



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

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October 7, 2022
VIA ELECTRONIC MAIL

In reply refer to: NPS_2022_0914_002

Mr. Clayton F. Jordan
Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Subject: Fuels Reduction to Protect Sequoia Groves from Effects of High-Severity Fire,
Sequoia & Kings Canyon National Parks (NPS-SEKI)

Dear Mr. Jordan:

The SHPO received your letter and Enclosures A-E dated October 5, 2022, continuing consultation for the above-referenced undertaking to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. §306108), as amended, and its implementing regulations at 36 CFR Part 800. After receiving the letter initiating consultation dated September 14, 2022 and meeting with NPS-SEKI officials on September 20, 2022 the SHPO responded on September 21, 2022, agreeing to the request for an expedited consultation and requesting additional information before commenting on NPS-SEKI's finding of No Adverse Effect. NPS-SEKI's 10/5/22 letter and enclosures provided adequate information to consult on this undertaking.

Undertaking

NPS proposes to take immediate action to reduce fuels within and surrounding Sequoia groves in order to protect the groves and the resources therein from the potential devastating effects of high-severity fire. Fuels reduction methods will include point protection, manual thinning, pile burning, perimeter preparation, and broadcast prescribed burns. The project's duration is estimated at approximately two years. However, drought, weather, safety concerns, logistics, and other conditions may extend the duration up to five years. In response to the SHPO's 9/21/22 letter NPS-SEKI noted it will report on this undertaking concurrent with the annual report per the NPS Nationwide Programmatic Agreement, which will include documentation of any new properties identified and areas surveyed.

Area of Potential Effects (APE)

NPS-SEKI's 10/5/22 letter and enclosures provided an overall map of the APE (Enclosure A) and reorganized information to show the historic resources identified, the planned fuel reduction activities, and the potential for effects for each of three individual portions of the discontinuous APE: Middle Fork of the Kaweah River, East Fork of the Kaweah River, and

Grant Grove (Enclosure B). The SHPO's 9/21/22 letter offered no comment on the APE as delineated by NPS-SEKI.

Identification of Historic Properties

Due to steep and rugged terrain, the ability to conduct new surveys for this undertaking was limited.

Properties identified:

Middle Fork of the Kaweah River

Redwood Meadow Ranger Station and Redwood Meadow Tack Shed (NRHP 1978)

Archaeological sites: [REDACTED]

East Fork of the Kaweah River

Mineral King Historic District (NRHP 2003)

Hockett Meadow Ranger Station (NRHP 1978)

Archaeological sites: [REDACTED]
[REDACTED]
[REDACTED]

Grant Grove

Gamlin Cabin (NRHP 1977)

Archaeological sites: [REDACTED].

As noted in the 9/21/22 letter, the SHPO agrees to assume NRHP eligibility of unevaluated archaeological sites for the purposes of this undertaking.

Tribal Consultation:

NPS-SEKI sent formal consultation letters on September 14, 2022, followed by calls to: Big Pine Paiute Tribe of Owens Valley; Big Sandy Rancheria of Western Mono Indians; Bishop Paiute Tribe; Bridgeport Indian Colony; Cold Springs Rancheria of Mono Indians; Fort Independence Community of Paiute; Fort Mojave Indian Tribe; Lone Pine Paiute-Shoshone Tribe; North Fork Rancheria of Mono Indians; Picayune Rancheria of the Chukchansi Indians; Santa Rosa Rancheria Tachi Yokuts; Table Mountain Rancheria; Tejon Indian Tribe; and Tule River Indian Tribe. NPS-SEKI described discussions with tribal partners about fuel-reduction efforts and plans over the past six years and the general advocacy for and concurrence with fuel-reduction, especially among Sequoia groves, from tribal partners. NPS-SEKI did not report any opposition to or concern with this undertaking from Tribes.

Enclosure D (10/5/22) notes the utilization of a draft Tribal Monitoring Plan and a draft Inadvertent Discovery Plan, (included). The SHPO requests to be notified of any substantive revisions to the current versions.

Finding of Effect

NPS-SEKI plans to employ protective measures, avoidance, archaeological and Tribal monitors, and post-treatment surveys to avoid adverse effects and to better survey areas after treatment, as outlined in Enclosures B, C, and E (10/5/22). (The results of post-treatment surveys will be reported to the SHPO in the annual report.) Your letter states cumulative effects are present for archaeological sites mainly from exposure due to direct fire; however, wildfire also creates this condition. Your assessment is that "direct fire

exposure affects the surface and near-surface deposits. These upper layer deposits are also vulnerable to exposure to natural forces such as erosion and/or soil compaction from increased human presence during fuel reduction actions that will result in impacts to site transformation processes. These cumulative effects will be slow to develop and can be identified through consistent archeological site condition assessment following an immediate posttreatment baseline condition assessment.”

- Pursuant to 36 CFR 800.5(b), NPS-SEKI has made a finding of No Adverse Effect, with protection measures and monitoring as conditions. **I do not object.**

If you have any questions or concerns, please contact Susan Negrete at susan.negrete@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer