

RECLAMATION

Managing Water in the West

Categorical Exclusion Checklist

Verizon Cell Tower at San Luis Reservoir

CEC-17-050

Prepared by:

Cameron Alfving
Cameron Alfving
Student, Natural Resources Management
South-Central California Area Office

Date: 09/14/18

Concurred by:

See Attachment A
Archaeologist/Architectural Historian
Mid-Pacific Regional Office
Regional Archeologist concurred with Item 8. Their determination has been placed within the project file.

Date: See Attachment A

Concurred by:

Lisa Buck
Lisa Buck
Wildlife Biologist
South-Central California Area Office

Date: 09/18/2018

Concurred by:

Rain L. Emerson
Rain L. Emerson
Environmental Compliance Branch Chief
South-Central California Area Office
ITA Designee concurred with Item 11. Their determination has been placed within the project file.

Date: 10/10/2018

Approved by:

Michael P. Jackson
Michael P. Jackson, P.E.
Area Manager
South-Central California Area Office

Date: 10/10/2018



U.S. Department of the Interior
Bureau of Reclamation
South-Central California Area Office

September 2018

Nature of the Action

The Bureau of Reclamation (Reclamation) proposes to issue a 25-year land use authorization to Verizon Wireless for the installation, operation, and maintenance of a wireless cell tower within Reclamation's right of way at San Luis Reservoir (Figure 1).

The approximately 25 foot by 25 foot leased area would be enclosed with a 6 foot high chain-link fence, which would have a 12 foot wide double access gate. Verizon Wireless would install an equipment enclosure, an emergency generator, and a Decorative Windmill lattice tower (not to exceed 162-feet in height) on a concrete pad within the leased area. The base of the lattice tower would require a piers foundation with a diameter of 4 feet and a depth of 40 feet for each pier. A trench 150 feet long by 4 feet deep by 2 feet wide would be excavated to install approximately 150 feet of underground conduit to connect the tower to an existing power pole located approximately 140 feet northeast.

1,000 feet of 4-inch diameter fiber conduit would be installed via directional boring along the existing access road and Gonzaga Road. The depths of the directional bores would vary between 3 to 8 feet, and all native soils removed during excavation would be used as backfill.

The Proposed Action would require light trucks, a drilling rig, concrete trucks, a dump truck, a ditch witch, and a crane. The Proposed Action Area would be accessed via an existing access road off of Gonzaga Road, and a staging area would be located adjacent to the proposed tower location. The Proposed Action is anticipated to take 60 to 90 days to complete.

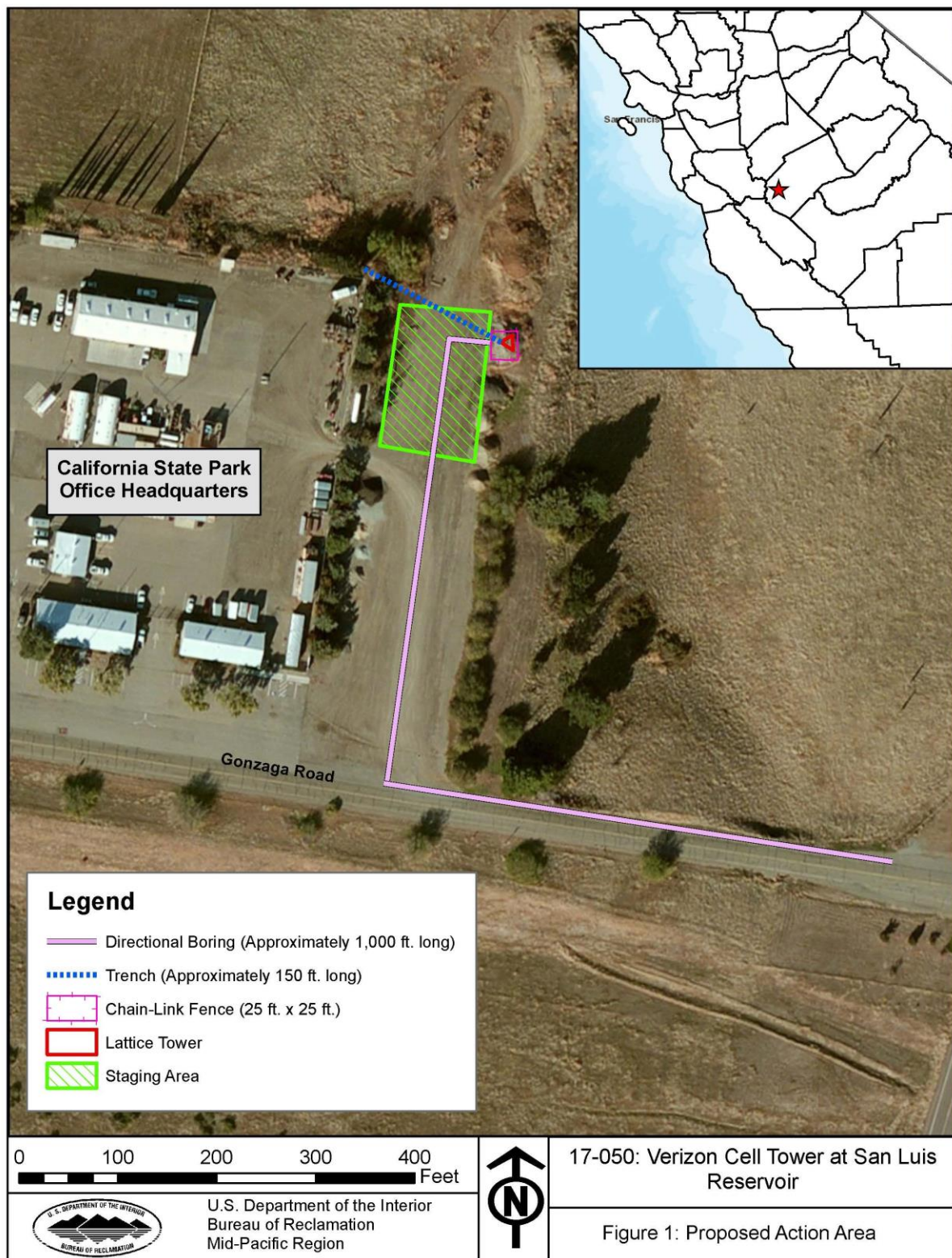


Figure 1 Project Location

Environmental Commitments

Verizon Wireless shall implement the following avoidance measures as part of the Proposed Action (Table 1).

Table 1 Environmental Protection Measures

| Resource | Protective Measure |
|----------------------|---|
| Biological Resources | A qualified biologist shall conduct pre-construction surveys for the San Joaquin kit fox, its sign, and burrows in the Action Area and within a 200-foot area outside of the project footprint. The survey shall be conducted no less than 14 days and no more than 30 days prior to the initiation of any construction activities for the Proposed Action. A letter report documenting survey methods and findings shall be submitted to Reclamation at least 5 days before construction. If kit foxes, kit fox sign, or kit fox burrows are found during the survey, construction on the Proposed Action shall not begin until Reclamation has been contacted and appropriate consultation has been completed. |
| Biological Resources | Before the initiation of any ground-disturbing activities for the Proposed Action, a qualified biologist shall survey the site for any burrows that may be suitable for blunt-nosed leopard lizards and which are located close enough to the Action Area that they may pass under an area where excavation would occur, or close enough that they may be destroyed during excavation (approximately 50 feet). If such burrows are present, and cannot be reasonably avoided, ground-disturbing activities shall not begin until Reclamation biologists have been contacted and appropriate consultation has been completed. |
| Biological Resources | To prevent inadvertent entrapment of wildlife during construction, all excavated steep-walled holes or trenches more than 1 foot deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such trenches or holes are filled, they must be thoroughly inspected for trapped animals. If federally protected species are found in any of the holes or trenches, work shall stop and Reclamation shall be contacted immediately for further guidance. |
| Biological Resources | <p>Before the start of any ground-disturbing activities associated with the Proposed Action, a qualified biologist shall conduct focused surveys for burrowing owls in areas of suitable habitat on and within 250 feet of the project footprint. A letter report documenting survey methods and findings shall be submitted to Reclamation at least 5 days before construction on the Proposed Action.</p> <p>If occupied burrowing owl burrows are found, Reclamation shall be notified and work on the Proposed Action shall not begin until a qualified biologist has established a non-disturbance buffer of 160 feet during the non-breeding season (September 1 through January 31) or 250 feet during the breeding season (February 1 through August 31). The biologist shall remain on-site during construction to monitor the burrow, and may stop construction at any time to avoid impacts to the owls. The buffer shall remain in place until the biologist determines the nest is no longer active.</p> <p>If a burrowing owl is observed at the construction site at any time during construction, a temporary non-disturbance buffer of approximately 160 feet shall be observed to establish a safe area for the animal until it leaves the construction area of its own volition.</p> |
| Biological Resources | In order to avoid impacts to Swainson's hawks, work on the Proposed Action shall occur outside of the nesting season (defined as March 1 - September 15) if possible. If work must occur between March 1 and September 15, a qualified biologist shall conduct surveys for nesting Swainson's hawks on and within a ½ mile of the Proposed Action Area in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (SHTAC, 2000). Three nest surveys shall be conducted in each of two survey periods, with the survey periods defined as follows: Period I – January 1 |

