



— BUREAU OF —  
RECLAMATION

Environmental Assessment

**Fire Fuels Reduction by Goat  
Grazing at Auburn Recreation  
District Lands**

CGB-EA-2020-010

## **Mission Statements**

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated Island Communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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# List of Acronyms and Abbreviations

ARD	Auburn Area Recreation and Park District
APL	Auburn Project Lands
CEQ	Council on Environmental Quality
CNDDDB	California Natural Diversity Database
EA	Environmental Assessment
ITA	Indian Trust Assets
MPA	Managing Partner Agreement
NEPA	National Environmental Policy Act
Reclamation	Bureau of Reclamation
SHPO	State Historic Preservation Officer
APE	Area of Potential Effect
UAIC	United Auburn Indian Community
PCWA	Placer County Water Agency

# **Section 1 Introduction**

## **1.1 Background**

In conformance with the National Environmental Policy Act of 1969 (NEPA), Council on Environmental Quality regulations (40 CFR 1500-1508), and Department of Interior Regulations (43 CFR Part 46), the Bureau of Reclamation (Reclamation) prepared this Environmental Assessment to evaluate and disclose potential environmental impacts associated with allowing Auburn Area Recreation and Park District (ARD) to graze vegetation for fuel reduction on Reclamation lands per the Managing Partner Agreement (MPA 2012). The MPA is an agreement between Reclamation and the California Department of Parks and Recreation to cooperate on the management of the lands at Folsom Lake, Lake Natoma, Auburn Dam and Reservoir lands. The Proposed Action is located near Maidu Drive just east of Auburn, California (Figure 1).

## **1.2 Need for the Proposed Action**

The Proposed Action derives from the need to protect Auburn Project Lands (APL) and adjacent communities from the risk and threats of wildfire from hazardous fuel loads on APL. The Project Area is particularly prone to fire due to overgrowth of non-native invasive weed species.

# **Section 2 Alternatives Including the Proposed Action**

## **2.1 No Action**

Under the No Action Alternative, ARD would leave fuels unmanaged and hazardous conditions would persist.



Figure 1. Project Area

## **2.2 Proposed Action**

Reclamation proposes to allow ARD to graze vegetation for fuel reduction on Reclamation lands under the MPA. The Proposed Action consists of initiating grazing to control the annual grasses and weeds on approximately 42 acres of managed lands along the boundary of the City of Auburn (Figure 1). The Proposed Action is expected to be implemented as needed due to fuel loading and vegetation conditions.

Proposed Action includes:

- Contracting for periodic grazing animals under the MPA to help reduce fuels within at least 100 feet of fences along the adjacent private property line and residences in the Project Area. The operational definition of “periodic” could be defined as one to three grazing sessions per season; balancing the project’s goals while preventing overgrazing will be paramount.
- Removing or thinning vegetation including weedy growth and grasses within the recreation areas and facilities under the MPA.
- ARD staff and the contractor will monitor the grazing animals, install electrified fencing where needed, and notification signs for residents and guests.
- Proper grazing techniques such as temporary fencing, rotation of goats, regular monitoring, and avoidance of overstocking or overgrazing would be implemented (Lovreglio 2014).

# **Section 3 Affected Environment and Environmental Consequences**

## **3.1 No Action Alternative**

Under the No Action Alternative, Reclamation would not approve ARD to use animal grazing for fuel reduction and fuels and hazardous conditions would persist.

## **3.2 Proposed Action**

Under the Proposed Action, Reclamation would approve ARD to use animals for grazing vegetation.

### **3.2.1 Required Resource Discussions**

Department of Interior Regulations, Executive Orders, and Reclamation guidelines require a discussion of Indian sacred sites, Indian Trust Assets (ITAs), and Environmental Justice when preparing environmental documentation.

*Indian Sacred Sites.* Sacred sites are defined in Executive Order 13007 (May 24, 1996) as “any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, and Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.” There are no identified Indian Sacred Sites within the Proposed Action area; therefore this Proposed Action would not inhibit use or access to any Indian Sacred Sites.

