and follows a generally easterly route into Tuolumne County passing through communities of Jamestown, Sonora, and Standard before terminating in Tuolumne City. Currently the status is listed as, "Eligible (3D) Appears eligible for listing in the National Register as a contributor to a district that has been fully documented according to OHP [Office of Historic Preservation] instructions and appears eligible for listing" (Appendix D4).

Additional Building Development and Archival Research

Dudek conducted additional background research to identify the presence of other historic-era built environment properties that were not identified through the CHRIS record search sited within and adjacent to the proposed project area. This research included a search of the Built Environment Resources Directory (BERD), which identified no resources that overlapped the Project API and no resources adjacent to the Project API within 1 mile. Dudek also reviewed historic aerial photographs, historic newspapers, and historic Sanborn maps in addition to conducting archival research at the following repositories:

- Tuolumne County Library
- Tuolumne County Historical Society
- California State Railroad Museum Library
- Tuolumne County Public Works Request for Records

Tribal Coordination

The NAHC was contacted by Dudek on January 18, 2021 to request a search of the Sacred Lands File. The NAHC responded on February 4, 2021 indicating that the search failed to identify any Native American resources in the vicinity of the project. The NAHC provided a list of Native American tribal contacts who may have additional knowledge relating to cultural resources in the area. Golden State Finance Authority did not receive any tribal requests for notification under Assembly Bill 52 (AB 52) prior to release of the Draft Environmental Impact Report, and therefore the formal requirements of AB 52 were not triggered for this project. However, in accordance with the Native American Heritage Commission, Tribal Consultation Under AB 52: Requirements and Best Practices, GSFA initiated "non-AB 52 tribal consultation" by sending outreach notices and offers to meet and confer to each of the Tribes listed on the NAHC contact list for the Lassen, Tuolumne, and Stockton sites. The results of those meetings and collaboration have informed the information, analyses, and management approach, in this chapter.

Field Methods

Archaeology

Dudek archaeologist Ross Owen conducted an intensive-level pedestrian survey of the Project API on January 13, 2021. The survey was conducted to identify and record any cultural resources that may occur in the Project API and used standard archaeological procedures and techniques (as outlined in Field Methodology in Appendix D3).

The Project API has been substantially altered since the development of a sawmill on the site in the 1970s. Large portions of the Project API consist of graded roadways and staging areas with retention basins, primarily along the eastern half. Ground visibility varied across the Project API, often obscured by dense grasses areas in the southeastern and western portions of the Project API, and by woodchips in the unpaved areas in the center of the Project API. The best visibility was along the northern edge of the Project, where sparse grasses and dry seasonal drainages afforded a 50% view of the ground surface. Areas of exposed soil along drainages and near rodent burrows were closely inspected. No historic-period or prehistoric cultural resources were identified during the cultural resources survey.

Dudek archaeologist Ross Owen, conducted auger tests in order to determine subsurface conditions within the project area. Nine 4-inch diameter augers were hand excavated with the project area. The purpose of auger testing

was to determine the potential for subsurface deposits yielding cultural materials within the project area. Surface conditions indicate the Project API generally consists of shallow loamy topsoil atop gravelly clay subsoil with fragments of weathered bedrock. Large areas of the API have been highly disturbed through grading, the development of retention basins and alterations to drainages. Soils profiles were variable, with a noted change in color and composition within the northern third of the Project API. In general, documented soils were observed to consist of a topsoil (A Horizon), represented by dark brown and very dark grayish brown loams (Munsell 10YR 3/2 and 3/3) terminating between 3-10cm below the surface (cmbs) and a subsoil (B Horizon), represented by dark yellowish brown clays (Munsell 10YR 4/4) with gravels and decomposing bedrock overlying metavolcanic and slate bedrock at 25-55cmbs. Soils within the northern portion of the Project API also consisted of a shallow soil profile, however there was an increase in clay content in both horizons and a notable change in coloration to a more reddish hue. No archaeological material or indications of subsurface deposits were identified throughout the course of testing. While significant soil disturbance has occurred within the footprint of the sawmill and retention basins, the soil profiles in the undeveloped areas within the Project API appear to be intact. Full testing results are found in Appendix D3.

Built Environment

Dudek Architectural Historian Fallin Steffen, MPS, conducted pedestrian survey of the Project area for historic built environment resources on January 13, 2021. The survey entailed walking the exteriors of all buildings and structures within the Project area, documenting each building with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the subject property were taken with a digital camera. All field notes, photographs, and records related to the current study are on file at Dudek's office in Sacramento, California (Appendix D4)

Results of Identification and Evaluation Efforts

Archaeology

No historic-period or prehistoric cultural resources were identified during the cultural resources survey.

Built Environment

Dudek recorded and evaluated two properties that contain historic era (over the age of 45 at the time of survey) buildings and structures located in the API. These properties are the SPI Keystone Mill and Support Facilities (Property 1) and the Sierra Railroad - Mainline, Keystone Segment (Property 2). Locational information for these properties is illustrated in figures presented in the technical report prepared for this project site and can be found in Appendix D4.

Property 1, SPI Keystone Mill and Support Facilities

Property Description

The Project area is currently comprised of the abandoned SPI Keystone mill and support facilities located on APN 063-190-056 that is 58.56 acres. Historically, the mill was a much larger property that is defined for the purposes of this study as Property 1 (see Figure 4 of Appendix D4) and includes the following APNs:

- APN 063-190-056, abandoned SPI Keystone Mill located at 12001 La Grange Road
- APN 063-350-004, residence located at 12051 La Grange Road
- APN 063-350-005, residence located at 12055 La Grange Road
- APN 063-190-051, American Wood Fibers located at 12015 La Grange Road

The property includes 15 components including 8 buildings, 5 structures, and 2 foundations. Surrounding the property is a chain-link fence with additional chain-link fences around the two residential buildings and American Wood Fibers. The abandoned SPI Keystone mill has two access points from La Grange Road, including southwest access by a paved driveway and northwest access by paved road. The two residences and American Wood Fibers are located directly off La Grange Road. Around Component 9, Foundation, is a partially paved truck turnaround. To the north of the abandoned SPI Keystone mill buildings are two improved springs with concrete footings for a sluice dam. Open grass spaces are located to the south, west, and northwest of the abandoned SPI Keystone mill. South of the American Wood Fibers buildings is an area of log storage. Property 1 Site Map, identifies the location of the buildings and structures within the Project area and their functions (See Appendix D4).

The following list of known alterations was compiled through archival research, a review of previous subject property documentation, and during the course of the pedestrian survey. Unless indicated, the date of these alterations is unknown:

- Demolition of two buildings (Pre-1987)
- Construction of bark processing plant (1990)
- Property was subdivided creating a separate parcel where the bark processing plant operated (1994)
- Subdivided for separate two single family residential parcels (2014)
- Replacement and removal of fenestration
- Alteration of fenestration openings
- Reroofing
- Addition of security doors

NRHP/CRHR Evaluations

In consideration of Property 1's lack of significant associations and compromised historical integrity, Property 1 is recommended not eligible for listing in the NRHP, CRHR, and County of Tuolumne Register of Cultural Resources under all criteria, based on the following significance evaluation.

NRHP Criterion A: associated with events that have made a significant contribution to the broad patterns of our history.

CRHR Criterion 1: is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Archival research indicates that the development of the property began in 1898 with the construction of the adjacent Sierra Railroad Keystone stop. Between the 1920s and the early 1960s, the property remained undeveloped with the Sierra Railroad running along the property's western boundary. In 1963, Sequoia Pine Mills, Inc. a subsidiary of Great Western Lumber Company of Downey, began developing the site as a lumber mill. The company maintained their headquarters and lumber manufacturing facilities at Keystone until 1969 when the Fibreboard Corporation acquired Sequoia Pine Mills, Inc. for shares of common stock and built the majority of the buildings on site, including two single-family ranch-style residences. Throughout the 1960s, Fibreboard purchased many of the lumber mills in Tuolumne County and had a large presence in the area. By the mid-1990s, the Fibreboard Corporation owned two sawmills, plywood plant, and a bark plant in Standard, Chinese Camp, and Keystone. In 1994, Fibreboard's Keystone property was subdivided, creating a separate parcel for its bark processing plant. In 1995, when the company sold its Wood Products Group to SPI, the deal included 76,000 acres of timberland and all of the operating facilities, including Keystone for \$245 million. Keystone continued to be used as a bark processing plant by SPI as the only decorative bark plant owned by the company at the time until 2020.

In Tuolumne County the timber industry emerged as a dominant force as a response to the need for timbers to support the mines, build stamp mills, and construct buildings in the late 1880s. The presence of the Sierra Railroad allowed large mills to develop to cut lumber for local use and export out of the County. By 1900, the railroad industry for logging, passenger, and freight services generated more economic opportunities for the area. The Sierra Railroad, incorporated in 1897, extended from Oakdale to Tuolumne and hauled a variety of things including lumber, ore, passengers, agricultural products, and livestock. The start of World War II put a stop to the mining industry in the area with the federal government ordering all mines to close in 1942. The Sierra Railroad - Mainline was reconstructed with heavier rail to accommodate the postwar housing boom's demand of forest and mineral products. Tuolumne County experienced several decades of growth between 1970 and 1990, with the population increasing from 22,169 to 48,456. Despite the increase in population, the lumber industry in Northern California has been on a steady decline since the 1980s, with 119 lumber mills present in 1987 decreasing to 59 by 1999.

Property 1, despite being one of the last functional bark processing plants in Tuolumne County in the 2000s, does not represent one of the first lumber processing plants in the County nor is it one of the few plants that are still in operation. Property 1 developed decades after the rise of the lumber industry in the County, with the majority of the buildings on the property constructed circa 1969 by the Fibreboard Corporation. Additionally, archival research failed to indicate that the Keystone Plant was the focus of the Fibreboard Corporation or SPI's lumber processing in the area. Throughout the 1960s, the Fibreboard Corporation also purchased a number of the lumber mills in Tuolumne County, and there is no indication that their Keystone Plant was unique among those acquisitions. During SPI's ownership of the plant it was one of the smallest, employing only 24 people compared to the 122 at the cedar fencing plant near Chinese Camp. The plant operated as SPI's only bark processing plant between 1995 and 2020, but there is no indication that its existence made a significant contribution to the development of the County or the State for creating an innovative or unique method to process lumber.

Property 1 is not associated with any extraordinary event or events occurring within the context of the lumber processing industry nationally, at the state level, or locally in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear eligible under NRHP Criterion A or CRHR Criterion 1.

NRHP Criterion B: associated with the lives of significant persons in our past.

CRHR Criterion 2: is associated with the lives of persons important in our past.

To be found eligible under Criterion B/2, the property has to be directly tied to an important person and the place where that individual conducted or produced the work for which he or she is known. Archival research failed to indicate any such direct association between individuals that are known to be historic figures at the national, state, or local level and Property 1. The bark processing plant represents the collective efforts of many individuals, rather than the work of any single individual. Therefore, Property 1 is not known to have any historical associations with people important to the nation's or state's past. Due to a lack of identified significant associations with important persons in history, the plant does not appear eligible under NRHP Criterion B or CRHR Criterion 2.

NRHP Criterion C: 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.

CRHR Criterion 3: embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

The majority of the remaining buildings and structures within the Property 1 site are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. These are relatively common buildings that can be found at various industrial/manufacturing plants throughout the country. Furthermore, the buildings and structures are not known to be the work of an important architect, builder, engineer, or designer, and are not known to have been built using an innovative construction technique. Additionally, the two adjacent Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings, including replacement windows and doors, addition of a security door, and reroofing, have affected their ability to display as 1960s era homes. Archival research failed to indicate the designer or architect of these buildings, and due to the ubiquitous style, they are unlikely to be the work of a master and do not possess high artistic value. Consequently, Property 1 does not appear eligible under NRHP Criterion C or CRHR Criterion 3.

NRHP Criterion D: have yielded, or may be likely to yield, information important in history or prehistory.

CRHR Criterion 4: has yielded, or may be likely to yield, information important in prehistory or history.

There is no evidence to indicate that the subject property is likely to yield any additional information important to prehistory or history beyond what is already known. The subject property is also not associated with an archaeological site or a known subsurface cultural component. Therefore, Property 1 does not appear eligible under NRHP/CRHR Criterion D/4.

Tuolumne County Statement of Significance

The County of Tuolumne County's criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the above significance evaluations, and in consideration of Property 1's lack of significant associations, Property 1 is also recommended ineligible as a County of Tuolumne County cultural resource under any criteria.

1. Exemplifies or reflects significant elements of Tuolumne County's cultural, social, religious, economic, political, engineering or architectural history.

As stated in NRHP/CRHR Criterion A/1, Property 1 is not associated with any extraordinary event or events within the context of the lumber processing industry in Tuolumne County that would distinguish it as significant. Moreover, research into the history of Property 1 revealed no evidence suggesting that the plant is associated with innovative bark processing techniques or a unique event or pattern of events considered historically significant. For these reasons, Property 1 does not appear to be directly associated with events that have made a significant contribution to the development of lumber processing in the County. Therefore, the plant does not appear eligible under County Criterion 1.

2. Identified with historic persons or with important local, state or national history.

As stated in NRHP/CRHR Criterion B/2, archival research did not reveal an association between Property 1 and any persons who significantly contributed to the development of the county, state, or nation. Therefore, Property 1 does not appear eligible under County Criterion 2.

3. Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship.

As discussed in NRHP/CRHR Criterion C/3, Property 1's buildings and structures are ubiquitous and prefabricated industrial buildings that are considered utilitarian, and do not represent a particular style of architecture. Additionally, the two adjacent Ranch style single-family residences constructed as part of the site's development circa 1969 do not embody distinctive characteristics of a type, period, or method of construction. Multiple alterations to both buildings including replacement windows and doors, addition of a security door, and reroofing have affected their ability to display as 1960s era homes. Therefore, Property 1 does not appear eligible under County Criterion 3.

4. Representative of a notable work of a master builder or architect.

As discussed in NRHP/CRHR Criterion C/3, the buildings and structures at Property 1 are not known to be the work of a master builder or architect. Additionally, archival research failed to indicate the designer or architect of the two Ranch style single-family residences constructed on the property circa 1969. Therefore, the plant does not appear eligible under County Criterion 4.

Integrity Discussion

In addition to meeting one or more of the above criteria, an eligible resource must retain integrity, which is expressed in seven aspects: location, design, setting, materials, workmanship, feeling, and association. All properties change over the course of time. Consequently, it is not necessary for a property to retain all of its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. In order to retain historic integrity, "a property will always possess several, and usually most, of the aspects" (Andrus and Shrimpton 2002). The following sections discuss the integrity of Property 1.

Location: All of the extant buildings and structures are sited on their original locations of construction in their original orientation, and therefore retain integrity of location

Design: The subject property retains diminished integrity of design. The essential elements of plan, structure, and style have remained largely intact over time. Despite this, several of the conscious decisions made during the original conception and planning of the property as a site with one industrial plant has been altered due to two

subdivisions affecting the essential element of space. Additionally, over time there has been a disruption in the original paths of circulation that makes it difficult to identify how the property was accessed during its original period of development. The demolition of certain buildings has also made it hard to determine the functionality of the site's processing from start to finish.

Setting: The subject property does not retain integrity of setting. Upon its completion circa 1969, the lumber processing plant displayed as one large industrial property with two single-family residences to the northwest. Due to subdivisions in 1994 and 2014 the character of the property no longer reads as one large property rather as four smaller properties. Additionally, throughout the 1990s multiple buildings were constructed on the American Wood Fibers site, which further impacted the property's ability to be identified as a 1960s era mill and original buildings were demolished. The relationship between buildings and other features including open space can no longer be recognized as its 1960s period of development. Additionally, the paths of circulation have been altered to the point that the property's original point of entry and access roads cannot be identified.

Materials: The subject property retains integrity of materials. Since the plant's development circa 1969, the physical elements dating from that period of construction have been retained with little replacement. The key exterior materials dating from the construction are existent, and replacements of windows and doors on the single-family residences have not significantly affected its integrity of materials for the property as a whole.

Workmanship: Similar to integrity of materials, the subject property retains integrity of workmanship. The physical evidence of skill required to construct the circa 1969 buildings and structures have been retained due to the lack of large-scale alterations to the property since its development circa 1969.

Feeling: The subject property does not retain integrity of feeling. The property is no longer able to express itself as a working bark processing plant constructed circa 1969. Due to the ubiquitous and utilitarian nature of the site it is unable to be dated to a certain period of time and therefore cannot express a historic sense of a particular time. Furthermore, changes to the setting over time and subdivision of the original parcels also contribute to the property's inability to convey integrity of feeling.

Association: Finally, the subject property does not retain integrity of association due to the lack of links between an important historic event or person and the property.

In summary, Property 1 retains integrity of location, materials, and workmanship with a diminished integrity of design. The subject property lacks integrity of setting, feeling, and association.

Property 2, Sierra Railroad – Mainline, Keystone Segment

Property Description

Property 2 is comprised of a 0.50-mile segment of the Sierra Railroad alignment (see Appendix D3, Figure 3). The Sierra Railroad's original mainline ran from Oakdale to Jamestown and was constructed in 1897. In 1900, the line was extended to Tuolumne City, totaling 56.2 miles in length. Most of the original standard gauge line is still in place and carries railroad traffic terminating just west of Standard. The railroad's Keystone Segment is located 10 miles southeast of Jamestown in rural Tuolumne County, south of the intersection of State Highway 108/120 and La Grange Road. The segment runs 0.5 miles in length at a height of 1 to 6 feet. The roadbed is carried on a berm at varying heights with the northern end at Highway 108/120 much larger than the southern end. Rails appear to

have the date stamp of 1929 constructed of wood ties, metal spikes, and a crushed stone roadbed. Property 2 does not display any noticeable changes since it was last evaluated in 2008. The railroad remains an active railway.

NRHP/CRHR Statement of Significance Update

The Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) was previously recommended eligible under NRHP and CRHR Criterion A/1 as a contributor to the existing Sierra Railroad Historic District for its impact on the social and economic development in Tuolumne County. However, it is unclear if the property was ever formally listed. Currently, the status is listed as “Eligible (3D) Appears eligible for listing in the National Register as a contributor to a district that has been fully documented according to OHP instructions and appears eligible for listing.” For the full evaluation, see the 2008 report titled *Second Addendum to Cultural Resources Inventory Report for the Yosemite Ranch Golf and Wetland Preserve Project at Yosemite Junction, Tuolumne County, California*, written by Laura Leach-Palm (Leach-Palm 2008). The 2008 JRP Historical Consulting Services report evaluated the Sierra Railroad under NRHP and CRHR criteria but did not provide an evaluation under local County of Tuolumne designation criteria. Therefore, the following provides an updated evaluation for the Keystone segment of the Sierra Railroad in consideration of local designation criteria.

Tuolumne County Statement of Significance

The County of Tuolumne County’s criteria for designation of a cultural resource closely follow those criteria outlined for the NRHP and CRHR. Based on the significance evaluation from the 2008 JRP Historical Consulting Services report, the Sierra Railroad – Mainline, Keystone Segment is recommended eligible for listing in the NRHP and CRHR. Given that the railroad segment remains largely unchanged since 2008 and continues to be an important part of the County’s history, it is also recommended as eligible for the Tuolumne County Register of Cultural Resources under Criterion 1, based on the following significance evaluation.

1. **Exemplifies or reflects significant elements of Tuolumne County’s cultural, social, religious, economic, political, engineering or architectural history.**

The Sierra Railroad – Mainline, Keystone Segment appears eligible under County Criterion 1 due to its enormous impact on the social and economic development in Tuolumne County. First, the railroad is closely associated with the quartz mining era in California that peaked in Tuolumne County between 1893 and 1920. The railroad eventually developed into a major transporter of lumber in the area to facilitate logging and milling operations. Beginning in 1914, the railroad also transported supplies of materials for the construction of major regional water resources including the City of San Francisco’s O’Shaughnessy Dam in Hetch Hetchy Valley in 1923 and storage reservoirs for local irrigation districts formed behind the Don Pedro Dam in 1923 and Melones Dam in 1926. The railroad also transported passengers to towns along its alignment and connected with interregional transportation services at its Oakdale Station terminus. Therefore, due to the Sierra Railroad – Mainline, Keystone Segment’s vital contributions to the economy and development of Tuolumne County, it appears eligible under County Criterion 1.

2. **Identified with historic persons or with important local, state or national history.**

The Sierra Railroad – Mainline, Keystone Segment does not appear eligible under County Criterion 2 for associations with significant individuals. Although individuals such as Thomas S. Bullock and William Crocker were involved in planning, financing, and designing the railroad, the railroad line does not retain integrity to their periods of association. Therefore, the railroad segment does not appear eligible under County Criterion 2.

3. **Embodies distinguished architectural characteristics valuable for study or a period style or method of construction or is a valuable example of the use of indigenous materials or workmanship.**

The Sierra Railroad – Mainline, Keystone Segment does not appear eligible under County Criterion 3 as embodying distinctive architectural characteristics of a period style or method of construction. Under this criterion, the proposed period of significance would be 1897 to 1900, the dates of initial construction of the railroad. As a result of the modifications to the line that occurred after the initial construction, the Sierra Railroad is more of a product of the 1910s and 1920s than 1900. Within this context, the railroad represents a late example of construction techniques that are not valuable for the study of railroad technology. Therefore, the railroad segment does not appear eligible under County Criterion 3.

4. Representative of a notable work of a master builder or architect.

The Sierra Railroad – Mainline, Keystone Segment, does not appear eligible under County Criterion 4. Archival research failed to identify the railroad’s builder or architect and due to the type of resource as a method of transportation it is unlikely to be the work of a master. Therefore, the railroad segment does not appear eligible under County Criterion 4.

