

DRAFT Study Proposal [To be Completed by Licensees]
TRADITIONAL CULTURAL PROPERTIES

~~(January 28, 2008)~~
February 22, 2008

1.0 Project Nexus

Continued Project operation and maintenance (O&M), and other uses associated with the project, including recreation, may have an adverse effect on Traditional Cultural Properties (TCP). The effect may be direct (e.g., result of ground disturbing activities), indirect (e.g., public access to Project areas) or cumulative (e.g., caused by a Project activity in combination with other past, present, and reasonably foreseeable future projects). This study focuses on these potential Project effects to TCPs.

Terms used throughout this study warrant definition at the outset.

Historic properties, as defined under 36 CFR 800.16(l), are prehistoric or historic sites, buildings, structures, objects, districts, or Traditional Cultural Properties included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Historic properties are identified through a process of evaluation against specific criteria found at 36 CFR 60.4.

For the purpose of this study proposal, a TCP is a historic property or prehistoric property that may be ~~that is~~ eligible, or has not been evaluated, for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that: 1) are rooted in that community's history; or 2) are important in maintaining the continuing cultural identity of the community (National Register Bulletin 38). TCPs can also be defined as:

- Locations associated with the traditional beliefs of a Native American aboriginal/indigenous group about its origins, its cultural history, or the nature of the world and cultural landscapes.
- A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices.
- Locations where Native American religious practitioners have historically gone and are known or thought to go to today, to perform ceremonial cultural rules of practice.
- Locations where a community has traditionally carried out economic, artistic or other cultural practices important in maintaining its historic identity. (National Register Bulletin 38, 1998:1)

The Native American Heritage Commission (NAHC) was contacted on July 26, 2006 for a list of Native American contacts which they provided on July 27, 2006. In March 2007, the individuals

and organizations included on the list were mailed a letter of introduction and a questionnaire to solicit information and/or concerns for the relicensing Projects. The United Auburn Indian Community responded in April 2007 to express interest in participating in the relicensing process. No other responses were received at that time. Subsequently, various organizations and individuals provided names and contact information for additional Tribal representatives, who the Licensees contacted between March and November 2007. Many of these people are participating in the relicensing process or have expressed interest in participating.

[The following participants were added to the process.](#)

[Colfax Todds Valley Consolidated Tribe](#)

[Tsi-Akim Maidu](#)

[Nisinam Maidu](#)

[These participants will have full access and participation to the completion of the relicensing process. The licensees have agreed to the participation of these tribal representatives though they are associated with non-federally recognized tribes.](#)

2.0 Resource Management Goals of Agencies with Jurisdiction Over the Resource to be Studied

~~The FERC license will permit activities that may "...cause changes in the character or use of historic properties, if any such historic properties exist..." (36 CFR § 800.16(d). FERC must therefore comply with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations at 36 CFR 800, which requires the head of any federal department or independent agency having authority to license any undertaking to take into account the effects of the undertaking on historic properties.~~

~~Additionally, the State Historic Preservation Officer (SHPO), in accordance with section 101(b)(3) of NHPA "...advises and assists Federal agencies in carrying out their Section 106 responsibilities..." by ensuring historic properties are taken into account early in the planning and development processes.~~

~~Other federal agencies with jurisdiction within the APE are the USDA Forest Service (FS) and USDI Bureau of Land Management (BLM). The primary goal of both agencies is for FERC to comply fully with Section 106, and to make sure historic properties are appropriately and adequately considered and managed. Additionally, these agencies are interested in consideration of potential enhancement and public education opportunities that may be identified during implementation of the study plan.~~

~~The FS management goals are further elaborated in its mission statement:~~

~~The USDA Forest Service has a multiple-use mission to manage its public lands for a variety of resources, values, products, and uses which may involve historic properties. As a public land steward, the Forest Service is mandated to comply with the National Historic Preservation Act of 1966, as amended (16 USC 470), and its implementing regulations, entitled "Protection of Historic and Cultural Properties" (36 CFR 800). The primary purpose of the Forest Service's legal obligations is to ensure that important heritage resources are protected and preserved for the benefit and enjoyment of future generations. An additional key component of this mission is public service in terms of interpretation and education.~~

- Evaluate heritage resources that have been or may be affected by the Project, and protect/conserv~~se significant resources, or mitigate effects to those resources.~~
- Conduct, as part of Section 106 compliance, on-going consultation with the appropriate Native American tribe(s) as defined by the Forest Service.
- Ensure full compliance of Section 106 through a Programmatic Agreement.
- Identify and document aboriginal and indigenous traditional cultural properties and resources that are adversely affected by the operations and maintenance within the area of the potential effect. (APE)

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3.0 Potential License Condition

1. Development of a Historic and Prehistoric Properties Management Plan (HPMP) that would include the involvement of Native peoples participation and describes protection, mitigation and enhancement (PM&E) measures for historic properties potentially-affected by continued Project O&M.

A HPMP is a plan for considering and managing effects on TCPs and other historic properties that may occur from constructing, operating, and maintaining hydropower, transmission, and distribution projects, and establishes a decision-making process for considering those effects. Because it is not possible to determine all of the effects of various activities that may occur over the course of a license, FERC typically requires, as a license condition, that the Licensee develop and implement a HPMP that considers and manages effects on TCPs and other historic properties throughout the term of the license. For hydropower, transmission, and distribution licensing actions, FERC typically completes Section 106 by entering into a Programmatic Agreement (PA) or Memorandum of Agreement (MOA) with the license applicant, the Advisory Council on Historic Preservation (ACHP), and the State Historic Preservation Officer (SHPO) that typically require the Licensee to develop and implement a HPMP. Additionally, FERC requires that Licensees develop the HPMP in consultation with various other federal, state, Tribal, and non-government parties who have interests in the Licensees Projects.

2. Development and implementation of policy and procedure guidelines that adequately documents the discovery or disturbance of native/indigenous areas or sites.

- a. Create manual
- b. Design forms
- c. Develop training procedures
- d. Develop database archiving system for records management

- [e. Maintain updated tribal contact list – \(Interactive working liaison communication model\)](#)
- [f. Reprimand / release guidelines](#)
- [g. Amnesty program](#)

4.0 Study Goals and Objectives

The Project goal is to assist the FERC in meeting its compliance requirements under Section 106 of the NHPA, as amended, by determining if licensing of the Project will have an adverse effect upon historic properties. The objective of this study is to identify Traditional Cultural Properties (TCPs), evaluate their eligibility to the National Register of Historic Places (NRHP), and identify Project-related effects on TCPs, other tribal interests, or traditional interests of other groups within the Area of Potential Effects (APE).

[The use of this term TCP \(Traditional Cultural Properties\) throughout the study guide allows for the exclusion of previous studies and ethnographic reports.](#)

[TCP is a relatively new term. Working with indigenous/aboriginal people and gathering any pertinent studies or reports that are used to identify significant indigenous/aboriginal sites will contribute to the understanding of TCP's as required in this FERC relicensing guidelines. Significant studies conducted by ethnographers, graduate students, cultural journalists, and oral historians that are archived in public and private libraries, must be included in this study in order to ensure that the spirit and integrity of the FERC relicensing regulation process are met.](#)

To address effects on TCPs, as required under Section 106, the Licensees have identified the APE (which may be modified as proposed in this study proposal) as “all lands within the FERC boundary.” Additionally, the APE includes an area of 100 feet in radius surrounding the Signal Peak and Quartz Hill communications towers, and any other facility related to the operation and maintenance of the Project (e.g., maintenance buildings directly related to O&M associated with the FERC Project Boundary). Under 36 CFR 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historical properties, if any such properties exist.”

As provided for in 18 CFR § 5.5(e), Licensee under separate cover has requested FERC designate the Licensee as FERC’s non-federal representative for purposes of initiating consultation under Section 106 of the NHPA and the implementing regulations at 36 CFR § 800.2(c)(4).

5.0 Existing Information and Need for Additional Information

Licensee conducted an extensive search of records and maps on file at the FS, Tahoe National Forest, BLM, and the North Central Information Center (NCIC) of the California Historical

Resources Information Center at California State University, Sacramento. The purpose of this search was to gather existing information regarding previously recorded TCPs within the APE, and to assess which areas of the APE had been subjected to previous ethnographic studies. The records searches include all lands within the FERC boundary plus a study area extending 0.25-mile around all Project features. For planning purposes, the study area extends beyond the Project APE in order to obtain existing information both within the APE and in the immediate adjoining area.

