

**APPENDIX G**

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Cultural Resources Letter Report



## MEMORANDUM

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**To:** California State Lands Commission  
**From:** Ross Owen – Archaeologist (Dudek)  
**Subject:** Cultural Resources Letter Report for the Rio Dell Feder Project, Humboldt County, California – Negative Findings  
**Date:** October 22, 2025  
**cc:** Adam Giacinto– Archaeologist (Dudek)

**Attachments:** A – Figures  
B – NCIC Record Search Results – Confidential  
C – NAHC SLFS Search Results

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This letter documents the negative findings of cultural resources Inventory efforts conducted by Dudek for the Rio Dell Feder Project (Project), located in Humboldt County, California. The California State Lands Commission (CSLC) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). All cultural resource fieldwork and reporting for this Project has been conducted by archaeologists meeting the Secretary of the Interior’s Professional Qualifications Standards. Results from a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search request returned a negative result. A Northwest Information Center (NWIC) records search indicated that no cultural resources have been recorded within the Project site. Intensive pedestrian survey of the Project area did not identify any cultural resources within the Project site.

## Project Location and Description

The proposed Project is located within and adjacent to the City of Rio Dell, Humboldt County, California (Figure 1, Project Location). The Project site is located in Townships 1N and 2N, Rangers 1W and 1E, and Sections 5, 6, 31, and 36 of the 7.5-minute U.S. Geological Survey Hydesville, Scotia, and Fortuna quadrangles.

The proposed Rio Dell Feeder Project (project) involves the installation of two 16-inch-diameter conduits extending under the Eel River, starting approximately 500 feet east-northeast of State Route (SR) 101 along North Pacific Avenue in Rio Dell, Humboldt County, California, utilizing horizontal directional drilling (HDD) methods. An electrical distribution line would be pulled through one of the conduits, and the other would be capped and retained for future installation of an as-yet unplanned additional distribution line. The new distribution line would connect to upgraded and existing utility infrastructure located north and south of the Eel River, ultimately connecting to the existing Rio Dell Substation. The Project site discussed in this report includes a 25-foot-wide buffer from both sides of the

proposed distribution alignment centerline, and a 50-foot-wide buffer surrounding each proposed Horizontal Direct Drilling (HDD) bore site. The Project site encompasses approximately 25 acres.

## Regulatory Context

While the Project as currently planned is subject only to state and local regulatory conditions, federal regulations are also provided here for reference should they be relevant in the future.

## Federal Regulations

### National Historic Preservation Act (NHPA)

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 NHPA 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 USC 470f).

36 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 with important cultural values; 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 defines criteria for determining eligibility for listing in the NRHP. The significance of cultural resources identified during an inventory must be formally evaluated for historic significance 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. The criteria for determining eligibility are essentially the same in content and order as those outlined under the California Environmental Quality Act (CEQA), but the criteria under NHPA are labeled A through D (rather than 1-4 under CEQA).

Regarding criteria A through D of Section 106, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, cultural resources, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or

- 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; or
- D. have yielded or may be likely to yield, information important in prehistory or history [36 CFR 60.4].

The current cultural resources inventory is not designed to generate enough data to make eligibility recommendations on previously recorded cultural resources that are outside of the APE, or newly discovered cultural resources; such determinations are typically made during a subsequent evaluation phase (e.g., excavations at prehistoric sites). However, the survey was designed to generate enough information to provide informal assessments of eligibility to help guide management considerations.

## State Regulations

### The California Register of Historical Resources

In California, the term “historical resource” includes but is not limited to “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” (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 in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. 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.

In order 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 California Code Regulations, Title 14, Section 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 the 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

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, 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 listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “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 a historical resource is materially impaired when a project:

- (1) 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; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) 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 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.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC Sections 21074(c); 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

### California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended California Public Resources Code, Section 5097.94, and added California Public Resources Code, Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. California Public Resources Code, Section 21074, defines tribal cultural resources as follows:

1. “Tribal cultural resources” are either of the following:
  - a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    - i. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    - ii. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- 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 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.
2. 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.
3. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, including tribes that may not be federally recognized, and that have requested in writing that the lead agency notify them of proposed projects within such geographic area. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report (EIR).

Section 9 of AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” Section 6 of AB 52 added Section 21080.3.2 to the California Public Resources Code, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (California Public Resources Code Section 21080.3.2(a)). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (California Public Resources Code Section 21082.3(a)).

