

3.6 CULTURAL RESOURCES, INCLUDING TRIBAL CULTURAL RESOURCES

This section presents an evaluation of the potential impacts of project implementation on cultural resources. “Cultural resources” is a general term that encompasses CEQA’s historical resource and unique archaeological resource (see Section 3.6.2, “Regulatory Setting,” for definitions of historical resources and unique archaeological resources). Cultural resources may include archaeological traces such as early Native American occupation sites and artifacts, historic-age buildings and structures, and places used for traditional Native American observances or places with special cultural significance. These materials can be found at many locations on the landscape, and along with prehistoric and historic human remains and associated grave-goods, are protected under various state and local statutes. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe.

During the public scoping comment period, comments relevant to tribal lands and artifacts, and previous Scotia EIRs that addressed historical resource planning, protection, and the special Scotia Historic Resource Protection zoning provisions were received. These topics are discussed in this section.

3.6.1 ENVIRONMENTAL SETTING

The information in this section was collected from the following cultural resources technical reports that were prepared for the project applicant. They included the results of a records search, lists and database reviews, background research, field surveys, subsurface investigations, and the evaluation of built environment resources associated with the transportation route.

- ▶ *Humboldt Wind Energy Project Cultural Resources Phase 1 Inventory of 2,240.71 Acres, Humboldt County, California Report* (Stantec 2018a)
- ▶ *Humboldt Wind Energy Project Bear River Ridge Historic Context and Landscape Study, Humboldt County, California Report—Addendum* (Stantec 2019a)
- ▶ *Humboldt Wind Energy Project—Updated Cultural Resources Phase 1 Inventory of 2,240.71 Acres, Humboldt County, California* (Stantec 2019b)
- ▶ *Archaeological Survey Report for the Bridgeville Substation Project Humboldt County, California Prepared for Pacific Gas and Electric Company* (DeGeorgey 2010)

These technical reports were peer reviewed for technical accuracy by AECOM cultural resource specialists before relevant material was incorporated into this section.

In addition, a potential historic district in the town of Scotia was identified in a 2007 historic resource report prepared for Pacific Lumber Company, the owner of the company-owned lumber town at that time (TBA West 2007). Although the potential Scotia historic district is outside the project site, this cultural resources section takes into account potential indirect effects on historical resources in the project vicinity, including this potential historic district. The analysis of indirect visual impacts on historical resources presented in this section utilizes the visual resources technical report prepared for the project applicant. The following visual impacts report was also peer reviewed by AECOM staff before incorporation of relevant material into this section:

- ▶ *Humboldt Wind Energy Project Visual Resources Technical Report, Humboldt County, California Report* (Stantec 2018b)

REGIONAL PREHISTORIC CONTEXT

The interior of California's North Coast Ranges is one of the least studied in terms of prehistory (Fredrickson 1984; Hildebrandt 2007). The excavation of sites in the Pilot Ridge–Trinity River area (Eidsness 1986; Hildebrandt and Hayes 1993; Sundahl and Henn 1993) helped to illuminate the cultural history and settlement patterns of people in the North Coast Ranges. Beyond this, much of the cultural chronology is borrowed from areas where more extensive archaeological research has been completed, particularly along the coast (Hildebrandt and Levulett 1997, 2002), the Clear Lake Basin (White 2002), and Warm Springs (Basgall and Bouey 1991).

Fredrickson (1974) outlined an analytical framework for interpreting the prehistory of the North Coast Ranges, dividing human history in California into broad periods and patterns and differentiating cultural units based on sociopolitical complexity, trade networks, population, and the introduction and variations of artifact types. The scientific significance of prehistoric sites rests partly on their ability to help archaeologists explain the reasons for these changes in different places and at different times in prehistory. With minor revisions (Fredrickson 1994) and a recent reframing of the time periods (Hildebrandt 2007), this scheme remains the dominant framework for prehistoric archaeological research in the region.

The Pleistocene–Holocene Transition period (11,500 to 8,000 calibrated years [cal] B.C.) was characterized by small, highly mobile groups occupying broad geographic areas. Archaeological evidence for human occupation of the Northwest Coast during this time is lacking, probably because coastal erosion, extensive scouring, and alluvial flood deposition along the rivers removed most of the evidence and buried much of what remained.

The first known archaeological evidence of human occupation near the project area dates to the Early Holocene (8,000 to 5,000 cal B.C.), based on the discovery of house floors as well as a number of upland ridgeline sites. These sites exhibit what has been termed the Borax Lake Pattern, an assemblage that includes wide-stemmed projectile points with indented bases, serrated bifaces, ovoid flake tools, handstones, and milling slabs, indicative of tools made and used by highly mobile foragers who did not store much food (Hildebrandt 2007).

During the Middle Holocene (5,000 to 2,000 cal B.C.), severe, extended droughts and unstable weather led to a highly dynamic landscape, with intense erosion and depositional events again destroying or obscuring many sites from this time (Hildebrandt 2007). The first archaeologically documented occupation in the Humboldt/Del Norte region dating to the Middle Holocene began around 3000 cal B.C. and is represented by the Mendocino Pattern, an assemblage characterized by side-notched, corner-notched, and concave-based projectile points, handstones, milling slabs, and early evidence of mortars and pestles. A few sites attributed to the Mendocino Pattern have been found in the King Range, Humboldt Bay, and Point St. George area in Del Norte County. In general, the pattern seems to reflect a short-term foraging or hunting subsistence strategy, focused on terrestrial rather than marine resources (Hildebrandt 2007).

The Late Holocene (post-2,000 cal B.C.) saw substantial changes in the lifeways and subsistence patterns of the indigenous peoples of the Northwest Coast. The primary subsistence strategy seems to have focused on marine resources, with an increased cultural complexity, represented by extensive villages with redwood houses and formal cemeteries. Artifacts associated with the Mendocino Pattern persisted until about cal A.D. 500, at which point people increasingly settled in long-term villages, began using new hunting and fishing gear to exploit

marine resources, and developed new forms of mortars, pestles, and polished stone clubs, bowls, and adzes. A common marker for this period is the Tuluwat Barbed (formerly Gunther Barbed) projectile point type. Archaeologists have connected this change in material culture to glottochronological evidence, indicating the arrival of Algic-speaking people (likely the early Wiyot) around cal A.D. 100 and the Yurok around cal A.D. 700–800, quickly followed by Athabaskan-speaking people around cal A.D. 800–900, including the ancestors of the Sinkyone (Hildebrandt 2007).

ETHNOGRAPHIC CONTEXT

The area presently known as Humboldt County is highly culturally diverse when compared to other regions of California and was home to a dozen distinct Native American tribes that occupied diverse areas, mainly conforming to the natural watershed basins. Most tribes of the region were either Algonquian or Athabaskan speakers, with the exception of the Karuk. The Yurok and Wiyot spoke Algonquian languages and were present along both the coast and rivers. The Karuk were Hokan-speaking and lived primarily in mountainous territory. Even more distinct are the five groups referred to collectively as the southern Athapaskans. Of these, the Nongatl, Sinkyone, Lassik, and Wailaki spoke dialects of a single language; Mattole also is recognized as a dialect of Athapaskan but may have differed (Elsasser 1978b; cf. Kroeber 1925).

The project area is about 12 miles inland from Cape Mendocino along two large east/west trending ridges: Bear River Ridge and Monument Ridge. The native inhabitants of the region at the time of contact were Athapaskan speakers of the Sinkyone, Mattole, Nongatl, and Bear River groups. The Sinkyone and Nongatl spoke closely related dialects, while the Bear River spoke a language closely related to the Athapaskan dialect spoken by the Mattole. Sinkyone were one of five groups speaking subdialects of Athabaskan; the other four were the Mattole, Nongatl, Lassik, and Wailaki. These make up what Kroeber referred to as the Southern Athabaskan (Kroeber 1925:142–144).

The study area is within the ethnographic territories of the Bear River and Sinkyone, as well as the neighboring Mattole and Nongatl. Ethnologists have defined tribal boundaries based mainly on liminal boundaries of the natural topography and informants of, often times, neighboring groups, describing their historical relationship with surrounding tribes. The focus in the following discussion is on material culture because this forms the archaeological record. Although the culture, traditions, and practices of the Bear River and Sinkyone are distinct, the material culture among them and surrounding Athapaskan groups is notably similar.

Bear River

The Bear River occupied the Bear River drainage from its headwaters to the coast as well as many of the surrounding ridgetops. Consensus on the exact boundary of any of the Southern Athapaskan groups remains a topic with no clear resolution. Elsasser (1978a) notes that using Kroeber's tribelet concept (1925) to identify distinct cultural groups speaking related languages results in a boundary division among the Athapaskan speakers of the area along single drainages. Bordered on the north by Wiyot, on the south by Mattole, and on the east by Sinkyone, the Bear River and Mattole groups represent the only two Athapaskan speaking groups whose territory centered primarily on a single river drainage. Baumhoff's summary of Bear River (1958) presents an overview of the territory and some village names and locations identified from the works of Nomland (1938) and Goddard (1929). Nomland (1938) provides the greatest informant-derived detail on the daily lives of the Bear River peoples.

Organization and Settlement

With settlements along the Bear River, Oil Creek, and other tributaries, the Bear River tribe enjoyed a foraging area extending from the Pacific Ocean to the upper reaches of Bear River southwest of Scotia. Noted villages were on river terraces at Capetown, Morris Ranch, and a large village described with a dance house about 15 miles upriver near the Bear River headwaters.

The Bear River tribe, like its Sinkyone neighbors, was organized into tribelets, with long-term settlement restricted to wintertime villages along annual drainages. Political organization was most evident at the tribal level and was centered on a chieftain. The chieftain was an inherited role, however; a chieftain passed on the role to his son if that son was an accomplished hunter and considered both wise and wealthy. If the son was not suitable, the elder men selected an able individual to assume the chieftain role. The primary role of the chieftain was to settle disagreements within the tribe, square debts, and provide decisions regarding when to go to war and how much enemies of the tribe should pay, following a successful campaign. Nomland (1938) notes that the Bear River tribe was a more peaceful tribe than its neighbors, according to her informant.

The family, consisting of a mother, a father, and children, formed the basis of daily life and organization. Groups of families would form multi-house villages. No clan structure existed among the Bear River tribe, and the chieftain was the only institution that families and extended families recognized in terms of tribal obligation or commitment beyond the family unit (Nomland 1938).

Technology and Material Culture

Technologically, the Bear River tribe created artistic and functional basketry, clothing, and tools. Among other uses, twined baskets were made for carrying burdens and water, storing food, worn as hats, and used as fish traps. Fibers for basketry were from redwood roots and maidenhair fern, and were colored with alder dyes (Kroeber 1925).

Clothing was made of animal hides and generally was not adorned for daily use. Men wore buckskin shirts, fastened at the waist, while women wore buckskin aprons and buckskin skirts. Women wore a basket hat in summer and buckskin head-cover in wet weather. Both men and women wore ornamented buckskin clothing during dances.

Tools produced for collecting and processing plant resources included digging sticks, twined seed-beaters and burden baskets, and portable milling stones. Acorns and seeds were collected and processed by Bear River women and children. Hunting tools included bows and arrows, tipped with silicate and obsidian arrowheads. Stone blades were used for knives, spears, and chopping tools (Nomland 1935).

Sinkyone

The Sinkyone are thought to have been divided into two groups, based on language differences: the Lolangkok (“Bull Creek”) Sinkyone to the north and the Shelter Cove Sinkyone to the south. The line dividing the groups passes just north of Briceland. The Sinkyone tribal boundary includes the main portion of the Eel River and a long stretch of the south fork of the Eel River, from present Scotia to Hollow Tree Creek on the south (Baumhoff 1958; Elsasser 1978b).

The Bear River tribe territory included almost the entire drainage of Bear River proper and the coast near its mouth. In the north, it included the western side of the Eel River, from near the mouth of the Van Duzen River to the present town of Scotia. No tribelet names are known, but village names have been cited in Baumhoff (1958). The primary sociopolitical unit appears to have been multi-village tribelets; the closest recorded Lolankok village site of Lahsasete is approximately 4 miles northeast of the project site, near Shively (Nomland 1935).

The Sinkyone hunted and gathered plants in a variety of environments. Much of their ancestral territory was within the redwood belt, which had limited resources for foraging. Their territory included coastal, mountain, and narrow but open valley environments. The latter provided a wide variety of resources, including tan oak acorn (*Lithocarpus desniflorus*), buckeye (*Aesculus* spp.), grass seeds, bulbs and tubers, manzanita berry, Columbian black-tailed deer (*Odocoileus hemionus* spp.), Roosevelt elk (*Cervus canadensis roosevelti*), several bird species, rabbits (*Leporidae* and *Ochotonidae*), and other small mammals. Although they harvested marine foods, particularly mussel (*Mytilus* spp.), clam, and sea lion (*Zalophus californianus*), in general these appear to have made up a modest portion of the Sinkyone diet. An exception to this were salmonids—King Salmon (*Oncorhynchus tshawytscha*), Coho (or Silver) Salmon (*O. kisutch*), and Steelhead Trout (*O. mykiss*)—which were primary resources that may have exceeded even acorn and deer in importance and could be collected from the major waterways of the Sinkyone territory (Elsasser 1978b; Kroeber 1925). Settlements generally were along drainages, while foraging and hunting focused on stream and riverine resources as well as fauna and limited flora along ridgetops.

Technology and Material Culture

Technologically, the Sinkyone created artistic and functional basketry, clothing, and tools. Clothing was made of animal hides and was minimal with respect to ornamentation. Men, women, and children wore necklaces of beads, while women also wore bead anklets. Beads worn by individuals established their wealth status in the tribe. In the summer, women wore buckskin. After puberty, women wore a twined basket hat (Nomland 1935). Men and women wore their hair long, with men tying it back with buckskin ties while women secured their hair in two braids. Women pierced their ears, and men pierced the septum of the nose; both used woodpecker plumage as decorations. A red pigment applied with sharp fish or bird bone was used to tattoo both men and women. Men would tattoo vertical lines on the chin or a single line, emanating from the rhinorrhea groove, as well as patterns on their arms and torso (Kroeber 1925; Nomland 1938).

HISTORIC CONTEXT

The historic era began at different times throughout California, as Euro-Americans moved into regions occupied by indigenous populations that had been severely affected by waves of Old World diseases that preceded the settlers. Subsequent government policies and ad hoc vigilante efforts by settlers led to forced removals and violence toward local indigenous communities, resulting in new, mostly immigrant communities embedded in the new economies of ranching, timber harvesting, and farming.

It is unclear which European explorer first reached the area of Humboldt County, but it is purported to be Alonso de Arellano, who deserted Father Andrés de Urdaneta's expedition of the coastline in 1565. Other explorers are thought to have reached Cape Mendocino (30 miles northwest of the study area) throughout the latter half of the 16th century, but true exploration of the area did not begin until the 1840s, when a steady stream of Americans began entering California (Kyle 2002). The onset of the Gold Rush in 1848 brought a torrent of people over the Sierra Nevada and into California, and although gold was scarce in the mountains around the Eel and Trinity

rivers, the valleys in the area were ideal for raising livestock. After the gold discovered in the Trinity Mountains was diminished, settlers began to move west to the coast (Clarke Historical Museum 2001). Clashes with local tribes were frequent, and thus in 1853, the U.S. Army ordered construction of Fort Humboldt (near present-day Eureka). Local wars with the tribes continued into the 1860s, until the Hoopa Valley Indian Reservation was established in 1864 and tribal members were forced to relocate there (Kyle 2002).

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848, and California achieved statehood in 1850. Humboldt County was established in 1853 from a portion of Trinity County, and in 1876, a portion of Klamath County (no longer extant) was added to its territory (Kyle 2002). Small towns slowly were established throughout the county, with settlers attempting to combat the rugged environment. Local communities were established in the project area toward the end of the 19th century, with focus on cattle and logging in the southern portion of Humboldt County.

Scotia

Originally known as Forestville, Scotia was founded in 1884 as a company town for Pacific Lumber Company (PALCO), which was incorporated in 1869 (Kyle 2002; TBA West 2007). PALCO began logging operations in 1882, following the incorporation of the Humboldt Bay and Eel River railroads to transport its lumber to Fields Landing. By 1885, PALCO had constructed its own rail line between Scotia and Alton (TBA West 2007). In 1888, PALCO's Mill A in Scotia was fully operational and at least 150 men were working for the company. With increased lumber activity at the turn of the century, PALCO placed Mill B into operation in 1910, making the company the operator of two of the largest sawmills in the world (Nolte 2001). The town grew as logging efforts increased, and during the 1910s and 1920s, houses, a hospital, and several community buildings were constructed (The Town of Scotia History 2018).

Logging production remained steady throughout most of the 20th century until the 1970s. In 1970, California enacted CEQA, and in 1973, the Forest Practice Act was passed, requiring lumber companies to provide timber harvest plans to the state. These new regulations brought logging and lumber harvesting to the forefront of environmental rights groups, and in the 1980s, PALCO agreed to conserve 7,000 acres of redwoods for 50 years and practice sustainable logging (TBA West 2007). In May 2001, PALCO shut down Mill B and ceased the harvest of old-growth redwood and Douglas-fir trees (Nolte 2001).

PALCO filed for bankruptcy in 2007 and sold its entire holdings to Mendocino Redwood Company in 2008. The name of the company was changed to Humboldt Redwood Company and it continues logging operations in Scotia today (*Los Angeles Times* 2008).

Eel River Communities

The Eel River was the third largest watershed in California and access to it contributed to the creation of several small towns throughout Humboldt County. The town of Shively was founded as a settlement for mill workers and loggers and named for William R. Shively, a settler who came to California from Ohio in 1852 (Gudde 2010). It is situated 10 miles southeast of Scotia on the banks of the Eel River below Shively Ridge. Deeper in the mountains on the eastern side of the study area, Bridgeville was founded in the 1870s by miners who moved north to discover more gold. Always secluded, it went little noticed until the entire town was auctioned off on eBay in 2002 (Nieves 2007). The agricultural community of Ferndale was founded around 1852 in the Eel River Valley in

the shadow of the Bear River Ridge, which separates the Eel River and Bear River valleys. Focused primarily on dairies, it remains an area dominated by cattle and the dairy industry (Kyle 2002).

Land on Bear River Ridge has alternately been used for private grazing or logging since the 1850s (Mad River Biologists 2008). Land on the southern side is ranch land, while Humboldt Redwood Company actively harvests lumber on the north side of the ridge. Examples of localized aggregate and soil extraction also are found across the area, which has resulted in shallow pits throughout the project area. Research has not identified a specific use, but these pits likely were borrow pits used for personal road surfacing. With new environmental regulations and decreasing forest area in the late 20th century, southern Humboldt County began to see a decrease in population and economic viability. In 2008, a study was undertaken for a potential wind farm on Bear River Ridge, with plans eventually abandoned in 2012 because of the high cost to transport and construct the wind turbine generators (WTGs) (*The Times-Standard* 2012).

Bear River Ridge Ranching

The Bear River Ridge and Valley was important to the development of Humboldt County's dairy industry. This area has served as the proving ground for many of the dairies that still operate today across Humboldt County. The study area is a small segment of a much larger valley, with many of the notable dairy and ranch properties located farther to the east. Joseph Russ and his descendants played an important role in the development of the region and the county. The family owned numerous properties, most of which were leased to tenants. Fern Cottage, located near Ferndale, has the greatest association with the family, as they lived at the home from the mid-1860s onward. Based on the *Humboldt Wind Energy Project Bear River Ridge Historic Context and Landscape Study, Humboldt County, California Report—Addendum* prepared for this project (Stantec 2019a), the Bear River Ridge and Valley is assumed eligible for the California Register of Historical Resources (CRHR) as a rural historic landscape and is considered a historical resource for purposes of CEQA. See Figure 3.6-1 for the historic landscape boundary.

CULTURAL RESOURCES STUDY METHODOLOGY AND FINDINGS

Cultural resource investigations for the proposed project have consisted of a staged approach that has included pre-field research, field surveys, resource documentation, and Native American consultation. All aspects of the cultural resource study were conducted in accordance with the federal *Secretary of the Interior's Guidelines for Identification of Cultural Resources* (48 Code of Federal Regulations 44720–44723) and the California Office of Historic Preservation's *Instructions for Recording Historical Resources*.

Records Search

Before field surveys were performed, a records search was conducted by the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) on June 20, 2018 (NWIC File No. 17-2847), to obtain and review previous cultural resource records, cultural resource studies, and any additional documentation pertaining to properties within 0.25 miles of the project site. The records search included reviews of sites listed in the CRHR, California Historical Landmarks, and other government-designated cultural resource sites, as well as a review of information center maps and files of the findings of previous cultural resource surveys that have been conducted in the project area. In addition to the records search at the NWIC, historical maps, aerial photographs, and literature were reviewed, to determine past land use activities in the project area that could indicate the likelihood of encountering cultural resources.

Previous Investigations and Recorded Cultural Resources

The records searches conducted before the field investigations documented in the cultural resources reports prepared by Stantec (2018a, 2019b) indicated that six archaeological resources have been identified previously in the project area, and an additional 53 resources are within a 0.25-mile radius. A total of 211 investigations and inventories have been conducted in the project area, and another 98 are within a 0.25-mile radius.

Table 3.6-1. Previously Recorded Archaeological Resources in the Project Area

Primary Number	Trinomial	Description
P-12-000212	CA-HUM-187	Multicomponent site, lithic scatter, and habitation debris
P-12-000918	CA-HUM-996H	Bridge Creek railroad grade
P-12-002351	N/A	Prehistoric lithic scatter
P-12-002352	N/A	Prehistoric lithic scatter
P-12-002827	N/A	Brushy Monument Timber Harvest Plan fence lines
P-12-003314	CA-HUM-1554	Prehistoric lithic scatter

Source: Search by Northwest Information Center of the California Historical Resources Information System in 2018

Previously Identified Cultural Resources in the Project Area

P-12-000212 (CA-HUM-187)

The site was first documented in 1956 by archaeologist James Bennyhoff. Bennyhoff did not physically visit the resource; however, the original site record documents projectile points of chert and obsidian, hopper mortar bases, and midden. As part of a Humboldt State University archaeology field course, Larry Weigel visited the site in 1975, noting the presence of surface artifacts including projectile points and hopper mortars. In his notes, Weigel postulated that this may be the ethnographic village *bok-ki-ki-ya*, reported by Goddard (unpublished notes reported in Baumhoff 1958).

In 2009, archaeologist Michael Darcangelo revisited the site vicinity for a California Department of Transportation (Caltrans) inventory of rural highways. Darcangelo noted no evidence of artifacts or site deposits within the Caltrans right-of-way along State Route 36 (immediately south of the project area).

In 2010, a backhoe excavated six trenches to determine whether any intact cultural resources were present in an area proposed for a 115-foot by 160.5-foot expansion of the existing substation within the boundaries of CA-HUM-187. This subsurface investigation revealed disturbed soils to a depth of about 12–16 inches below surface, where six chert flakes were recovered from disturbed soils in Trench 1. Intact soils are present below a depth of about 16 inches. No cultural materials were identified in intact strata. Mechanical trenching was successful in verifying that (1) cultural materials are present within the disturbed layer, and (2) no intact cultural resources associated with CA-HUM-187 are present in the project area (DeGeorgey 2010).

A 2011 update conducted by Cardno Entrix was based on observed surface artifacts and midden soil. It included three loci containing lithic debitage, projectile points, and portable mortars. In addition, lithic scatter is continuous across the site, in varying intensities. The site also contains historic components, including house and cabin sites. The 2011 update also noted impacts from construction of the Caltrans yard, a Pacific Gas and Electric Company (PG&E) substation, residential use, and artifact looting (Browning 2011). In addition to conducting surface

observations, Browning collected information on artifacts and their locations from individuals who inhabited some of the buildings that surrounded the Caltrans yard and PG&E substation.

For a proposed replacement of the bridge at Little Larrabee Creek and the Van Duzen River, Van Bueren (2018) and Baxter (2019) conducted an archaeological inventory that included excavation of site test pits in the southern portions of the site. Van Bueren excavated nine site test pits within or immediately adjacent to Browning's site boundary southwest of the Caltrans workyard and north of the highway. Van Bueren (2018) summarized the results of the test pit excavation as follows:

Farther west, in Locus 1, there is a mixture of prehistoric debitage, a possible hand stone, and historic-era items mainly confined to the upper 40 cm [centimeters]. An extensive scatter of historic-era items is on the ground surface including colorless and amber bottle glass, modern sanitary cans of various types including a Folgers three-pound coffee and a one-gallon cylindrical juice can, portions of a precast concrete sink, iron hardware, wire nails, and modern plastics.

These excavations occurred in Browning's Locus 1 and indicate a shallow mixed deposit of a few prehistoric artifacts and a larger assemblage of historic-era and modern refuse. Neither Van Bueren nor Baxter proposed changes to Browning's site boundary and both refer to that record as the most comprehensive site record to date, excluding the results of Van Bueren's extended Phase 1 testing.

On August 23, 2018, Stantec archaeologists confirmed the location of the site. The site appears to be in the same condition as reported in the 2011 update. All loci previously identified were found. Artifacts observed at Locus 2 included two burgundy Franciscan chert cores, a burgundy Franciscan chert biface, and black, white, and burgundy chert reduction flakes. Locus 1 was accessed on private property. Buildings that originally were identified appear to be in various stages of decay.

In a memo dated March 14, 2019, Stantec concluded that the excavations conducted by DeGeorgey in 2010 within the footprint of the proposed substation expansion did not identify archaeological deposits that meet the criteria for including that portion of CA-HUM-187 in the CRHR. However, because of the potential for encountering intact archaeological deposits during ground-disturbing activities, they recommended that a professional archaeologist and Native American tribal representative monitor any ground-disturbing activity associated with the project to identify and recover any cultural resources and/or human remains that may be uncovered during project construction. Based on previous surface and subsurface investigations, there is a moderate to low potential for the existence of buried archaeological deposits within the proposed project footprint. Project development, including improvements at the Bridgeville Substation and construction of the transmission line, has a moderate to low potential to affect surface and subsurface archaeological deposits.

P-12-000918 (CA-HUM-996H)

This site was originally recorded in 2002 by Mitchel Hunt as part of a timber harvest plan. At that time the site was described as a linear feature with a small gauge rail bed prism and associated artifacts. The 2018 update noted remnants of the railroad grade, including sections of terraced rock that was visible in areas where water and wind erosion carved cavities in the gravel road bed. The western extent of the grade ended in an area that was 32 feet north/south by 48 feet east/west. The termination point and adjacent corridor were surrounded by thick vegetation from a mixed evergreen forest with redwood and Douglas fir trees as well as ferns and blackberry bushes.

Extending east downslope away from the western termination point, the corridor undulated between 12 and 18 feet in width, with slopes increasing from 2.3 to a 6 percent grade. The grade appeared to continue east along Shively Ridge Road for 0.09 mile, and then lose visibility in dense vegetation from the surrounding forest. Multiple survey routes were taken to define the eastern extent of the grade contouring Shively Ridge, but only a segment, 0.11 mile long, was found in the more densely vegetated and steeper eastern corridor. Soils were the same as the original recordation of the site, and no associated artifacts observed during this revisit.

A low possibility exists for archaeological deposits associated with this feature. However, a large portion of the linear feature parallels the proposed route to the transmission line.

P-12-002351

This site was originally recorded in 2010 as a chert flake scatter (n =14), with no evidence of being worked (i.e., produced by humans). Stantec performed a site revisit of this prehistoric lithic scatter on July 16, 2018. Two artifacts were found during this revisit—a green cryptocrystalline (CCS) biface midsection fragment, and a brown CCS flake tool with evidence of utilization (i.e., edge damage caused by human use) on cutting margins—and three additional CCS flakes. The site had poor surface visibility because of dense grassy vegetation. All artifacts were recovered in rodent-generated dirt piles, with no soil change in the surface substrate.

Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits at this site. The site is within the right-of-way of a proposed access road and most likely would be affected by project implementation.

P-12-002352

This site was originally recorded in 1997 as a chert flake scatter with one worked chert flake. Stantec performed a site revisit of this prehistoric lithic scatter on July 16, 2018. One green CCS flake was rediscovered at the site. Additional resources were not observed, and approximately 85 percent of the site appears to have been disturbed by recent logging activities. A large debris pile currently is in the center of the site, not noted in previous recordings.

Based on the scarcity of artifacts identified at this location, previous ground disturbance, and boot scrapes employed during field recordation, a low possibility exists for subsurface archaeological deposits at this site. The site is within the right-of-way of a proposed access road and most likely would be affected by project implementation.

P-12-002827

This site was recorded in 2008 as three segments of historic-age fence line. Stantec performed a site revisit on segments of the Brushy Mountain Timber Harvest Plan fence line on July 2, 2018. Both segments were relocated, contouring the southern edge of Mount Pierce Lookout Road on Monument Ridge east of the intact fence line. The first segment, 30 feet east of the original fence line, consisted primarily of downed posts, still in alignment with the original fence line with baling wire still present around the posts. The second alignment was in a deteriorated condition, with only two downed posts in alignment with the original fence line.

A low possibility exists for subsurface archaeological deposits at this site. The fence line is approximately 100 feet from a proposed access road and most likely would be avoided through project design.

This site was originally recorded in 2010 as a dense scatter of Franciscan chert. Stantec was unsuccessful in relocating this site. The area has been heavily disturbed by off-road users and cattle use. In addition, the northern portion of the site is covered by heavy vegetation. The site possibly still exists in this area, but is covered by thick vegetation. As defined previously, the site is rather extensive, and the proposed access road may bisect the site.

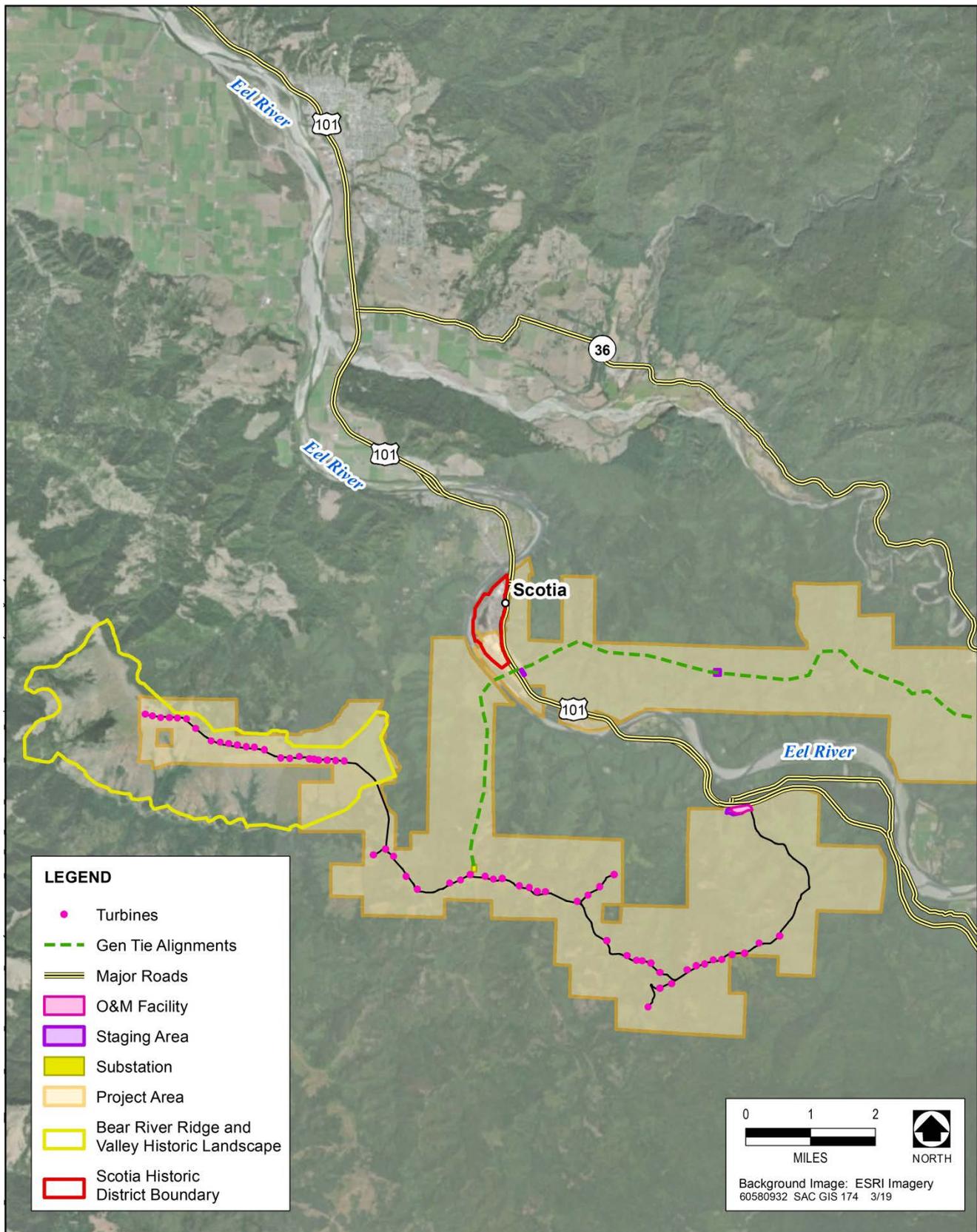
Scotia Historic District

Although outside the project site and the 0.25-mile records search radius, a potential historic district for the town of Scotia was identified in a 2007 historic resource report and evaluated using National Register of Historic Places (NRHP) evaluation criteria. It is a potential district because it meets certain of the eligibility requirements under the NRHP evaluation criteria; however, it has not been designated as a historic district in either the CRHR or the NRHP.

The potential historic district is significant under NRHP Criterion A for having the oldest surviving mill of its type still in lumber production and for association with development of the lumber industry in the United States and California and its adaptation to the economic, environmental, and social factors in terms of its settlement and the industrial production that occurred at various times during its period of significance (1896 to 1959). The historic district also was found to be NRHP eligible under Criterion B for its association with PALCO President Albert Standwood Murphy, who was associated with the town of Scotia for 50 years, beginning in 1931. The potential district also possesses architectural significance and was evaluated as eligible under NRHP Criterion C. The building types in Scotia are mostly traditional structures that reflect lumber mill operations and production, as well as associated residential, commercial, recreational, and other uses, and the components of Scotia's cultural historic landscape vernacular were found to collectively contribute to its significance. The potential Scotia historic district also embodies distinctive architectural types, methods of construction, and technical innovations, which reflect the town's evolution. Three hundred nine (309) of 341 historic-age resources within the potential district boundaries were identified as contributors to the historic district, and the district appeared to retain sufficient historic integrity of location, design, setting, materials, workmanship, feeling, and association to define the town's physical integrity.

The 2007 study also identified Scotia's abundance of forested areas in the immediate vicinity as a character-defining feature of its setting that is significant with regional and statewide importance. Scotia is the last company-owned town of its kind in California. Character-defining features of the setting within the historic district boundary include streetscape elements, such as sidewalks, lighting and utility elements, fire hydrants, retaining walls, continuous picket fences, trees, signage, as well as various industrial, residential, commercial, institutional, recreational, and landscape components. These features are within walking distance of each other, creating a pedestrian-friendly atmosphere (TBA West 2007). The environmental setting of Scotia as a working community adjacent to the Eel River and distant from more urbanized areas (such as Eureka) is also a contributing element to the town's distinctive identity, and it retains its feeling as a secluded early 20th century company town.

Based on the findings of the 2007 report, the Scotia historic district is considered to be a historical resource for the purposes of CEQA. The Scotia historic district boundary is shown in Figure 3.6-1.



Source: TBA 2007, Terra-Gen Development Company 2019

Figure 3.6-1. Scotia Historic District Boundary and Bear River Ridge and Valley Historic Landscape

Field Survey

Between July 7 and August 23, 2018, Stantec archaeologists conducted a pedestrian field survey of the proposed WTG locations, access roads, the right-of-way for the generation transmission line (gen-tie), and the location of the proposed Bridgeville Substation. Stantec archaeologists surveyed a 152-meter (500-foot) radius around proposed representative WTG locations and a corridor 152 meters (500 feet) wide around project roads and electrical collection lines (76 meters [250 feet] on either side of the centerline). Stantec archaeologists surveyed an area 152 meters (500 feet) wide around proposed staging and temporary impact areas. Furthermore, Stantec archaeologists surveyed a corridor 60 meters (200 feet) wide around the electrical collection line and the gen-tie (30 meters [100 feet] on either side of the centerline). No subsurface testing was undertaken during this survey. Areas with limited ground visibility were inspected by a combination of visual inspection of rodent burrows, road cuts, and periodic removal of vegetation cover by the surveyors (done at a frequency of about every 25 meters on a given transect).

The project area encompasses 2,240.71 acres of private property. The entire project area was subject to analysis as part of this inventory. The majority (1,755 acres or 78 percent) of the project area was inventoried by archaeologists walking linear transects at an interval not more than 15 meters apart. Areas of extreme slope (defined as greater than 35 percent) or impassable vegetation were considered to be unsafe to inventory at the set transect interval. These areas (totaling 485.71 acres or 22 percent) were inventoried by walking established safe paths downslope, where possible, and inspecting adjacent areas visually. If the crew encountered topographical features considered sensitive for cultural resources, such as springs, drainages, or rock outcrops, those features were inspected thoroughly by the individual encountering them when it was judged safe to do so.

A field investigation of the proposed transportation route was conducted on March 21, 2019. The investigation covered the transportation route's six separate locations: Fields Landing, Depot Road, Visitor Center Slip Ramp (Hookton Road Overpass), Visitor Center Onramp (Hookton Road Overpass), Dinsmore Drive Slip Ramp (12th Street Overpass), and Riverwalk Drive Onramp (12th Street Overpass).

Native American Consultation

A sacred lands search was requested by Stantec from the Native American Heritage Commission (NAHC) on September 6, 2018. The purpose of the search was to ascertain whether additional resources or locations exist that may be of importance to Native Americans who traditionally have resided in the project area. On September 7, 2018, the NAHC responded, stating that a review of its files yielded negative results. The NAHC also provided the contact information for the Big Lagoon Rancheria, the Hoopa Valley Tribe, the Bear River Band of the Rohnerville Rancheria, the Wiyot Tribe, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria, who may have additional information. Letters were sent to these tribes on September 11, 2018.

As of November 2, 2018, one response had been received. The Cher-Ae Heights Indian Community of the Trinidad Rancheria responded by letter on October 23, 2018. The letter stated that the tribe has no interest in further consultation but would like a copy of the final report. Follow-up phone calls were made on November 5, 2018; a call log is provided in Appendix A of the *Humboldt Wind Energy Project Cultural Resources Phase 1 Inventory of 2,240.71 Acres, Humboldt County, California Report*.

Humboldt County (County) initiated Assembly Bill (AB) 52 consultation via letter on July 13, 2018, with the Big Lagoon Rancheria, the Hoopa Valley Tribe, the Bear River Band of the Rohnerville Rancheria, the

Wiyot Tribe, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria. This letter served as a formal invitation to the tribes to consult with the County regarding the conditional use permit application for the proposed Humboldt Wind Energy Project, pursuant to Public Resources Code (PRC) Section 21080.3.1. In an e-mail message dated July 13, 2018, Erika Cooper, Tribal Historic Preservation Officer with the Bear River Band of the Rohnerville Rancheria, accepted the invitation. In a message dated July 13, 2018, Ted Hernandez, Cultural Director with the Wiyot Tribe, also accepted the invitation for consultation. Mr. Hernandez also stated that the Wiyot Tribe has concerns about the project and locations of project sites.

As part of the County's AB 52 tribal consultation efforts and as requested by the Bear River Band of Rohnerville Rancheria and the Wiyot Tribe, these tribes were provided with a copy of the Cultural Resource Phase I Inventory Report on December 12, 2018. A follow-up notice was sent to the tribes on January 15, 2019. On Wednesday, February 13, 2019, a meeting was held with the Tribal Historic Preservation Officers of the Wiyot Tribe and the Bear River Band of the Rohnerville Rancheria. The primary concerns identified pertained to ethnobotanical landscapes, the possible future release of condors in Humboldt County, and how to address important archaeological sites. A follow-up meeting with the Bear River Band was held on Friday, February 22, 2019. Government-to-government tribal consultation was held between the County and the Wiyot Tribal Council on March 25, 2019.

The Wiyot Tribe followed up with a letter dated March 29, 2019. This letter outlined three issues of importance to the Wiyot Tribe that the Tribe believes would result in significant unavoidable impacts on the natural and physical environment:

- ▶ Bear River Ridge, known as *Tsakiyuwit*, is a defining feature of the large Wiyot cultural landscape, the southern boundary of Wiyot ancestral territory (Figure 3.6-2), and a coastal prairie that supports numerous ethnobotanical resources critical to the survival and cultural of the Wiyot people.
- ▶ In a separate document (*Wiyot List of Plant Species of Environmental and Cultural Concern*), the Wiyot Tribe provided a list identifying ethnobotanical plant species, including 27 species that can be found in a coastal prairie environment, and the area that the Tribe has identified as an ethnobotanical area (Figure 3.6-2). Evidence of ethnographic use of the ridge is further supported by the presence of the prehistoric sites P-12-0314, and HUM TG-02, and isolated milling tools. Old-growth Douglas Fir trees provide further evidence of the prehistoric use of fire in the management of the biological environment, including Siskiyou checkerbloom, tarplant (*hushurawu'n*), and tanoak.
- ▶ Tribal elders indicated that Bear River Ridge was most likely used as a high prayer spot. In summary, the Wiyot believe that Bear River Ridge qualifies as a tribal cultural resource and that impacts associated with the placement of "sixty 500 foot-tall wind turbines would alter the spiritual and sacred view shed of the Wiyot cultural landscape."

Government-to-government tribal consultation was held between the County and the Bear River Band of the Rohnerville Rancheria Tribal Council on March 26, 2019. The AB 52 consultation process has concluded with both tribes.

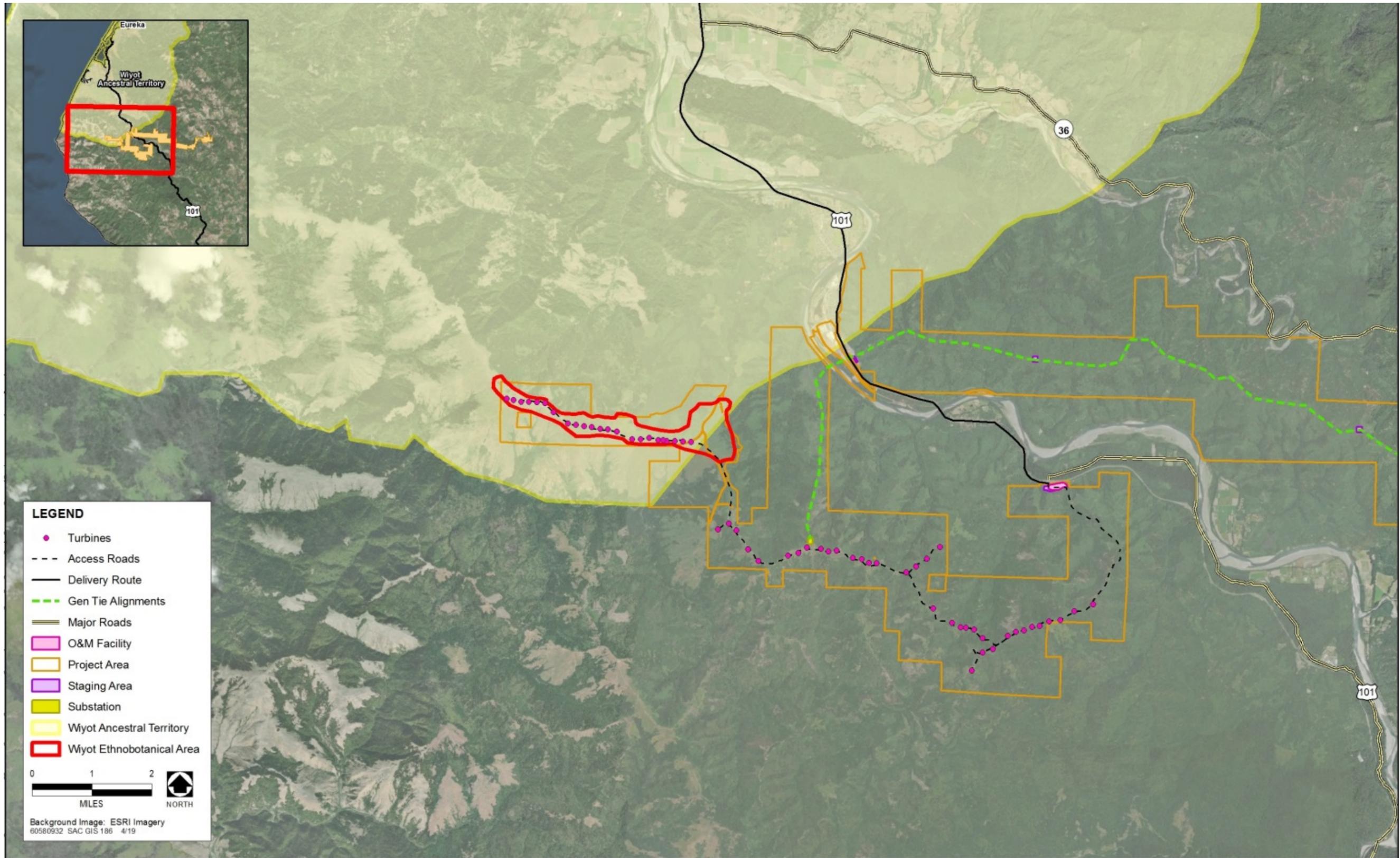


Figure 3.6-2. Wiyot Ancestral Territory Boundary and Bear River Ridge Ethnobotanical Area

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Survey Findings

An intensive reconnaissance-level pedestrian field survey of the project area, including the proposed transportation route, resulted in recordation of 21 newly discovered archaeological sites (16 prehistoric resources, four historic-age resources, and one multi-component resource) and two built environment resources. In addition, Stantec cultural resources staff identified and recorded 20 isolated artifacts and features, and also revisited and updated the six previously recorded resources.

HUM TG 01

This site has a large gravel quarry, 0.25 mile south of the junction of Lone Star Ranch Road and Bear River Ridge Road. It is a large gravel mound that has been reduced by removal of the gravel. The north-facing rim is the highest point and may be the original height of the mound. The southwestern edge is below road level. The quarry encompasses an area measuring 2180.08 feet, with an approximate height of 25 feet. The raised berm edge measures approximately 107 feet long. This resource is present in the 1956 historic aerial, labeled as “gravel pit” (Historic Aerials 2018). No identified artifacts are associated with this cultural feature. It was likely used for local road maintenance. A low possibility exists for subsurface archaeological deposits at this site. This site would be less than 100 feet from a proposed project access road. However, it may be avoided by project design.

HUM TG 02

This site has moderately dense lithic scatter on top of a small knoll, with a full solar aspect and a slope of less than 10 degrees. The scatter includes approximately 50 chert flakes, with a maximum density of five artifacts per square meter. Four tools were identified, including a Tuluwat Barbed projectile point with broken tip and barb. Tuluwat Barbed projectile points date to 1,000–200 years Before Present (B.P.) (Justice 1995). The site measures 265 meters east/west by 165 meters north/south. Based on the high volume of prehistoric resources within the site boundary, a potential exists for buried archaeological deposits at this site, and it is possible that this site extends beyond the recorded boundaries. This extensive site would be bisected by the proposed access road and a proposed WTG.

HUM TG 03

This site has a large gravel quarry at the junction of Bear River Ridge Road and Rim Road. It is a large gravel mound that has been reduced by removal of large amounts of gravel. The north-facing rim is the highest point and may be the original height of the mound. The southwestern edge is below road level. The quarry has not been used recently, and therefore native grasses have covered approximately 90 percent of the quarry. The quarry encompasses an area measuring 2,180.08 feet, with an approximate height of 25 feet. The raised berm edge measures approximately 115 feet long. This resource is labeled as “gravel pit” on topographic maps and has been present since at least 1956 (Historic Aerials 2018). A low possibility exists for subsurface archaeological deposits at this site. This site would be adjacent to the proposed access road, and avoidance by project design may not be feasible.

HUM TG 08

This site has prehistoric lithic scatter consisting of three secondary-thinning CCS flakes. The flakes were found within 8 meters of each other on a grassy knoll in between two east/west trending access roads on a mild, downhill slope. The site is on the northern side of Monument Ridge, southeast of a barn approximately

180 meters away. The site is 12.99 meters north/south by 10.58 meters east/west. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits at this site. This site would be adjacent to the proposed access road, and avoidance by project design may not be feasible.

HUM TG 09

This site has prehistoric lithic scatter on the northern side of Bear River Ridge. Artifacts include 20 flakes: 19 CCS flakes of various colors (e.g., white, brown, aquamarine, and mottled opaque green) and one dark grey, fine-grained basalt flake. The site measures 54.69 meters north/south by 93.28 meters east/west. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits at this site. This site would be approximately 500 feet from a proposed WTG and access road.

HUM TG 10

Located on a gently sloping grassy hillside, the site has two possible historic-age mining features on the northern side of Bear River Ridge Road. The features measure 25 feet north/south by 15 feet east/west. Feature 1 includes a large depression measuring 16.5 feet north/south by 15.5 feet east/west by 4 feet deep, with a small adit to the south, measuring 2 feet by 3 feet in diameter, and a second possible shaft on the northern side of the first shaft. Feature 2 is a circular air shaft on the southeastern end of Feature 1, measuring 52 inches north/south by 58 inches east/west. A low possibility exists for subsurface archaeological deposits at this site. This site would be approximately 100 feet from a proposed access road, but most likely could be avoided by project design.

HUM TG 11

This site has one historic-age feature. The feature is a shallow hand-dug water conveyance ditch, extending north-northwest from the northern edge of the access road on Monument Ridge. The ditch terminates downhill in a grassy meadow and may have originated beneath the canal road; no useable culvert exists at the road edge. The ditch is 2,095 feet long, 81 inches at the top opening, 20 inches at the bottom opening, and 1.5 feet deep. This ditch is present in the 1956 historic aerial (Historic Aerials 2018). No other features or cultural constituents are in the vicinity of this resource. This ditch may be used to divert water from seasonal drainages north of it. A low possibility exists for subsurface archaeological deposits at this site because they are water conveyance systems and typically are not used for other purposes. This site would be directly adjacent to a proposed access road, and project design to avoid it may not be feasible.

HUM TG 12

This site has prehistoric lithic scatter adjacent to a small drainage on the southern side of the access road on Monument Ridge, within the Russ Ranch property boundary. The material consists of white, grey, and brown CCS flakes. This site measures 22.84 meters north/south by 40.41 meters east/west. Based on the topography and density of the artifacts, subsurface archaeological deposits possibly exist, associated with this site. A proposed WTG would be approximately 200 feet from this location but could be avoided by project design.

HUM TG 16

This site has a prehistoric lithic scatter on a flat meadow with low grasses. The northern portion of the site is under power lines. Visibility on-site is limited. All artifacts were found in disturbed soils and rodent dirt piles. Artifacts included eight CSS flakes of various colors (two green, three brown, one light green, one brown/dark grey mottled core reduction flake, and one white). The site measures 66.12 meters north/south by 43.23 meters east/west. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be approximately 100 feet from the centerline of an access road and 250 feet from a WTG, but most likely would not be affected by project implementation.

HUM TG 17

This site has small lithic scatter consisting of three chert flakes and is on the southern slope of Mt. Pierce Lookout Road. The artifacts were found in a disturbed context, with three small green CCS flakes next to a spur road and in an area of pushed-up road gravel. The site measures 9.31 meters north/south by 5.28 meters east/west. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be approximately 100 feet from the centerline of an access road and 250 feet from a WTG, but most likely would not be affected by project implementation.