Character-Defining Features

The character-defining features associated with the Sierra Railroad – Mainline, Keystone Segment, are limited to its location, setting, original alignment, construction materials, and its ability to convey use a railroad alignment.

Eligibility Summary

Property 1, SPI Keystone Mill and Support Facilities located on APN 063-190-056, is not eligible for listing in the NRHP, the CRHR, or the Tuolumne County Register of Cultural Resources due to a lack of historical associations and architectural merit. As such, Property 1 is not a historical resource under CEQA.

Property 2 which is a segment of the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347), is eligible for listing in the NRHP, CRHR, and Tuolumne County Register of Cultural Resources under Criteria A/1/1. Therefore, Property 2 is considered a historical resource under CEQA.

Tribal Cultural Resources

The effort to identify TCRs at the Tuolumne Facility project site included, as described above, a records search and a review of the archaeological, ethnographic, and historical literature; a Native American Heritage Commission (NAHC) Sacred Lands File Search; tribal engagement; examination of historic maps; historical research; and field surveys. No TCRs have been identified within the project site.

3.4.1.4 Port of Stockton

Setting and Area of Potential Impacts

Finished pellets would be transported by rail from both the Lassen and Tuolumne facilities to the Port of Stockton, California (see Figure 2-10, Port Location). The proposed GSNR facility would be located in the West Complex of the Port, formerly known as Rough and Ready Island. The Port of Stockton is an active deep-water port. In 2022, the Port had 278 vessel calls, received 38, 271 railroad cars, 4.4 mm tons of cargo, was the number one dedicated bulk/break-bulk port in California, and the fourth busiest port in the state (Port of Stockton 2024). The West Complex, also known as Rough and Ready Island, is a former naval communication station (NCS) (and previously,

a naval supply annex). The property was approved for transfer to the Port of Stockton in 1966 for the benefit of maritime trade. The property was transferred in 2000.

The API for cultural resources is the extent of area where proposed project activities will occur as indicated on Figure 2-11, Project Site Plan (Port).

Archaeological Context

The following archaeological context for the region is summarized from the *Archaeological Resources Inventory Report for the Delta Dams Rodent Burrow Remediation Project at Clifton Court Forebay* by the Department of Water Resources by Dudek (Dudek 2021).

Prehistoric Context

Various attempts to parse out information provided through recorded archaeological assemblages throughout California for the past 12,000 years have led to the development of numerous cultural chronologies. Some of these are based on geologic time, most are interpreted through temporal trends derived from archaeological assemblages, and others are interpretive reconstructions. The spatial extent and detail of these chronologies is also highly variable, with detailed chronologies developed in some areas based on substantial numbers of radiocarbon dates, while other areas rely on cross-dating of stylistically distinct artifact styles or cultural patterns. However, each of these chronologies describes essentially similar trends in assemblage composition and cultural succession, with varying degrees of detail. California's archaeological assemblage composition is generally accepted as falling within the following overarching patterns: Paleoindian Period, Archaic Period, Emergent/Prehistoric Period, and Ethnohistoric Period.

The archaeology and prehistory of the Central Valley, in particular, are not well understood. Early and widespread agricultural use of the valley floor has destroyed much of the bottomland archaeology, and siltation has most likely buried many resources well below the surface sediments. Much of the recovered archaeological material from the valley area is devoid of context, having been scavenged from the surface and placed in private collection. Despite these difficulties, a general chronological framework for the Central Valley has been developed. Like the general California chronology, the archaeological record of the Central Valley can be divided into the Paleoindian Period (11,550 to 8550 calibrated years [cal] BC), Archaic Period (8550 cal BC to cal AD 1100), Emergent Period (cal AD 1100 to 1750), and Ethnohistoric Period (post-AD 1769). The Archaic Period is further subdivided into three phases—the Lower Archaic (8550 to 5550 cal BC), Middle Archaic (5550 to 550 cal BC), and Upper Archaic (550 cal BC to cal AD 1100)—based on climatic and cultural variations (Bennyhoff and Fredrickson 1994; Groza et al. 2011; Rosenthal et al. 2007).

Paleoindian Period (ca. 11,550 to 8550 cal BC)

While few sites of Paleoindian age have been identified in the Central Valley, occupation is known to date to at least 11,000 years ago (e.g., Fenenga 1993; Fredrickson and Grossman 1977; Riddell and Olsen 1969; Siefkin 1999). Most of the evidence for a Paleoindian presence in the valley has been limited to surface finds of fluted projectile points, which are typically regarded by North American archaeologists as late Pleistocene early Holocene time markers. Numerous specimens of these fluted, concave base (Clovis or "Clovis-like") projectile points and other artifacts presumed to be Paleoindian in age (e.g., "humpies" and crescents) (see Fredrickson and Grossman 1977; Sampson 1991) have been collected from surface contexts in several locations in the Central Valley. Unfortunately, most of these discoveries have been made by amateur collectors, many of whom were collecting illegally, so virtually

no provenance has been provided for these artifacts. This has resulted in an enormous and irretrievable loss of data for understanding the Paleoindian Period in this region.

One of the most significant Paleoindian locations in this region is the Witt Site (CA-KIN-32) on the southwest shore of Tulare Lake, which contained fluted projectile points, scrapers, crescents, and Lake Mojave series points (Moratto 1984:81–82). The Witt Site, at an elevation of 192 feet, signifies a “major lake level for a considerable span of time” (Riddell and Olsen 1969: 121). Subsequent archaeological investigations conducted by Fenenga (1993) in the early 1990s near the Witt Site resulted in the recovery of additional fluted projectile points, as well as later types, indicating sustained occupation of the Tulare Lake Basin dating from the Paleoindian Period to contact. These and other isolated finds elsewhere in the Central Valley indicate an initial occupation of the region at the end of the Pleistocene and early Holocene.

Archaic Period (8,550 cal BC to cal AD 1,100)

The Archaic Period in California is generally characterized by gradual development of specific regional adaptations and the proliferation and regional differentiation of subsistence strategies and tool types as people became increasingly sedentary, or at least reoccupied a greater number of locations with greater frequency, resulting in the formation of a larger number of regionally or functionally distinct sites. The Archaic Period in the Central Valley is subdivided into three phases—Lower Archaic, Middle Archaic, and Upper Archaic.

Lower Archaic (8550 to 5550 cal BC)

As with the Paleoindian Period, Lower Archaic deposits in the Central Valley tend to be isolated finds lacking stratigraphic context. Stemmed projectile points, flaked stone crescents, and other distinctive flaked stone artifact types are associated with this period, several of which have been found in the vicinity of Tulare Lake (Fenenga 1992). It is believed that human subsistence during this period was based largely on the hunting of large game and fishing (Sutton 1997:12). Grinding implements, such as mortars, pestles, millingstones, and handstones, appear infrequently during this time in the archaeological record. Other types of artifacts in these assemblages include hand-molded baked clay net weights, Olivella and Haliotis shell beads and ornaments, and charmstones.

Middle Archaic (5550 to 550 cal BC)

The onset of the Middle Archaic in Central California marked a substantial change in the climate, with warmer, drier conditions resulting in the shrinking and eventual drying out of Tulare Lake, a phenomenon common among other Pleistocene Lakes throughout the western United States during this time. This also coincided with the formation of new wetland habitats as rising sea levels pushed inland, forming the Delta. These climatic processes resulted in substantially more stable landforms as fans and floodplains stabilized within the Delta, making buried Middle Archaic deposits much more common than those from the Early Archaic.

Middle Archaic sites are typified by the distinct adaptive pattern of more generalized and logistically organized subsistence practices and residential stability along river corridors (Rosenthal et al. 2007). While hunting, fowling, and fishing continue to be important aspects of subsistence, the prevalence of groundstone tools, including early examples of mortars and pestles, suggest an increased reliance on vegetal resources, likely the result of greater residential stability driving resource intensification (e.g., Basgall 1987). The continued importance of fishing is indicative in the adoption of new fishing technologies, including gorge hooks, composite bone hooks, and spears, along with abundant ichthyofaunal remains, identified at Middle Archaic sites in Contra Costa, Sacramento, and San Joaquin Counties (Heizer 1949; Rosenthal et al. 2007). Other artifact types characteristic of the period include

Olivella and Haliotis beads and other ornaments, distinctive spindle-shaped charmstones, cobble mortars, chisel-ended pestles, and large projectile points (implying use of the atlatl) (Moratto 1984:183; Sutton 1997:12).

Upper Archaic (550 cal BC to cal AD 1100)

The transition to the Upper Archaic Period coincides with the onset of late Holocene environmental conditions, during which time the climate was markedly cooler, wetter, and more stable. The archaeological record from the Upper Archaic is better understood and represented, and is marked by an increase in cultural diversity, with numerous regional distinctions in burial posture, artifact styles, and other elements of material culture (Bennyhoff and Fredrickson 1994; Rosenthal et al. 2007).

The Upper Archaic record is marked by the development and proliferation of numerous bone tools and implements, as well as widespread production and trade of manufactured goods, including Olivella shell beads, Haliotis ornaments, and obsidian bifacial roughouts and ceremonial blades (Bennyhoff and Fredrickson 1994; Moratto 1984). Subsistence economies during the Upper Archaic focused on seasonally structured resources that could be harvested and processed in bulk, including acorns, salmon, shellfish, deer, and rabbits. The proliferation of mortars and pestles and archaeobotanical remains indicate that the first widespread reliance on acorns occurred during this period (Wohlgemuth 1996). Large, mounded village sites also first occurred in the Delta region during this period (Bennyhoff and Fredrickson 1994; Rosenthal et al. 2007).

On the whole, the Archaic Period in the Central Valley is characterized by increasing residential stability, cultural diversity, and subsistence intensification through time.

Emergent Period (cal AD 1100 to Historic Contact)

The archaeological record for the Emergent Period is the most substantial and well-documented of any period in the Central Valley, and the assemblages and adaptations represented therein are the most diverse. The Emergent Period also marks the onset of cultural traditions consistent with those documented at European contact and the disappearance of several previous archaeological traditions. Large villages developed in areas of the Sacramento Valley, and the number of mound villages and smaller hamlets increased across the region. Subsistence economies during the Emergent Period were increasingly reliant on fishing and plant gathering, with increased subsistence intensification evident in the increased reliance on small seeds and a more diverse assortment of mammals and birds (Broughton 1994; Rosenthal et al. 2007). Perhaps the most notable technological change during the Emergent Period is the introduction of the bow and arrow, which replaced atlatl technology as the favored hunting implement sometime between AD 1100 and AD 1300 (Bennyhoff and Fredrickson 1994; Moratto 1984). The material record during the Emergent Period is also marked by the introduction of new Olivella bead and Haliotis ornament types, and eventually the introduction of Clamshell Disk beads (Groza et al. 2011; Moratto 1984; Rosenthal et al. 2007). The Emergent Period in general is marked by an increase in population size and the number of residential sites and villages throughout the region, with increasing regional variability and resource intensification.

Ethnohistoric (post-AD 1750)

The history of Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims

and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century. The principal intent of these researchers was to record the pre-contact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005:32) by recording languages and oral histories within the region.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007).

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007). A large amount of variation within the language of a group represents a greater time depth than a group’s language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla (2007) has observed that the “absolute chronology of the internal diversification within a language family” can be correlated with archaeological dates. This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

The project vicinity falls within the area occupied Yokuts speaking groups during the ethnohistoric period. These three languages form a branch (“Yok-Utian”) of the Penutian linguistic group, with two distinct sub-branches: Yokuts, and the more closely related Costanoan and Miwok (“Utian”) (Golla 2011). The Yok-Utian language group is believed to have originated in the Great Basin and been subsequently brought to California in two separate migration events, an initial Utian migration that reached the Delta region approximately 2,500 to 2,000 cal BC and a later Yokut migration, possibly as late as 600 to 700 cal AD (Golla 2007, 2011). Kroeber’s (1959) interpretation of the ethnographic distribution of the major sub-dialects of the Yokut language suggests that the original diversification of Yokut speaking groups in California originated in the southern San Joaquin Valley and subsequently spread northward. Golla (2011) notes that the most specialized subdialects of Yokut, and thus presumably the oldest variants, are from the southern end of Yokut territory, suggesting that the Yokut language group likely originated in the vicinity of the Lower Kern River or Tehachapi Pass, with the language diversifying as it spread north along San Joaquin Valley and the southern Sierra Nevada foothills.

Ethnohistoric inhabitants of the area now representing the project vicinity would have likely spoken Tamukamne, a dialect of Delta (or Far Northern Valley) Yokuts centered approximately 15 miles west of Lathrop (Golla 2011:153). People speaking Delta Yokuts dialects occupied the lower course of the San Joaquin River from the Merced River east of Newman to the Delta sloughs north of Stockton. Little is known about Tamukamne, or any Delta Yokuts dialects, due to the effects of early missionization activities and Euro–American settlement, with the only linguistic documentation coming from late nineteenth- and early twentieth-century word lists. Despite the paucity of linguistic data, it appears that these dialects can be classified as Valley Yokuts on phonological and morphological grounds, though several portions of the language are non-cognate with other Yokuts dialects and word borrowing from the adjacent Miwok and Costanoan languages is evident (Golla 2011:154). The similarity between Delta Yokuts and

Valley Yokuts has generally led to the grouping of Delta Yokuts with the Northern Valley Yokuts in ethnographic works describing the ethnographic lifeways of the region.

Broadly defined, Northern Valley Yokuts refers to groups speaking several distinct dialects who inhabited the lower San Joaquin River watershed and its tributaries extending from Calaveras River in the north to approximately the large bend of San Joaquin River eastward near Mendota. The lower San Joaquin River meanders through the territory making bends, sloughs, and marshes full of tule reeds. Farther from the rivers and marshes, the valley floor would have been dry and sparsely vegetated grassland with occasional stands of sycamores, cottonwoods, and willows along stream courses and groves of valley oaks where the soil was rich enough (Wallace 1978; Kroeber 1976). In contrast to the limited diversity of available plants, the fauna of the region was both plentiful and diverse on land and water. Fish, freshwater shellfish, migratory waterfowl, tule elk, pronghorn antelopes, and other smaller animals would all have been available and often seasonally abundant.

Northern Valley Yokuts habitation was most common and dense in areas situated in proximity to rivers and major tributaries, though the drier plains were occupied at lower density, more often on the east side of the river (Kroeber 1976). West of the river populations were much sparser and concentrated in the foothills on minor waterways. The concentration of the population near waterways is unsurprising given that many of the Northern Yokuts subsistence staples, particularly fish and waterfowl, would have been most available in these areas. The focus on fishing is seen in the material culture consisting of net sinkers and harpoons, likely used from rafts constructed from tule reed bundles (Wallace 1978). Gathered vegetable resources would also have been an important part of subsistence, particularly acorns, although tule roots and various seeds were also gathered. These vegetal resources would likely have been processed in portable mortars—often made from white oak although stone mortars were occasionally used (Kroeber 1976).

Due to abundant riverine resources, the Northern Valley Yokuts were generally sedentary, occupying the same locations year-round, though there were times of seasonal disbandment for harvesting wild plant resources such as acorns and seeds (Gayton 1948; Kroeber 1976). Principal settlements were perched atop low mounds on or near riverbanks, where their elevated position prevented inundation during seasonal flooding (Wallace 1978). Northern Valley Yokuts' dwellings were constructed of tule reed woven mats placed over a pole frame oval or round structure. These structures were usually 25 to 40 feet in diameter and would belong to a single family (Wallace 1978). This is in contrast to the larger multifamily dwellings erected sometimes by the Southern Yokuts. In addition to dwellings, earth-covered ceremonial sweat lodges and larger ceremonial assembly chambers were constructed, with each community likely having one or more of these buildings (Wallace 1978).

As with most aspects of their lifeways, little can be said for certain about the political organization among the Northern Valley Yokuts, but it is believed that these groups were organized into tribes of as many as 300 individuals, guided by a head man or chief (Wallace 1978). Most members of the tribe congregated in a single principal settlement, although smaller hamlets of two or three houses also existed.

Based on the information about population density and settlement distribution, it is possible to conjecture that the total population of the Northern Valley Yokuts may have been quite large prior to European contact. However, the Northern Valley Yokut population saw sharp and devastating decline from disease and relocation to coastal missions nearly immediately after Spanish contact (Osborne 1992). This only increased with the large influx of cattle ranching and Anglo Americans after the gold rush (Osborne 1992).

Historic Period Context

The following text is summarized from the *Rough and Ready Island Determination of Eligibility Report* prepared by Terracon Consultants in 2018 (Terracon 2018).

Early American Period

Rough and Ready Island is said to have been named by a miner from an area of Nevada County, California, with the same name. The first permanent Euro-American settlement in the API was established by a Mr. Downie who reclaimed approximately 12 acres of tulle land to create his farm. By 1858, the Crozier Brothers had purchased Rough and Ready Island and implemented reclamation efforts and planted a fruit orchard. The Croziers left their property to W.C. Daggett, who inherited it upon Coziers' death. By 1895, the property was subdivided into 11 parcels of varying size, which was expanded to 13 by 1905. It was during this period that the Daggett Bridge was constructed on the south side of the island. By 1912, there were three bridges leading to the island. Daggett's property was eventually purchased by Albert Lindley, who promoted the development of Rough and Ready Island and was an influential advocate of creating the deep water channel. By 1927 most of Rough and Ready Island was being cultivated by Lindley and his partner A.R. Patrick (Terracon 2018:5-8).

Rough and Ready Island, Early Industrial Development

In 1925, the city of Stockton approved General Obligation Harbor Bonds and efforts to construct a deep water channel by dredging the San Joaquin River began. Between 1933 and 1940, the US Government dredged the 30-foot-deep shipping channel that straightened the island's north boundary and catalyzed rapid industrialization. Initial development included the Stockton Public Oil Terminal, a petroleum storage and distribution facility comprised of pumps, refined petroleum tanks, three vehicular bridges, and the Belt Line Railroad with links to Santa Fe, Southern Pacific, and Western Pacific railways (Terracon 2018:7-8).

Rough and Ready Naval Supply Annex and Naval Communication Station

In 1944, the US Navy purchased 1,310 acres of Rough and Ready Island from Lindley and demolished existing structures with the exclusion of the (extant) Lindley residence, where the couple continued to live until their deaths. In late 1944 and 1945, the Navy transformed the remaining farmland into the Naval Supply Annex Station, a military base complete with paved roads, vehicle and railroad bridges, new railroad spur lines, shipping facilities, utility infrastructure, administrative offices, an extensive warehouse district, and maintenance facilities. The Navy constructed the base to relieve supply congestion at the Oakland. The military base became operational in July 1945, a month before World War II's conclusion (Terracon 2018:8-10, 12).

Immediately after World War II, the Island's development slowed dramatically. However, with the onset of the Korean War, buildup at Rough and Ready Island began again in July 1950. Between 1950 and 1953, NSA Stockton operated on a 24-hour basis. After the Korean War, activity on the island slowed and in 1956, the base was manned by a residual force of maintenance and administration. Between 1956 and 1957, a communications facilities were installed to enhance new communication technology. The NCS, San Francisco operated as a tenant to the military supply base until the base was decommissioned in 1965. From 1965 to 1976, the communication facility on the island was known as NCS, San Francisco, Stockton. And then renamed NSC Stockton in 1976. Despite decommissioning the base, the US Navy retained the Island until 1996 (Terracon 2018:17-19).

The Port of Stockton

The US Navy transferred the Jurisdiction of Rough and Ready Island to the Port of Stockton in 1996. The Port of Stockton has maintained warehouse and building space, which it rents to private tenants utilizing the Deep Water Channel. Commodities are loaded from ships to transit holds before being transferred to railcars. Since the Port of Stockton took ownership of the Island, two modern buildings have replaced historic-era structures and 20 Port structures have been demolished. As of 2018, the majority of warehouses at the Port of Stockton were occupied and used for their original purpose. The administration buildings, however, were largely vacant (Terracon 2018:20-23).

Methods and Identification of Cultural Resources

CHRIS Records Search

A supplemental records search of the CHRIS was requested for the API and a 1-mile buffer surrounding the API on May 31, 2023. The records search was conducted by staff at the Central California Information Center. The records search consulted the CHRIS base maps of previously recorded cultural resources and previously conducted cultural resources studies for the API and all areas within 1 mile buffer. Additional sources of information, including historic maps, and the various resources directories maintained by the CHRIS were consulted as part of the records search. Results are summarized below.

Summary of Archaeological Specific Records Search Results

The records search identified four previous studies that intersect the API, conducted between 1996 and 1998. Another 17 previous studies were found within the 1-mile buffer. These studies were conducted between 1981 and 2018.

The records search did not identify any previously recorded archaeological resources within the API or within the 1-mile buffer.

Summary of Built Environment Specific Records Search Results

The records search revealed that there were four previous cultural resources studies that intersect with the API. One was a Historic American Building Survey prepared for buildings associated with the Naval Supply Annex, and another was a protection plan for the NCS Station, Stockton.

Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 17 previous cultural resources studies have been conducted within 1 mile of the Project area between 1981 and 2018.

Previously Recorded Cultural Resources

The records search results indicate that there are 16 resources within the API. Each of these resources pertain to the Rough and Ready Historic District (Historic District), which is summarized below.

Rough and Ready Island Historic District

The Historic District was documented and evaluated in 1996 and again by Terracon Consultants in September 2018.

The 1996 evaluation was conducted as part of the U.S. Navy's conveyance of NCS Stockton to the Port of Stockton and a Historic and Archaeological Resources Protection (HARP) Plan was prepared. The HARP Plan determined the Historic District was eligible for the NRHP under Criteria A and C at the national level of significance, with a period of significance between 1944 and 1946 (Uribe & Associates 1996:B-1). The boundary encompasses the entire island, but excluded the northwest corner of the island (Corbett 1995:5). Contributors to the district were assigned a California Historical Resources Status Code 2D2 (Contributor to a multi-component resource determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR).