### **Native American Historic Cultural Sites**

State law 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 establishes the Heritage Commission 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 a Native American historic or cultural site that is listed or may be eligible for listing in the CRHR.

### **Native American Historic Cultural Sites**

State law (California Public Resources Code, 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 NAHC.

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 California Public Resources Code, Section 5097.98)

and California Health and Safety Code, Section 7050.5, define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended on the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that the County Coroner or County-approved Coroner represented 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 descendant 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 California Public Resources Code, Section 5097.98 (14 CCR 15064.5(e)).

### California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (Section 7050.5b). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (Section 7050.5c). The NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

## Background Research

### Cultural Records Search Results

A records search of the APE and the surrounding ½-mile was completed by NWIC staff on behalf of Dudek on June 23, 2025 (Confidential Appendix A). This search included their collection of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the National Register of Historic Places (NRHP), California Inventory of Historical Resources/CRHR and listed OHP Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information.

### Previously Conducted Studies

NWIC records indicate that 43 previous cultural resources technical investigations have been conducted within ½-half mile of the APE. Of these, 17 intersect the current APE (Table 1).



**Table 1.  
Previous Technical Studies**

Report Number	Date	Title	Author
<b>Reports within the Project Site</b>			
000248	1976	An Archaeological Survey of the Proposed Improvements for the Sewage Treatment System of the City of Rio Dell, Humboldt County, California	Pamela R. Roberts
000848	1976	A Summary of Knowledge of the Central and Northern California Coastal Zone and Offshore Areas, Vol. III, Socioeconomic Conditions, Chapter 7: Historical & Archaeological Resources	David A. Fredrickson
002458	1981	Overview of Prehistoric Archaeology for the Northwest Region, California Archaeological Sites Survey; Del Norte, Humboldt, Mendocino, Lake, Sonoma, Napa, Marin, Contra Costa, Alameda	Neil Ramiller, Suzanne Ramiller, Roger Werner, and Suzanne Stewart
002458a	1982	Prehistoric Archaeology Overview Northwest Region; California Archaeological Inventory, Volume I: Humboldt	Suzanne Ramiller
002458b	1982	Archaeological Overview of Mendocino and Lake Counties	Roger H. Wemer
002458c	1982	Prehistoric Archaeology Overview Northwest Region; California Archaeological Inventory, Volume 3: Napa and Sonoma Counties	Suzanne Stewart
002458d	1982	Archaeological Overview of Alameda, Contra Costa, and Marin Counties	Suzanne B. Stewart
002458e	1982	Environmental Overview of the Northwest Region	Neil Ramiller
007888	1973	Early Cultures of the North Coast Ranges, California	David Allen Fredrickson
008226	1986	Status of Archeological Resources in the Northern Region, California Department of Parks and Recreation	E. Breck Parkman
011185	1988	Boundary Development in Northwestern California, an Ecological Approach to Culture History	Glenn J. Gmoser
016879	1995	An Evaluation of the Archaeological Potential Within the North Coast Railroad, Eureka to Willits, California, and a Field Inspection of 23 Repair Points Along the Route: Final Report	William Roop, Katherine Flynn, Jeff Parsons, and Dea Bacchetti
020395	1998	PCNs of the Coast Ranges of California: Religious Expression or the Result of Quarrying?	Donna L. Gillette
030202	2000	Draft Environmental Assessment, Restoration of the Northwestern Pacific Railroad, Humboldt, Trinity, and Mendocino Counties	Quentin Bliss, Kristin Byrd, Laura Cholodenko, Janet Frentzel, Rob Greene, Morgan Griffin, Robin Plutchok, and Wendy Weber
030204	2003	The Distribution and Antiquity of the California Pecked Curvilinear Nucleated (PCN) Rock Art Tradition.	Donna L. Gillette

**Table 1.  
Previous Technical Studies**

Report Number	Date	Title	Author
040131	1999	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, Kirtley NTMP	Andrew Elsabee
040323	2007	A Cultural Resources Investigation of the Proposed Rio Dell Wastewater Reuse Project, located in Rio Dell and Scotia, Humboldt County, California	James Roscoe, Jerry Rohde, and Nick Angeloff
042173	2004	An Archaeological Survey Report for the Swains Flat THP, Humboldt County, California; THP #1-04-137 HUM	Jeremy Drakeford
044819	2009	An Archaeological Survey Report for the Evans Non-Industrial Management Plan, Humboldt County, California	Stephen Hohman
044964	2008	Historic Property Survey Report, 01-HUM-101, K.P. 0.32-202.77 (P.M. 0.20-126.00), EA 01-464000	Jeff Haney
044964a	2008	Phase I Archaeological Survey of 262 Locations Planned for Metal Beam Guardrail Construction along State Route 101, Humboldt County, 01-HUM-101, PM 0.20-126.00 (KP 032-202.77), EA 01-464000	Laura Leach-Palm, William R. Hildebrandt, and Jack Meyer
044964b	2008	FHWA080411A: State Route 101 Metal Beam Guardrail Project, Humboldt County, California; 01-HUM-101, K.P.O. 32-202.77 (P.M. 0.20-126.00)	Susan K. Stratton and Sandra Rosas
051664	2018	A Cultural Resources Investigation for the Greater Eel River Arundo donax Eradication Phase III (HR-196) California Department of Fish and Wildlife – FRGP (Grant # P1510506) Humboldt County, California	Karen Raskin and Jonathan Roldan
051664a	2018	Cultural Resources Investigation Addendum Report for the Greater Eel River Arundo donax Eradication Phase III (HR-196) California Department of Fish and Wildlife – FRGP (Grant # P1510506) Humboldt County, California	Karen Raskin and Jonathan Roldan
054338	1977	A Preliminary Proposal for the Application of Remote Sensing for the Protection of Cultural Resources in Northwest California	Milton M. Marks, Sylvia S. White, James R. Benson, and Orley Lindgren
<b>Reports within 1/2-Mile of the Project Site</b>			
001291	1978	An Archaeological Survey of a Proposed Minor Subdivision, Assessor's Parcel Number 205-071-24, near Rio Dell, Humboldt County, California	Richard A. Stradford
015435	1993	Cultural Resources Assessment of a Proposed Apartment Complex Located on APN 052-312-12, Rio Dell, Humboldt County, California	-
015555	1993	Archaeological and Historical Resources Survey and Impact Assessment, Kirtley THP	Gary F. Howard
018855	1996	Archaeological and Historical Resources Survey and Impact Assessment, Scotia THP, THP #1-96-490H	Bruce Chapman
019896	1997	Archaeological Review of THP #1-97-492 HUM (Primofiore) (letter report)	Mark Gary

**Table 1.  
Previous Technical Studies**

Report Number	Date	Title	Author
020050	1996	Archaeological and Historical Resources Survey and Impact Assessment, Scotia THP, THP #1-96-490 HUM	Bruce Chapman
020936	1997	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, Christensen NTMP, 1-97NTMP-013 HUM	Steven R. Childs
022270	1999	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, West Rio Dell THP, THP #1-99-356 HUM	Chris Curtis
030907	2004	Caltrans Historic Bridge Inventory Update: Metal Truss, Moveable, and Steel Arch Bridges, Contract: 43A0086, Task Order: 01, EA: 43-984433, Volume I: Report and Figures	Christopher McMorris
038865	2011	Cultural Resources Inventory of Caltrans District 1 Rural Conventional Highways in Del Norte, Humboldt, Mendocino and Lake Counties, Contract No. 01A1056, Expenditure Authorization No. 01-453608	Laura Leach-Palm, Paul Brady, Pat Mikkelsen, Libby Seil, Darla Rice, Bryan Larson, Joseph Freeman, and Julia Costello
038865a	2011	A Geoarchaeological Overview and Assessment of Northwest California: Cultural Resources Inventory of Caltrans District 1, Rural Conventional Highways: Del Norte, Humboldt, Mendocino, and Lake Counties	Jack Meyer, Philip Kaijankoski, and Jeffrey S. Rosenthal
038865b	2011	Volume I: Report and Appendices A-E, Native American Ethnogeography, Traditional Resources, and Contemporary Communities and Concerns: Cultural Resource Inventory of Caltrans District 1, Rural Conventional Highways: Del Norte, Humboldt, Mendocino, and Lake Counties	Shelly Tiley and Shannon Tushingham
039923	1999	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, Scotia Bluffs THP	Keith Hess
040068	1999	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California New Scotia 2, 1-99-333 HUM	Bruce Chapman
040560	2007	Scotia Historic Assessment Study	Gerald T. Takano
041686	2004	An Archaeological Survey Report for the Tank 04' Timber Harvesting Plan, Humboldt County, California	Jasom D. Cushman
041739	2005	A Cultural Resources Investigation of the Belleview Creek Fish Passage-Culvert Replacement Alternatives Project, located in Humboldt [County], California	Nick Angeloff and James Roscoe
041820	2005	An Archaeological Survey Report for the Slater THP, Humboldt County, California	Craig R. Newman
042375	2007	New Tower Submission Packet; Dinsmore Ranch Road, Rio Dell, CA-568423	Lorna Bilat