HUM TG 18

This site has prehistoric lithic scatter on a graded section of a short, north/south trending spur road on the northern side of an east/west trending segment of Mt. Pierce Lookout Road. Artifacts are dispersed across the site, situated in a small clearing surrounded by a redwood and Douglas fir forest. Artifacts include more than 10 CCS flakes in various colors (mottled grey, green, red, and mottled white), as well as one mottled white-brown biface fragment and one foliate-shaped grey CCS projectile point (possibly a cottonwood leaf projectile point), at the southern end of the site boundary, in the road. The possible cottonwood leaf projectile point dates to 900–200 B.P. (Justice 1995). This site measures 68.09 meters north/south by 7.29 meters east/west. Based on the density and diversity of artifacts at this site, a possibility exists for subsurface archaeological deposits. The site would be within the right-of-way of a proposed access road and most likely would be affected by project implementation.

HUM TG 22

This site has low-density prehistoric lithic scatter (more than five per square meter), 20 meters south of a spur road. Artifacts include one small interior white mottled CCS flake with possible utilization, one medium-sized interior mahogany and green striated CCS flake with a utilized edge along the curved margin of the flake platform to distal end, and one large exterior mottled grey-green mahogany formed flaked tool. Both margins of the tool show pressure flaking scars, the tool appears to be heat-treated because a pot lid scar is present on the tool face, and the cortex remains are present on a striking platform. The site measures 50 cm by 50 cm. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be directly adjacent to a proposed access road and less than 100 feet from a proposed WTG.

HUM TG 23

This site has low-density prehistoric lithic scatter (more than five per square meter) and is 20 meters south of a spur road. Artifacts include one large exterior red CCS flake, one small interior grey CCS flake fragment, and one white quartzite flaked tool with a cutting edge. Additional lithic artifacts were identified within 10 meters east of the initial find, approximately 5 meters south of the road corridor. A second scatter is on an exposed gravel surface, surrounded by a thick layer of herbaceous plants. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be approximately 100 feet from the centerline of a proposed access road.

HUM TG 24

This site has lithic scatter in and around the margins of a logging equipment/log storage area and possible log landings on the northern and southern sides of the ridge. Historic-age clearing and grading appear to have affected the distribution of some resources (e.g., hammer/anvil stone found in bladed push pile); however, lithic artifact density is highest in the northeastern portion of the surface scatter, closest to the natural grade of the adjacent ridgeline to the east/northeast. The proposed road realignment may affect relatively more intact portions of the site, if the cultural deposits continue upslope into the thickly vegetated area east/northeast of the surface lithic scatter. The site measures 41 meters north/south by 25 meters east/west. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site could be directly adjacent to a proposed access road.

HUM TG 25

This site has small historic debris scatter along the southern side of the possible log landing above the adjacent ravine/slope. Ground surface visibility in this site area generally is poor (less than 10–20 percent), with moss, needle duff, and leaf cover. The debris scatter is on a slope (approximately 10 degrees) under a canopy of second growth and planted/thinned Douglas fir trees. No evidence of recent disturbance exists at this site. Artifacts include rifle shell casing (center fire, “Peters 25-20 HV”); a clear glass jar base with the production mark “Duraglass” (written in cursive script) around the bottom of the side edge, a star pattern around the outside edge of the base, stippling across the base, and an Owens Illinois production mark; a ceramic cup side and rim fragment with a pattern; a brown glass beer bottle with a seam across the crown lip, with a base production mark on center of base; and a marine clam shell valve (large and complete). The Owens Illinois production mark indicates a production date of 1944 (Lindsey 2018). The base production mark on the brown bottle possibly indicates a 1944 manufacture date (Lindsey 2018). A low possibility exists for subsurface archaeological deposits. The site would be approximately 200 feet from the centerline of a proposed access road.

HUM TG 26

This site has small lithic debitage scatter in a 2-meter area on the northern side of the existing access road. The site is along the ridge crest between two small knolls. Surface visibility is limited outside the bladed corridor, approximately 10–20 percent in grassy areas and zero percent in adjacent wooded and blackberry covered areas approximately 2 meters north of the lithic debitage. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be along the centerline of a proposed access road, within the road.

HUM TG 27

This site has a green CCS interior flake (in three fragments), exposed in the surface of a graded logging access road that is bladed into native sediments. Local sediments are silty with fine sand-size grains. The site is on south/southeast facing slope above a landing. Additional debitage (n=2) is along the southern side of the same roadway at the downslope side of a surface runoff diversion berm, and one edge-modified flake is approximately 3 meters north of the road cut. Site HUM TG 27 measures 24 meters northeast/southwest by 10 meters northwest/southeast. Based on the scarcity of artifacts identified at this location, previously disturbed soils, and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be approximately 250 feet from the centerline of a proposed access road, but most likely would not be affected by project implementation.

HUM TG 28

This site has lithic scatter with a projectile point base, flaked cobbles, and debitage along a bladed cut, along the southeastern side of the ridge. The bench is relatively flat, and the site is along the edge of the bench, overlooking the river valley. Artifacts include a flaked cobble (with steep unifacial edge, possibly for heavy plant processing, such as wood/bark stripping). A surface drainage channel has been cut approximately 15–25 cm below the surface. Most of the artifacts are associated with spoils from this linear cut and the adjacent bladed roadway. The site measures approximately 35 meters north/south by 8 meters east/west. Based on the density and diversity of artifacts, a possibility exists for subsurface archaeological deposits. The site would be approximately 100 feet from a proposed WTG.

HUM TG 29

This prehistoric site has two lithic concentrations. The site is along a north/south trending fence line in a slightly wooded area with a gradual south/southwest trending slope. At the southern edge of the site is a remnant two-track access road that runs east/west on the northern side of a steep ravine. At the southwestern corner of the site is the fence line corner, which bends at 90 degrees and runs west, contouring the dual track downhill from the site. Ground visibility is poor, with dense grasses and leaves. The site would be directly adjacent to a proposed WTG, and therefore would be affected by project implementation.

Lithic Concentration #1

Lithic concentration #1 measures 10 meters east/west by 20 meters north/south, and is on the south/southwest side of the site, near a two-track road and corner of a fence line. The artifacts consist of one possible mahogany CCS core, one small interior red and white CCS flake, one small interior black and blue mottled CCS flake, and one small interior blue and white mottled CCS flake. Additional artifacts found on the western side of the fence line, on an exposed boulder with one large gray interior simple flaked tool, one small red interior CCS debitage fragment, one small black interior CCS flake fragment, one small white interior CCS flake fragment, and one red/green/white core tool. The site is located on eastern Monument Ridge, adjacent to a proposed WTG location.

Lithic Concentration #2

Lithic concentration #2 measures 4 meters east/west by 10 meters north/south, and is north of concentration 1. All artifacts were found in exposed soils or in the eroded surface of the slope. The artifacts included one large black interior CCS flake one small blue/aqua interior CCS flake fragment, and one small white interior quartzite flake

fragment. Based on the density and diversity of artifacts, a possibility exists for subsurface archaeological deposits. The site would be directly adjacent to a proposed WTG, and most likely would be affected by project implementation.

HUM TG 41

The site has five lithic concentrations of various flake types, materials, and tools, as well as one historic feature consisting of a Douglas fir tree stump with double-twist, double-pronged barbed wire wrapped around the overgrown trunk. The site is in a wooded area, in and around an east/west-trending access road with a mild downhill slope, which descends in a westward direction. Prehistoric artifacts are present in five lithic concentrations that begin in and continue along the east/west-trending road bed, tracking along a terrace that slopes downhill and to the west. The artifacts include CCS flakes, hand stones, hammerstones, and an obsidian biface. The site measures 107 meters northeast/southwest by 35 meters northwest/southeast. The site extends downslope in and around the east/west-trending two-track road. Steep ravines are on both the northern and southern sides of the survey area, and the site is primarily on the terrace that contours the high ground between the grades. The site extends down multiple terraces, terminating at a grassy knoll at the western extent of the project area. Based on the density and diversity of artifacts at this site, a possibility exists for subsurface archaeological deposits. The transmission line would bisect the site at two locations.

HUM TG 42

This prehistoric resource has two small lithic concentrations. The first concentration is on a ridgeline in a semi-open clearing within a conifer forest setting on a gentle southwestern-facing slope. The majority of artifacts are around a large tree stump on the lower edge of the slope. The second concentration is approximately 12 meters northwest (and downslope) of Locus 1. The site material consists of mottled brown/blue-grey chert, white chert, Franciscan burgundy colored chert, and quartzite. Based on the scarcity of artifacts identified at this location and boot scrapes employed during field recordation, a low possibility exists for buried archaeological deposits. The site would be directly adjacent to the proposed transmission line, but most likely could be avoided by project design.

Calvary Community Church

This church is located in a small field on the corner of Depot Road and Fields Landing Drive. Although it does not appear to be within the area of potential effects or the project area, an evaluation conducted by Stantec concluded that Calvary Community Church does not appear to meet the criteria for listing in the NRHP or the CRHR because of a lack of integrity and significance. The property was evaluated in accordance with Sections 15064.5(a)(2) and 15064.5(a)(3) of the State CEQA Guidelines, using the criteria outlined in PRC Section 5024.1, and does not appear to be a historical resource for the purpose of CEQA.

Calvary Community Church was recommended ineligible for listing in the NRHP or CRHR under Criteria Consideration A or Criterion 1 because the church is not recognized for its scholarly contributions, importance during an important theme in history, or significant traditional cultural values. Although the church has been an entity in Fields Landing since the 1870s and was the first church in town, it did not contribute to the settlement of the area. Settlers came to the area in search of coastal jobs and land to own, and the church was a fixture of town life. Every pioneer town at the time had its own church, so Calvary Community Church is representative of a

common theme in history. The church is not eligible for listing because it has not contributed to national, state, or local history in a significant fashion.

There is no evidence that Calvary Community Church has an important association with any person(s) who made significant contributions to history at the local, state, or national level. The land for the original church building was donated by Waterman Field, but the original building and location are no longer extant. In addition, Field was not a religious leader, and research did not reveal any notable figures specifically associated with the church or indicate the potential for significant associations in this regard. The church is recommended not eligible under NRHP Criteria Consideration A for Criterion B or CRHR Criterion 2.

Calvary Community Church was recommended not eligible for the NRHP under Criterion C or CRHR Criterion 3 because it is not an important example of any type, period, or method of construction and does not represent the important work of a master architect or engineer. The church was recommended not eligible as a source, or likely source, of important information regarding history, under NRHP Criterion D or CRHR Criterion 4. Although alterations were made to character-defining features, the church retains some aspects of integrity; however, the church lacks significance under all criteria and was therefore recommended not eligible for the NRHP or CRHR.

Fields Landing Boat Yard

The yard and dock are within the boundaries of the Fields Landing Boat Yard, a public boat yard owned and operated by the Humboldt Bay Harbor, Recreation, and Conservation District. Stantec (2019b) documented and assessed the yard, remaining docks, the repair building within the yard, a small office building within the yard, and two small buildings on the southern edge of the property for inclusion in the NRHP and CRHR. They recommended that the resources are not eligible for listing in the NRHP or CRHR under Criterion A or Criterion 1 because its previous use as a lumber dock and shipping yard was a minor component of the development of the lumber industry in Humboldt County and was not a key factor in the establishment of the town of Fields Landing, and because the boat yard and dock have not contributed to national, state, or local history in a significant fashion.

There is no evidence that the Fields Landing Boat Yard has an important association with any person or persons who made significant contributions to history at the local, state, or national level. The boat yard was designed for lumber shipping and storage by the Pacific Lumber Company. Research did not reveal any notable figures specifically associated with the yard or dock, and research did not indicate the potential for significant associations in this regard. Therefore, the boat yard was recommended not eligible under NRHP Criterion B or CRHR Criterion 2.

The Fields Landing Boat Yard was recommended not eligible for the NRHP under Criterion C or for the CRHR under Criterion 3 because it is not an important example of any type, period, or method of construction and does not represent the important work of a master architect or engineer. The yard and dock represent common architectural and engineering styles that have been used across the California coast and the nation for industrial shipping projects. The buildings currently in the yard are prefabricated shop structures and are not architecturally significant.

The Fields Landing Boat Yard is not recommended eligible as a source, or likely source, of important information regarding history, building materials, construction techniques, or advancements in architecture or engineering.

Such structures are well documented in the historic record and use common construction materials and techniques that would not be deemed significant under NRHP Criterion D or CRHR Criterion 4.

The Fields Landing Boat Yard retains integrity of location, setting, feeling, and association. However, it does not retain integrity of design, materials, or workmanship, as the original docks and buildings are gone, and the original materials and workmanship are no longer associated with the property. Alterations were made to character-defining features of the original Pacific Lumber Company Yard and Dock. Despite retaining some aspects of integrity, the Fields Landing Boat Yard lacks significance under all criteria and is therefore not eligible for the NRHP or CRHR.

3.6.2 REGULATORY SETTING

STATE PLANS, POLICIES, REGULATIONS, AND LAWS

California Environmental Quality Act

CEQA includes provisions that specifically address the protection of cultural resources. CEQA requires consideration of impacts of a project on unique archaeological resources and historical resources. A unique archaeological resource, as defined in PRC Section 21083.2(g), is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, a high probability exists that it:

- ▶ contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- ▶ 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.

Section 15064.5(a) of the State CEQA Guidelines generally defines a historical resource as:

- (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR;
- (2) a resource listed in a local register of historical resources or identified in a historical resource survey meeting the requirements in PRC Section 5024.1(g); and
- (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines is historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record; or a resource determined by a lead agency to be “historical,” as defined in PRC Section 5020.1(j) or 5024.1.

California Register of Historical Resources

The CRHR includes resources that are listed in or are formally determined eligible for listing in the NRHP, as well as some California State Landmarks and Points of Historical Interest (PRC Section 5024.1; California Code of Regulations Title 14, Section 4850). Properties of local significance that have been designated under a local

preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA, unless a preponderance of evidence indicates otherwise (State CEQA Guidelines, Section 15064.5[a][2]). The eligibility criteria for listing in the CRHR are similar to those for NRHP listing but focus on the importance of the resources to California history and heritage. A cultural resource may be eligible for listing in the CRHR if it:

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

In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, the contractor or the project applicant immediately must halt potentially damaging excavation in the area of the burial and notify the County Coroner to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code, Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code, Section 7050[c]). Following the coroner's findings, the property owner, contractor, or project applicant, and the NAHC-designated Most Likely Descendant are to determine the ultimate treatment and disposition of the remains, and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting on notification of a discovery of Native American human remains are identified in PRC Section 5097.9.

ASSEMBLY BILL 52

AB 52, enacted in 2014, amends sections of CEQA relating to Native Americans. AB 52 establishes a new category of cultural resources, named tribal cultural resources (TCRs), and states that a project that may cause a substantial adverse change in the significance of a TCR may have a significant effect on the environment. Section 21074 was added to the Public Resources Code to define TCRs, as follows:

- (a) "TCRs" 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 TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique 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 requires the lead agency to begin consultation with any tribe that is traditionally or culturally affiliated with the geographic area. In addition, AB 52 includes the following time limits for certain responses regarding consultation:

- ▶ 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.
- ▶ After provision of the formal notification by the public agency, the California Native American tribe has 30 days to request consultation.
- ▶ The lead agency must begin consultation process within 30 days of receiving a California Native American tribe’s request for consultation.

REGIONAL AND LOCAL PLANS, POLICIES, REGULATIONS, AND ORDINANCES

The Conservation and Open Space Elements of the *Humboldt County General Plan* (Humboldt County 2017) include the following goals, policies, standards, and implementation measures related to cultural resources:

Goal CU-G1: Protection and Enhancement of Significant Cultural Resources. Protected and enhanced significant cultural resources, providing heritage, historic, scientific, educational, social and economic values to benefit present and future generations.

- ▶ **Policy CU-P1: Identification and Protection.** The potential for impacts to significant cultural resources shall be identified during ministerial permit and discretionary project review, impacts assessed as to significance, and if found to be significant, protected from substantial adverse change per California Public Resources Code (PRC) Section 5020.1.
- ▶ **Policy CU-P2: Native American Tribal Consultation.** Native American Tribes (as defined below in CU-S3) shall be consulted during discretionary project review for the identification, protection and mitigation of adverse impacts to significant cultural resources. Consultation on ministerial permits shall be initiated if it has been determined the project may create a substantial adverse change to a significant cultural resource. At their request, Tribes shall be afforded the opportunity to review and provide comments to the County early in

project review and planning (screening) about known or potential Tribal cultural resources located in project areas within their respective tribal geographical area of concern.

- ▶ **Policy CU-P3: Consultation with Other Historic Preservation Agencies and Organizations.** Historic preservation agencies and organizations shall be consulted during discretionary project review for the identification, protection and mitigation of adverse impacts to significant cultural resources. These include, but may not be limited to, the County’s Cultural Resources Advisory Committee, Humboldt County Public Works Department and the Planning and Building Divisions, the Northwest Information Center of the California Historical Resources Information System (NWIC), the California Office of Historic Preservation, the Native American Heritage Commission, local historical societies, museums, colleges and universities, and incorporated cities historic preservation commissions or committees for their respective LAFCO sphere of influence, and local historians, cultural resources consultants and historic preservation staff affiliated with various state and federal agencies.
- ▶ **Policy CU-P4: Avoid Loss or Degradation.** Projects located in areas known, or suspected to be archeological sites or Native American burial sites shall be conditioned and designed to avoid significant impacts to significant sites, or disturbance or destruction to Indian burial grounds. Preserving Native American remains undisturbed and in place shall be selected as the preferred alternative unless substantial factual evidence is presented demonstrating that no alternative(s) are feasible. Conditions of approval shall include standard provisions for post-review inadvertent archaeological discoveries and discovery and respectful treatment and disposition of Native American remains with or without funerary objects in accordance with state law (Health and Safety Code (HSC) Section 7050.5 and PRC Section 5097.98).
- ▶ **Policy CU-P5: Findings Necessary for Loss or Destruction.** Substantial adverse changes to significant cultural resources shall not be allowed through a ministerial or discretionary action unless:
 - a. The cultural resource has been found not to be significant based on consultation with culturally affiliated Native American Tribe(s) and other historic preservation agencies and organizations as required by CU-P2 and CU-P3; or
 - b. There is an overriding public benefit from the project, and compensating mitigation to offset the loss is made part of the project.
- ▶ **Policy CU-P6: Mitigation.** Mitigation measures shall be required for any permitted project or County action that would adversely impact significant cultural resources.
 - **Standard CU-S1: Significant Cultural Resources Defined.** Significant cultural resources include, but are not limited to, any object, building, structure, site, district, area, or place that is culturally, historically, or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of Humboldt County, the State of California or the Nation. Sites, resources, or structures listed in federal, state, or local registration programs, or formally determined eligible for listing, or that meet the criteria for listing in the California Register of Historical Resources as well as those cultural resources determined to be significant by a lead agency shall also be recognized as significant cultural resources. Significant cultural resources also include Tribal Cultural Resources defined by the 2014 Assembly Bill 52 (Native Americans: CEQA), Native American Sacred Sites such as sanctified cemeteries, places of worship, religious or ceremonial

sites, or sacred shrines and Native American Historic Resources such as any historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register, including any “historic or prehistoric ruins, any burial grounds, and any archeological or historic sites” (PRC Sections 5097.9 and 5097.993).

- **Standard CU-S2: Confidentiality.** As prescribed by California Public Records Act, Government Code Section 6250 et seq., and the Information Practices Act of 1977, Civil Code Section 1798 et seq., the exact location of Native American grave sites, burial grounds, sacred sites, sensitive cultural places, and prehistoric and historic archaeological sites shall not be publicly disclosed in order to prevent the possibility of theft or vandalism.
- **Standard CU-S3: Cultural Resources Community.** The cultural resources community includes:
 - A. Native American Tribes, defined as federally recognized and nonrecognized tribes and tribal organizations that have ancestral lands in Humboldt County that are on the contact list maintained by the Native American Heritage Commission; and, the appointed Tribal Historic Preservation Officers (THPOs) of such tribes.
 - B. Historic preservation agencies and organizations referenced in CU-P2x.
 - C. Other interested parties who have requested in writing to be notified of such matters.
- **Standard CU-S4: Conditioning, Designing, or Mitigating Projects to Avoid Loss or Reduce Impacts to Archaeological Resources.** Conditioning, designing, and/or mitigating projects to avoid or reduce impacts to archaeological resources, significant for their cultural value to descendent communities and/or scientific value shall consider the following options:
 - A. **Avoidance.** Design projects involving any ground disturbance to avoid known archaeological sites, or
 - B. **Capping.** Provide protective cover (e.g., cap with geotextile material and/or other barrier and cover with imported fill soil using light-weight rubber tired equipment) and confine development to the protective cover for all or portions of known sites that cannot be feasibly avoided, after the site has been adequately characterized (depth, area, constituents) and reported on using appropriate scientific excavation techniques, or
 - C. **Data Recovery.** Where site avoidance or capping is infeasible, design and implement a research design guided mitigation excavation program, in consultation with culturally affiliated Tribe(s) or other descendant groups, as appropriate, under the direction of a professional archaeologist knowledgeable about regional archaeology, to recover and document significant scientific information that would otherwise be lost by project implementation. Preserving Native American remains undisturbed in place shall be selected as the preferred alternative unless substantial factual evidence is presented demonstrating that no alternative(s) is (are) feasible.
 - D. **Conservation Easements.** Voluntary deeding of the site into a permanent conservation easement.

- E. **Standard Conditions and Notations for Inadvertent Archaeological or Native American Remains Discoveries.** In addition, for discretionary projects and ministerial permits that involve ground disturbing activities, the following measures shall be included as standard conditions of approval or as notations to be placed on development plans:

“The project site is not located within an area where known archaeological sites have been identified. However, as there exists the possibility that undiscovered archaeological resources may be encountered during construction activities, the following post-review, inadvertent archaeological discovery measures are required under state and federal laws:

If archaeological resources are encountered, all ground disturbing work at the find location plus a reasonable buffer zone must be immediately suspended, the approving County department contacted, and a qualified professional archaeologist retained to analyze the significance of the find and formulate further mitigation (e.g., project relocation, excavation plan, and protective cover) in consultation with culturally affiliated tribes or other descendant groups, where applicable.

Pursuant to California Health and Safety Code Section 7050.5, if known or suspected Native American or other human remains are encountered, all ground-disturbing work must cease in the vicinity of the discovery, and the County Coroner contacted. The respectful treatment and disposition of remains and associated grave offerings shall be in accordance with PRC Section 5097.98.

The applicant and successors in interest are ultimately responsible for ensuring compliance with this condition.”

- **Standard CU-S5: Professional Archaeologist Qualification Standards and Practices.** For the purpose of this chapter, a professional archaeologist meets the Secretary of the Interior’s Professional Qualification standards for Archaeology Principal Investigator and the explicit education and experience qualification standards adopted by the Society for California Archaeology in 2012. The professional archaeologist shall make a good faith effort to inform and include the descendant community in all aspects of their work, as applicable, to respect sensitive or confidential information, and to integrate the community’s policies and practices in respectful handling of archaeological material.
- **Standard CU-S6: Assessment and Treatment of Impacts to Significant Historic Structures, Buildings and Districts.**
 - A. **Ministerial Permit Review.** For ministerial permits, a records check will be conducted by staff. If the project site and/or structures are listed on the local, State, or federal register, or has been surveyed and determined to be eligible for listing on the local, State, or federal register, it will be considered a significant cultural resource. The project will either be modified as may be necessary to ensure continued protection of the significant historic structures, buildings or districts, or the project will be subjected to the discretionary review process described below.
 - B. **Discretionary Project Review.** For discretionary projects, a records check will be conducted by staff, and if no listing or survey for eligibility has been done, an initial screening will be

conducted to determine whether there is a potential for significant historic structures, buildings or districts to be significantly impacted by the project. Where it is found that there is a potential for significant adverse impacts, an historic architectural resources report meeting the Secretary of the Interior's Standards for Historic Preservation prepared by a qualified professional shall be required. The report shall assess the presence, extent, condition, and explicit significance values of all extant cultural resources and the likely impact upon such resources found to qualify as significant historical resources under CEQA. The report shall include recommendations for avoiding and/or mitigating identified significant adverse impacts.

- C. **Areas of Historic Concern.** To assist in protecting potential historical structures yet to be surveyed, the Board of Supervisors may designate areas of historical concern, in which all structures 45 years or older would be assessed as outlined for discretionary projects above. Designating an "area of historic concern" shall require providing written notice to all the affected property owners and at least one public hearing by the Board of Supervisors prior to approving the designation.
- D. **Encouraging Nomination to the California Register.** To assist in identifying historical resources of significance, the County encourages the cultural resources community to utilize the nomination process for the California Register of Historical Resources, which provides notice and comment opportunities for local government and the property owner, in determining eligibility for register listing.
- **Standard CU-S7: Cultural Resource Advisory Committee Recommendations and Mitigation.** The conclusions, findings and recommendations of the Historic Architectural Report and other types of cultural resources reports shall be evaluated during the project review process including referral for comments from the advisory Cultural Resources Committee. The Cultural Resources Committee will make recommendations on cultural resources to County staff and the Planning Commission. Applicants shall be encouraged to plan projects to avoid substantial adverse change to significant cultural resources, otherwise, mitigation measures shall be required to lessen the impacts to a less than significant level.
 - **Implementation Measure CU-IM1:¹ Cultural Resources Ordinance and Advisory Committee.** Review existing ordinances and guidelines and make necessary amendments to assure the protection of cultural resources, resulting in the adoption of a comprehensive Cultural Resources Ordinance and establishment of (an) advisory Cultural Resources Committee(s). The purpose of the Ordinance is to implement the goals, policies and standards of this section (10.6- Cultural Resources), including a clearly prescribed process for the identification, evaluation, assessment and treatment (mitigation) of cultural resource impacts for County permitted projects or actions that could result in significant adverse impacts. The Ordinance shall include establishing a Cultural Resources Committee composed of local historic preservation professionals that are knowledgeable and experienced in CEQA and historical resources, and in the fields of regional prehistoric and historic archaeology, historic architecture, and cultural landscapes, plus County tribal representatives (THPOs), which shall advise

¹ The 2017 *Humboldt County General Plan* does not include an Implementation Measure CU-IM2.