No previously documented TCPs were identified within the APE or surrounding areas during the records searches. However, the Forest Service, Tahoe National Forest, synthesized the results of several ethnographic studies in an overview of Native American cultural on the Forest (Carlson 1986). The overview and other relevant ethnographic literature will be reviewed during implementation of this study.

To comply with the integrity and intent of Section 106 standards, the licensees extensive research is incomplete due to the unilateral exclusion of unevaluated sites and documented aboriginal/indigenous sites that haven't met or have not been evaluated for TCP and National Register of Historic Places status.

6.0 Study Methods and Analysis

6.1 Study Area

The study area is the APE, which includes all lands, Project facilities and features within the FERC Project Boundary and Project-affected locations outside the FERC boundary. The APE is defined as "...the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historical resources if any such cultural resources exist..." [36 CFR § 800.16(d)]. As required under Section 106 [36 CFR § 800.4(a)(1)], maps depicting the APE, as well as the FERC Project Boundary, will be submitted to SHPO for formal review and comment. The APE and FERC Project Boundary are shown on Figures [ADD]

It is possible that current recreation, road, or other studies implemented as part of the Relicensing process may identify areas outside the FERC Project Boundary that have potential to affect traditional cultural properties. It is also possible that the Licensee may propose project improvements that are outside the FERC Project Boundary. If such areas are identified by these studies or as project improvements, the Licensee will expand the APE in accordance with 36 CFR 800.4(a)(1) in consultation with FS and BLM, as appropriate, SHPO, other appropriate agencies, Tribes, and interested parties. Appropriate cultural surveys will be completed as part of this study if the APE is expanded.~~It is possible that current recreation, road, or other studies implemented as part of the Relicensing process may identify areas outside the FERC Project Boundary that have potential to affect historic properties. If such areas are identified by these~~

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~~studies, the Licensee will consult with FERC, SHPO, all other appropriate agencies, Tribes, and interested parties as appropriate to expand the APE in accordance with 36 CFR 800.4(a)(1).~~

6.2 General Concepts

~~[Workgroup this section will be before the Study Proposal is final – 12/19/07]~~

- ~~• Personal safety is an important consideration of each fieldwork team. If Licensee determines the information cannot be collected in a safe manner, Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.~~
- ~~• Licensee shall obtain permission to access private property where needed well in advance of performance of the study. If access is not granted or river access is not feasible or safe, Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.~~
- ~~• The schedule for each proposed study is reasonably flexible to accommodate unforeseen problems that may affect the schedule. If a schedule changes, Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.~~
- ~~• Field crews may make minor modifications to the study proposal in the field to accommodate actual field conditions and unforeseen problems. When modifications are made, Licensee's field crew will follow the protocols in this study proposal. If minor modifications are made, Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.~~
- ~~• Licensee's performance of the study does not presume Licensee is responsible in whole or in part for resource management measures that may arise from that study.~~
- ~~• The estimated level of effort and cost is not a firm commitment by Licensees to expend all the funds. If the study costs more, Licensee is committed to completing the study. If the study costs less, Licensee is not committed to expending the remaining funds on other Relicensing studies or resource management measures.~~
- Global Positioning System (GPS) data will be collected in a manner that meets or exceeds the Federal government's "National Map Accuracy Standards" for published maps. All GPS data will be in the Universal Transverse Mercator (UTM) Coordinate System, using the North American Datum 1983 and stored in Environmental Science Research Institute (ESRI) Shapefile format. After a Shapefile has undergone a quality assurance/quality control (QA/QC) review to Licensee's satisfaction and after all metadata have been documented, Licensee will provide the Shapefile to resource and land management agencies upon request. Geographic Information System maps will be included in study reports, as appropriate.
- Licensee shall treat all information regarding the specific locations of cultural resource sites as Privileged and Confidential. The GPS coordinates and maps showing the locations of such resources will not be made available to any Relicensing Participant, other than the FS, BLM, FERC, SHPO, NCIC, and participating Tribes.

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6.3 Study Methods

The study methods will consist of the following steps:

Step 1 – Archival Research. As described above, Licensee performed archival research in preparation of the PAD. In this step, Licensee will conduct additional archival research.. The places or people to be contacted or visited for additional information include: 1) California State Library, California History Room; 2) California State Library, Government Publications; 3) Bancroft Library, University of California, Berkeley; 4) federal archives; 4) Previous ethnographic records; and 5) UC Davis Ph.D Graduate Student, Sherry Tatsch (Nisenan village research); 6) other graduate student research and documentation; 7) Placer County, Nevada County, Yuba County, Sierra County, Plumas County, public library and archives.