**Table 1.  
Previous Technical Studies**

Report Number	Date	Title	Author
042829	2000	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, Tank 5 THP, THP #1-00-454 HUM	Jason Poburko
044010	2013	Cultural Resources Constraints Report: Pac Lumber (Scotia) Tap 60 kV	Joanne Grant
044624	2009	Collocation Submission Packet; Rio Dell, SF-40969A	Lorna Billat
044926	2007	An Archaeological Survey Report for the LE 59 Timber Harvest Plan Humboldt County, California	A.J. Evanson
049378	2017	An Archaeological Survey Report for the Slater Creek THP, Humboldt County, California	Nick Robinson
050988	2015	Historical Resources Evaluation Report, Caltrans Statewide Historic Bridge Inventory: 2015 Update, 1965-1974	Helen Blackmore, Lauren Clementino, Andy Hope, Noah M. Stewart, and Janice Calpo
050988a	2016	Update of Caltrans Historic Bridge Inventory Covering Bridge Built Between 1965-1974 ( 43-SAC-O )( May 5, 2016 letter report )	Kelly J. Hobbs and Julianne Polanco
050988b	2016	Historic Bridge Inventory Update (FHWA_2013_0823_003)(43-SAC-O)	Natalie Lindquist and Kelly Hobbs
050988c	2014	Supplemental Proposal to extend the Update of Caltrans Historic Bridge Inventory covering 1965-1969 bridges to also include 1970-1974 bridges (43-SAC-O) (letter report)	Anmarie Medin and Carol Roland-Nawi
050988d	2014	Determination of Eligibility and Notification of No Historic Properties Affected for the Fair Oaks Ave. Overhead Bridge Rehab Project, Santa Clara County (BHL 521-J (039)) (Fair Oaks Ave. Overhead Bridge Rehab)	Boris Deunert
050988e	2013	Proposal for Updating the Caltrans Historic Bridge Inventory (43-SAC-O)	Anmarie Medin and Carol Roland-Nawi
051117	2018	An Archaeological Survey Report for the Scotia Bluffs THP, Humboldt County, California	Brita Rustad
052774	2019	An Archaeological Survey Report for the Scotia Bluffs THP II, Humboldt County, California	Brita Rustad
053187	1981	Archaeological Survey Report, Slide correction along the eastern cut bank above the access road which parallels Route 101 northbound, 01-HUM-101 PM 51.8/52.0, 01101-195951	Barry K. Douglas

**Previously Identified Cultural Resources**

No previously recorded cultural resources intersect the proposed APE. Four previously recorded cultural resources are located within ½-mile of the proposed APE, three of which are historic built environment resources and one of

which is components of a prehistoric shell midden that was imported in fill soils from elsewhere (Table 2; Confidential Appendix A).

**Table 2.  
Previously Recorded Cultural Resources**

Primary ID	Trinomial	Resource Name	Age	Description	NRHP/CRHR Status
<b>Resources within the Project Site</b>					
None					
<b>Resources within the 1/2-Mile Search Site</b>					
P-12-001353	CA-HUM-001041H	Resource No. 5; Caltrans Bridge No. 04-015; Eagle Prairie Bridge; A.S. Murphy Memorial Bridge	Historic	Bridge	3S
P-12-002564	CA-HUM-001124H	Evans-Old Highway 101 Crossing	Historic	Foundations/Structure pads; Roads/Trails/Railroad grades	-
P-12-003800	-	Bridge 04 0016L; Eel River Bridge; Nello J Barsanti Memorial Bridge	Historic	Bridge	-
P-12-004012	-	Shell Redeposit	Prehistoric	Other: Shell Midden	

