

NOTICE OF EXEMPTION

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812

From: TRC Companies
707 Wilshire Blvd., Suite 3250
Los Angeles, CA 90017

County Clerk of San Benito
1601 Lana Way
Hollister, CA 95023

Project Title: New Idria Road Bridge over Larios Creek

Project Applicant: County of San Benito Department of Public Works

Project Location – Specific: New Idria Road is rural collector located in the southeastern portion of San Benito County. The project location is 15.9 miles south of the intersection of Panoche Road and New Idria Road. See Appendix A.

Project Location – City: Panoche

Project Location – County: San Benito

Description of Nature, Purpose, and Beneficiaries of Project: The site has experienced flooding and has gone through several washouts in recent years. The County has made emergency repairs each time it has washed out. The current crossing over Larios Creek consists of two 10-foot diameter pipe culverts installed by the County in September 2024. Historical aerial imagery suggests the last bridge at the site was built between 1947 and 1958, the abutments of which are in the fill slopes of the roadway embankment. See Attachment D of Appendix C for Site Photos. The County of San Benito Department of Public Works proposes to construct a new bridge on the existing alignment of New Idria Road over Larios Creek.

The new structure will be a 95-foot-long single span bridge and have a total bridge width of 27 feet 6 inches. The abutments will be of a seat-type, supported on 18–24-inch piles. The beneficiaries of the Project include the County of San Benito and members of the community who utilize New Idria Road.

Name of Public Agency Approving Project: County of San Benito Resource Management Agency

Name of Person or Agency Carrying Out Project: Steve Loupe



Exempt Status:

☐ Ministerial (Sec. 21080(b)(1); 15268)

☐ Declared Emergency (Sec. 21080(b)(3); 15269(a))

☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c))

☐ Common Sense Exemption (Sec. 15061(b)(3))

☒ Categorical Exemption. State type and section number: Class 2 Section 15302; Section 15300.2

☐ Statutory Exemptions. State code number:

☒ Other: 23 CFR 771.117(a); 771.117(d)(3)

Reasons why project is exempt:

Class 2 / 15302

-Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

-This project is exempt from CEQA because the bridge replacement will be located on the same site and will have the same purpose and capacity. The project would not result in a significant cumulative effect on environmental, historical, or scenic resources.

23 CFR 771.117(a); 771.117(d)(3)

-(a) Categorical exclusions (CEs) are actions which do not individually or cumulatively have a significant effect on the human environment, and which have been found to have no such effect in procedures adopted by a federal agency in implementation of these regulations, and, based on past experience with similar actions, do not involve significant environmental impacts.

-(d) Additional actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and paragraph (a) of this section may be designated as CEs only after Administration approval.

Examples of such actions include but are not limited to:

(3) Bridge rehabilitation, reconstruction or replacement or the construction of grade separation to replace existing at-grade railroad crossings.

-This bridge replacement project is exempt from CEQA because it involves actions which: do not induce significant impacts to planned growth or land use for the area, do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic or other resource; do not involve significant air, noise, or water

quality impacts; do not have significant impacts on travel patterns; and do not otherwise, either individually or cumulatively, have any significant environmental impacts.

Section 15300.2 Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of this Project indicates that it would not violate any of the exceptions, as described below:

1. The Project will occur in certain specified sensitive environments or locations;

This Project replaces an existing bridge and is not considered a sensitive environment or location. The surrounding uses are zoned as AR, Agricultural Rangeland. The new bridge will be located over the Larious Creek, which is a seasonal stream. Based on the nature of the site, field visits, and a desktop due diligence review, a 401 certification, 404 permit, and LSA agreement will be required before construction begins. Based on biological surveys conducted at the Project Site, Biological Resource Protection Measures will be put in place during and following project construction; See Appendix B. Blunt-nosed Leopard Lizards were not detected during field surveys over 17 days; See Appendix C.

2. Cumulative impacts will be considerable because successive projects of the same type will occur at the same place over time;

The Project will not be expected to result in significant cumulative environmental impacts. Because a bridge is already in place, it is anticipated that smaller projects such as routine maintenance activities and upgrades will occur on the bridge in the future.

3. There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;

There are no known unusual circumstances that will have a significant effect on the environment. The removal of trees is not anticipated as part of the proposed scope of work. If vegetation removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities. Compliance with County specifications will ensure there is not a reasonable possibility that the Project will have a significant effect on the environment due to unforeseen circumstances.

