

CALFED

**TECHNICAL REPORT
ENVIRONMENTAL CONSEQUENCES**

CULTURAL RESOURCES

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LIST OF ACRONYMS

CALFED	CALFED Bay-Delta Program
cfs	cubic foot per second
CVP	Central Valley Project
CVPIA	Central Valley Project Improvement Act
GIS	geographic information system
MAF	million acre-feet
MOA	memorandum of agreement
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
SWP	State Water Project
TAF	thousand acre-feet

CULTURAL RESOURCES

INTRODUCTION

This technical report describes impacts on cultural resources associated with implementation of the CALFED Bay-Delta Program (CALFED).

Impacts on cultural resources could occur from:

- Ground-disturbing activities, such as grading, excavation or dredging, habitat enhancement, and revegetation.
- Activities at borrow pits, spoil dumps, and equipment staging areas.
- Inundation, resulting in erosional, chemical, and biological effects.
- Recreation uses, resulting in indirect impacts.

Several factors affect impacts on cultural resources. Prehistoric and historic sites are not distributed uniformly across the landscape, and environmental factors are important in determining where sites are found. For example, prehistoric and historic sites (after 1850) tend to be found along waterways. Work conducted elsewhere in the Central Valley demonstrates that late prehistoric sites are more likely to be found in certain soil-land forms (West, Welch, and Hansen 1995).

Elevation also is an important factor in predicting the presence of prehistoric sites in the Delta Region. Elevations in the area range from -18 feet below sea level to 200 feet above sea level. Most prehistoric sites in the Delta Region are found within 5 feet of mean sea level. This elevation approximates the 1850 tidal line as defined by Atwater (1982). Many areas likely to contain archeological and historical sites are targeted for CALFED activities in the Delta Region.

Agricultural development in the Delta, Sacramento River, and San Joaquin River regions as well as the substantial industrial and residential development associated with the Bay Region have severely altered the archeological and historical record. Many sites have been destroyed and obliterated. Sites in urban areas have been capped by asphalt or concrete, and prehistoric mounds have been leveled for agricultural fields. Repeated plowing has broken artifacts and compromised or destroyed their context.

Any trace of a site may be difficult to see in agricultural fields, and sites recorded at the turn of the century can no longer be found. Although CALFED activities in agricultural fields would not have the same potential for impact as projects proposed for undeveloped areas, prehistoric sites still may be discovered in areas of intense agricultural development (Peak and Associates 1997). Levees reportedly have covered prehistoric sites, and channel modifications and levee setbacks also may disturb sites.

Projects requiring construction can affect cultural resources in a variety of ways. Construction may include grading, excavation, or dredging with heavy equipment. Such activity would take place at the site for a new reservoir or during levee setback. Sites may be disturbed or destroyed from being scraped away, leveled, or buried under fill. Ancillary borrow pits, spoil dumps, equipment staging areas, and road construction also must be considered. Finally, construction also includes the actual footprint from the construction of new facilities, dams, or control structures.

For this analysis, "minor construction" is defined as activities with limited use of heavy equipment and little surface disturbance. Some gravel replacement projects for habitat enhancement are an example. Minor construction projects may involve hand work such as revegetation where access is provided by truck.

Impacts on cultural resources from inundation are well documented (Lenihan et al. 1981). Historic and prehistoric sites are subject to erosion from fluctuating water levels. Artifacts can be consolidated or dispersed as intervening sediments are washed away. Artifacts themselves may be physically or chemically altered by being inundated. Prehistoric midden deposits are adversely affected by cycles of wetting and drying. Finally, clams, such as *Corbicula*, or other aquatic taxa may disturb sites by burrowing.

Agricultural development in the Central Valley began in the 1840s. Modification of existing irrigation facilities may affect properties or facilities that are eligible for listing in the National Register of Historic Places (NRHP). Modifying gate structures or irrigation facilities, for example, may damage historically significant properties. Razing buildings or relocating houses could destroy historic values. Actions that affect the context of NRHP-eligible properties may constitute an impact on the historic property.

Miscellaneous indirect adverse impacts related to recreation also can affect cultural resources. Off-road vehicular activity in reservoir drawdown zones, for example, can disturb sites. Increased recreational activity as a result of improved opportunities could lead to increased amounts of unwitting vandalism or purposeful artifact theft.