### P-12-004012

The prehistoric archaeological site falling just outside of the Project boundary consists of imported soils with remnants of a prehistoric shell midden from an unknown original location (P-04-001561). This resource consists of many prehistoric marine shell pieces from an unknown location that were redeposited in artificial fill deposits that form a berm or levee just north of the Eel River Bridge north of the town of Rio Dell. The site is approximately 500 ft away from the proposed APE. The site was recorded and tested in 2021, at which time shells including clam (*Tresus nuttallii*), cockle, and oyster (*Ostrea lurida*) were identified in a discrete fill layer of dark colored soils between 1.0 and 2.0 meters in depth. A radiocarbon date of 2953 ±22 14C BP (2396 cal BP) was obtained from an oyster shell, and a date of 1909 ±22 14C BP ( 1212 cal BP) was obtained from a clam shell, which indicate the shell is prehistoric in age (See Appendix A for additional details).

## Review of Historical Maps and Aerial Imagery

Dudek consulted historic maps and aerial photographs to understand development of the APE and surrounding properties. Historic aerial photographs, available from 1940, 1956, 1965, 1968, 1972, 1983, 1998, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020 and 2022, and historic topo maps, available from 1944, 1951, 1961, 1965, 1966, 1974, 1985, 2012, 2015, 2018, and 2021, were inspected to observe previous development in the Project site (NETR 2025). These maps and images display the southern half (south of Eel River) of the Project area as a small town located along Eel River and US 101, with greater development

beginning in 1956. The city further expands throughout the years with the appearance of the US 101 bypass in 1983 in the same alignment as present-day. The northern extent (North of Eel River) of the project area remains relatively unchanged as forested areas and agricultural land.

## NAHC and Tribal Correspondence

Dudek requested a NAHC search of their Sacred Lands File on May 23, 2025 for the Project site (Appendix B). Results for this search were provided by the NAHC on June 17, 2025. Results were negative. A list of traditionally culturally affiliated Native American tribal representatives who may have additional information related to cultural resources in the area was provided as part of this search. In the interest of ensuring efficient and direct consultation between the CSLC and tribes, Dudek has not followed up by contacting the tribes directly.

The proposed Project is subject to compliance with Assembly Bill 52 (PRC Section 21074), which requires consideration of impacts to “tribal cultural resources” as part of the CEQA process, and requires the CEQA lead agency to notify any groups (who have requested notification) of the proposed Project who are traditionally or culturally affiliated with the geographic area of the Project. Because Assembly Bill 52 is a government-to-government process, all records of correspondence related to Assembly Bill 52 notification and any subsequent consultation are on file with the lead agency.

## Intensive Pedestrian Survey

On July 21, 2025, Dudek archaeologist Ross Owen, MA, RPA conducted intensive pedestrian survey for the Project area using standard archaeological procedures and techniques that meet the Secretary of Interior’s Standards and Guidelines for cultural resources inventory. Exposed ground surfaces were observed for surface artifacts, undisturbed areas, archaeological deposits, and historic structures; periodic boot scrapes were employed to expose additional ground surface. Evidence of artifacts and archaeological deposits were also opportunistically sought after in animal burrows and other areas with disturbed soils. Transects spaced no more than 10 meters apart, were walked over the entirety of the Project site. The southern portion of Project site within Rio Dell consisted of dense grasses and Himalayan blackberry, with modern disturbance from existing PG&E facilities. Due to the disturbance, ground visibility was moderate (between 25-50%). Soils were a brown clay silt with less than 5% rounded gravels. North of the Eel River, the staging area in the northwestern portion of the Project site is graded and covered in imported gravels. The northeastern portion of the project site consists of pasture and a small riparian corridor with dense grasses and wetland vegetation, and minimal ground visibility (>5%). Soils consisted of a dark brown loam with sparse rounded gravels and pebbles. No artifacts were observed within the Project site.

## Review of Setting and Archaeological Sensitivity

Potential for yet identified cultural resources in the vicinity was reviewed against geologic and topographic GIS data for the area and information from other near-by projects. The “archaeological sensitivity,” or potential to support the presence of a buried prehistoric archaeological deposits, is generally interpreted based on geologic landform, environmental parameters (i.e., distance to water and landform slope), and an area’s history of use.