Step 2 – Tribal Consultation and Identification of Resources. The identification of potential TCPs involves extensive Tribal consultation. Consultation and any fieldwork and potential TCP documentation shall be undertaken in accordance with Section 106 of the NHPA, as amended, and shall be consistent with National Register Bulletin No. 38, Guidelines for Evaluating and Documenting Identification of Traditional Cultural Properties. TCPs will be documented using Department of Parks and Recreation (DPR) forms. Oral histories obtained during the archaeological field effort also will be documented on DPR forms and attached to the associated archaeological records. In order to facilitate this consultation, Licensee and tribal/cultural representatives will retain multiple qualified, professional ethnographers who meets the standards for ethnography as defined in Appendix II of N.R. Bulletin No. 38. Licensees will coordinate the selection of an ethnographer with the assistance of affected Tribes and other interested cultural/tribal stakeholders. A monitor chosen by the aboriginal descendents will facilitate clear communication between the ethnographer and tribal participants.

In order to protect confidentiality of disclosed locations, the Licensee and the ethnographer shall agree not to disclose these locations to any parties other than federal land management agencies (e.g., BLM, FS), FERC, and SHPO. The Licensees also signed a confidentiality agreement that addresses use of Forest Service information. At the instruction in writing to Licensee by the participating Tribes, this information may be disclosed to the NCIC at California State University, Sacramento.

The identification of TCPs will begin with a review of the ethnographic literature obtained during the archival research. This will be followed by interviews with Tribal elders and other representatives (Tribal Interviewees). The ethnographer will contact the appropriate Tribe(s) and interested/tribal stakeholders to arrange for interviews at a time and location acceptable to those tribal representatives to be interviewed who may have knowledge of special interest areas or traditional cultural practices within the Project APE. Tribal Interviewees and the ethnographer may need to visit the APE together to accurately define potential TCPs. If necessary, Licensee

will arrange for an initial introductory meeting between the Licensee, Tribal representatives and the ethnographer.

Interviews may be conducted on a “one-on-one” basis with the ethnographer. The oral traditions and information collected during the interviews will be used to help define potential TCPs in the APE and to assist in making sound judgments and management decisions in Project planning.¹ All information gathered will be kept confidential and respectfully documented by the ethnographer.

If participating Indian Tribes do not wish to disclose the locations of any potential TCPs, Licensee shall instead work with the Tribes to identify the general issues and concerns that the Tribe(s) may have regarding potential impacts of the Project upon resources known to the Tribe(s) and work with the Tribes and appropriate land management agencies to develop agreeable measures to alleviate these concerns.

Interviews conducted with Tribal representatives will be considered similar to other consultant services, and Tribal interviewees will be compensated for their time spent during the interviews. Compensation will follow the Advisory Council on Historic Preservation’s guidelines regarding these fees (ACHP April 26, 2002). What standard should this compensation be based on? State standards \$30/hr. with Caltrans set by United Auburn Preservation Committee. Compensation should be appropriate for the level of professional services provided from within the Tribe or interested cultural/tribal stakeholders. Compensation could be relative to subcontractor consultants for research.

Step 3 – Archaeological Site Visit. Tribal interviewees or a physically capable representative and the ethnographer may want to continue the interview by visiting archaeological sites identified during the Historic Properties Study Proposal field work. The purpose of the visit would be to provide Tribal representatives the opportunity to examine prehistoric archaeological sites encountered during that study and for the ethnographer to obtain additional information on potential TCPs the representatives may choose to share after viewing the sites. The agency official (i.e., heritage resource program manager) will be included in the site visits if the site is on agency managed land.