4. The Project may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources within a highway officially designated as a scenic highway;

There are no scenic or similar resources within or near the Project area.

5. The Project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code;



The Project Site does not contain any Open Sites as listed on the State Water Resources Control Board's GeoTracker website and was not listed on the Department of Toxic Substances Control Board's Envirostor website. Therefore, the Project will have no impacts related to being located on a hazardous waste site.

6. The Project may cause a substantial adverse change in the significance of a historical resource.

Nothing in the Project Area and a half-mile radius is listed on the California Register of Historical Resources, or the California Built Environment Resource Directory (BERD), or the National Register of Historic Places (NRHP). The Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC) were negative for Tribal cultural resources. The crossing is recommended as ineligible for inclusion on the NRHP. The project is not anticipated to cause a substantial adverse change in the significance of a historical resource as defined in 36 CFR 800.5(a)(1). See Appendix D.

Lead Agency Contact Person: Steve Loupe

Phone and Email: (831) 207-0347 sloupe@sanbenitocountyca.gov

Signature: 

Date: 3/4/29

Title: Public Works Administrator

☒ Signed by Lead Agency

☐ Signed by Applicant

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes / No

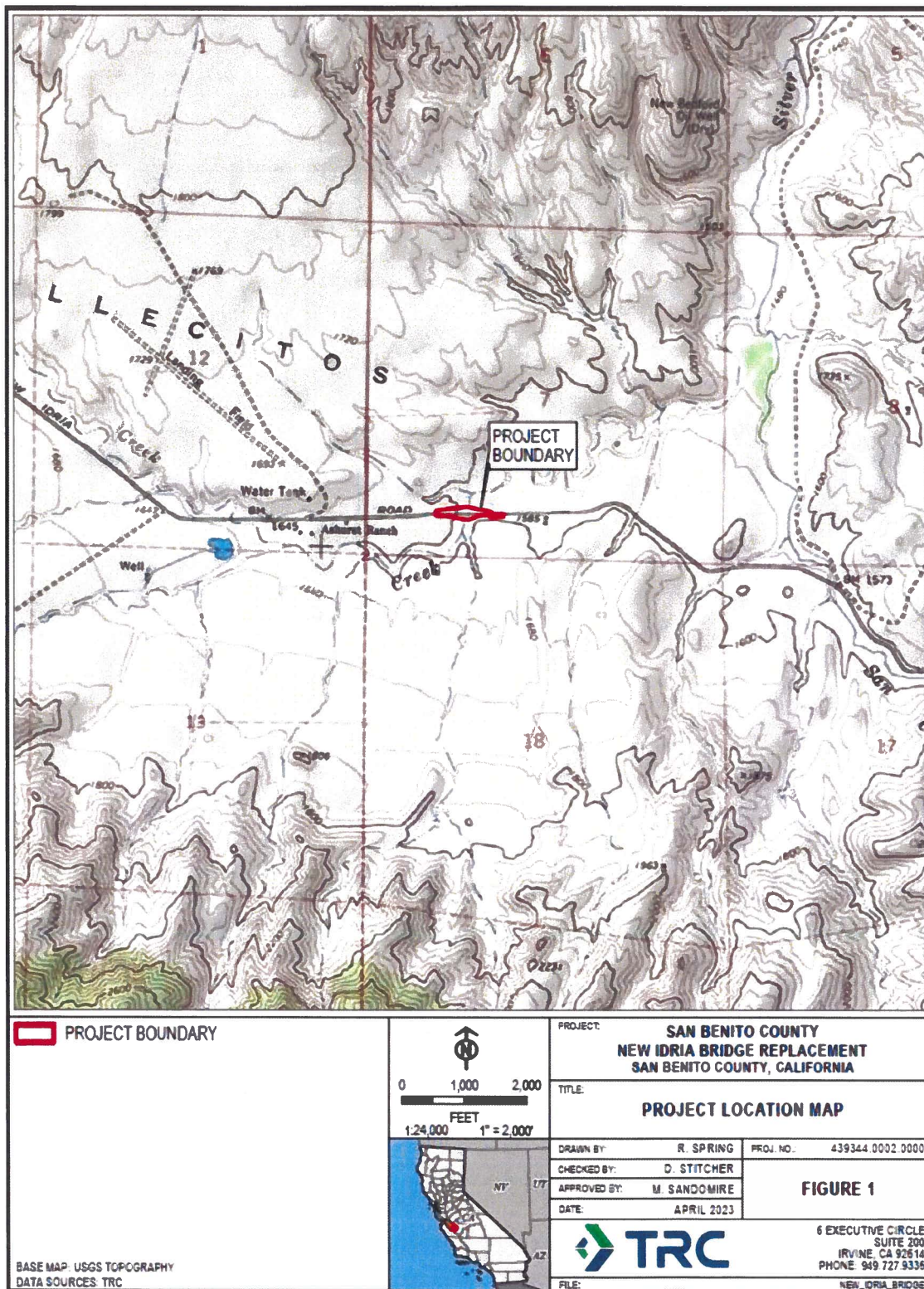
Authority cited: Sections 21083 and 21110, Public Resources Code.

Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR:



Appendix A: Site Map



Appendix B: Biological Resource Protection Measures



Biological Resource Protection Measures

September 2024

New Idria Road Bridge Project

San Benito County, CA

Prepared for:

TRC

10680 White Rock Road, Suite 100

Rancho Cordova, CA 95670

Prepared by:

Colibri Ecological Consulting, LLC

9493 N Fort Washington Road, Suite 108

Fresno, CA 93730

colibri-ecology.com



The County of San Benito plans to replace a bridge along New Idria Road over Larios Creek in southeastern San Benito County, California. To protect special-status species during construction, we recommend implementing the following Biological Resource Protection Measures:

BIO-1. Worker Environmental Awareness Training

- A Worker Environmental Awareness Program (WEAP) shall be implemented to train all construction personnel to recognize and protect biological resources on the project site. The WEAP training shall include a review of sensitive biological resources and special-status species, their legal status and protections, and avoidance measures. The WEAP training shall inform personnel of the appropriate actions to take if a special-status species is detected, including work stoppage and consultation with the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS).

BIO-2. Best Management Practices

- All areas of disturbance shall remain within the project boundaries. Vehicle traffic and construction activities outside of the project boundaries are prohibited.
- Spoil storage sites shall not be located within the stream, or where spoil will be washed into the stream. Rock, gravel, and/or other materials shall not be imported into or moved within the bed or banks of the stream.
- All disturbed soils on the project site shall be stabilized to reduce erosion potential, both during and following construction. Temporary erosion control devices, such as straw bales, silt fencing, and sandbags, may be used, as appropriate, to prevent siltation of the stream.
- To prevent entrapment of wildlife during construction, avoid using monofilament plastic for erosion control and cover all steep-walled holes, excavations, or trenches more than two feet deep at the close of each workday with plywood or similar materials; fill all voids and holes beneath the material to prevent wildlife from entering them. Alternatively, install one or more escape ramps in the excavations or trenches constructed of earth fill or wood planks at an angle no greater than 45 degrees. Before filling any holes or trenches, inspect them thoroughly for the presence of trapped animals. If any animals are found, they shall be allowed to leave on their own. If California tiger salamander, San Joaquin kit fox, or any other special-status species is found, work activities shall be halted and the CDFW and the USFWS shall be contacted immediately.
- All pipes, culverts or similar structures greater than 4 inches in diameter stored on the construction site shall be capped or inspected daily for nesting birds, San Joaquin kit fox, or other wildlife.
- Construction personnel shall inspect below staged equipment and parked vehicles for wildlife presence prior to moving.
- A speed limit of 15 miles per hour within the project boundaries shall be maintained by all vehicles and equipment.
- Trash and food waste shall be deposited in closed containers and removed daily to avoid attracting wildlife.



- Personnel shall be prohibited from feeding wildlife and bringing pets (excluding service animals) to the project site.
- Intentionally killing or collecting any wildlife species is prohibited.

BIO-3. Protect Crotch's Bumble Bee

- To protect Crotch's bumble bee, a qualified biologist shall survey the work area within one year prior to ground disturbing activities. Surveys should be conducted during the flying season (1 March to 1 September). If an individual is observed, project activities shall not occur until the animal has left the work area of its own volition. If a nest is observed, no project activities shall occur until a plan to protect Crotch's bumble bee, including overwintering queens, has been submitted to CDFW and approved in writing by CDFW.

