

STUDY DESCRIPTION CR-1
Cultural Resources Study
April 9, 2026

This Study Description is developed to inform information gaps identified by Calaveras County Water District (CCWD) for the relicensing of its North Fork Stanislaus River Hydroelectric Project (Project).¹

STUDY AREA

CCWD anticipates that the Study Area for the Cultural Resources Study will be the same as the proposed area of potential effects (APE) for the relicensing.

Under the National Historic Preservation Act (NHPA) Section 106 implementing regulations at 36 Code of Federal Regulations (C.F.R.) § 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” Based on this regulatory definition, the APE for the Project relicensing has been initially identified by CCWD as including all lands within the FERC Project Boundary. This is the area identified by CCWD where Project operations or Project-related activities may cause changes in the character or use of historic properties, if any such properties exist.

CCWD anticipates that FERC will designate CCWD as FERC’s non-federal representative for carrying out consultation pursuant to Section 106 of the NHPA. Thus, following this designation, and pursuant to 36 C.F.R. § 800.4(a)(1), CCWD will consult with the California State Historic Preservation Officer (SHPO) regarding the determination of the APE prior to study implementation.

If CCWD proposes modifications to the FERC Project Boundary or Project-related effects are identified outside of the Study Area, the Study Area (and subsequently the APE) will be expanded as necessary to include areas potentially affected by the addition.

STUDY METHODS

Archival Research

A cultural resources records search of the Study Area and a half-mile buffer around the Study Area was conducted for the preparations of the Pre-Application Document (PAD). This included a review of previously recorded cultural resources and previously conducted cultural resources investigations. As necessary, additional archival research will be conducted to obtain any additional information specific to cultural resources in the Study Area. Potential places to be contacted include:

¹ In addition to the details provided in this study description, study implementation will also follow the “*Concepts and Practices Applicable to All Relicensing Studies*” developed by CCWD.

- Calaveras County Historical Society and Museums;
- Publicly available digital archives; and
- United States Forest Service (USFS) Records.

Field Survey and Identification of Resources

Archaeological Field Survey

CCWD will conduct a pedestrian field survey to verify locations of previously recorded cultural resources and to identify previously unknown cultural resources, if present, in the Study Area. The archaeological survey will be an intensive level survey and will follow the approved archaeological survey and inventory standards maintained by SHPO and the USFS. The field survey will be supervised by qualified, professional archaeologists (i.e., individuals who meet the Secretary of the Interior's (SOI) Historic Preservation Professional Qualifications Standards for Archaeology) and will follow the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (National Park Service [NPS] 1983). As a portion of the Study Area consists of USFS managed lands, the field survey of these lands will be conducted under an Archaeological Resource Protection Act (ARPA) permit acquired through the Stanislaus National Forest.

The survey will examine all accessible lands within the Study Area. Locations within the Study Area that cannot be accessed in a safe manner (e.g., locations containing dense vegetation, unsafe slopes, or inundated areas) will not be surveyed; these areas will be identified in the Study Report and an explanation for survey exclusion will be provided. Field methods will include crew members walking parallel transects spaced no more than 15-20 meters apart. Topographical features considered to be sensitive for cultural resources (e.g., flat stream terraces) will be thoroughly inspected. Lands typically inundated by the Project reservoirs that become accessible during the survey season as a result of normal operations or other maintenance activities will be examined. CCWD will make a reasonable effort to access all areas that are safe to survey during the Study and where feasible will view inaccessible locations from boat or other advantageous locations to provide as much information as possible on locations that cannot be surveyed on foot. Additionally, each site identified during the survey will be assessed for Project-related effects including, but not limited to, water fluctuation, wave action, and vegetation management activities. Locations of previously recorded cultural resources will be verified, and the sites re-recorded to current standards.

Field crews will use digital tablets (iPad or similar) equipped with Esri's Field Maps application and connected to a global navigation satellite system receiver. The digital tablets will be pre-loaded into the Field Maps application along with the FERC Project Boundary, locations of previously documented sites received from record search data, and digitized locations of potential historic features identified during pre-field research. Newly and previously identified resources will be recorded according to SHPO standards on the appropriate Department of Parks and Recreation 523 forms.

Built Environment Survey

A field inspection and documentation of historic built-environment resources 45 years or older that are within or partially within the FERC Project Boundary will be conducted. For the purposes of this survey, only those built-environment resources fully within or partially within the FERC Project Boundary, or that may not be within the FERC Project Boundary but are on parcels that intersect with the FERC Project Boundary will be surveyed and evaluated. Each resource will be recorded on the appropriate Department of Parks and Recreation 523 forms.