Step 4 – National Register of Historic Places Evaluation. Pursuant to 36 CFR § 800.4(2)(c) the Licensee’s goal is to undertake formal NRHP evaluations of potential TCPs within the APE. Formal evaluations will be conducted in consultation with affected Indian Tribes, federal land management agencies, FERC, and SHPO, and will utilize the National Register criteria codified at 36 CFR 60.4, as follows:

National Register Criteria for Evaluation. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites,

¹ These data will be used to help construct a Historic Properties Management Plan that assists Licensee in establishing the policies, procedures, and strategies for avoidance or protection of TCPs, or management or mitigation measures that may be necessary during the Project. See Step 7.

buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

- (a) that are associated with events that have made a significant contribution to the broad pattern of our history;
- (b) that are associated with the lives of persons significant in our past;
- (c) that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
- (d) that have yielded, or may be likely to yield, information important to prehistory or history.

In addition to the criteria set forth at 36 CFR § 60.4, properties can have other cultural values that should be considered. Amendments to the National Historic Preservation Act in 1992 [§101(d)(6)(A)] specify that properties of traditional religious and cultural importance to an Indian Tribe may be determined eligible for inclusion in the NRHP because of their “association with cultural practices or beliefs of a living community that are: 1) rooted in that community’s history; and 2) are important in maintaining the continuing cultural identity of the community.” Therefore, a property may also be significant if it has traditional or ethnographic significance because of its ties to the cultural past of Native Americans. Formal evaluations will be submitted to the SHPO for concurrence.

If formal evaluation of any identified location is opposed by Indian Tribes and/or land management agencies, unevaluated resources will be treated as eligible. An informal recommendation of eligibility is a professional observation made by the ethnographer based on information provided by the Tribal Interviewees and on the level of integrity identified at potential TCPs. All potential TCPs will be addressed in the resulting HPMP and the informal recommendations will be utilized to develop appropriate protection and/or management measures for identified Project-related impacts. If identified impacts to potential TCPs cannot be avoided or eliminated, formal NRHP evaluation may be necessary.

Step 5 – Identify and Assess Potential Project Effects on National Register-Eligible Properties. As required under 36 CFR § 800.5, Licensees will identify and assess, in consultation with the SHPO, FS, BLM, and potentially affected Indian Tribes, any adverse effects on historic properties resulting from Project O&M. Adverse Effects are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative (36 CFR § 800.5(a)(1)).

Step 6 –Reporting. Licensee will prepare a report that includes the following sections: 1) Study Goals and Objectives; 2) Methods and Analysis; 3) Results; 4) Conclusions; and 5) Description of Variances from the FERC-approved study proposal, if any. Licensee plans to make the report available to Relicensing Participants when completed, and to include progress updates in the Initial and Updated study reports. The report, and draft HPMP, will be included in the License Application.

The report will indicate whether identified impacts constitute “adverse” or “non-adverse” effects, as required under 36 CFR § 800.5. Copies of this report will be provided to the affected Indian tribes, federal land management agencies (e.g. BLM, FS), SHPO, the California State University, Sacramento, Historic Resources Information Center (with Tribal representative permission) and the FERC. Copies of the final report and detailed locations of identified properties may be withheld from public disclosure in accordance with Section 304 (16 U.S.C. 4702-3) of the National Historic Preservation Act (as amended). Concurrence on report recommendations will be sought from the SHPO.

6.4 Study Plan Consultation

The implementation of this study plan will be conducted in consultation with the FERC, the SHPO, affected Native American Tribes, and all appropriate agencies (e.g. the FS, BLM).

Licensee will consult with other Relicensing Participants if it believes a modification to the study proposal is needed.

6.5 Schedule

Licensee anticipates the schedule to complete the study proposal as follows, assuming FERC’s Study Plan Determination (i.e., approval) regarding this proposal is deemed final on February 9, 2009, and the Initial Study Report, which includes the results of the implemented Study Plan, is due to FERC on February 9, 2010 (this assumes there will be no study proposal dispute):

[TCP Management Oversight Team – Study Plan Research, Development, Development, Archiving Arrangements – 2008 - ?](#)

Planning/Prefield Arrangements.....February 10, 2009 – March 10, 2009
Field Work (Steps 1, 2 & 3).....March 16, 2009 - October 1, 2009
Office Works (4 & 5).....October 1, 2009 - December 31, 2009
Study Proposal Consultation.....As needed and Quarterly Reports
Report Preparation (6).....October 1, 2009 – February 9, 2010

6.6 Consistency of Methodology with Generally Accepted Scientific Practices

The proposed study methods discussed above are consistent with the study methods followed in several of the Licensee's relicensing projects. The methods presented in this study plan also are consistent with the Advisory Council on Historic Preservation's guidelines for compliance with the requirements of Section 106 of the National Historic Preservation Act, found at 36 CFR 800 and with National Register Bulletin 38.