County staff and the Planning Commission about the adequacy, findings and recommendations of CEQA review and reporting in accordance with applicable laws and best practices in historic preservation. In addition the Committee will advise and educate the public about historic preservation, tribal cultural resources, and the field of cultural resources management.

- **Implementation Measure CU-IM3: Cultural Resources Designation.** Develop a process to encourage and actively support nominations with the owner’s consent to the federal, state, and local cultural resource registration programs.
- **Implementation Measure CU-IM4: Historic Building Code.** Promote the use of the Historic Building Code of the State of California for historical sites.
- **Implementation Measure CU-IM5: Historic Building Identification.** Establish and maintain a process for identifying significant historic buildings and structures (individually or as part of districts or landscapes).
- **Implementation Measure CU-IM6: Map Resource Areas.** In consultation with the cultural resources community (as defined), and the Cultural Resources Committee, the Planning Division shall (1) map Overlay Zones for culturally sensitive areas (including potentially significant cultural landscapes) especially in rural, inland areas outside the Coastal Zone to expand the County’s review of projects that may affect known & unknown cultural resources to facilitate Initial Project Screening (CUP1), (2) develop a confidential database that identifies locations of archaeological or cultural heritage sensitivity, and (3) compile and maintain a listing of listed, eligible or potentially eligible cultural resources including but not necessarily limited to architectural sites, districts and cultural landscapes, within the County’s jurisdiction. Continue to contract with the NWIC to provide rapid-response, reduced fee initial review of project locations for purposes of determining if known cultural resources are recorded on or near project areas, and for opinions on cultural resources sensitivity with appropriate recommendations.

3.6.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Cultural Resources

The following thresholds of significance are based on the environmental checklist in Appendix G of the State CEQA Guidelines, as amended. Implementing the project would result in a significant impact on cultural resources if it would:

- ▶ cause a substantial adverse change in the significance of a historical resource, pursuant to Section 15064.5 of the State CEQA Guidelines;
- ▶ cause a substantial adverse change in the significance of an archaeological resource, pursuant to Section 15064.5 of the State CEQA Guidelines;
- ▶ disturb any human remains, including those interred outside formal cemeteries; or

- ▶ cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074.

Section 15064.5 of the State CEQA Guidelines defines “substantial adverse change” as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings. Section 21083.2 of CEQA defines “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:

- (1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- (2) that it has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
- (3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person.

Section 15064.5 of the State CEQA Guidelines defines “historical resource” as a resource (1) listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR; (2) listed in a local register of historic resources or as a significant resource in a historical resource survey, or (3) considered to be “historically significant” by a lead agency as supported by substantial evidence in the record. Generally, a resource shall be considered by the lead agency to be “historically significant” if it meets any of the following criteria for listing on the CRHR if it:

- (a) is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- (b) is associated with the lives of persons important in our past;
- (c) 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 value; or
- (d) has yielded, or may be likely to yield, information important in prehistory or history.

To be eligible for listing in the CRHR, a property must have both historic significance and integrity. Integrity is judged by considering the property’s retention of location, design, setting, workmanship, materials, feeling, or association.

Tribal Cultural Resources

The following thresholds of significance are based on the environmental checklist in Appendix G of the State CEQA Guidelines, as amended. Implementing the project would result in a significant impact on tribal cultural resources if it would:

- ▶ cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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 CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
- ▶ 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ANALYSIS METHODOLOGY

The following analysis of impacts and mitigation measures and follows the environmental checklist in Appendix G of the State CEQA guidelines. It is based on a combination of background research, archaeological pedestrian surveys, and an assessment of historical resources impacts. Table 3.6-2 presents a summary of identified cultural resources and their relationship to the project elements as currently defined.

IMPACTS AND MITIGATION MEASURES

IMPACT 3.6-1	<i>Change to the Significance of an Archaeological Resource. Multiple documented or assumed eligible cultural resources in the project area have the potential to be damaged or destroyed by project implementation. This impact would be potentially significant.</i>
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A total of 27 cultural resources have been identified in the project area or in the vicinity of proposed project elements. The potential exists for these resources to undergo a substantial adverse change. Section 15064.5 of the State CEQA Guidelines defines a “substantial adverse change” as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings. Because the potential exists for ground-disturbing construction activities associated with the various project components to damage or destroy documented or assumed significant cultural resources in the project area, this impact would be **potentially significant**.

Mitigation Measure 3.6-1a: Avoid Potential Impacts.

Before construction permits are issued, the project applicant shall submit improvement plans to the County Planning & Building Department demonstrating that the WTG locations and other permanent infrastructure will avoid known archaeological resources. Previously recorded site P-12-003314 must be identified in the field and avoided. If it cannot be relocated, its extent will be assumed to be consistent with the Roscoe et al. 2010 study and no WTG or other infrastructure requiring excavation will be located in this area.

Implementation: Project applicant.

Timing: Before approval of grading or any ground-disturbing activities.

Enforcement: Humboldt County Planning & Building Department.

Table 3.6-2. Summary of Cultural Resources, and Location of Resources Relative to Proposed Project Elements

Temporary Number/ P-Number	Description	Historic/ Prehistoric	CRHR Significance	Location	Proposed Mitigation Measure
HUM TG-01	Gravel pit	Historic	Not Eligible ¹	Within 100 feet of proposed access road centerline	Gravel Pit
HUM TG-02	Lithic scatter	Prehistoric	Assumed Eligible ²	Bisected by access road centerline and turbine	Preservation in place
HUM TG-03	Gravel pit	Historic	Not Eligible ¹	Adjacent to access road centerline	Gravel Pit
HUM TG-08	Lithic scatter	Prehistoric	Not Eligible ³	Adjacent to access road centerline	Avoidance
HUM TG-09	Lithic scatter	Prehistoric	Not Eligible ³	500 feet from proposed access road centerline and turbine	Avoidance
HUM TG-10	Mining feature	Historic	Not Eligible ¹	100 feet from proposed access road centerline	Avoidance
HUM TG-11	Ditch	Historic	Not Eligible ¹	Adjacent to access road	Avoidance
HUM TG-12	Lithic scatter	Prehistoric	Assumed Eligible ²	200 feet from turbine	Avoidance
HUM TG-16	Lithic scatter	Prehistoric	Not Eligible ³	100 feet from access road centerline and 250 feet from turbine	Avoidance
HUM TG-17	Lithic scatter	Prehistoric	Not Eligible ³	100 feet from access road centerline and 250 feet from turbine	Avoidance
HUM TG-18	Lithic scatter	Prehistoric	Assumed Eligible ²	Bisected by access road centerline	Avoidance
HUM TG-22	Lithic scatter	Prehistoric	Not Eligible ²	Adjacent to access road centerline and less than 100 feet from turbine	Avoidance
HUM TG-23	Lithic scatter	Prehistoric	Not Eligible ³	100 feet from access road centerline	Preservation in place
HUM TG-24	Lithic scatter	Prehistoric	Not Eligible ³	Adjacent to access road centerline	Preservation in place
HUM TG-25	Historic debris	Historic	Not Eligible ¹	200 feet from access road centerline	Avoidance
HUM TG-26	Lithic scatter	Prehistoric	Not Eligible ³	Bisected by access road centerline	Preservation in place
HUM TG-27	Lithic scatter	Prehistoric	Not Eligible ³	250 feet from access road centerline	Preservation in place
HUM TG-28	Lithic scatter	Prehistoric	Assumed Eligible ²	100 feet from turbine	Avoidance
HUM TG-29	Lithic scatter	Prehistoric	Assumed Eligible ²	Adjacent to turbine location	Preservation in place
HUM TG-41	Lithic scatter	Prehistoric	Assumed Eligible ²	Bisected by gen-tie line	Avoidance
HUM TG -42	Lithic scatter	Prehistoric	Not Eligible ³	Adjacent to gen-tie line	Avoidance
P-12-00212	Lithic scatter and habitation debris	Prehistoric/ Historic	Assumed Eligible ²	Bisected by gen-tie line, and Bridgeville Substation is within site boundary	Monitoring of ground-disturbing activities
P-12-00918	Bridge Creek railroad grade	Historic	Not Eligible ¹	Parallels the gen-tie line	Avoidance
P-12-02351	Lithic scatter	Prehistoric	Not Eligible ³	Bisected by access road centerline	Preservation in place
P-12-02352	Lithic scatter	Prehistoric	Not Eligible ³	Bisected by access road centerline	Preservation in place
P-12-02827	Brushy Monument Timber Harvest Plan fence lines	Historic	Not Eligible ¹	100 feet from access road centerline	Avoidance
P-12-03314	Lithic scatter	Prehistoric	Not Eligible ³	Bisected by access road centerline, one turbine is within site boundaries and another is within 150 feet	Additional work to identify and avoid
N/A	Potential Scotia Historic District	Historic	Determined Eligible	Outside project site but in project area	
N/A	Bear River Ridge and Valley Historic Landscape	Historic	Assumed Eligible ²	Inside and outside project site	
N/A	Calvary Community Church	Historic	Not Eligible	Depot Road	None
N/A	Fields Landing Boat Yard	Historic	Not Eligible	Fields landing	None

Notes:
 CRHR = California Register of Historical Resources; gen-tie = generation transmission line N/A = not applicable
¹ These types of sites do not typically possess the potential to yield any information important in history, and therefore do not appear significant.
² The site includes diagnostic artifacts and/or features and/or the type and quantity of other artifacts that provide information important in prehistory or history. Therefore, sites with these characteristics appear significant.
³ The number and type of artifacts identified at the site do not suggest that the site has the potential to yield information important in prehistory, and therefore do not appear significant.
 Source: Data compiled by AECOM in 2019

Mitigation Measure 3.6-1b: Preserve Resources in Place.

For locations where archaeological resources have been identified or may exist (including the Bridgeville Substation expansion area) and cannot be avoided, the improvements shall be constructed such that no excavation is undertaken. The intact resources shall be preserved in place by capping the resource(s). The improvement plans submitted to the County shall include details regarding the improvements, with components including placement of geo-fabric over existing ground, placement of clean fill material over the fabric, and final improvements on top of the clean fill.

Implementation: Project applicant.

Timing: Before approval of grading or improvement plans or any ground-disturbing activities.

Enforcement: Humboldt County Planning & Building Department.

Mitigation Measure 3.6-1c: Monitor Ground-Disturbing Activities.

An archaeologist and Native American Tribal monitor shall be on-site, at the project applicant's expense, to observe and inspect all ground-disturbing activities. The archaeologist and Native American Tribal monitor shall have authority to stop work in an area where previously unidentified resources are encountered until the resources have been appropriately identified and addressed. In the event that resources are discovered, the County Planning & Building Department shall be notified immediately.

Implementation: Project applicant.

Timing: During grading or improvement plans or any ground-disturbing activities.

Enforcement: Humboldt County Planning & Building Department.

Mitigation Measure 3.6-1d: Prepare Treatment Plan and Stop Potentially Damaging Work for Inadvertent Discovery of Cultural Materials Uncovered during Project Construction, Assess the Significance of the Find, and Pursue Appropriate Management.

The project applicant shall prepare an unanticipated-discoveries plan that shall outline contacts and steps to be taken in the event of an unanticipated discovery, including steps from assessment to curation. The plan shall include the following steps to be taken if an inadvertent discovery of cultural materials (e.g., unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains) is made during project-related construction activities:

- Halt construction activities within 100 feet until a qualified archaeologist and Native American monitor make a determination about the resource.
- Evaluate the significance of the resources. Implement treatment measures set forth in the plan in consultation with the County. If avoidance is feasible, project modifications shall be made to avoid the resource. If avoidance is not feasible and the County Planning & Building Department determines

that the resource is not CRHR eligible, no additional mitigation is required and construction can proceed. If the County Planning & Building Department determines that the resource is CRHR eligible and that the discovery has significant historical associations or could yield additional scientific information about local or regional history or prehistory that has not been recovered during prior investigations, the project applicant shall complete a Phase III data recovery excavation program for significant cultural resources that would be affected.

- Prepare a report documenting evaluation and treatment of the resource for submission to the County.

Implementation: Project applicant.

Timing: Approval of plan by County Planning & Building Department before any ground disturbance or issuance of any permits.

Enforcement: Humboldt County Planning & Building Department in consultation with Native American tribes.

Implementing Mitigation Measures 3.6-1a through 3.6-1d would reduce the impact of damage to or destruction of archaeological resources during project construction to **less than significant**.

Implementing Mitigation Measures 3.6-1a through 3.6-1d would reduce the impact of disturbance of archaeological resources by construction for the Bridgeville Substation expansion to **less than significant**.

<p>IMPACT 3.6-2</p>	<p>Disturbance of Human Remains. <i>Previously undiscovered buried human remains could be encountered during project construction, resulting in damage to or destruction of such remains. This impact would be potentially significant.</i></p>
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Project construction would involve grading, trenching, excavation, and other earth-moving activities. No indication exists that the project area has been used for human burials in the recent or distant past; therefore, human remains are unlikely to be encountered. However, in the unlikely event that human remains are discovered during subsurface activities, they could be inadvertently damaged. This impact would be **potentially significant**.