The HARP Plan also identified Bridge 528, a "riveted steel through-truss swing bridge" as eligible for the NRHP under Criterion C at the state level of significance. The period of significance is 1902, the year of its construction. The bridge is also a contributing element to the historic district (Uribe & Associates 1996:2).

In 2018, Terracon conducted a reconnaissance-level survey of the historic district to "to assess the integrity and condition of extant historic resources and understand any changes or alterations since 1996" (Terracon 2018:3).

Tribal Coordination

The NAHC was contacted by Dudek on October 10, 2023 to request a search of the Sacred Lands File. The NAHC responded on November 28, 2023 indicating that the search failed to identify any Native American resources in the vicinity of the project. The NAHC provided a list of Native American tribal contacts who may have additional knowledge relating to cultural resources in the area Golden State Finance Authority did not receive any tribal requests for notification under Assembly Bill 52 (AB 52) prior to release of the Draft Environmental Impact Report, and therefore the formal requirements of AB 52 were not triggered for this project. However, in accordance with the Native American Heritage Commission, Tribal Consultation Under AB 52: Requirements and Best Practices, GSFA initiated "non-AB 52 tribal consultation" by sending outreach notices and offers to meet and confer to each of the Tribes listed on the NAHC contact list for the Lassen, Tuolumne, and Stockton sites. The results of those meetings and collaboration have informed the information, analyses, and management strategies in this chapter.

Field Methods

Archaeology

Survey and reporting was completed by Terracon Consultants in September 2018. No additional fieldwork was completed by Dudek. The area has been documented to have been fully developed. The area is unsuited to support the presence of significant archaeological resources, given these present conditions.

Built Environment

Dudek Architectural Historian Fallin Steffen, MPS, conducted pedestrian survey of the Project area for historic built environment resources on August 31, 2023. The survey entailed walking the exteriors of all buildings and structures within the Project area, documenting each building with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial

photographs. Photographs of the historic district were taken with a digital camera. All field notes, photographs, and records related to the current study are on file at Dudek's office in Sacramento, California.

Results of Identification and Evaluation Efforts

Built Environment

Dudek reviewed the 1996 HARP Plan, which determined that the Historic District is eligible for the NRHP under Criterion A, for embodying “a new approach to the supply problem by the U.S. Navy – the establishment of inland depts at several locations around the United States, and a new approach to cargo handling with the adoption of pallets and fork lift trucks throughout the Navy supply line” (Uribe & Associates 1996:B-1). Under NRHP Criterion C the Historic District is significant because it “embodies better than any other supply depot the Navy’s redesign of its warehouses to accommodate pallets and forklift trucks as the first and only complete depot built to accommodate this means of cargo handling” (Uribe & Associates 1996:B-1). The Historic District is eligible at the national level of significance because it is “associated with the role of the Navy Department in Washington in the location and design of the facility at Stockton and with the significance of Naval Supply Annex Stockton among other Naval supply depots and other shipping facilities throughout the United States” (Uribe & Associates 1996:B-1). The Historic District’s period of significance is 1944 to 1946.

The HARP Plan identified 109 contributing elements and 12 non-contributing elements. All buildings, structures, and features constructed after 1946 were considered non-contributors to the historic district. Additionally, there were 69 buildings and structures constructed after 1946 that were considered non-contributing because they were less than 50 years old at the time of survey (Uribe & Associates 1996:B1, B-6). For a complete list of contributors and non-contributors refer to the 1996 HARP Plan.

The boundary for the Historic District was the entire Rough and Ready Island that included the “outer edge of the marginal wharf, the levees, and the bridges (two vehicular and one railroad)” (Corbett 1995:5). Excluded from the boundary are the two, 13-acre oil company properties and the 6.458 acres around the Lindley House, which are all in the northeast corner of the island. This area of the island was excluded from the boundary because they are not associated with NSA Stockton (Corbett 1995:5).

Dudek reviewed the 2018 report prepared by Terracon Consultants for the Port of Stockton, which provided a reconnaissance-level architectural survey of Rough and Ready Island that was based on the 1996 HARP Plan. Terracon concurred with the 1996 HARP Plan determination under Criterion A. Terracon also found that the Historic District was eligible under Criterion A for the “development of palletization and forklifts as the standardized method for the storage and transportation of goods” (Terracon 2018:51). This reasoning for significance was applied to Criterion C in the 1996 HARP Plan. Terracon recommended that an additional period of significance of 1944-1965 to account for the Historic District’s association with NCS, and the inclusion of the NCS-era resources as contributors to the district (Terracon 2018:3).

Based on its reconnaissance-level survey, Terracon identified 94 contributors and 13 non-contributors to the Historic District. Nineteen elements that were considered contributors to the Historic District in the HARP Plan, were not located by Terracon. Another 16 contributing elements were demolished between 1996 and 2018 (Terracon 2018:26–31). Terracon further recommended that the historic boundary for the district exclude 330 acres, which covered areas of the island that were developed during the 2000s years and is largely in the southern and southeast sections of the island (Terracon 2018:3, 22–23).

Within the API, are 16 contributing buildings, as well as roads, railroad tracks/spurs that are also contributing elements to the Historic District, and two non-contributors (Uribe & Associates 1996:B-5; Terracon 2018:31). Character-defining features of the Historic District include:

The contributing buildings are categorized as warehouses, which fall into four types (Terracon 2018:32). Those within the API include three types: four Transit Sheds (built between 1944-1945), 11 Steel Warehouses (built in 1944), and one Heavy Materials Storage (built in 1944).

Terracon identified the following character-defining features of a warehouse type:

- Corrugated metal siding
- Sliding wood garage doors
- Wood panel egress doors
- Wood louvers
- Wood canopy over rail side
- Exterior light fixtures
- Steel sash windows
- Gabled roofs
- Board-formed concrete foundations
- Plywood-formed concrete foundations
- Interior trusses
- Footprint and location (Terracon 2018:36)

While the above character-defining features pertain to the warehouses as a property type, the Historic District's character-defining features include:

- Location
- Overall plan
- Spatial relationships between the buildings, railroad tracks, and the deep-water channel
- Open space
- Arrangement of buildings
- Inter-modal transportation network (railroad tracks, street grid, wharf at the waterfront)
- Hardscape

Tribal Cultural Resources

The effort to identify TCRs at the Port Facility project site included, as described above, a records search and a review of the archaeological, ethnographic, and historical literature; a Native American Heritage Commission (NAHC) Sacred Lands File Search; tribal engagement; examination of historic maps; and historical research. No TCRs have been identified within the project site.

3.4.2 Regulatory Setting

3.4.2.1 Federal

Section 106 of the National Historic Preservation Act

The NHPA established the National Register of Historic Places (NRHP) and the President’s Advisory Council on Historic Preservation (ACHP), and provided that states may establish State Historic Preservation Officers (SHPOs) to carry out some of the functions of the NHPA. Most significantly for federal agencies responsible for managing cultural resources, Section 106 of the Act directs that “[t]he head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP.” Section 106 also affords the ACHP a reasonable opportunity to comment on the undertaking (16 U.S.C. 470f).

Title 36 of the Code of Federal Regulations, Part 800 (36 CFR 800), implements Section 106 of the NHPA. It defines the steps necessary to identify historic properties (those cultural resources listed in or eligible for listing in the NRHP), including consultation with federally recognized Native American tribes to identify resources of concern to them; to determine whether or not they may be adversely affected by a proposed undertaking; and the process for eliminating, reducing, or mitigating the adverse effects.

The content of 36 CFR 60.4 also defines criteria for determining eligibility for listing in the NRHP. The BLM evaluates the significance of cultural resources identified during inventory phases in consultation with the California SHPO to determine if the resources are eligible for inclusion in the NRHP. Cultural resources may be considered eligible for listing if they possess integrity of location, design, setting, materials, workmanship, feeling, and association. A resource may be considered historically significant and eligible for NRHP listing if it is found to meet one of the following criteria:

- A. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- B. It is associated with the lives of persons important to local, California, or national history.
- C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
- D. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Integrity is defined in NRHP guidance, *How to Apply the National Register Criteria for Evaluation*, as “the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity” (NPS 1997). NRHP guidance further states that properties must have been completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be “exceptionally important” (criteria consideration G) to be considered for listing.

A historic property is defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria” (36 Code of Federal Regulations (CFR) Section 800.16(i)(1)).

Effects on historic properties under Section 106 of the National Historic Preservation Act are defined in the assessment of adverse effects in 36 CFR Sections 800.5(a)(1) as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Adverse effects on historic properties are defined as follows (36 CFR 800.5 (2)):

- i. Physical destruction of or damage to all or part of the property;
- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;
- iii. Removal of the property from its historic location;
- iv. Change of the character of the property’s use or of physical features within the property’s setting that contributes to its historic significance;
- v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features;
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance.

To comply with Section 106 of the National Historic Preservation Act, the criteria of adverse effects are applied to historic properties, if any exist in the project area of potential effects, pursuant to 36 CFR Sections 800.5(a)(1). If no historic properties are identified in the area of potential effects, a finding of “no historic properties affected” would be made for the proposed project. If there are historic properties in the area of potential effects, application of the criteria of adverse effect (as described above) would result in project-related findings of either “no adverse effect” or of “adverse effect.” A finding of no adverse effect may be appropriate when the undertaking’s effects do not meet the thresholds in criteria of adverse effect (36 CFR Sections 800.5(a)(1)), in certain cases when the undertaking is modified to avoid or lessen effects, or if conditions are imposed to ensure review of rehabilitation

plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (codified in 36 CFR Part 68).

If adverse effects were expected to result from a project, mitigation would be required, as feasible, and resolution of those adverse effects by consultation may occur to avoid, minimize, or mitigate adverse effects on historic properties pursuant to 36 CFR Part 800.6(a).

American Indian Religious Freedom Act

The American Indian Religious Freedom Act recognizes that Native American religious practices, sacred sites, and sacred objects have not been properly protected under other statutes. It establishes as national policy that traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies and institutions that receive federal funds, including museums, universities, state agencies, and local governments, to repatriate or transfer Native American human remains and other cultural items to the appropriate parties upon request of a culturally affiliated lineal descendant, Indian tribe, or Native Hawaiian organization (43 Code of Federal Regulations [CFR] Section 10.10). Federal NAGPRA regulations (43 CFR Part 10) provide the process for determining the rights of culturally affiliated lineal descendants, Native American tribes, and Native Hawaiian organizations to certain Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony, which are indigenous to Alaska, Hawaii, and the continental United States but not to territories of the United States, that are (i) in federal possession or control, (ii) in the possession or control of any institution or state or local government receiving federal funds, or (iii) excavated intentionally or discovered inadvertently on federal or tribal lands.

3.4.2.2 State

California Register of Historical Resources

In California, the term "historical resource" includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (Public Resources Code (PRC) Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR, enumerated in the following text, were developed to be in accordance with previously established criteria developed for listing in the NRHP. According to PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is either (i) listed or eligible for listing in the CRHR, (ii) included in a local register of historic resources, or (iii) identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), then it qualifies as a “historical resource” for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)(1)-(3)). The CEQA lead agency also is not precluded from determining, based on substantial evidence, that a resource that does not meet one of these three specific criteria nevertheless qualifies as a historic resource for CEQA purposes (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” is defined to mean “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics” that account for the resource being identified as an historic resource under CEQA (CEQA Guidelines Section 15064.5(b)(2)).

With respect to archaeological sites, the first issue is whether the site qualifies as a historic resource under the provisions discussed above. If the archaeological site does not qualify as an historic resource, and if the site also does not meet the definition of a “unique archaeological resource” or a “tribal cultural resource,” then any impacts to the resource are not considered significant and further evaluation is not required (PRC Section 21083.2(h); CEQA Guidelines Section 15064.5(c)). A “unique archaeological resource” is defined to mean an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Sections 21083.2(g)).

Native American Historic Resource Protection Act (AB 52)

The Native American Historic Resource Protection Act (AB 52), which went into effect July 1, 2015, establishes that Tribal Cultural Resources must be considered under CEQA and defines a lead agency's requirements for notification and consultation with California Native American tribes.

Public Resource Code (PRC) Section 21074 states:

- 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 PRC Section 21084.1, a unique archaeological resource as defined in subdivision (g) of PRC Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of PRC Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Under AB 52, lead agencies must notify all California Native American tribes that are traditionally and culturally affiliated with the project area and that have requested formal notification. The notification requirement extends to tribes that are not federally recognized, and notification must occur at the onset of a project, which is typically considered to be when an NOP is released. After notification, tribes may request to engage in consultation with the Lead Agency. If it is determined that a substantial adverse change to a tribal cultural resource would result from a project, the tribal consultation can include development of MMs and/or project alternatives that could reduce or avoid those impacts.

Golden State Finance Authority did not receive any tribal requests for notification under AB 52 prior to release of the Draft Environmental Impact Report, and therefore the formal requirements of AB 52 were not triggered for this project. However, in accordance with the Native American Heritage Commission, Tribal Consultation Under AB 52: Requirements and Best Practices, GSFA initiated "non-AB 52 tribal consultation" in May 2024 by sending outreach notices and offers to meet and confer to each of the Tribes listed on the NAHC contact list for the Lassen, Tuolumne, and Stockton sites. The results of those meetings and collaboration have informed the information, analyses, and management strategies in this chapter.

Native American Historic Cultural Sites

State law (PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be

implemented if Native American skeletal remains are discovered during construction of a project; and established the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Health and Safety Code Section 7050.5

In the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the CEQA Guidelines (as incorporated from PRC Section 5097.98) and California Health and Safety Code Section 7050.5 define the subsequent protocol. If human remains are encountered, excavation or other disturbances shall be suspended of the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98 (14 CCR 15064.5(e)).

3.4.2.3 Local

Lassen County

Lassen County does not have any general plan policies or ordinances that directly pertain to cultural resources or historic preservation.

Tuolumne County

Tuolumne County General Plan

Goal 13A. Identify incentives to strengthen the local economic base by providing and promoting a positive atmosphere for visitor, resident, business and industry activity compatible with an historic environment.

Policy 13A.1. Initiate, adopt, and promote the availability of monetary and other incentive programs to encourage the retention, reuse and restoration of historic structures.

Goal 13B. Encourage historic preservation by adopting a consistent and predictable environmental review process for evaluating impacts to cultural resources.

Policy 13B.1. Adopt flexible and consistent environmental review procedures for new development entitlements including provisions for monitoring and enforcement.

Goal 13C. Maintain Tuolumne County's cultural heritage, through the identification, management, preservation, use, enhancement, restoration and study of its cultural resources. (f)

Policy 13C.1. Survey, record, inventory, maintain and regularly update databases and archives of historic, architectural, and archeological resources for informational purposes.

Policy 13C.3. Identify historic districts and structures.

Tuolumne County Register of Cultural Resources.

Since the Tuolumne County Board of Supervisors adopted requirements for the County Register of Cultural Resources in July 1992, it has designated 17 properties on this register and twelve properties that occur in the unincorporated County. Pursuant to Implementation Program 9.C.e in the County’s Cultural Resources Management Element, the County Register of Cultural Resources applies to all properties contained within cultural resources inventories which have been or are assigned a National Register designation of 1 (listed on the National Register), 2 (determined eligible for listing by formal process involving federal agencies), 3 (appears to be eligible for listing in the judgment of the person completing the form), 4 (might become eligible for listing), or 5 (ineligible for listing but of local interest and eligible for the Tuolumne County Register of Cultural Resources). Inclusion on the register qualifies properties to use the State Historical Building Code, to enter into a Mills Act Contract for qualifying rehabilitations and maintenance, and for alternative development standards.

Port of Stockton

City of Stockton Municipal Code

The City designates Landmarks and Historic Sites under the City Municipal Code, Title 16, Division 7, Chapter 16.220. Landmarks are artifacts, natural features, or structures notable for one or more of the following: archaeological interest; architectural artisanship, style, or type; association with a historic event or person; association with the heritage of the City, state, or nation; visual characteristics; relationship to another landmark; or integrity as a natural environment. Historic sites are areas, neighborhoods, properties, or sites which meet one or more of the following: archaeological interest; association with the heritage of the City, state, or nation; visual characteristics; association with a particular way of life important to the City; or association with a historic event, significant person, or a person significant to a specific national origin. Historic sites cannot be relocated or demolished without a permit.

3.4.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to cultural resources would occur if the project would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15063.4.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15063.4.
- Disturb any human remains, including those interred outside of dedicated cemeteries.

CEQA defines a “*unique archaeological resource*” as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC §21083.2(g)).

State CEQA Guidelines Section 15064.5 defines a *historical resource* as:

- A resource listed in, or determined to be eligible for listing in, the California Register;
- A resource listed in a local register of historical resources.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California...Generally, a resource shall be considered by the lead agency to be :historically significant.” Generally a resource is considered historically significant if it meets criteria for listing in the California Register of Historical Resources, including:
 1. Is associated with events that made a significant contribution to the broad patterns of California’s history and cultural heritage.
 2. Is associated with the lives of people important in our past.
 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values.
 4. Has yielded or may be likely to yield information important in prehistory or history; or
- A resource determined to be a historical resource by a project's lead agency.

CEQA Guidelines Section 15064.5 defines a “historical resource.” If a cultural resource in question is an archaeological resource, CEQA Guidelines Section 15064.5[c][1] requires that the lead agency first determine if the resource is a historical resource as defined in Section 15064.5(a). If the resource qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource. If the archaeological resource does not qualify as a historical resource but does qualify as a “unique archaeological resource,” then the archaeological resource is treated in accordance with Public Resources Code Section 21083.2 (see also CEQA Guidelines Section 15069.5[c][3]).

CEQA Guidelines Section 15064.5(b) defines a “*substantial adverse change*” to a historical resource as: “physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is *materially impaired* when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources or in registers meeting the definitions in Public Resources Code 5020.1(k) or 5024.1(g).

A significant impact related to tribal cultural resources would occur if the project would:

- 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:
 - 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).
 - 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.4.4 Impact Analysis

3.4.4.1 Methodology

The proposed project would consist of three primary phases: feedstock acquisition, wood pellet production, and transport to market. The impact analyses below evaluate each of these primary phases as related to cultural resources.

Feedstock/Program Level Impacts Assessment

The following measures have been incorporated into the project and are considered as part of the impact assessment for cultural resources for Feedstock Acquisition. As specific Sustainable Forestry Management Projects cannot be known at a project or site specific level of detail at this time, this document functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities described in Section 2.4 of this EIR.

PDF-CUL-1: A CHRIS record search and review of other pertinent desktop sources will be conducted per the applicable federal, state or local agency procedures prior to any treatment activities.

PDF-CUL-2: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the California Native American Tribes in the counties where the treatment activity is located will be notified. The notification will contain the following:

- A written description of the treatment location and boundaries.
- Brief narrative of the treatment objectives.
- A description of the activities used (e.g., mastication) and associated acreages.
- A map of the treatment area at a sufficient scale to indicate the spatial extent of activities.
- A request for information regarding potential impacts to cultural resources from the proposed treatment.
- A detailed description of the depth of excavation if ground disturbance is expected. In addition, NAHC will be contacted for a review of their Sacred Lands File.

PDF-CUL-3: Research will be conducted prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. Qualified cultural resources specialists will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey.

PDF-CUL-4: GSNR will coordinate with a qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be

completed for every cultural resource survey completed. The specific requirements will comply with the applicable federal, state, or local agency procedures.

- PDF-CUL-5: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. GSNR, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures.
- PDF-CUL-6: GSNR, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. GSNR will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, GSNR determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected.
- PDF-CUL-7: If the CHRIS records search and/or other desktop review identifies built environment historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, these resources will be avoided. Within a buffer of 100 feet of the built historical resource, there will be no mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist or architectural historian. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided.
- PDF-CUL-8: All crew members and contractors implementing treatment activities will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance).
- PDF-CUL-9: If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the

archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.

Lassen, Tuolumne, and Stockton Site Activities (Project Level)

Site specific activities at the Lassen, Tuolumne, and Stockton sites are being evaluated at the project level. The CEQA Guidelines define a substantial adverse change in the significance of a historical resource as a significant effect on the environment. A substantial adverse change to archaeological, tribal cultural, or historical resources is defined to include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]). The significance of a historical resource is materially impaired when a project diminishes the characteristics that convey its historical significance and that justify its inclusion on a historic register. Proposed project activities were evaluated for their potential to result in a substantial adverse change to a significant cultural resource. See “Methods and Identification of Cultural Resources “ in Section 3.4.1.2, 3.4.1.3, and 3.4.1.4, above, for a discussion of how potential cultural resources were identified at the Lassen, Tuolumne, and Stockton sites.

3.4.4.2 Project Impacts

Impact CUL-1 The project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15063.4.

This section addressed potential impacts to built environment resources. Built environment resources are largely considered buildings, structures, landscapes, and districts that comprise what is considered the built environment. Built environment resources include but are not limited to water management structures (levees, canals, dams, ditches), buildings (residential, industrial, and commercial), linear structures (railroad alignments, roads, and bridges), and landscapes which can include hardscape (walls, paved walkway, fountains, outside structures) or softscape components (tree allées, purposefully designated and designed planted vegetation). Archaeological and tribal cultural resources are addressed separately, below.

Specifically, this section addresses potential impacts to built environment resources that are as defined by the CEQA Guidelines (14 CCR 15000 et seq.), a “historical resource” which is considered to be a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (Public Resources Code Section 21084.1; 14 CCR 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (Public Resources Code Section 21084.1; 14 CCR 15064.5(a)).

A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource is materially impaired (15064.5[b][1]) to the extent that the resource can no longer exist or convey significance.

Under CEQA, material impairment of a historical resource is considered a significant impact (or effect), which can be direct, indirect, or cumulative.

Feedstock Acquisition

Sustainable Forest Management Projects

Review of the Proposed Program Activities related to Feedstock Acquisition indicates that there is a low likelihood of proposed activities resulting in impacts to built environment properties that might be considered CEQA historical resources. Potential activities proposed as part of the Feedstock Acquisition that may result in potential impacts to built environment resources will likely be located in remote forested areas that do not contain buildings or structures. Additionally, the activities are limited to removal of trees or brush proposed as part of the Hazardous Fuel Reduction Projects and the Construction of Shaded Fuel Breaks. The locations of these potential activities are not yet known nor is the presence of any known or potential built environment property that may be considered a CEQA historical resource. PDF-CUL-7 has been developed as part of the program design to ensure identification and avoidance of any known or potential built environment CEQA historical resources.

PDF-CUL-7: If the CHRIS records search and/or other desktop review identifies built environment historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, these resources will be avoided. Within a buffer of 100 feet of the built historical resource, there will be no mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist or architectural historian. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided.

Due to this PDF which ensures identification, evaluation if necessary, and avoidance measure will be implemented if needed the impact to built environment historical resources under CEQA are considered **less than significant**.

Wood Pellet Production

Northern California (Lassen) Facility

As stated earlier, two (2) historic era properties were identified within the API and were evaluated for significance under NRHP, and CRHR Criteria. None of these properties were found eligible for listing under the Criteria and are therefore not considered historical resources for the purposes of CEQA. The project would have **no impact** to historical resources at the Lassen site.

Tuolumne Facility

Two (2) historic era properties were identified within the API and were evaluated for significance under NRHP, CRHR, and County designation Criteria. Only one of these properties, (Property 2) a segment of the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347), is eligible for listing in the NRHP, CRHR, and Tuolumne County Register of Cultural Resources under Criteria A/1/1. Therefore, Property 2 is considered a historical resource under CEQA. The character-defining features associated with the Sierra Railroad – Mainline, Keystone Segment, are limited to its location, setting, original alignment, construction materials, and its ability to convey use as a

railroad alignment. The character-defining features are the physical attributes enable the historical resource to convey significance.

Proposed construction activities that may result in impacts to Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) are summarized here:

Construction of the proposed facility, the Tuolumne site may be used as a wood storage yard, consistent with its past and present use. The proposed project would further include long-term use as a new wood pellet processing facility, including a woodyard, green processing area, drying area, pellet mill, pellet storage and loadout area. New roads for truck access and mill personnel access will be added, including a new truck access from La Grange Road at the southeast corner of the site. A new rail spur connecting to the adjacent Sierra Northern Railway line as well as additional rail siding tracks on site for the storage of full and empty railcars will be added for finished product loadout. Other improvements will include repurposing existing truck scales and a graded area for overflow raw material storage. The proposed site layout is shown in Figure 2-9, Project Site Plan (Tuolumne).

The proposed Project will not result in the physical destruction of or damage to any character-defining feature of the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) resource. The addition of a rail spur and additional facilities proposed for construction to redevelop the property that the historic rail line crosses will not result in damage to historical resource structural materials. Nor will the proposed construction result in physical destruction or damage. Following project construction and implementation the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) retain location, setting, alignment, and will still be used as a railroad. As such the historic resource will remain eligible for listing under Criteria A/1/; therefore, the CEQA finding is **less than significant**.

Transport to Market

Port of Stockton

The proposed Project site/API is located within the Rough and Ready Island Historic District which is a CEQA historical resource.

Within the API, there are 16 contributing buildings, as well as contributing roads, and railroad tracks/spurs and two non-contributors of the Historic District (Terracon 2018:31). The character-defining features of the Historic District and those relating specifically to the property type of warehouse are discussed in the previous section.

The project consists of the construction of additional rail spur lines, two storage domes, and a conveyor system to transport material from the storage domes to a cargo ship. See Figure 2-11 for the site layout.

Development of the project would include a new wood pellet storage and loadout facility, including a rail unloading system, two storage domes, and a ship loadout system featuring a conveyor system. Each component of the project would be constructed within the boundary of the Historic District. The study area/API includes 16 contributing buildings: Nos. 211, 310, 409, 508 (Transit Sheds); Nos. 213, 214, 312, 313, 314, 412, 413, 414, 510, 511, 512 (Warehouses), and No. 411 (Heavy Material Storehouse). Also, in the study area/API are contributing structures that include streets, railroad tracks, and a paved parking lot. The four Transit Sheds in the northern section of the API share a similar design and historic function and are approximately 33 feet high. The Warehouses are nearly identical in design, served the same historic purpose, and are 33 feet high. The Heavy Material Storehouse, is the tallest contributor to the Historic District and is in the API, standing 47 feet high.

The existing railroad tracks within the Historic District's boundary are contributing elements. The addition of the rail unloading system south of Edwards Avenue will introduce new visual feature within the Historic District, which will somewhat alter integrity of design and materials. However, the new railroad tracks would not be out of character with the district and considering the size and number of contributing elements to the Historic District, sufficient integrity will be maintained, and the Historic District will continue to convey its significance under NRHP Criteria A and C.

The domes would be constructed partially on a contributing feature to the Historic District, a former paved parking lot. This addition would somewhat alter a character-defining feature of the Historic District however, other parking areas, particularly those north of Davis Avenue which contribute to the Historic District, will remain intact. This includes two that are in the immediate vicinity of the project area. Of the seven aspects of integrity impacted by the construction of the domes, only integrity of design would be marginally affected by the construction of the domes. The overall design of the Historic District, which includes its spatial relationships between the buildings, railroad tracks and the deep-water channel, hardscape, and transportation network would not be altered. Therefore, the Historic District would retain sufficient integrity of design as well as location, materials, workmanship, setting, feeling, and association to convey its significance under NRHP Criteria A and C.

The storage domes would be the highest project structure, at 151 feet in height (15 stories) making them 104 feet taller than the tallest building (Building 411 – Heavy Material Storehouse) in the Historic District. The domes would be located to the south of that building by approximately 1,240 feet and approximately 370 feet south of the nearest warehouse, which is 33 feet tall. These warehouses and transit sheds form the core of the Historic District and defines the visual character of the Historic District (Mikesell 1997:2–3). The visual intrusion caused by the domes within the viewshed of the historical resource would not result in the material impairment of the Historic District's integrity of setting because there will still be a significant concentration of the Historic District's setting unaltered after the domes are constructed. The Historic District's character, how the district is situated, and its relationship to the surrounding features, including the spatial arrangement between the warehouses and transit sheds, the road grid system and the railroad tracks will not be marred by the addition of the domes. The Historic District will maintain its relationship to the Stockton Deep Water Channel, a major shipping channel used during the Historic District's period of significance, as well as the sloughs that surround the island. The domes would not be near public viewpoints and would be setback from the viewers on the north side of the San Joaquin River.

The elevated conveyor structure would be above Boone Drive, which is part of the street grid that contributes to the Historic District. It would connect from the domes to the ship berth. This conveyor system would not be taller than the existing warehouses, which form the core of the Historic District and provide a strong visual presence because of their numbers and size. Therefore, the conveyor structure would not represent a change in the visual character of the project area. The elevated conveyor structure would not alter the organization of the inter-modal transportation system (street grid system, railroad tracks, wharf) in the Historic District. The Historic District would retain the seven aspects of integrity to convey its historic and architectural significance.

Overall, the project is within a small area of the Historic District, which in 2018 was identified as having 94 contributors and 13 non-contributors (Terracon 2018:26–31). As outlined above, the project is not altering the Historic District's integrity of location, setting, workmanship, feeling and association. Integrity of design and materials will only be marginally affected by the project. The Historic District will continue to convey its significance under NRHP Criterion A for embodying “a new approach to the supply problem by the U.S. Navy – the establishment of inland depts at several locations around the United States, and a new approach to cargo handling with the adoption of pallets and fork lift trucks throughout the Navy supply line” (Uribe & Associates 1996:B-1). And under NRHP Criterion C embodying “better than any other supply depot the Navy's redesign of its warehouses to

accommodate pallets and forklift trucks as the first and only complete deport built to accommodate this means of cargo handling” (Uribe & Associates 1996:B-1). Therefore, the impacts to built environment cultural resources would be **less than significant**.

Impact CUL-2 The project may cause a substantial adverse change in the significance of an archaeological resource pursuant to §15063.4 or disturb human remains.

Feedstock Acquisition

Sustainable Forest Management Projects

As noted, this portion of the analysis is being carried out at the programmatic level, as the specific locations of these activities are presently unknown and consequently cannot feasibly be studied at the project level at this time. PDF CUL-1, CUL-3, SPR CUL-4, CUL-5, and CUL-8 apply most directly to archaeological resources. PDF CUL-1, intended to identify the location of previously recorded prehistoric and historic-era cultural resources relative to the project treatment area, will be satisfied through records searches directed at project specific activities. PDF CUL-3, requiring pre-field research would be completed through preparation of appropriate technical studies. PDF CUL-4, requiring appropriate fieldwork, will be satisfied through GSNR’s intensive-level survey of all accessible portions of the proposed treatment area. In the event that cultural resources are identified through activities stipulated by PDF CUL-1 through CUL-8, added Project-specific mitigation may be necessary to ensure that these archaeological resources are not affected during treatment activities. Management strategies may include archaeological and Native American monitoring, pre-construction resource flagging, or other methods intended to ensure that resources would not be subject to significant impact.

During treatment activities, PDF CUL-8, training, will require that appropriate pre-treatment training is provided regarding the identification and treatment of any potential cultural resources should they be encountered by crews completing work. With appropriate implementation of inadvertent discovery processes stipulated by PDF CUL-2, unidentified resources will be managed through best practice standards outlined by regulatory conditions. With PDF CUL-1, CUL-2, CUL-5, CUL-6, and CUL-8 implemented, impacts to archaeological resources will be **less than significant**.

Wood Pellet Production

Northern California (Lassen) Facility

This study consisted of a CHRIS records search of the API and a 1-mile buffer, a Native American Heritage Commission Sacred Lands File search, and an intensive pedestrian survey of the API (Appendix D1). The records search did not identify any previously recorded cultural resources within the API. Ten cultural resources have been recorded within 1 mile. An intensive-level pedestrian survey was conducted of the entire API; this survey did result in the identification of four newly recorded historic era refuse scatters. Sufficient documentation was gathered through archaeological inventory efforts to evaluate this resource for NRHP and CRHR listing, for which the sites were assessed to be not eligible. To be eligible for listing in the CRHR/NRHP, a site must have “yielded, or [have] the potential to yield, information important to the prehistory or history of the local area, California, or the nation” (PRC Section 5024.1; 14 CCR 4852). The sites are not substantially associated with any specific significant events locally, regionally, or nationally (Criterion A/1); are not directly associated with the lives of any important people locally, regionally, or nationally (Criterion B/2); do not contain architecture (Criterion C/3); and, beyond the attributes captured through recordation, does not have the potential to yield information locally, regionally, or nationally (Criterion D/4). Refuse scatters of this type are common throughout the region, and none of the sites

represent a “unique” resource as defined under CEQA. Any data potential associated with sites intersecting the API have been exhausted through recordation. As such, these resources are not eligible for listing in the NRHP/CRHR, and impacts/effects that would occur through planned project disturbances would be less than significant.