There are three soil types mapped within the Project site: Ferndale 0-2% slopes, Dungan 0-2% slopes and Hookton-Urban Land complex, 0-2 slopes (USDA 2025). The primary constituents of these soils are silt loam and

clay loam. Soils in the Ferndale and Hookton-Urban Land complex series are poorly drained soils formed in alluvium derived from mixed sources, and the Dungan series is formed in mixed alluvium.

The southern and northwestern portions of the Project site have been subject to modern disturbances related to existing PG&E infrastructure with limited potential for intact, subsurface cultural deposits. The northeastern portion of the Project site has higher potential for intact, subsurface deposits due to the proximity to riparian habitat, and the Eel River to the south. In consideration of this information the southern and northwestern portions of the Project site are considered to have low potential to support the presence of intact buried archaeological deposits, while the northeastern portion has moderate-high potential.

## Summary and Management Recommendations

No previously recorded, potentially significant resources were identified within the Project site or surrounding area by the CHRIS record search. While one area with precontact archaeological constituents was documented relatively near the Project site, this cultural material was imported from elsewhere. Thus, its compromised provenience does not contribute to or otherwise inform the archaeological sensitivity of the area. The NAHC SLF search yielded negative results. Archaeological survey did not result in the identification of archaeological resources. Based on these results, and the observed level of disturbance within the Project site, the area has a low potential for significant resources to be present. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during project construction are provided below.

## Archaeological Resources

### Unanticipated Discovery of Archaeological Resources

All employees should be alerted to the potential to encounter archaeological material. In the event that cultural resources (sites, features, or artifacts) are exposed during work activities for the proposed Project, all ground disturbing work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, 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. Significance shall be assessed by the qualified archaeologist pursuant to CEQA requirements (14 CCR 15064.5(f); PRC Section 21082) prior to making a determination regarding if/when further earth-disturbing activity may occur in the area. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

### Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. 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, if the potential remains are human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, the County Coroner 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 (MLD) from of the deceased Native American. The MLD 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.

If you have any questions about this report, please contact me at [esivell@dudek.com](mailto:esivell@dudek.com)

Sincerely,



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Ross Owen, MA, RPA  
Archaeologist

cc: Adam Giacinto, MA, RPA, Dudek  
Brian Grattidge, Dudek

Att: NADB Information  
Appendix A: Figures  
Appendix B: NWIC Records Search Information (Confidential)  
Appendix C: NAHC SLF Search

## References Cited

NETR (National Environmental Title Research LLC) 2025. *Historic Aerials*. Accessed July 10, 2025.  
<http://www.historicaerials.com/>.

USDA (United States Department of Agriculture). 2023. *Natural Resources Conservation Service (NRCS). Web Soil Survey*.  
Accessed July 10, 2025. <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.

# National Archaeological Database (NADB) Information

**Authors:** Ross Owen, MA, RPA; Adam Giacinto, MA, RPA; Elizabeth Sivell; William Burns, MsC, RPA; Nicholas Hanten, MA, RPA