*Indian Trust Assets.* ITAs are legal interests in assets that are held in trust by the U.S. for federally recognized Indian tribes or individuals. The closest ITA to the Proposed Action is the United Auburn Indian Community of the Auburn Rancheria (Appendix A). Based on the nature of the planned work, the Proposed Action is not in an area that would impact Indian hunting or fishing resources or water rights. It is reasonable to assume that the Proposed Action would not have any impacts on ITAs.

*Environmental Justice.* Executive Order 12898 requires each Federal agency to identify and address disproportionately high and adverse human health or environmental impacts, including social and economic effects of its program, policies, and activities on minority populations and low-income populations. The Proposed Action would not have adverse economic or social effects on any individuals or populations within the vicinity of the project. Therefore, the Proposed Action would not have disproportionately negative impacts on low-income or minority populations.

### **3.2.2 Cultural Resources**

Cultural resources is a broad term that includes prehistoric, historic, architectural, and traditional cultural properties. Title 54 U.S.C. 300101 *et seq.*, formerly and commonly known as the National Historic Preservation Act (NHPA) is the primary legislation for Federal historic preservation. Section 106 of the NHPA (54 U.S.C. 306108) requires Federal agencies to take into consideration the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation an opportunity to comment. Historic properties are those cultural resources that are listed on or eligible for inclusion in the National Register of Historic Places (National Register). The implementing regulations at 36 CFR Part 800 for Section 106 describe the process that the Federal agency takes to identify historic properties within the area of potential effects and to assess the effects that the proposed undertaking will have on those historic properties, through consultations with the State Historic Preservation Officer, Indian tribes, and other identified consulting and interested parties.

#### *Affected Environment*

In an effort to identify historic properties in the APE, Reclamation reviewed a cultural resources report commissioned by ARD. In April 2015, the environmental consulting firm Dudek conducted a cultural resources inventory of the project area. As part of this investigation, Dudek conducted a records search of the project area at the North Central Information Center, reviewed archival information provided by Reclamation, and conducted a pedestrian survey of a portion of the proposed project APE. One cultural resource was identified within the APE: CA PLA 1759-H, commonly known as the Shirland Canal. The canal bisects the APE from north to south and



extends for a total of 4.4 miles. Originally an earthen canal serving as a lateral for the Boardman Canal, the Shirland Canal was lined with gunite sometime between 1924 and 1940. The canal was evaluated for inclusion on the National Register of Historic Places (National Register) and was determined ineligible as it failed to meet any requisite criteria for significance. Reclamation concurs with Dudek's determination that the Shirland Canal is ineligible for listing on the National Register; the application of gunite has altered elements of function and design that would have characterized the original earthen structure at the time of its initial construction circa 1924.

On October 7, 2019, Reclamation conducted a pedestrian survey of the entire 48.6-acre APE. Aside from the Shirland Canal, no new cultural resources were identified in the APE.

Reclamation identified the Shingle Springs Band of Miwok Indians (Shingle Springs), the Wilton Rancheria, and the United Auburn Indian Community (UAIC) as Indian tribes who might attach religious and cultural significance to historic properties within the APE. Reclamation sent letters to the tribes inviting their participation in the Section 106 process and requesting their assistance in the identification of sites of religious and cultural significance or historic properties that may be affected by the proposed undertaking pursuant to 36 CFR § 800.4(a)(4). On September 13, 2019, Reclamation received a response via email from the Wilton Rancheria expressing concern about the potential for inadvertent discoveries of human remains and/or artifacts during ground disturbing activities and requested that work be stopped and the tribe immediately notified should such a discovery occur. Wilton Rancheria also requested that further consultation should be directed to UAIC. Reclamation passed Wilton Rancheria's concerns along to ARD, who committed to abide by Wilton Rancheria's request. To date, no responses have been received from UAIC or Shingle Springs.

#### *Project Impacts*

Reclamation initiated consultation with SHPO by letter dated October 31, 2019, requesting concurrence with our finding of no historic properties affected for the proposed project. In a letter dated November 26, 2019, SHPO did not object to Reclamation's finding (Appendix B). As a result of the inventory, evaluation, as assessment of effects, Reclamation concluded that the Proposed Action will have no impact on cultural resources.

### **3.2.3 Biological Resources**

#### *Affected Environment*

Existing conditions within the Project Area consist of open oak woodland and open areas of weedy growth. Vegetation was historically sparse and heavily used for grazing.

The California Natural Diversity Database Rarefind (CNDDDB) and the U.S. Fish and Wildlife Service's Information, Planning, and Conservation System databases were reviewed on July 10<sup>th</sup>, 2019 and on December 18<sup>th</sup>, 2019, to identify sensitive species and habitats recorded within the Project Area. No listed or proposed threatened or endangered species or critical habitats occur on or near the Project Area. The CNDDDB query did not return any species of concern within or around the Project Area.

Reclamation conducted a site visit on July 12<sup>th</sup>, 2019 and on November 8<sup>th</sup>, 2019 to check on conditions for wildfire potential, signs of erosion, presence of native and invasive species, riparian areas, and any other biological factors. A significant amount of invasive weeds such as exotic medusahead (*Taeniatherum caput-medusae*) and star thistle (*Centaurea solstitialis*) exist in the understory among native blue oaks (*Quercus douglasii*). No significant cases of erosion, riparian areas, or other biological factors were detected during the site visits.

#### *Project Impacts*

The Proposed Action would reduce the wildfire hazard along the wildland-urban interface by removal of flammable vegetation, especially in proximity to residential and nonresidential structures owned by Reclamation, the public, and private entities. Grazing would reduce fuel loads both through the ingestion and trampling action of the grazing animals. With proper grazing management, erosion can be reduced to a minimal to no effect outcome. Grazing would mostly reduce the amounts of invasive medusahead and star thistle predominating in the open areas and the weedy growth in the understory among the blue oaks (Thomsen 1993).

No listed species are present in the Project Area, therefore, implementation of the Proposed Action would not affect any listed or sensitive animals, plants, or plant communities.

### **3.2.4 Water Resources**

#### *Affected Environment*

The Proposed Action is located due west of the North Fork of the American River. The headwaters of the North, Middle, and South Fork of the American River lie in the Sierra Nevada mountains. Winter snowfall in the Sierras is crucial as it determines flows throughout the year. Runoff from the Sierras typically occurs during Spring.

The North Fork and the Middle Fork of the American River connect at the Confluence near Auburn and eventually lead into Folsom Lake. Wildlife habitat, recreational opportunities, and a Wild and Scenic River status are among the many resources that the North Fork has to offer. Additionally, the Shirland Canal is a resource that runs through the eastern portion of the Proposed Action area.

The project area lies at an elevation range of approximately 1,300 to 1,400 ft along Maidu Drive in Auburn. The distance to the North Fork is approximately 2,000 ft to the east with an elevation of 500'. The downhill gradient is bisected by Maidu drive and a number of service roads and trails leading to the Placer County Water Agency (PCWA) pump station.

#### *Project Impacts*

Grazing goats in the proposed project area may increase the likelihood of erosion due to loss of vegetation via trampling and consumption. Erosion in turn may lead to drainages which could transport sediment or goat fecal matter downhill into the Shirland Canal or the North Fork. Goat fecal matter may become a vector for bacteria such as fecal coliform and enterococci thus negatively affecting water quality (Hubbard 2004).

Despite this potential for adverse impacts to water and soil quality, natural and man-made conditions and proper grazing techniques can mitigate for these potential effects. The contours of the Project Area mostly lead to the Shirland Canal and the Placer County Water Agency building; an existing berm before the canal and fencing around the building prevents sedimentation or fecal matter from adversely affecting water quality in the area. Maidu Drive, roads, and trails in the area are properly crowned and ditched to allow for proper drainage and erosion management and as such any potential impacts will be contained within the Proposed Action area. The aforementioned best management practices for goat grazing will also be employed to mitigate for erosion and other adverse impacts. Overall, the Proposed Action will not cause any adverse impact to water resources in the area.

### **3.3 Cumulative Effects**

Per Council on Environmental Quality regulations for implementing the procedural provisions of NEPA, a cumulative impact is defined as *the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time* (40 CFR 1508.7).

Reclamation determined that the Proposed Action would have no effect to environmental resources. As a result, there would be no adverse cumulative effects associated with implementation of the Proposed Action.

## **Section 4 Consultation & Coordination**

### **4.0 Agencies and Persons Consulted**

Reclamation consulted and coordinated with the ARD and the State Historic Preservation Officer.

## Section 5 References

- California Department of Fish and Wildlife. Natural Diversity Database Rarefind. Available: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> . Accessed: July 10<sup>th</sup>, 2019 and December 9<sup>th</sup>, 2019.
- Hubbard, R.K., Newton, G.L., Hill, G.M. (2004). Journal of Animal Science, Volume 82, Issue suppl\_13, January 2004, Pages E255–E263, [https://doi.org/10.2527/2004.8213\\_supplE255x](https://doi.org/10.2527/2004.8213_supplE255x)
- Lovreglio R, Meddour-Sahar O, Leone V (2014). Goat grazing as a wildfire prevention tool: a basic review. iForest 7: 260-268. - doi: 10.3832/ifor1112-007
- Ojerio, Ryan; Moseley, Cassandra; Lynn, Kathy; Bania, Neil (2011). Natural Hazards Review, Volume 12, Issue 1, February 2011. [https://ascelibrary.org/doi/abs/10.1061/\(ASCE\)NH.1527-6996.0000027](https://ascelibrary.org/doi/abs/10.1061/(ASCE)NH.1527-6996.0000027)
- Thomsen C, Williams W, Vayssières M, Bell F, George M. (1993). Controlled grazing on annual grassland decreases yellow starthistle. Calif Agr 47(6):36-40.
- U.S. Department of the Interior Bureau of Reclamation Central Valley Project American River Division. Management Agreement Between the United States of America and the State of California, January 2012.
- USFWS. 2019. Information for Planning and Consultation (IPaC). Available: <https://ecos.fws.gov/ipac/>. Accessed: July 10, 2019 and December 9<sup>th</sup>, 2019.

# Appendix A: Indian Trust Assets

Indian Trust Assets (ITA) Request Form (Mid-Pacific [MP] Region)

Submit your request to your office's ITA designee William DeGrush Date: July 11th, 2019

Requested by  
(office/program) Will DeGrush  
Fund 19XR0680A4  
WBS WBS RX.085980184990000

Fund Cost Center 19XR0680A4  
Region Number (if other than MP)  
Project Name Auburn Recreation District Goat Grazing  
Categorical Exclusion Checklist (CEC) or Environmental Assessment (EA) Number  
CCAO-EA-19-13

Project Description: (Attach additional sheets if needed and include photos if appropriate.) Project Description: (Include all components of project. Identify stage: Preliminary, draft, final. Provide updates as needed throughout project.)

Project Description/Proposed Action  
The Bureau of Reclamation (Reclamation) proposes to allow Auburn Area Recreation and Park District (ARD) to graze vegetation for fuel reduction on Reclamation lands under a Managing Partner Agreement (MPA) Contract #00-LC-20-7281 near Maidu Drive just east of Auburn, California. The objective of this project is to improve public safety by Adaptive Management (516 Department Manual 4.16). The Proposed Action would reduce the wildfire hazard along the wildland-urban interface by removal of flammable vegetation, especially in proximity to residential and nonresidential structures owned by Reclamation and private entities.

The MPA provides in Article 6.i:  
In the administration of recreation development and when due to recreation activities, the District will take all reasonable measures necessary to minimize siltation and erosion, prevent and suppress wildfires, protect against the introduction and spreading of noxious weeds detrimental to agriculture, and cooperate in watershed management practices. All concession contracts hereafter entered into shall contain suitable provisions consistent herewith, including such provisions as are required by the United States.

ARD proposes to use grazing as a method to control the annual grasses and weeds that may increase wildfire risk on about 42 acres of managed lands (outside of buildings and paved areas). Grazing reduces the amount of accumulated plant matter present on these lands, reducing fire fuel loads. Grazing can reduce fuel loads both through the ingestion and trampling action of the grazing animals.