BIO-4. Protect California Tiger Salamander

- Work should be postponed if the chance of rain is greater than 70% based on the National Weather Service forecast or within 48 hours following a rain event greater than 0.1 inch. If work must occur during these conditions, an approved biologist will conduct a clearance sweep of work areas prior to the start of work to confirm California tiger salamander (CTS) is not in the work area.
- Work will be avoided during or after significant rainfall; no work will be conducted if a rain event of 0.25 inches or greater in a 24-hour period occurs. For work conducted during the CTS migration season (November 1 to May 31), a qualified biologist will survey active work areas (including access roads) in the morning following measurable precipitation, and work will not proceed until the qualified biologist confirms CTS is not present. Construction may resume after precipitation ceases, a drying-out period of 48 hours is observed, and a qualified biologist inspects all work areas to verify CTS is not present.
- If an unpredicted rainfall event commences while construction activities are in progress, all work activities will be suspended, and equipment and personnel will be demobilized. Equipment may be moved to a designated staging area until work is allowed to resume. The designated area will be a hard surface devoid of small mammal burrows.

BIO-5. Protect Nesting Birds

- To the extent practicable, construction shall be scheduled to avoid the nesting season, which extends from February through August.



- If it is not possible to schedule construction between September and January, pre-construction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no active nests will be disturbed during the implementation of the Proposed Action. A pre-construction survey shall be conducted no more than 14 days prior to the initiation of construction activities. During this survey, the qualified biologist shall inspect all potential nest substrates in and immediately adjacent to the impact areas. If an active nest is found close enough to the construction area to be disturbed by these activities, the qualified biologist shall determine the extent of a construction-free buffer to be established around the nest. If work cannot proceed without disturbing the nesting birds, work may need to be halted or redirected to other areas until nesting and fledging are completed or the nest has otherwise failed for non-construction related reasons.

BIO-6. Protect San Joaquin Kit Fox

- To protect San Joaquin kit fox, a qualified biologist shall conduct a pre-construction survey within 30 days prior to the start of construction to identify any potential dens (burrows with openings > 4 inches in diameter) in suitable land cover. If potential dens are present, their disturbance and destruction shall be avoided. If potential dens are in the proposed work area and cannot be avoided during construction, a qualified biologist shall determine if the dens are occupied. If unoccupied, the qualified biologist will remove these dens by hand excavating them in accordance with USFWS procedures found in *U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior or During Ground Disturbance* (2011). When occupied or potentially occupied dens are adjacent to the work area, exclusion zones shall be implemented following USFWS procedures. Exclusion zones shall be determined based on the type of den and current use: Potential Den—50 feet; Known Den—100 feet; Natal or Pupping Den—to be determined on a case-by-case basis in coordination with USFWS and CDFW.

Appendix C: Blunt-nosed Leopard Lizard Survey Report



Blunt-nosed Leopard Lizard Survey Report

September 2024

New Idria Road Bridge Replacement Project
San Benito County, California

Prepared for:
TRC
707 Wilshire Boulevard, Suite 3250
Los Angeles, CA 90017

Prepared by:
Colibri Ecological Consulting, LLC
9493 N Fort Washington Road, Suite 108
Fresno, CA 93730
colibri-ecology.com



Executive Summary

The County of San Benito proposes to replace the bridge on New Idria Road over Larios Creek in southeastern San Benito County, California. The 3-acre project site is between State Route 25 and Interstate 5, approximately 26 miles southwest of Mendota.

The project site provides habitat for the endangered blunt-nosed leopard lizard (*Gambelia sila*). Carrying out the project will remove habitat for this species. Therefore, to determine whether the species is present on the project site and help avoid or minimize impacts to it during project construction, protocol surveys were conducted for blunt-nosed leopard lizard during the 2024 survey season.

Following the protocol involved conducting surveys over 17 days, 12 during the optimal active period for adult lizards (15 April – 15 July) and five during the optimal active period for juveniles (15 August – 30 September). Blunt-nosed leopard lizard was not detected during the surveys.