An architectural historian who meets the SOI's Professional Qualifications Standards for architectural history will supervise all fieldwork and reporting. Architectural historians will review available documents to provide a basis for recommendations on eligibility, significance, and integrity. The survey will consist of a field visit and archival research following methods outlined by SHPO guidance. Historic built-environment resources will be recorded or re-recorded to meet current SHPO standards. This will include digital color photography and sketch maps of individual features that show the relationship between buildings and structures, including any historic architectural or engineering plans, subject to availability. The historic built environment resources identified during the Study will be assessed together, as a system and a potential district², as well as on an individual basis.

Analysis

Identify and Assess Potential Effects on Cultural Resources

CCWD will document any Project-related effects identified at cultural resources in the Study Area. This information will be used to inform the need for any National Register of Historic Places (NRHP) evaluations that may occur under the NHPA Section 106 consultation. Additionally, CCWD will also describe other potential threats to the cultural properties within the Study Area, including natural deterioration such as erosion or deflation; on-going use such as recreational use; or the potential for vandalism. The Study Report will describe potential effects from Project-related activities and any potential avoidance, minimization or mitigation options.

As possible based on the level of documentation completed for the Study, CCWD will apply the NRHP criteria for evaluation pursuant to 36 C.F.R. § 60.4 to evaluate the eligibility of identified properties for inclusion in the NRHP and consider and review previous NRHP evaluations conducted by others to incorporate existing evaluation data as appropriate. The integrity of properties that meet the significance requirements under one or more of the NRHP criteria of evaluation will be assessed pursuant to 36 C.F.R. § 60.4 to confirm they still retain sufficient integrity in order to convey their significance³. It is possible that some identified properties may not have enough available information to complete NRHP eligibility evaluations (e.g., precontact

² "A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS 1997:5).

³ Integrity of historic properties is described in National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* (NPS 1997).

sites with untested subsurface components); these properties will be assumed and treated as eligible for inclusion in the NRHP.

In accordance with the criteria for evaluation (36 C.F.R. § 60.4), properties are eligible if they are significant in American history, architecture, archaeology, engineering, or culture. The quality of significance is present in historic properties that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- Criterion A: Are associated with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B: Are associated with the lives of persons significant in our history; or
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant or distinguishable entity whose components may lack individual distinction; or
- Criterion D: Have yielded or may be likely to yield information important in prehistory or history.

REPORTING

CCWD will prepare a report at the conclusion of the Study consistent with SHPO guidance that includes the following sections⁴: 1) Project Description, 2) Study Goals and Objectives, 3) Environmental Setting and Cultural and Historical Context, 4) Pre-Field Research, 5) Consultation Summary, 6) Methods and Results, 7) Management Recommendations and Conclusions⁵, and 8) Description of Variances from this Study Plan. The report will also include:

- Maps that clearly depict the following on U.S. Geological Survey 1:24,000 topographic maps:
 - The FERC Project Boundary;
 - Resource locations; and
 - Survey coverage.
- Consultation correspondence related to the Study.
- Descriptions of the isolated finds.
- Resumes for key Study personnel.

⁴ In addition to the details provided in this section, reporting will also follow the "*Concepts and Practices Applicable to All Relicensing Studies*" developed by CCWD.

⁵ Recommendations could include the development a PA and Historic Properties Treatment Plan or HPMP if there are eligible resources within the APE.

The results of the Study may include culturally sensitive information that is exempt from public release⁶. CCWD will protect the culturally sensitive information from public view by designating it as privileged and only distributing it to those consulting parties allowed access to privileged information (i.e., Tribes, SHPO, FERC, and USFS cultural resources representatives). It is expected that the portions of the Study Report that include privileged information will only be shared as described here and will be filed in FERC's privileged files. The Study Report will be distributed to interested Tribes, USFS, and the SHPO for review and comment as part of the NHPA Section 106 consultation process that will be conducted by CCWD outside of this Study.

SCHEDULE

CCWD anticipates the schedule for Study completion as follows:

Conduct Archival Research	March – June 2027
Conduct Field Survey and Identification	May – July 2027
Analysis	August – September 2027
Reporting	September – November 2027

REFERENCES

United States Department of Interior, National Park Service (NPS). 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines in the Federal Register, September 29, 1983 (48FR44716). Department of the Interior, Washington, D.C.

⁶ Federal laws exempt certain types of cultural resources information from public disclosure (e.g., 54 U.S.C. Section 307103(a) of the NHPA, Section 9(a) of the ARPA, exclusions permitted by the Freedom of Information Act (FOIA), and the Native American Graves Protection and Repatriation Act (NAGPRA)).

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