The grazing would be done with contracted companies that provide such services. The goats will be monitored daily by the contractor, and guard dogs will be used during the duration. Electrified fencing will be used to help contain the goats, and water will be found at nearby sources or

brought in daily by the contractor. Notification via signs will be used to notify residents and guests to avoid contact with the fencing or the grazing animals.

The project consists of grazing lands along the boundary of City of Auburn within the MPA area mapped as Exhibit B to improve public safety. Location is within T. 12 N., R. 8 E., NW1/4SE1/4 and SW1/4NE1/4 of Section 22. The site is bounded in most part by Maidu Drive on the south and east, and residences in Auburn on the west (Figure 2). Work will include:

- Periodic grazing of fuels within at least 100 feet of fences along the adjacent private property line and residences, which is also the boundary of the City of Auburn.
- Contracting for herded goats or other grazing animals under the MPA as needed to help reduce fuel loadings.
- Removing or thinning vegetation including weedy growth and grasses within the recreation areas and facilities.

Work will be performed alternatively by ARD staff, contracted crews, or using only livestock contractors such as for goat grazing operations. Grazing would mostly reduce the amounts of invasive exotic medusahead *Taeniatherum caput-medusae* and star thistle *Centaurea solstitialis* predominating in the open areas and the weedy growth in the understory among the blue oaks *Quercus douglasii*. These minor alterations in the condition of vegetation would not involve removal of healthy, mature, or scenic trees.

The closest ITA to the proposed **Auburn Recreation District Goat Grazing Project** activity is the **Auburn, United Auburn Indian Community of the Auburn Rancheria** about 17 miles to the northwest (See attached image).

Based on the nature of the planned work it **does not** appear to be in an area that will impact Indian hunting or fishing resources or water rights nor is the proposed activity on actual Indian lands. It is reasonable to assume that the proposed action **will not** have any impacts on ITAs.

<u>William DeGrush</u>	<u>William DeGrush</u>	<u>11 July 2019</u>
Printed Name of Approver	Signature	Date