7.0 Products

The results of the Study Plan will be reported in Exhibit E of the License Application, which will include a summary of the information and findings of the Study Plan. Figures and other pertinent data supporting the summary in Exhibit E will be appended to the License Application. The cultural records and other sensitive information will be included in a confidential appendix withheld from public disclosure, in accordance with Section 304 (16 U.S.C. 4702-3) of the National Historic Preservation Act (as amended).

It is not anticipated that stand-alone reports will be necessary. If a stand-alone report is deemed necessary by a resource agency (i.e., FS, BLM, etc.) prior to the Study Proposal's submittal to FERC, then Section 7.0 (Products) will be amended accordingly at the time of that determination. Licensees anticipate that requests for a stand-alone report will not occur following resource agency reviews of the Study Proposal prior to its submittal to the FERC. If any stand-alone reports are requested by resource agencies, they will incorporate the same sections as the License Application, including (e.g., purpose of study, study area, methods, results, analysis, references).

Licensees anticipate that preparation of a HPMP will be a condition for receiving a new license and is not considered a product of the Study Plan.

8.0 Relationship to Other Studies

As noted above in Section 3.0, it is anticipated that a condition for receiving a new license will require the Licensees to develop Project HPMPs that identify historic properties, anticipated effects, and proposed measures to protect historic properties. The results of both the Traditional Cultural Properties and Historic Properties studies will be included in the Project HPMP.

In addition, Licensee's ethnographer will consult with the Licensee's technical leads performing other relicensing studies to assure that those studies have not identified a potential impact that could affect TCPs. If they have, Licensee will consider this information in development of the HPMP.

If the APE is to be expanded as a result of other resource studies conducted during the Project, all necessary changes will be completed as described in Section 4.0.

Study consultants should review maps of traditional cultural properties and tribal sites produced from this study to see if other studies will be conducted on these aboriginal sensitive sites. If they find their studies will access or adversely impact these lands, before doing the study consultants should contact the appropriate Tribe and cultural/tribal stakeholders to discuss the sensitivity of these sites.

When consultants are in the field for other studies, they should informally document Native American cultural resources. The consultant should compile these records from all field consultants and provide them to the appropriate Archaeologist with the agency land manager. The Archaeologist will go out to the field and evaluate the Native American cultural resource. This information will inform the Final Report for this study.

Licensees should conduct Cultural Site Identification Training for all field consultants and employees who will be out in the field for the studies of the Drum-Spaulding and Yuba-Bear relicensing. (This could be a daylong training).

Information from this study will be used by the following studies:

- Recreational Use Study
- Recreational Flow Study
- Stream Fish Population Study and Reservoir Fish Population Study Proposal
- Amphibian and Aquatic Reptiles Study
- Bioaccumulation Study
- Water Quality
- Land Use – Transportation, Wildfires, Land Use, Socioeconomic
- Botanical Special Status Plants and Special Status Wildlife

9.0 Level of Effort and Cost

The preliminary cost estimate for the study in 2008, 2009, and 2010 dollars (the year in which the study work will occur) is as follows:

Planning/Prefield Arrangements	\$ *
Consultation and Field Work (1, 2 & 3).....	\$ *
Office Works (4, & 5).....	\$ *
Study Proposal Consultation.....	\$ *
Report Preparation (6).....	\$ *
TOTAL	\$

* TCP Management Oversight Team – Study Plan Research, Development, Archiving

The estimated level of effort and cost is not a firm commitment by Licensees to expend all the funds. If the study cost more, Licensee is committed to completing the study. If the study costs less, Licensee is not committed to expending the remaining funds elsewhere.

10.0 References Cited

Federal Energy Regulatory Commission (FERC) and Advisory Council on Historic Preservation. 2002. *Guidelines for the Development of Historic Properties Management Plans for FERC Hydroelectric Projects*. Washington D.C.

Parker, Patricia L., and Thomas F. King, 1998. *Guidelines for Evaluating and Documenting Traditional Cultural Properties*. Revised. National Register Bulletin 38. U.S. Department of the Interior, National Park Service, National Register, History, and Education Division, Washington, D.C.