Based on these results, no known significant archaeological resources will be impacted by the project as currently designed. However, given the records search results and project conditions, the potential for the inadvertent discovery of cultural resources cannot be discounted. Impacts related to the inadvertent discovery of cultural resources would be **potentially significant**. **MM-CUL-1** and **CUL-2** would be implemented to address the potential for inadvertent discovery.

Tuolumne Facility

This study consisted of a CHRIS records search of the API and a 1-mile buffer, a Native American Heritage Commission Sacred Lands File search, and an intensive pedestrian survey of the API (Appendix D3). The records search identified one cultural resource within the API, a segment of the Sierra Railroad Mainline (P-55-000347), but did not identify any previously recorded archaeological resources within the API. Three additional cultural resources have been recorded within 1 mile. An intensive-level pedestrian survey was conducted of the entire API; this survey updated the previously recorded built environment resource and identified one previously unrecorded built environment resource but did not identify any archaeological resources.

Based on these results, no known significant archaeological resources will be impacted by the project as currently designed. However, given the records search results and project conditions, the potential for the inadvertent discovery of cultural resources cannot be discounted. Impacts related to the inadvertent discovery of cultural resources would be **potentially significant**. **MM-CUL-1** and **CUL-2** would be implemented to address the potential for inadvertent discovery.

Transport to Market

Port of Stockton

This study consisted of a CHRIS records search of the API and a 1-mile buffer, a Native American Heritage Commission Sacred Lands File search, and pedestrian survey of the API (Dudek 2021). The records search did not identify any significant previously recorded archaeological resources within the API. Survey and reporting was completed by Terracon Consultants in September 2018. This survey did not result in the identification any archaeological resources. No additional fieldwork was completed by Dudek. The area has been documented to have been fully developed. The area is unsuited to support the presence of significant archaeological resources, given these present conditions.

Based on these results, no known significant archaeological resources will be impacted by the project as currently designed. However, given the records search results and project conditions, the potential for the inadvertent discovery of cultural resources cannot be discounted. Impacts related to the inadvertent discovery of cultural resources would be **potentially significant**. **MM-CUL-1** and **MM-CUL-2** would be implemented to address the potential for inadvertent discovery.

Impact CUL-3

The project could 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)?
- 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Feedstock Acquisition

Sustainable Forest Management Projects

As noted, this portion of the analysis is being carried out at the programmatic level, as the specific locations of these activities are presently unknown and consequently cannot feasibly be studied at the project level at this time. PDF CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, CUL-8, and CUL-9 apply most directly to TCRs. PDF CUL-1, intended to identify the location of previously recorded prehistoric and historic-era cultural resources relative to the project treatment area, will be satisfied through records searches directed at project specific activities. PDF CUL-2 requires the project proponent to obtain the latest NAHC provided Native American Contact List and to notify the provided California Native American Tribes in the counties where the treatment activity is located. PDF CUL-3, requiring pre-field research would be completed through preparation of appropriate technical studies. PDF CUL-4, requiring appropriate fieldwork, including Native American Consultation, will be satisfied through survey of all accessible portions of the proposed treatment area. PDF CUL-5 and CUL-6 involve the notification, consultation, and the development of effective protection or avoidance measures for cultural resources identified within a treatment area. PDF-CUL-8 requires training for project employees to identify potential resources, and complements PDF-CUL-9 which requires work stoppage for inadvertent discovery of potential resources. With these PDFs, impacts to TCRs would be **less than significant**.

Wood Pellet Production

Northern California (Lassen) Facility

The records search did not identify any previously recorded cultural resources within the API, although ten cultural resources have been recorded within 1 mile of the site. An intensive-level pedestrian survey was conducted of the entire API; this survey did result in the identification of four newly recorded historic era refuse scatters, but no potential TCRs were identified. Tribal outreach has not resulted in identification of potential TCRs within the project site. However, given the records search results, the potential for the inadvertent discovery of TCRs cannot be discounted. Impacts related to the inadvertent discovery of a TCR would be **potentially significant**. **MM-CUL-1** would address the potential for inadvertent discovery.

Tuolumne Facility

The records search did not identify any previously recorded cultural resources within the project APE, the NAHC Sacred Lands File search results were negative, and the pedestrian survey did not result in the identification of

TCRs. Results of the cultural resources records search indicate that a total of four previously recorded cultural resources fall within one mile of the Project APE, including one historic-era resource (P-55-000347) which intersects the Project APE (see Section 4.4, Cultural Resources). Tribal outreach has not resulted in identification of potential TCRs within the project site.

Although no TCRs have been identified within or adjacent to the proposed project area, the presence of naturally occurring springs within the project vicinity would have been an attractive resource for prehistoric people, and any low-slope areas adjacent to these springs would have higher potential for buried deposits (see Appendix D3 – Cultural Resources Inventory Report for Golden State Natural Resources, Keystone, Tuolumne County, California). Thus, there is a potential that unanticipated TCRs could be encountered during project-related activities. The discovery of unknown TCRs could result in a **potentially significant** impact. **MM-CUL-1** would address the potential for inadvertent discovery.

Transport to Market

Port of Stockton

The records search, including an updated CHRIS, SLF request, and previous analysis of Rough and Ready Island by the U.S. Navy, and Terracon Consultants (2018) did not identify any potential TCRs. These results, and the disturbed nature of the project site, indicate the probability of accidental discovery is low. Tribal outreach has not resulted in identification of potential TCRs within the project site. Nevertheless, such a discovery would be **potentially significant**. **MM-CUL-1** would address the potential for inadvertent discovery.

3.4.4.3 Cumulative Impacts

A cumulative impact to cultural and tribal cultural resources, refers to the mounting aggregate effect upon cultural and tribal cultural resources due to modern or recent historic land use, such as residential development, and natural processes, such as erosion, that result from human acts. The issue that must be explored in a cumulative impact analysis is the aggregate loss of information and the loss of recognized cultural landmarks and vestiges of a community's cultural history.

Feedstock Acquisition

Sustainable Forest Management Projects

The Sustainable Forest Management Projects, in combination with other related projects and plans throughout the state, could contribute to a cumulative loss of historic resources in the Working Area. Conducting record searches, contacting Native American groups, conducting pre-field research and cultural resource surveys, and avoiding known resources, as provided in the PDFs, will avoid or minimize the risk of disturbance, damage, or destruction of these resources by identifying, avoiding or protecting these sensitive resources from damage that could be caused by treatment activities. Therefore, the contribution of feedstock acquisition activities to a significant cumulative impact related to known unique archaeological resources, tribal cultural resources, subsurface historical resources, or built historical resources, would **not be cumulatively considerable**.

Wood Pellet Production

Lassen Facility

There are no NRHP/CRHR eligible archaeological resources within the API. Existing regulatory requirements, including those organized and stipulated by **MM-CUL-1** and **MM-CUL-2**, will ensure that the project would not contribute to a cumulative impact to archaeological resources, tribal cultural resources, and human remains.

As discussed in Section 3.4.1.2, no built environment CEQA historical resources were identified in the API. As such there are no impacts to CEQA Historical Resources as a result of the Project. Therefore, there would be no significant cumulative impact to which the Project could contribute related to CEQA historical resources.

Tuolumne Facility

There are no NRHP/CRHR eligible archaeological resources within the API. Existing regulatory requirements, including those organized and stipulated by **MM-CUL-1** and **MM-CUL-2**, will ensure that the project would not contribute to a cumulative impact to archaeological resources, tribal cultural resources, and human remains.

None of the identified cumulative projects would result in impacts to the Sierra Railroad – Mainline, including the Keystone Segment (P-55-000347) historical resource.

Transport to Market

Port of Stockton

There are no NRHP/CRHR eligible archaeological resources within the API. Existing regulatory requirements, including those organized and stipulated by **MM-CUL-1** and **MM-CUL-2**, will ensure that the project would not contribute to a cumulative impact to archaeological resources, tribal cultural resources, and human remains.

None of the identified cumulative projects identified would result in significant impacts to the Rough and Ready Island Historic District.

3.4.4.4 Mitigation Measures

Feedstock Acquisition

Sustainable Forest Management Projects

No additional mitigation is required beyond PDF-CUL-1 through PDF-CUL-9 to ensure impacts to cultural resources are appropriately addressed.

Wood Pellet Production

Lassen Facility

The following mitigation measures have been developed to ensure compliance with regulatory conditions based on the results of technical studies.

MM-CUL-1 Unanticipated Archaeological Resources. All crews should be alerted to the potential to encounter archaeological material. In the unlikely event that cultural resources (sites, features, or artifacts) are exposed during creek bank stabilization activities, all construction work occurring within 100 feet of the find shall immediately stop and GSNR contacted. A qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, will be assigned to review the unanticipated find, and evaluation efforts of this resource for NRHP and CRHR listing will be initiated in consultation with GSNR. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under NHPAA/CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

MM-CUL-2 Unanticipated Discovery of Human Remains. Should human remains be discovered, work will halt in that area and procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) will be followed, beginning with notification to the ACOE (if applicable) and County Coroner. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall provide recommendations on next steps within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Tuolumne Facility

No additional mitigation measures are required for archaeological resources, beyond those that are stipulated in the event of inadvertent discovery of cultural resources (**MM-CUL-1**) or human remains (**MM-CUL-2**).

Transport to Market

Port of Stockton

No additional mitigation measures are required for archaeological resources, beyond those that are stipulated in the event of inadvertent discovery of cultural resources (**MM-CUL-1**) or human remains (**MM-CUL-2**).

3.4.4.5 Significance After Mitigation

Impact CUL-1 The project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15063.4.

Impacts at the facilities locations would be less than significant. With the implementation of PDF CUL-7, potential impacts to historical resources as a result of Sustainable Forest Management projects would be **less than significant**. No additional mitigation is required.

Impact CUL-2 The project may cause a substantial adverse change in the significance of an archaeological resource pursuant to §15063.4 or disturb human remains.

With the implementation of PDF CUL-1 through PDF-CUL-9, as well as **MM-CUL-1** and **MM-CUL-2**, potential impacts to archaeological resources or human remains would be **less than significant**.

Impact CUL-3 The project could 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)?
- 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

With the implementation of PDF CUL-1 through PDF-CUL-9, as well as **MM-CUL-1**, potential impacts to tribal cultural resources or human remains would be **less than significant**.

3.4.5 References

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