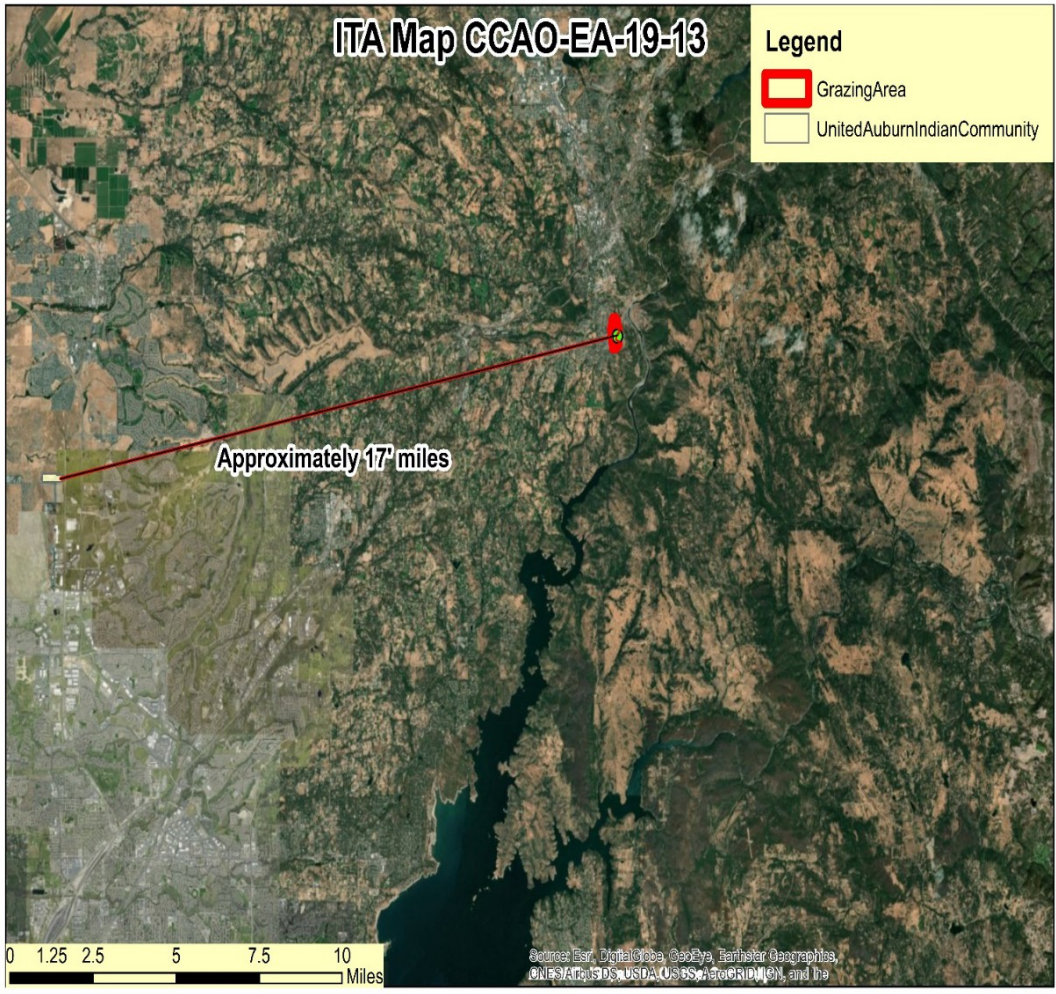


Figure 2: ITA Map



# Appendix B: Cultural Resources

DEPARTMENT OF PARKS AND RECREATION OFFICE OF HISTORIC PRESERVATION  
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  
Lisa Ann L. Mangat, Director

November 26, 2019 In reply refer to: BUR\_2019\_1101\_001  
VIA ELECTRONIC MAIL

Ms. Anastasia T. Leigh, Regional Environmental Officer  
U.S. Bureau of Reclamation, Interior Region 10 □ California-Great Basin 2800 Cottage Way,  
Sacramento, CA 95825-1898

Subject: Section 106 Consultation for the Auburn Recreation District (ARD) Goat Grazing  
Project, Placer County, California (19-CCAO-172)

Dear Ms. Leigh:

The State Historic Preservation Officer (SHPO) received your letter on October 31, 2019 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 most recent implementing regulations found at 36 CFR Part 800. The U.S. Bureau of Reclamation (Reclamation) proposes to authorize the ARD to employ goats for a fuels reduction project on Reclamation-owned lands near Maidu Drive east of the town of Auburn in Placer County. Reclamation requests concurrence with its finding of no historic properties affected. Submitted documentation is:

- Enclosure 1: MAPS: Figure 1: Project Location [overlaid USGS Quad map]; Figure 2: Area of Potential Effects (APE) [overlaid aerial photo map-with color coding];
- Enclosure 2: REPORT: Post-Field summary: Auburn Recreation District Goat Grazing Project, Folsom Lake, Placer County, CA, (19-CCAO-172); October 08, 2019. [By: J. Foin, Archaeologist, US Bureau of Reclamation, Interior Region 10 □ California-Great Basin, Sacramento, CA]. [with Appendices A & B & C. Note that Appendix C is Dudek's Report: "Auburn Recreation District Maidu Bike Park Project, Placer County, California"; June 5, 2015].

Lands in the project area are owned by Reclamation and administered by ARD under a cooperative management agreement. ARD proposes to employ grazing as a method of controlling the annual grasses and weeds that are increasing wildfire risk on approximately 48 acres of managed lands (excluding buildings and paved areas). Grazing reduces the amount of accumulated plant matter present on these lands and helps reduce fine fuel loads by both goat consumption and trampling. The grazing will be managed by contracted companies that specialize in the provision of these services. The goats will be monitored daily by the contractor, and guard dogs and temporary electrified fencing will be used during the duration of

the project to maintain control of the herd. Water will be acquired from nearby sources or hauled in daily by the contractor. Signage will be posted to notify residents and guests to avoid contact with the fencing, the herding dogs, and the goats.

Reclamation's area of potential effects (APE) comprises a 48.6-acre parcel measuring about 2,800 feet north-south by 1,000 feet west-east. The vertical APE is negligible due to the nature of the undertaking in which goats are transient over the landscape.