**Consultant Firm:** Dudek

**Project Name:** Rio Dell Feeder Project

**Project Proponent:** California State Lands Commission

**Report Date:** October 2025

**Report Title:** Cultural Resources Letter Report for the Rio Dell Feeder Project, Humboldt County, California

**Type of Study:** Intensive Archaeological Inventory

**Resources:** None

**USGS Quads:** Scotia, CA; Hydesville, CA; Fortuna, CA

**Acreage:** Approximately 25

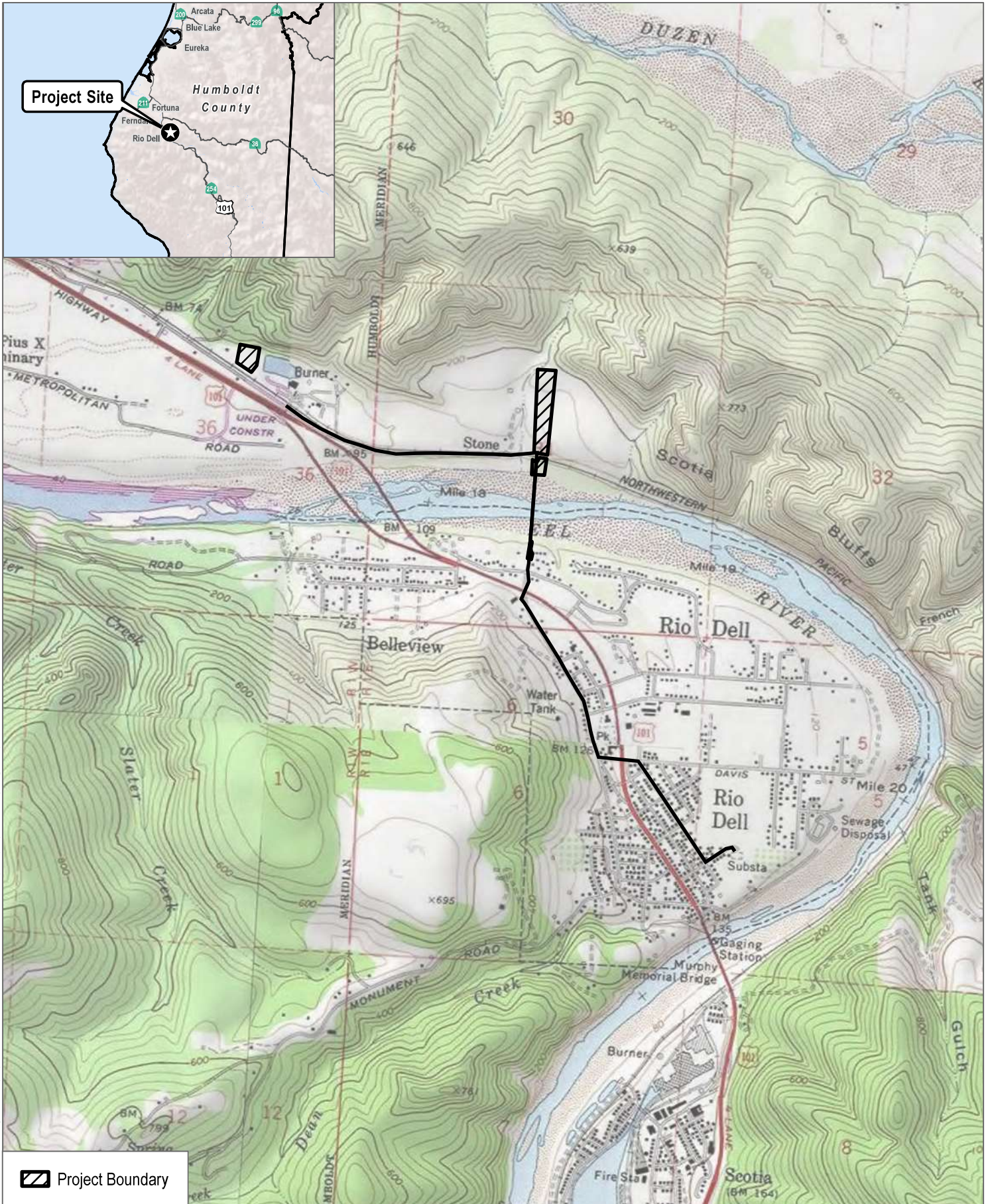
**Permit Number:**

**Lead Agency:** Placer County Department of Agriculture, Parks, and Natural Resources

**Keywords:** Rio Dell; Eel River; Intensive Pedestrian Survey

# Appendix A

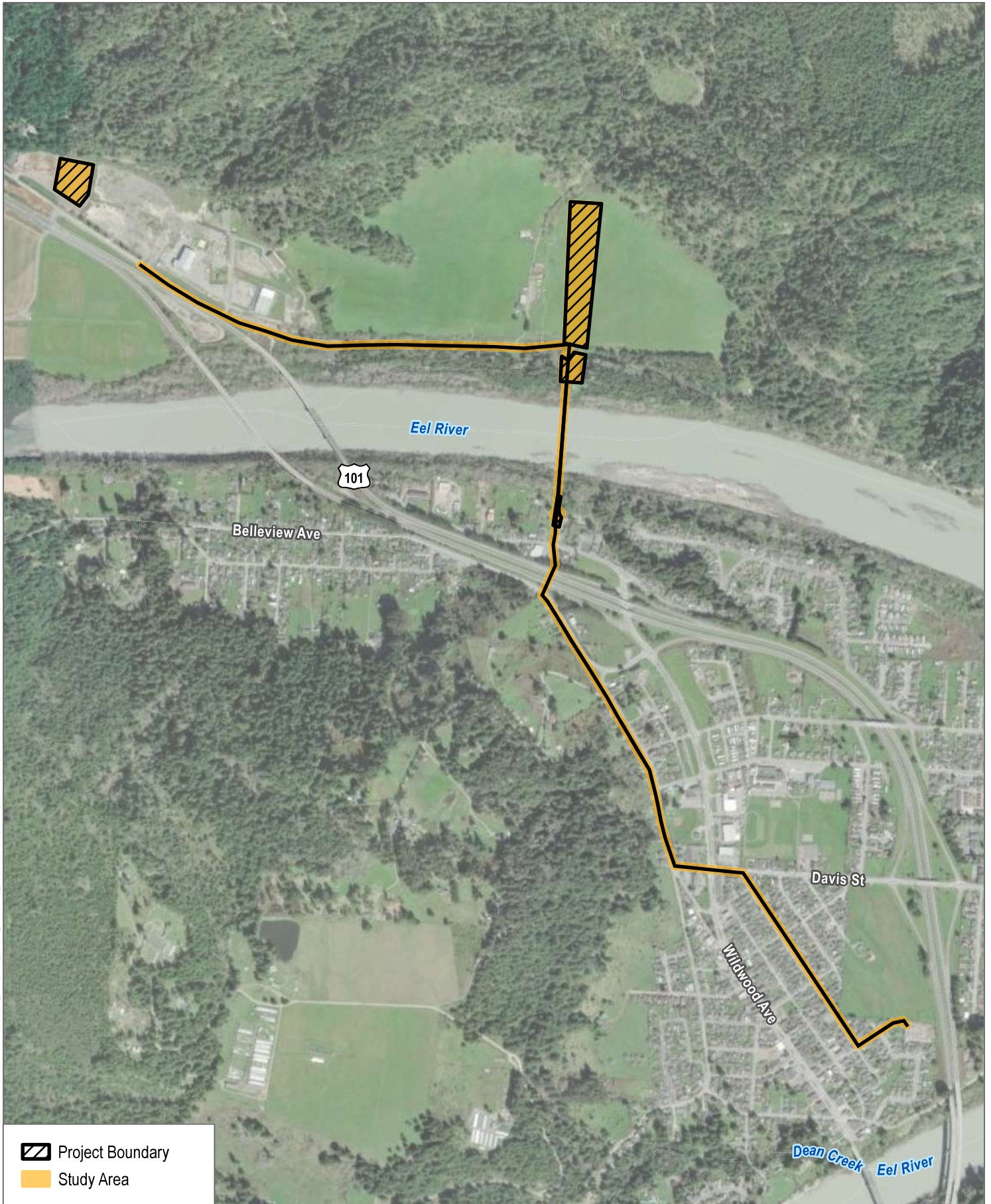
## Figures



SOURCE: USGS National Map 2025

FIGURE 1

Project Location



SOURCE: Bing Maps 2024, OpenStreetMap

**DUDEK**



0 500 1,000 Feet

**FIGURE 2**  
Project Site

CSLC Rio Dell Feeder Project

# **Appendix B**

## NWIC Record Search Results (Confidential)

# Appendix C

## NAHC SLF Search Results



## NATIVE AMERICAN HERITAGE COMMISSION

June 17, 2025

Afifa Awan  
California State Lands Commission

**Via Email to: Afifa.Awan@slc.ca.gov**

CHAIRPERSON  
**Reginald Pagaling**  
Chumash

VICE-CHAIRPERSON  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

SECRETARY  
**Sara Dutschke**  
Miwok

PARLIAMENTARIAN  
**Wayne Nelson**  
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COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Stanley Rodriguez**  
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COMMISSIONER  
**Reid Milanovich**  
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COMMISSIONER  
**Bennae Calac**  
Pauma-Yuima Band of  
Luiseño Indians

COMMISSIONER  
**Vacant**

ACTING EXECUTIVE  
SECRETARY  
**STEVEN QUINN**

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[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

**Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, PG&E Rio Dell Feeder 35239524 Project, Humboldt County**

To Whom it May Concern:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

*Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.*

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: [melina.carlos@nahc.ca.gov](mailto:melina.carlos@nahc.ca.gov)

Sincerely,

*Melina Carlos*

Melina Carlos  
Cultural Resources Analyst

Attachment