| | |
|--|---|
| | <p>to March 20, Period II – March 20 to April 5, Period III – April 5 to April 20, Period IV – April 21 to June 10, and Period V – June 10 to July 30. Surveys shall take place in the two survey periods immediately prior to the start of construction, with the exception of Period III, when no surveys should take place per the SHTAC 2000 guidelines. The surveys shall consist of inspecting all accessible, suitable trees of the survey area for the presence of nests and hawks.</p> <p>If any active Swainson's hawk nests are discovered within the survey area, an appropriate disturbance-free buffer shall be established based on local conditions and agency guidelines. Disturbance-free buffers shall be identified on the ground with flagging, fencing, or by other easily visible means, and shall be maintained until a qualified biologist has determined that the young have fledged and are capable of foraging independently.</p> |
|--|---|

Environmental consequences for resource areas assume the measures specified would be fully implemented.

Exclusion Category

516 DM 14.5 D (10). *Issuance of permits, licenses, easements, and crossing agreements which provide right-of-way over Bureau lands where action does not allow for or lead to a major public or private action.*

Evaluation of Criteria for Categorical Exclusion

Below is an evaluation of the extraordinary circumstances as required in 43 CFR 46.215.

| Extraordinary Circumstance | No | Uncertain | Yes |
|---|-------------------------------------|--------------------------|--------------------------|
| 1. This action would have a significant effect on the quality of the human environment (40 CFR 1502.3). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. This action would have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA Section 102(2)(E) and 43 CFR 46.215(c)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. This action would have significant impacts on public health or safety (43 CFR 46.215(a)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. This action would have significant impacts on such natural resources and unique geographical characteristics as historic or cultural resources; parks, recreation, and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (43 CFR 46.215 (b)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. This action would have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks (43 CFR 46.215(d)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. This action would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (43 CFR 46.215 (e)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. This action would have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Extraordinary Circumstance | No | Uncertain | Yes |
|--|-------------------------------------|--------------------------|--------------------------|
| 8. This action would have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. This action would have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species (43 CFR 46.215 (h)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. This action would violate a Federal, tribal, State, or local law or requirement imposed for protection of the environment (43 CFR 46.215 (i)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. This action would affect ITAs (512 DM 2, Policy Memorandum dated December 15, 1993). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. This action would have a disproportionately high and adverse effect on low income or minority populations (EO 12898) (43 CFR 46.215 (j)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. This action would limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007, 43 CFR 46.215 (k), and 512 DM 3)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. This action would contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act, EO 13112, and 43 CFR 46.215 (l)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

NEPA Action: Categorical Exclusion

The Proposed Action is covered by the exclusion category and no extraordinary circumstances exist. The Action is excluded from further documentation in an EA or EIS.

Attachment A: Cultural Resources Determination

CULTURAL RESOURCES COMPLIANCE
Division of Environmental Affairs
Cultural Resources Branch (MP-153)

SCAO
MP-153 Tracking Number: 18-~~CCA~~0-057

Project Name: Verizon Wireless (Verizon) Cell Tower Land Use Authorization at San Luis Reservoir, Merced County, California

NEPA Contact: Stacy Brown

MP 153 Cultural Resources Reviewer: John Fogerty, Archaeologist *John A. Fogerty*

Determination: No Historic Properties Affected

Date: August 15, 2018

Reclamation is proposing to issue a 25-year land use authorization to Verizon for the installation, operation, and maintenance of a wireless cell tower to be placed on Reclamation land near the B.F. Sisk Dam at San Luis Reservoir. The tower site is located northeast of the California State Parks (State Parks) Main Office within San Luis Reservoir State Recreation Area, which is managed for recreation purposes by State Parks through an agreement with Reclamation. Project activities include installation of a new equipment enclosure, emergency generator, and a 155-foot-tall lattice tower on a concrete pad within an approximately 25-foot by 25-foot area.