Historic properties identification efforts were done by ARD contract with the environmental consulting firm, Dudek, who conducted a cultural resources inventory of the project area for a nearby project (April, 2015). As part of this investigation, Dudek conducted a records search of the project area at the North Central Information Center, reviewed archival information provided by Reclamation, and conducted a pedestrian survey of a portion of the proposed project APE (Enclosure 2, Appendix C). One cultural resource was identified within the APE: CA-PLA-1759-H, commonly known as the Shirland Canal.

The canal bisects the APE from north to south and extends for a total of 4.4 miles. Originally an earthen canal serving as a lateral for the Boardman Canal, the Shirland Canal was lined with gunite sometime between 1924 and 1940 (2010 DPR 523 form: color photos 1-4).

The canal was evaluated for inclusion on the National Register of Historic Places (National Register) and was determined ineligible as it failed to meet any requisite criteria for significance (the attached contractor's report has further discussion). Reclamation states that it agrees with Dudek's determination that the Shirland Canal is ineligible for listing in the National Register under any of the criteria. The application of gunite has altered elements of function and design that would have characterized the original earthen structure at the time of its initial construction circa 1924. On October 7, 2019 a Reclamation Archaeologist conducted a pedestrian survey of the entire 48.6-acre APE with negative results. Aside from the Shirland Canal, no additional new cultural resources were identified within the APE.

I note that the Shirland Canal was also recently evaluated and found ineligible for National Register listing under a separate Reclamation Section 106 review for the Placer County Water Agency's Automated Canal Headgates Installation project. It is identified with a field survey number of "19CC-03" in this separate review. (Reclamation letter August 05, 2019 and SHPO concurrence letter September 04, 2019 [BUR\_2019\_0805\_002 copy attached]).

Reclamation identified the Shingle Springs Band of Miwok Indians (Shingle Springs), the Wilton Rancheria, and the United Auburn Indian Community (UAIC) as Indian tribes who might attach religious and cultural significance to historic properties within the APE and sent letters inviting their participation in the Section 106 process. On September 13, 2019, the Wilton Rancheria responded via email expressing concern about the potential for inadvertent discoveries of human remains and/or artifacts during ground disturbing activities and requested that work be stopped and the tribe immediately notified should such a discovery occur. Wilton Rancheria also requested that further consultation should be directed to UAIC. Reclamation passed Wilton Rancheria's concerns along to ARD, who committed to abide by Wilton Rancheria's request. To date, no responses have been received from UAIC or Shingle Springs. Should any concerns subsequently arise, Reclamation will work to address them and make notifications as required.

Based on a review the scope of current project activities and the provided documentation, Reclamation finds that the project is a no historic properties affected outcome because no historic properties are present within the defined APE and requests review and comment on delineation of the APE, efforts to identify historic properties, and seeks concurrence with its effect finding for this undertaking.

After OHP review of submitted documentation, the following comments are offered for the Auburn Recreation District (ARD) Goat Grazing Project, Placer County, California (19-CCAO-172):

- Pursuant to 36 CFR 800.4(a)(1), there are no objections to the APE as defined;
- Pursuant to 36 CFR 800.4(b), it is considered that Reclamation has made a reasonable and good faith effort to appropriately identify historic properties within the area of potential effects.
- Pursuant to 36 CFR 800.4(c)(2), I reconfirm that I do not object that Reclamation has determined that the Shirland Canal (CA-PLA-1759-H), is a locally built, common-type structure that lacks a significant historic context and that has lost its physical integrity due to material and visual changes through time, and is therefore not eligible for listing in the National Register of Historic Places under any of the criteria.
- Reclamation finds that the proposed undertaking will result in no historic properties affected. Pursuant to 36 CFR 800.4(d)(1)(i), 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](mailto:Jeanette.Schulz@parks.ca.gov) or her desk phone is: (916) 445-7031.

Sincerely,  
Julianne Polanco  
State Historic Preservation Officer

Attachment: SHPO concurrence letter dated September 04, 2019