Mitigation Measure 3.6-2: Stop Potentially Damaging Work if Human Remains Are Uncovered during Project Construction, Assess the Significance of the Find, and Pursue Appropriate Management.

California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in Sections 7050.5 and 7052 of the California Health and Safety Code, and PRC Section 5097.

In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, all such activities within a 100-foot radius of the find must be halted immediately and the project applicant’s designated representative must be notified. The project applicant is required to notify the County Coroner and a qualified professional archaeologist immediately. The coroner will examine all discoveries of human remains within 48 hours of receiving notice of a discovery

on private or state lands, as per Section 7050.5(b) of the Health and Safety Code. If the coroner determines that the remains are those of a Native American, the coroner will contact the NAHC by phone within 24 hours of making that determination, as per Section 7050(c) of the Health and Safety Code. The project applicant must act on notification of a discovery of Native American human remains in compliance with PRC Section 5097.9. The project applicant and the professional archaeologist are required to contact the Most Likely Descendant, as determined by the NAHC, regarding the remains. The Most Likely Descendant, in cooperation with the property owner and the lead agencies, will determine the ultimate disposition of the remains.

Implementation: Project applicant.

Timing: During construction.

Enforcement: Humboldt County Planning & Building Department.

Implementing Mitigation Measure 3.6-2 would reduce the impact related to potential for inadvertent damage of human remains discovered during subsurface activities to **less than significant**.

Implementing Mitigation Measure 3.6-2 would reduce the potential impact of disturbance of human remains during construction for the Bridgeville Substation expansion to **less than significant**.

<p>IMPACT 3.6-3</p>	<p>Change to the Significance of a Historical Resource. <i>Historic districts and historic landscapes could be affected by the project. This impact on the Scotia Historic District would be less than significant, while this impact on the Bear River Ridge and Valley Historic Landscape and Bear River Ridge Ethnobotanical/Cultural Landscape would be significant.</i></p>
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Scotia Historic District

The wind generation facilities installed for the proposed project would include up to 60 WTGs, with a maximum rotor blade rotation height of 182 meters (600 feet) from the base of the WTG, and up to six permanent meteorological towers that would be between 80 and 120 meters (262–394 feet). Based on visualizations prepared for the project, WTGs on both Bear River Ridge and Monument Ridge would be visible from two key observation points (KOPs): KOP 2 (at 4th and B Streets) and KOP 3 (on Main Street) in the Scotia historic district. The introduction of these visual vertical elements would create a change to the horizon view for viewers standing in downtown Scotia. The WTGs would be approximately 3 miles from the downtown area.

Although this change to the setting would introduce a new vertical element to a horizontal view, it would not result in a substantial adverse change in the historical resource that would materially impair that resource. The ability of the town of Scotia to convey its historic significance is grounded in the seven elements of integrity: location, setting, design, materials, workmanship, feeling, and association. Although the introduction of WTGs has the potential to change the setting and the feeling of the town of Scotia, it would retain sufficient elements of integrity that its eligibility would not be affected. The new WTGs would not preclude the continued eligibility of Scotia as a historical resource under any of the evaluative criteria for either the CRHR or the NRHP. The rural setting would remain largely intact, and the town would still convey its significance as a working lumber community of regional and statewide importance.

Section 15064.5 of the State CEQA Guidelines defines a “substantial adverse change” as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings. No proposed components of the wind generation facility would result in a substantial adverse change in the significance of the Scotia potential historic district; therefore, this impact would be **less than significant**.

Bear River Ridge and Valley Historic Landscape

The proposed project would construct access roads and WTGs within the Bear River Ridge and Valley Historic Landscape, which is assumed eligible for the CRHR. None of the historic-age ranching properties within the historic landscape would be directly adversely affected by the project through physical demolition, destruction, relocation, or alteration to resources or its immediate surroundings such that the significance of the historical resource would be materially impaired.

Of the identified historic-age ranching properties, the existing historic-age hay barn on the R. M. Ranch is sited less than 200 feet from a proposed WTG, and a new access road would be cut through two existing dirt roadways leading into the property from the north side of Bear River Road. Construction of the WTGs would negatively affect the design, setting, feeling, and association of the rural agricultural setting of the historic landscape during the 30-year life span of the project, and possibly longer if a separate repowering permit is approved, at which time the WTGs, cables, and other infrastructure support facilities would be removed.

Section 15064.5 of the State CEQA Guidelines defines “substantial adverse change” as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings. No proposed components of the wind generation facility would directly affect individual resources within the Bear River Ridge and Valley Historic Landscape; however, as designed, construction of the WTGs and access roads would result in a **significant** impact on the immediate surroundings and setting of the historic landscape.

Mitigation Measure 3.6-3a: Prepare a Historic American Landscape Survey Report.

Before any project-related ground disturbance, the project applicant shall retain a professional who meets the Secretary of the Interior’s Professional Qualifications Standards for Architectural History to prepare written and photographic documentation of the historic landscape that will be negatively affected by the project. The documentation of historical resources shall be prepared based on the National Park Service’s Historic American Landscape Survey (HALS) report guidelines; however, the documentation will not be reviewed by the National Park Service or transmitted to the Library of Congress, and therefore, does not need to be a full-definition dataset.

The written historical data shall follow the HALS Historic Guidelines’ three-part outline format, which includes (1) historical information (physical history, historical context); (2) physical information; and (3) sources of information. The written historical data shall be printed on 8.5-by-11-inch archival bond paper.

Efforts shall also be made to locate historic photographs and maps of the built environment resources within the historic landscape. If located, these shall be reproduced and included in the dataset. If available, up to 10 historic photographs, maps, or other relevant material shall also be included in the dataset.

Before the start of construction and any ground-moving activities, large-format (4 x 5 inch) black-and-white archival photographs shall be taken of the historical resources. Up to 30 photograph views for the dataset shall include (1) contextual views; (2) detail views of building clusters; and (3) any relevant detail views. The photographs shall be fully captioned and referenced on a photographic key.

After completion of the HALS documentation, the materials shall be placed on file with Humboldt County and archival-quality copies of the respective reports shall be distributed to the Ferndale Museum, the Scotia Museum, the Humboldt County Historical Society, and other local historical societies, libraries, and museums as necessary.

Implementation: Project applicant.

Timing: Before grading or improvement plans or any ground-disturbing activities.

Enforcement: Humboldt County Planning & Building Department.

Mitigation Measure 3.6-3b: Prepare and Implement a Site Protection Plan.

Before permits are issued for construction or grading activities, a detailed site plan to protect historic-age built environment resources shall be developed and submitted to the County Planning & Building Department. Implementation of the plan will reduce potential impacts by avoidance and protection of properties to ensure that construction activities will not cause inadvertent damage. The protection plan shall also include mitigation strategies to avoid inadvertent damage, including but not limited to the following:

- Avoid siting or routing heavy equipment or trucks within 100 feet of historic-age buildings or structures including corrals, barns, and ancillary buildings.
- Establish compliance and monitoring procedures to avoid any inadvertent damage to historic-age buildings and structures.
- Brief project personnel on the sensitivity of historical resources in the historic landscape and compliance and monitoring procedures.

Implementation: Project applicant.

Timing: Before approval of grading or improvement plans or any ground-disturbing activities.

Enforcement: Humboldt County Planning & Building Department.

Bear River Ridge Ethnobotanical/Cultural Landscape

Several culturally important and sensitive shrub land communities are within the easternmost portion of Bear River Ridge. This includes oceanspray, a shrub used for arrow shafts and other cultural items. An oceanspray stand that occurs near the junctions of Bear River Ridge and Monument Road could be affected by the project.

The California blackberry is also included as an important plant, as berry picking was traditionally and continues to be an important cultural activity.

Other plants found on the “Wiyot List of Plant Species of Environmental and Cultural Concern” but not otherwise listed as sensitive include one-leafed onion (*Allium unifolium*), small-flowered camas (*Canassua qyamash* ssp. *breviflora*), blue dicks (*Dichelostemma capitatum*), wild hyacinth (*Triteleia hyacinthiana*), rice-root (*Fritillaria affinis*), and grassnut (*Triteleia laxa*). The Wiyot Tribe values these perennial geophytes.

Project construction would result in direct impacts on the Bear River Ridge Ethnobotanical/Cultural Landscape. The removal of these vegetation patterns would result in a loss of important vegetation patterns of prehistory. Therefore, this impact would be **significant**.

Mitigation Measure 3.6-3c: Incorporate Plants Appropriate for the Wiyot Tribe Ethnobotanical Area into the Reclamation, Revegetation, and Weed Control Plan Required as Part of Mitigation Measure 3.5-23e.

The project’s reclamation, revegetation, and weed control plan shall incorporate plants included in the “Wiyot List of Plant Species of Environmental and Cultural Concern” in the final restoration plan. The species planted shall be subject to the same monitoring requirements and success criteria established in Mitigation Measure 3.5-23e, “Develop and Submit a Reclamation, Revegetation, and Weed Control Plan.”

Implementation: Project applicant.

Timing: Before and after construction.

Enforcement: Humboldt County Planning & Building Department in consultation with the Wiyot Tribe.

Impacts on Siskiyou checkerbloom would be reduced through implementation of Mitigation Measure 3.5-23d, “Compensate for Impacts on Siskiyou Checkerbloom.”

Implementing the above mitigation measures would reduce the impact of the project on historical resources, but not to less than significant. This impact would be **significant and unavoidable**.

The Bridgeville Substation expansion would not have an effect on the historic American landscape or the Bear River Ridge Ethnobotanical/Cultural Landscape. **No impact** would occur.

IMPACT 3.6-4	Change to the Significance of a Tribal Cultural Resource. <i>Tribal Cultural Resources could be affected by construction and operation of the proposed project. This impact would be significant.</i>
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Tribal Cultural Resources, or TCRs, include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe when they are included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources. In addition, a TCR can be a resource

determined by the lead agency, in its discretion and supported by substantial evidence, to be significant considering the significance of the resource to a California Native American tribe.

The government-to-government tribal consultation with the Wiyot Tribe and the Bear River Band of the Rohnerville Rancheria resulted in identification of the TCRs described below.

Bear River Ridge

The Wiyot Tribe identified Bear River Ridge (*Tsakiyuwit*) as a TCR. Bear River Ridge is the southern boundary of the Wiyot Ancestral Territory. The entire Wiyot ancestral territory can be viewed from Bear River Ridge. Likewise, Bear River Ridge is visible from anywhere within Wiyot territory, including from Table Bluff and Humboldt Bay where *Tuluwat*² is located. In the past it would have been used as a high prayer spot. Bear River Ridge is currently held as private property, restricting access to the tribe, but the tribe does see the ridge as a sacred high place that remains visible throughout Wiyot territory. Constructing WTGs on Bear River Ridge would be a **significant** visual impact on this sacred high place. No feasible mitigation is available to reduce this significant impact; therefore, this impact would be **significant and unavoidable**.

California Condor

Both the Wiyot Tribe and the Bear River Band of the Rohnerville Rancheria identified the California condor as a TCR. The condor is sacred and part of the Wiyot creation story.

The condor has not occupied the Pacific Northwest in more than a century. The National Park Service, U.S. Fish and Wildlife Service, and Yurok Tribe are partnering to reintroduce California condors in the Bald Hills region of Redwood National Park. An environmental assessment (EA) has been prepared for the reintroduction project under the National Environmental Policy Act (NEPA); the EA began circulation on April 5, 2019. The EA evaluates a range of alternatives for and environmental effects of establishing a condor release facility in the park within the species' historical northern range and breeding areas. Condors released from this location will have a range that includes the Humboldt Bay region and extends from Oregon to well south of the project location. Although the condors have not yet been released, the reintroduction program is reasonably foreseeable in the near future, and certainly within the 30-year project time frame.

The condors will be released under the classification of “nonessential experimental,” which means they are not subject to the protections provided by the federal Endangered Species Act or the California Endangered Species Act. However, the condor is a spiritual symbol for the tribes of Humboldt County. Therefore, because the potential exists for condors to collide with WTGs, this impact would be **significant**.

Mitigation Measure 3.6-4: Detect Presence of and Curtail Operations for Condors.

If condors are released in the Bald Hills in Redwood National Park or another location with a range overlapping the project's WTGs, the project applicant shall implement a detection system using the transponders attached to the condors, and shall curtail operations when condors are close to the WTGs so that the condors are not at risk of encountering operating WTGs. The detection technology and plan for curtailment shall be incorporated into the project's bird and bat conservation strategy (Mitigation Measure

² *Tuluwat* (Indian Island), located in Humboldt Bay, is the Wiyot center of the universe.

3.5-18a). Implementation of the detection technology and the requirement to curtail WTGs shall occur within 6 months after the condors are released.

Implementation: Project applicant.

Timing: Bird and bat conservation strategy before issuance of construction permits; to be implemented within 6 months of the release of condors.

Enforcement: Humboldt County Planning & Building Department.

Implementing Mitigation Measure 3.6-4 would reduce the impact of the project on California condor, a TCR, but not to less than significant. This impact would be **significant and unavoidable**.

The expansion of the Bridgeville Substation would not have an effect on TCRs. **No impact** would occur.