Federal acquisition of property may lead to positive impacts on cultural resources. When a property is placed under federal control, consideration of historic properties is required by federal law.

ASSESSMENT METHODS

Identifying potential impacts from implementation of CALFED alternatives involves considering both the level of impacts of a particular activity and the naturalness of the land. For example, an impact on undeveloped land would be greater than an impact on land that had been farmed or developed. The effects of CALFED projects on cultural resources

range from low for minor actions to high for projects with substantial ground disturbance or inundation. The naturalness of a landscape also ranges from low for heavily disturbed areas such as agricultural lands to high for uncultivated and undeveloped areas.

These factors were combined to evaluate potential impacts. Table 1 depicts the range of adverse impacts and naturalness to generate three levels of "weighted" impacts with corresponding numerical values: low (1), moderate (2), and high (3). These numbers, also appearing in Tables 3 and 4, portray the range of potential surface-disturbing adverse impacts factoring in the potential for finding intact cultural resources. These numbers do not take into consideration variation in landform or other environmental factors for finding archeological sites. It is important to note that projects identified in Table 2 with a minor adverse impact could result in significant impacts at a particular site. In addition, placing a project on top of an archeological site could cause considerable harm regardless of the amount of surface disturbance. The ratings (1, 2, and 3) apply only to the severity of surface disturbance that may adversely affect cultural resources.

Level of Impact			
High	2	3	3
Moderate	1	2	3
Low	1	1	2
	Low	Moderate	High
Naturalness			
NOTES:			
1 = Low potential impacts.			
2 = Moderate potential impacts.			
3 = High potential impacts.			

Table 1. Weighted Impacts and Landscape Naturalness

SIGNIFICANCE CRITERIA

The criteria for determining significance varies between federal and state governments.

At the federal level, the NRHP lists properties deemed to have historical significance (36 CFR 60). For a property to be eligible for listing in the NRHP, it must meet one of four criteria and retain integrity. The four criteria for eligibility and other issues associated with significance are discussed in the Supplement to the Draft Affected Environmental Technical Report for Cultural Resources.

According to federal regulations (36 CFR 800), actions that diminish the integrity of a property include the physical destruction, damage, or alteration of a historic property; the isolation of a property from its setting; the introduction of visible, audible, or other elements that are out of character with the property; the neglect of a property; and the transfer, lease or sale of the property from federal ownership.

Impacts were considered potentially significant if implementation of a CALFED action would result in any action listed as a significant effect under federal or state regulations.

ENVIRONMENTAL CONSEQUENCES

Comparison of No Action Alternative to Existing Conditions

Any proposed or future construction activities could significantly affect NRHP-eligible historic properties. Flooding also would result in significant adverse impacts on NRHP-eligible historic properties.

Several actions, either planned or under development as a result of the Central Valley Project Improvement Act (CVPIA) or other programs, would be implemented under the No Action Alternative. Impacts on cultural

resources from these actions in each of the regions are being considered prior to implementation. For example, considerable inventory and excavation of historic and archeological sites have been conducted in support of the Los Vaqueros Reservoir Project. Some actions under the No Action Alternative would not affect cultural resources. Setting water contract rates is an example of an action that would not affect cultural resources.

Comparison of CALFED Alternatives to No Action Alternative

The following discussion of alternatives for each region is generic and focused at the alternative level. Examples of alternative variations and their associated impacts are provided only to illustrate the range of variability. Tables 2 and 3 provide detailed information for each alternative variation.

Program	Impacts	Region
Ecosystem Restoration Program		
Restoration actions, fish screens, diversion and facility upgrades, fish passage, shallow flooding	Minor and moderate construction, acquisition, flooding, modification	Delta Sacramento River San Joaquin River
Levee System Integrity Program		
Rehabilitate levees, setback levees, shallow flooding	Minor and moderate construction, flooding	Delta

Table 2. Impacts on Cultural Resources from the Ecosystem Restoration and Levee System Integrity Programs

DELTA REGION

Table 2 summarizes actions and impacts common to each alternative for the Ecosystem Restoration and Levee System Integrity Programs.

Table 3 summarizes each permutation of the three alternatives for each region. Actions are divided into conveyance alternatives for the Delta Region and storage options for the other regions. Anticipated impacts from each action are identified.

ALL ALTERNATIVES

Cultural resources potentially would be affected by the Ecosystem Restoration Program and by levee stabilization and setback efforts. Possible adverse impacts on cultural resources include a variety of construction actions and flooding. Acquiring property would constitute a beneficial impact. The Water Quality and Water Use Efficiency programs may result in minor adverse impacts on cultural resources if canal lining, tailwater recovery ponds, or new water recycling plants were developed. Projects have not been identified. Adverse impacts in the Delta Region are rated as either as Con\1 (minor construction) or Con\2 (moderate construction).

A multitude of minor construction projects will take place. Revegetation projects, improved fish passages, eradication of undesirable plant species, and establishment of shallow-water habitat could result in relatively minor adverse impacts on archeological and historic sites. Conversely, gravel replacement, new floodways, and levee setbacks may constitute a moderate adverse impact on cultural resources because of the proximity of these activities to waterways, which are areas of potentially greater archeological and historic sensitivity.

ALTERNATIVE 1

Storage and Conveyance

Conveyance actions proposed for the Delta Region under Alternative 1 are presented in Table 3. Adverse impacts associated with the conveyance variations of this alternative are minor construction and modification of existing structures. For example, construction of a barrier at Old River under Configuration 1B represents minor construction. The disturbance is expected to be limited. The new Clifton Court intake proposed under Configuration 1C represents modification of an existing facility. No cultural resources have been recorded in the vicinity of Clifton Court, although formal inventories would be needed prior to project implementation. No storage components in the Delta Region are associated with Alternative 1.

ALTERNATIVE 2

Storage and Conveyance

Alternative 2 repeats proposals identified in Alternative 1 and increases the range of proposed actions and adverse impacts (Table 3). A series of facilities upgrades or installations are proposed. The intakes proposed for Hood and Holland Tract, for example, constitute minor impacts. Several alternative variations include setback levees along various islands, sloughs, and rivers. Levee setbacks are viewed as a potentially moderate impact because of the extensive earth movement required and the sensitivity associated with the proximity of water sources. In the Delta Region, prehistoric and historic sites often are clustered along water courses. As an example, levee setbacks along the North Fork of the Mokelumne River may affect six recorded prehistoric sites and two historic sites.

Several tracts could be flooded under Alternative 2. Breaching the levees at Bouldin Island, Brack Tract, and the Canal Ranch Tract to create aquatic and wetlands habitat is considered a moderate adverse impact. Although only one prehistoric site has been

recorded in the area. construction and flooding would occur along potentially archeologically sensitive waterways.

Several conveyance projects are called for under the variations of Alternative 2 (Table 3). Clifton Court Forebay is the endpoint of three potential intake projects. One project, involving a 15,000-cubic-foot-per-second (cfs) conveyance from Roberts Island, is an example of a potential moderate adverse impact. This project involves extensive construction and earth movement; however, the bulk of this effort takes place in areas of as much as 10 feet of peat deposits (DWR 1993).

These areas hold a low potential for encountering archeological sites. The Roberts Island conveyance parallels Whiskey and Trapper sloughs as well as Victoria Canal, human-made conveyances. No archeological or historical sites have been recorded along the route.

Additional adverse impacts associated with variations of Alternative 2 involve flooding certain tracts, acquiring land along the Mokelumne River and relocating certain facilities.

ALTERNATIVE 3

Storage and Conveyance

The variations of Alternative 3 repeat some projects identified for Alternatives 1 and 2 (Table 3). Additional projects in the five variations of this alternative include a wide range of activities that represent a minor adverse impact to cultural resources (Con\1). Intakes, pumping plants, new gates, and new bridges are examples.

Moderate adverse impacts (Mod\2) are expected for other projects. The open channel from Brentwood to Clifton Court Forebay, storage of water on several islands, and setback levees along Old River are examples of projects with moderate adverse impacts. In the case of the open channel, one archeological and three historical sites are recorded in the area. Some inventory for this area has been completed, but the final route has not been fully examined.

Alternative 3 also includes projects with the potential for high adverse impacts (Con\3) on cultural resources. Various conveyance alternatives exist to transport water from Hood to the Clifton Court Forebay. The alignment, the same for each alternative, is potentially sensitive since it falls outside peat soils and numerous waterways are crossed. Archeological records revealed that approximately six prehistoric sites and one historic site are in the vicinity of the route. Adverse impacts are considered high due to the sheer magnitude of the project, the presence of potentially sensitive archeological areas, and the amount of disturbance such an undertaking would entail. The route has not been inventoried, and unrecorded sites undoubtedly are present. Encountering buried archeological sites during excavations also is a distinct possibility.

Flooding Victoria Island is an example of a storage project for the Delta Region. This island, containing approximately 7,250 acres, has no recorded prehistoric or historic sites. Victoria Island has been cultivated for decades, and unrecorded historic structures related to agriculture are present along the edges of the island. These architectural structures need to be recorded and evaluated prior to initiating storage at Victoria Island. Further inventory also is required.

BAY REGION

No alternative involves construction activities that would affect cultural resources in the Bay Region. Some ecosystem restoration projects may affect cultural resources found at Suisun Marsh.

Config.	Conveyance: Delta Region		Storage: Range of Options		
	Actions	Impacts ^(a)	Surface Impacts	Groundwater Impacts	Region
1A	None	None	None	None	None
1B	a. Barrier at Old River b. Flow and stage control: Middle/Old Rivers, Grant Line c. New fish screens: Skinner and Tracy d. Intertie: Tracy and Clifton Court	a. Minor construction b. Minor construction c. Modification d. Minor construction	None	None	None
1C	a. New Clifton Court intake b. Channel enlargement c. See 1Ba and 1Bb ^(b)	a. Modification b. Minor construction c. See above	a. 3.0 MAF: major construction, flooding b. 1.0 MAF: major construction, flooding	a. 500 TAF: moderate construction b. 500 TAF: moderate construction	a. Sacramento River b. San Joaquin River
2A	a. Hood: Gated intake, fish screen, bypass b. Hood: Open channel, setback levee, relocate c. Hood: Breach McCormack-Williamson d. 600-foot corridor at Mokelumne River e. Setback levees, remove levees, relocate f. 1Ca, 1Cb, 1Ba-1Bd ^(b)	a. Minor construction b. Moderate construction c. Flooding d. Acquisition e. Moderate construction f. See above	None	None	
2B	Same as 2A ^(b)	Same as 2A	Same as 2E	Same as 2E	Same as 2E
2D	a. 2Aa-2Ac ^(b) b. Setback levees: New Hope, Terminous, Staten Island c. Remove levees: S.F. Mokelumne, Bouldin Island d. Setback levee: Old River e. 1Ca, 1Ba, 1Bc, 1Bd ^(b)	a. See above b. Con\2 c. Con\2 d. Con\2 e. See above	a. 2.0 MAF off-aqueduct: Con\2	a. None	a. San Joaquin
2E	a. Setback levee: Georgiana Slough b. Inflatable rubber dam c. Channel section control in Georgiana Slough d. Breach Tyler Island levee e. Riprap interior levees f. 2Ac, 2Db, 2Dc, 2De, 1Ba, 1Bc, 1Bd ^(b)	a. Moderate construction b. Unknown c. d. Minor construction e. Minor construction f. See above	a. 3.0 MAF: major construction b. 500 TAF: moderate construction c. 2.0 MAF: Major construction (off-aqueduct)	a. 500 TAF: moderate construction b. 500 TAF: moderate construction	a. Sacramento River b. San Joaquin River c. San Joaquin River (south of Delta)
3A	a. 2Ad, 2Ae, 1Ca, 1Cb, 1Bb-1Bd ^(b) b. Screened intake and pumping plant at Hood c. 2,000-foot alignment: Hood to Clifton Court conveyance d. 5,000-cfs channel: Hood to Clifton	a. See above b. Minor construction c. Minor construction d. Major construction	None	None	
3B	Same as 3A; spur links with Bay and east Delta		Same as 2E + 200 TAF	Same as 2E	See 2E, Delta
3E	a. 2Ad, 2Ae, 1Ca, 1Ba, 1Bc, 1Bd, 2Aa, 3Ac ^(b) b. 15,000-cfs channel: Hood to Clifton	a. See above b. Major construction	Same as 3B	Same as 3B	Same as 3B
3H	a. 2Ea-2Ee, 2Ac, 2Db, 2Dc, 1Ca, 1Ba, 1Bc, 1Bd ^(b) b. 2Aa, 3Ac, 3Ad ^(b) c. Setback levees at Old River: 3,000-foot channel	a. See above b. See above c. Moderate construction	Same as 2E	Same as 2E	Same as 2E
3I	a. 2Aa, 1Ca, 1Bc, 1Bd ^(b) b. Siphons: under stream crossings; San Joaquin River	a. See above b. Moderate construction	a. Same as 2E b. 50 to 100 TAF at Holland	Same as 2E	a. Same as 2E b. Delta

Table 3. Impacts on Cultural Resources from Conveyance and Storage Projects

SACRAMENTO RIVER REGION

ALTERNATIVE 1

Ecosystem Restoration Program

A variety of projects are proposed under Ecosystem Restoration for the Sacramento River Region. These projects call for habitat improvement, fish facilities, the relocation of water facilities, and upgrade of structures. The potential adverse impacts to cultural resources from these actions include primarily minor and possibly moderate construction activity (Con\1,2). Site-specific inventories and evaluations are needed to fully evaluate adverse impacts from activities of the Ecosystem Restoration Program.

Storage and Conveyance

Cultural resources in the Sacramento River Region would experience adverse impacts under Alternative 1. Options under this alternative call for surface storage of up to 3.0 million acre-feet (MAF) and ground water storage of up to 250 thousand acre-feet (TAF) (Table 3). New reservoirs represent significant surface disturbance with high construction adverse impacts (Con\3) and adverse impacts associated with flooding. Groundwater storage would result in similar impacts since percolating basins would be needed, but the overall scope of groundwater storage projects is less than a new or enlarged reservoir.

The Sites/Colusa Reservoir Project is an example of off-stream pumped storage from the Sacramento River. Cultural resource impacts would depend on the alternative chosen; reservoir options for this site range from 1.2 to 3.3 MAF of storage. Some inventory has been conducted for this reservoir area; 18 prehistoric sites, 13 historic sites, and three ethnohistoric sites have been recorded. Chartkoff (1969) conducted an early inventory of this reservoir and describes complex midden-bearing sites, some of which contain housepits. Additional

inventory would be needed, depending on the alternative selected.

The Thomes-Newville Reservoir Project is another example of a potential storage project in the Sacramento River Region. Archeological inventory has recorded 223 prehistoric sites, 35 sites identified as ethnographic, and approximately 70 historic sites. Archeological sites include temporary camps, milling stations, lithic scatters, and burial localities. The ethnographic sites are not known. Historic resources include mining and ranching remains, artifact scatters, and transportation features. Some early water development facilities also require evaluation for their historic value. Potential facilities associated with this project require full inventory.

Nearly 30 reservoirs are being examined for possible construction or enlargement under the alternatives. Cultural resources would be affected because of the extent of surface disturbance.

ALTERNATIVES 2 AND 3

Storage and Conveyance

Adverse impacts on cultural resources under Alternatives 2 and 3 from surface and groundwater storage would be similar to those described for Alternative 1.

SAN JOAQUIN RIVER REGION

ALTERNATIVE 1

Ecosystem Restoration Program

Projects associated with the Ecosystem Restoration Program in the San Joaquin River Region may affect cultural resources. The program calls for a variety of habitat restoration actions as well as modification of existing fish screens and weirs to better protect fish species. Potential adverse impacts on cultural resources from these actions include primarily minor and

possibly moderate construction activity (Con\1\2). Site-specific inventories and evaluations would be needed to fully evaluate adverse impacts from activities of the Ecosystem Restoration Program.

Storage and Conveyance

Cultural resources in the San Joaquin River Region would experience adverse impacts under Alternative 1. Options under this alternative include surface storage of up to 1.0 MAF and groundwater storage of up to 500 TAF (Table 3). New reservoirs represent significant surface disturbance with high construction adverse impacts (Con\3) and adverse impacts associated with flooding. Groundwater storage would result in similar impacts since percolating basins would be needed, but the overall scope of such projects is less than a new or enlarged reservoir. This alternative includes 10 possible reservoir sites.

The Montgomery Reservoir is a small facility that may become a portion of this alternative. It is an example of a potential facility where no cultural resource information has been collected. The area falls within the American River Water Resources Investigation study area (West, Welch, and Hansen 1995). Prehistoric site density projections are available as a result of a geographic information system (GIS) model developed for the study. Twenty-four prehistoric sites are predicted to be found within the affected area. Historic mining activity took place in the area, but historic sites are unknown. Determining the actual number of sites would require a cultural resource inventory.