Reclamation deemed adequate prior cultural resource investigations conducted by Pacific Legacy, Inc. for a different undertaking in 2016, which included archival records search, intensive pedestrian field survey of the entire current Area of Potential Effects (APE). No historic properties were identified within or adjacent to the current APE as a result of these efforts. Tribal consultation requests with the Picayune Rancheria of Chukchansi Indians, Santa Rosa Rancheria Tachi Yokut Tribe, and Table Mountain Rancheria were initiated May 8th, 2018 requesting consultation for assistance in identification efforts. No concerns or properties information have been provided to date. On July 5th, 2018, Reclamation submitted a finding of no historic properties affected to the California State Historic Preservation Officer (SHPO) and received concurrence on the finding, dated August 3rd, 2018. Consultation correspondence between Reclamation and the SHPO has been provided with this cultural resources compliance document for inclusion in the administrative record for this action.

I concur with Item 8 of the Categorical Exclusion Checklist (CEC-17-050) prepared for this undertaking. This action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)). This document serves as notification that Section 106 compliance has been completed for this undertaking. Please note that if project activities subsequently change, additional NHPA Section 106 review, including further consultation with the SHPO, may be required.



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825-1898

IN REPLY REFER TO:

JUL 05 2018

MP-153
ENV-3.00

SPECIAL DELIVERY - HAND DELIVERED

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Subject: National Historic Preservation Act (NHPA) Section 106 Consultation for the Verizon Wireless (Verizon) Cell Tower Land Use Authorization at San Luis Reservoir, Merced County, California (Project #18-SCAO-057)

Dear Ms. Polanco:

The Bureau of Reclamation is initiating consultation under Title 54 U.S.C. § 306108, commonly known as Section 106 of the NHPA, and its implementing regulations found at 36 CFR Part 800, for the issuance of a 25-year land use authorization to Verizon for the installation, operation, and maintenance of a wireless cell tower on Reclamation land located northeast of the California State Parks (State Parks) Office Headquarters on Gonzaga Road within San Luis Reservoir State Recreation Area (Enclosure 1: Figure 1). Reclamation determined the proposed land use authorization and subsequent construction activities constitute an undertaking as defined in 36 CFR § 800.16(y) and involve the type of activity that has the potential to cause effects on historic properties under 36 CFR § 800.3(a). We are entering into consultation with you regarding this undertaking and notifying you of our finding of no historic properties affected.

Reclamation is the underlying owner of San Luis Reservoir and the surrounding lands that comprise San Luis Reservoir State Recreation Area which is managed for recreational use by State Parks under an agreement with Reclamation. Verizon has requested permission to install a new equipment enclosure, emergency generator, and a 155-foot-tall lattice tower on a concrete pad within an approximately 25-foot by 25-foot area adjacent to State Parks headquarters. The depth of ground disturbance for installing the 4-foot-diameter self-supporting foundation piers for the tower would be 40 feet below the existing ground surface. The proposed project also would involve excavation of a trench 150 feet long by 4 feet deep by 2 feet wide for installing underground conduit to connect the new tower to an existing power pole to the northwest and directional boring at depths varying between 3 and 8 feet for approximately 1,000 feet to install 4-inch-diameter fiber conduit along an existing access road and Gonzaga Road.

Reclamation determined the direct area of potential effects (APE) for the proposed project includes all ground disturbing activities noted above, including a 20-foot-wide corridor for proposed linear project elements (i.e., trenches and directional bore path), and a 10-foot-wide buffer around the pad, lattice tower, and work/staging area (Enclosure 1: Figure 2). The direct APE is approximately 0.9 acres in size, with a maximum vertical APE extending to a depth of 40 feet below the surface. Additionally, Reclamation determined the indirect APE for this undertaking extends 0.5 mile from the proposed cell tower location for consideration of indirect visual effects. The legal description for the APE is Section 14, T. 10 S., R. 8 E., Mount Diablo Base Meridian, as depicted on the San Luis Dam, California U.S. Geological Survey 7.5' topographic quadrangle (Enclosure 1: Figure 1). The APE is characterized by existing infrastructural, industrial, and structural elements associated with B.F. Sisk Dam and San Luis Reservoir State Recreation Area (e.g., B.F. Sisk Dam, Gianelli powerplant and associated transmission lines, State Parks administrative complex, etc.).

In an effort to identify historic properties in the APE, Reclamation conducted an in-house review of past project records and requested information from Indian tribes and Native American individuals and organizations regarding historic properties of concern. Since the APE is confined to Reclamation lands, a California Historical Resources Information System records search was not conducted. The records review showed several cultural resources inventories with pedestrian surveys in recent years in the vicinity of the current APE. Most recently, in 2016, Pacific Legacy, Inc., (Pacific Legacy) conducted surveys covering the San Luis Reservoir pool and adjacent lands, including the current APE, for a separate Reclamation undertaking known as the San Luis Low Point Improvement Project (SLLPIP) (Enclosure 2: Appendix B, Figure B-3d). The SLLPIP is currently on hold; however we have enclosed a copy of the April, 2017 Pacific Legacy report related to that undertaking for your reference (Enclosure 2: compact disk). Given this recent survey coverage, additional pedestrian survey specific to the present undertaking was found unnecessary.

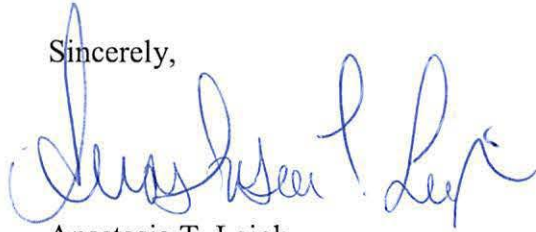
No historic properties were identified within the current APE, either as a result of Reclamation's in-house review or in conjunction with any prior efforts, including those conducted by Pacific Legacy in 2016 (Enclosure 2). B.F. Sisk Dam, which Reclamation historically has treated as eligible for the National Register of Historic Places under Criterion A, is located in the vicinity of the proposed cell tower, but outside the 0.5 indirect APE noted above.

Pursuant to 36 CFR § 800.4(a)(4), Reclamation invited Picayune Rancheria of Chukchansi Indians, the Santa Rosa Rancheria Tachi Yokut Tribe, and the Table Mountain Rancheria to assist in identifying historic properties of concern that may be affected by the proposed undertaking. Pursuant to 36 CFR § 800.4(a)(3). Reclamation also invited the following Native American representatives to identify issues regarding effects on historic properties: Mr. Valentin Lopez, Amah Mutsun Tribal Band; Mr. Robert Ledger Sr., Dumna Wo-Wah Tribal Government; Ms. Katherine Erolinda Perez, North Valley Yokuts Tribe; and Ms. Lois Martin, Southern Sierra Miwuk Nation. To date, no responses have been received. Reclamation will work to address any concerns, if raised, and contact your office as appropriate.

Based on the above and enclosed information, Reclamation has reached a finding of no historic properties affected for the current undertaking, pursuant to 36 CFR § 800.4(d)(1). We invite your comments on the delineation of the APE and the appropriateness of the historic properties

identification efforts. In the event of a post-review discovery during project implementation, Reclamation will follow the procedures outlined at 36 CFR § 800.13. If you have any questions or concerns regarding this project, please contact Mr. John Fogerty, Archaeologist, at 916-978-5030 or jfogerty@usbr.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anastasia T. Leigh". The signature is fluid and cursive, with the first name being the most prominent.

Anastasia T. Leigh
Regional Environmental Officer

Enclosures - 2



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

Lisa Ann L. Mangat, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000

FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov

www.ohp.parks.ca.gov

August 03, 2018

In reply refer to: BUR_2018_0706_001

VIA ELECTRONIC MAIL

Ms. Anastasia T. Leigh, Regional Environmental Officer
U.S. Bureau of Reclamation, Mid-Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825-1898

Subject: Section 106 Consultation: The Verizon Wireless (Verizon) Cell Tower Land Use
Authorization at San Luis Reservoir, Merced County, CA (Project #18-SCAO-057)

Dear Ms. Leigh:

The State Historic Preservation Officer (SHPO) received on July 06, 2018 your letter initiating consultation on the above referenced undertaking to comply with Section 106 of the National Historic Preservation Act of 1966 (as currently amended) and its implementing regulations found at 36 CFR Part 800. The U.S. Bureau of Reclamation (Reclamation) proposes to issue a 25-year land use authorization to Verizon for the installation, operation, and maintenance of a wireless cell tower to be placed on Reclamation land near the B.F. Sisk Dam at San Luis Reservoir. The tower site is located northeast of the California State Parks (State Parks) Main Office within San Luis Reservoir State Recreation Area, which is managed for recreation purposes by State Parks through an agreement with Reclamation. Reclamation seeks comments for their affect finding. Documentation submitted is:

- *Enclosure 1: Figure 1: Project Location (overlaid USGS Qua Map); Figure 2: Area of Potential Effects (overlaid aerial photo map).*
- *Enclosure 2: (Final Draft) Cultural Resources Report for The San Luis Low Point Improvement Project, Merced and Santa Clara Counties, California [Project No. 2823-06]; April 2017. [By: L. Holm, M. Greenberg, M. O'Neill, E. Reese, S. Streich, C. Peske, E. de Haro, J. Varkel & J. Holson; Pacific Legacy, Inc., Berkeley, CA] [For: C. Park, CDM Smith, Sacramento, CA]*

Verizon wishes to install an equipment enclosure, emergency generator, and a 155-foot-tall lattice tower on a concrete pad within about a 25-foot by 25-foot area at the State Parks Headquarters compound. Installation of the 4-foot-diameter self-supporting foundation piers for the tower will require excavating to 40 feet below existing ground surface. The proposed project needs a trench excavation of 150 feet long by 4 feet deep by 2 feet wide for placing underground conduit to connect the new tower to an existing power pole to the northwest and directional boring at depths varying between 3 and 8 feet for around 1,000 feet to install 4-inch-diameter fiber conduit along an existing access road and Gonzaga Road (Figure 2).

The direct Area of Potential Effects (APE) for the proposed project includes all ground disturbing activities noted above, including a 20-foot-wide corridor for proposed linear project elements (i.e., trenches and directional bore path), and a 10-foot-wide buffer around the pad, lattice tower, and work/staging area. The direct APE is about 0.9 acres in size, with a maximum vertical APE extending down to a depth of 40 feet. Additionally, Reclamation determined that an indirect APE for this undertaking extends for a 0.5-mile radius from the proposed tower location for consideration of indirect visual effects due to the proposed tower's height. However, Reclamation notes that the overall indirect APE is characterized by multiple existing infrastructural, industrial, and structural elements associated with B.F. Sisk Dam and the surrounding San Luis Reservoir State Recreation Area

(B.F. Sisk Dam, Gianelli Powerplant and its associated transmission towers and lines, the State Parks administrative complex, California Department of Water Resources complex and similar elements) that are all visible from the public way of the adjacent State Route 152.

For historic properties identification Reclamation reviewed past project records. Most recently, in 2016, Pacific Legacy, Inc., surveyed the San Luis Reservoir pool and adjacent lands, including the current APE, for a separate Reclamation undertaking known as the San Luis Low Point Improvement Project. Based on this recent extensive survey coverage, Reclamation did not do additional pedestrian survey and utilized this recent report. Results indicate no surface evidence of cultural resources were identified within the undertaking's APE, which was heavily disturbed during initial dam construction.

The Picayune Rancheria of Chukchansi Indians, the Santa Rosa Rancheria Tachi Yokut Tribe, and the Table Mountain Rancheria were invited to assist in identifying historic properties. Mr. Valentin Lopez, Amah Mutsun Tribal Band; Mr. Robert Ledger Sr., Dumna Wo-Wah Tribal Government; Ms. Katherine Erolinda Perez, North Valley Yokuts Tribe; and Ms. Lois Martin, Southern Sierra Miwuk Nation also were invited to identify any concerns for historic properties. To date, no responses have been received. Reclamation will work to address any future concerns, should any be raised, and will make notifications as required.

Based on the above and the submitted documentation, Reclamation has reached a finding of *no historic properties affected* and requests comments on delineation of the APE and appropriateness of historic properties identification. Reclamation states that in the event of a post-review discovery during project construction, the procedures outlined at 36 CFR 800.13 (Post-Review Discoveries) will be followed. Given the 40-foot depth of proposed excavation, and that several archaeological sites were buried during dam construction, and that a long sequential Native American occupation of this area of San Luis Creek has been documented, and that the geology of the locale indicates buried potential living surfaces, I strongly agree with implementation, if necessary, of this proposed regulatory process.

Following OHP review of the documentation, the following comments are offered.

- Pursuant to 36 CFR 800.4(a)(1), there are no objections to the APE as defined;
- Pursuant to 36 CFR 800.4(b), Reclamation has documented a reasonable and good faith effort to appropriately identify historic properties;
- Reclamation finds that the proposed undertaking will result in no historic properties affected. Pursuant to 36 CFR 800.4(d)(1), **I do not object.**

Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800 (as currently amended). Should you require further information, please contact Jeanette Schulz at Jeanette.Schulz@parks.ca.gov or her desk phone is: (916) 445-7031.

Sincerely,



Julianne Polanco
State Historic Preservation Officer