ALTERNATIVES 2 AND 3

Storage and Conveyance

Alternative 2 calls for smaller surface storage behind new or enlarged reservoirs compared to Alternative 1. A maximum of 500 TAF is proposed. Groundwater storage is the same as Alternative 1 at 500 TAF. One major difference between the two alternatives is the proposed use of off-aqueduct storage. One or several of 11 south-Delta aqueduct storage projects are

possible, with a maximum pool of 2.0 MAF. This form of water storage involves pumping water to existing or new facilities.

Several examples of pump-storage reservoirs are on the west side of the San Joaquin Valley. One such project has been inventoried for cultural resources, and 35 prehistoric and six historic sites have been documented. The prehistoric sites included major habitation locations, temporary camps, flake and tool scatters, and milling stations. The historic properties consisted of the remains of early residences. Preliminary evaluations of these sites have been completed. Fifteen sites were considered clearly eligible, 19 were considered potentially eligible but needed further evaluation, and seven sites were considered clearly ineligible. Formal determinations of eligibility were not conducted, and no properties were mitigated before the project was abandoned.

Surface water and groundwater storage facilities under Alternative 3 are similar to those for Alternative 2 (Table 3).

SWP AND CVP SERVICE AREAS OUTSIDE THE CENTRAL VALLEY

CALFED actions would not result in any direct adverse impacts on cultural resources in the SWP and CVP Service Areas Outside the Central Valley. No structures, conveyance facilities, storage projects, or habitat improvements are planned, but the delivery of water to nonagricultural areas may cause growth above current projections. Slight differences in the flows of water in some streams may occur, but these changes would not affect cultural resources.

Comparison of CALFED Alternatives to Existing Conditions

Future impacts on cultural resources under the No Action Alternative are expected to be similar to those under existing conditions.

MITIGATION STRATEGIES

A range of actions is possible to mitigate adverse impacts on cultural resources.

Avoiding the historic property is the preferred action. This option saves money and preserves the resource for posterity. Routes can be diverted, facilities relocated, or projects redesigned to avoid adversely affecting historic properties. When avoidance is not feasible, mitigation is necessary.

Historic and prehistoric sites can be mitigated through recordation, mapping, surface collections, and possibly excavations. These actions are preceded by a research design and by a Memorandum of Agreement (MOA) in compliance with Section 106 of the NHPA. Completing an MOA, as stated above in "Significance Criteria," involves input from various federal and state agencies as well as potential input from interested members of the public. Mitigation is complete with the agency acceptance of a final report. Public reports summarizing the results of mitigation efforts often are used to disperse what was learned from the work. In addition to field work, mitigation may involve other long-term actions, such as fencing, monitoring, or maintenance of a historic property.

Mitigating historic architectural properties is more involved. If a structure is determined eligible for inclusion in the NRHP, an MOA is prepared as above. The actual level of documentation for a structure or engineering facility is determined in consultation with the National Parks Service, which provides direction for recording the structure to standards found in the Historic American Buildings Survey or the Historic American Engineering Record.

Mitigating impacts on traditional cultural properties is more problematic because of the character and potential sensitivity of the value. Development of a management plan for the property is a possible measure. Conducting intensive ethnographic interviews and research would provide additional documentation, if appropriate. Fencing, project redesign, and limiting the season of use are all options.

Considerable consultation would be required with the affected cultural group to determine appropriate mitigation strategies.

POTENTIALLY SIGNIFICANT UNAVOIDABLE IMPACTS

Implementation of the Bay-Delta Program would result in impacts to some cultural resources. The quantity and significance is unknown since an alternative has not been chosen and a detailed cultural resource inventory and evaluation for specifications has not been conducted. However, these impacts may be adverse and unavoidable. If impacts to NRHP-eligible or important cultural resources in any region of the Study area can not be avoided through project design, significant impacts would occur. Mitigation measures would include construction monitoring or data recovery. The appropriate level of data recovery would be determined on a project-specific basis in consultation between CALLED, SHOO, and the advisory Council on Historic Preservation.

Mitigation measures would be implemented to offset the loss of or disturbance to RHP-eligible resources or important sites under CEQA in accordance with regulation. According to 36CFR800, the process of mitigation can result in a determination of "no adverse effect" to a property. If historic or prehistoric sites are discovered during the course of inventory, and if these properties can not be fully mitigated, then a determination of "adverse effect" may be in order. In this situation, there would be a significant unavoidable impact to the resource.

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