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1.0 Introduction

The County of San Benito proposes to replace a washed-out bridge along New Idria Road over Larios Creek in southeastern San Benito County, California (the Project). The 3-acre Project site is at latitude 36.459840°N, longitude -120.701349°W, between State Route 25 and Interstate 5, approximately 26 miles southwest of Mendota (Figures 1 and 2). The Project site is within the current range of the federally and state-listed as endangered and state fully protected blunt-nosed leopard lizard (*Gambelia sila*). The land cover on the Project site (which included annual grassland, a streambed, and a road), represents habitat for the species (Figure 2). To determine the potential presence of blunt-nosed leopard lizard on or near the Project site and therefore avoid or minimize impacts to the species, protocol surveys were conducted during the 2024 survey season before the start of construction.

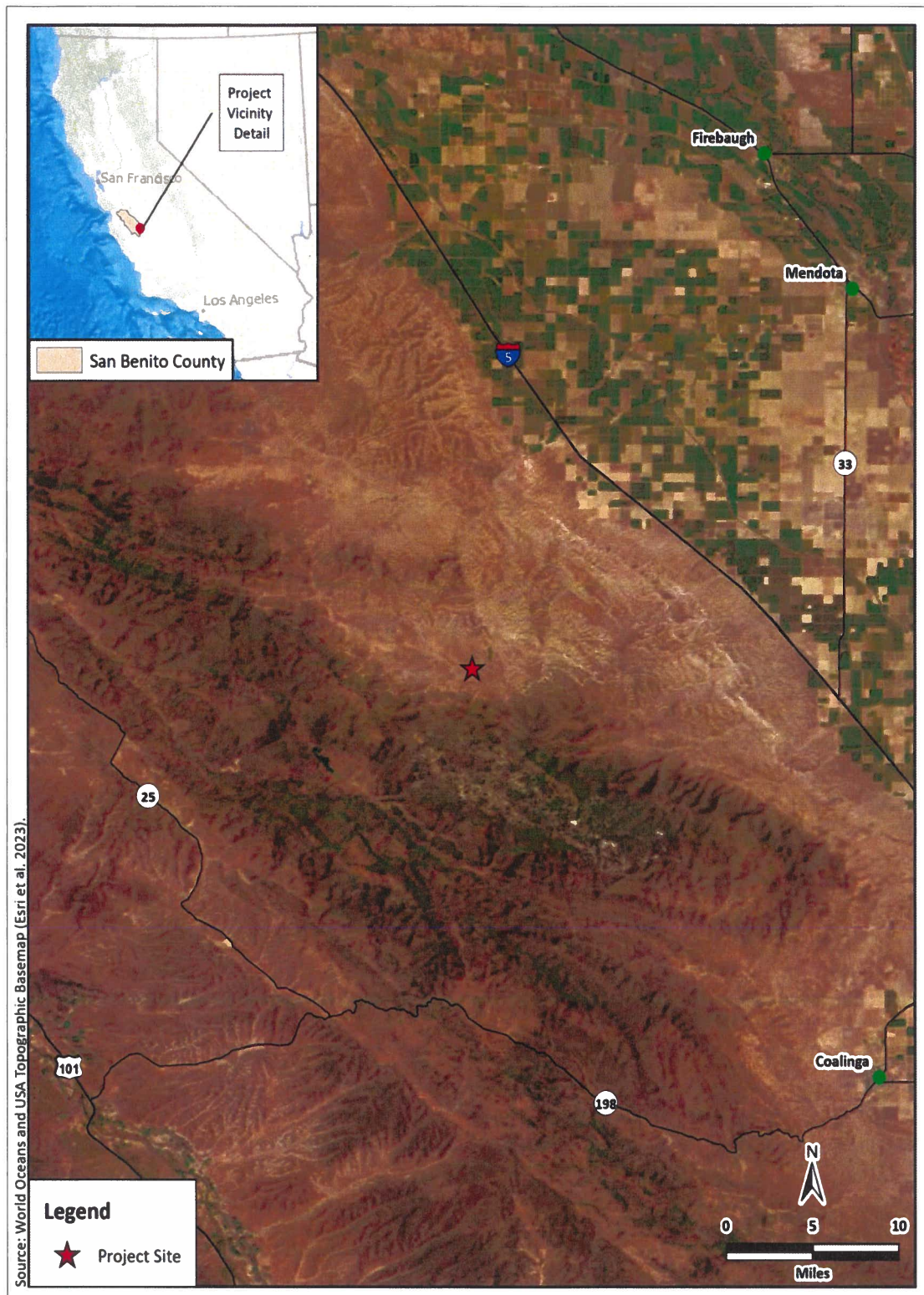


Figure 1. Project site vicinity map.

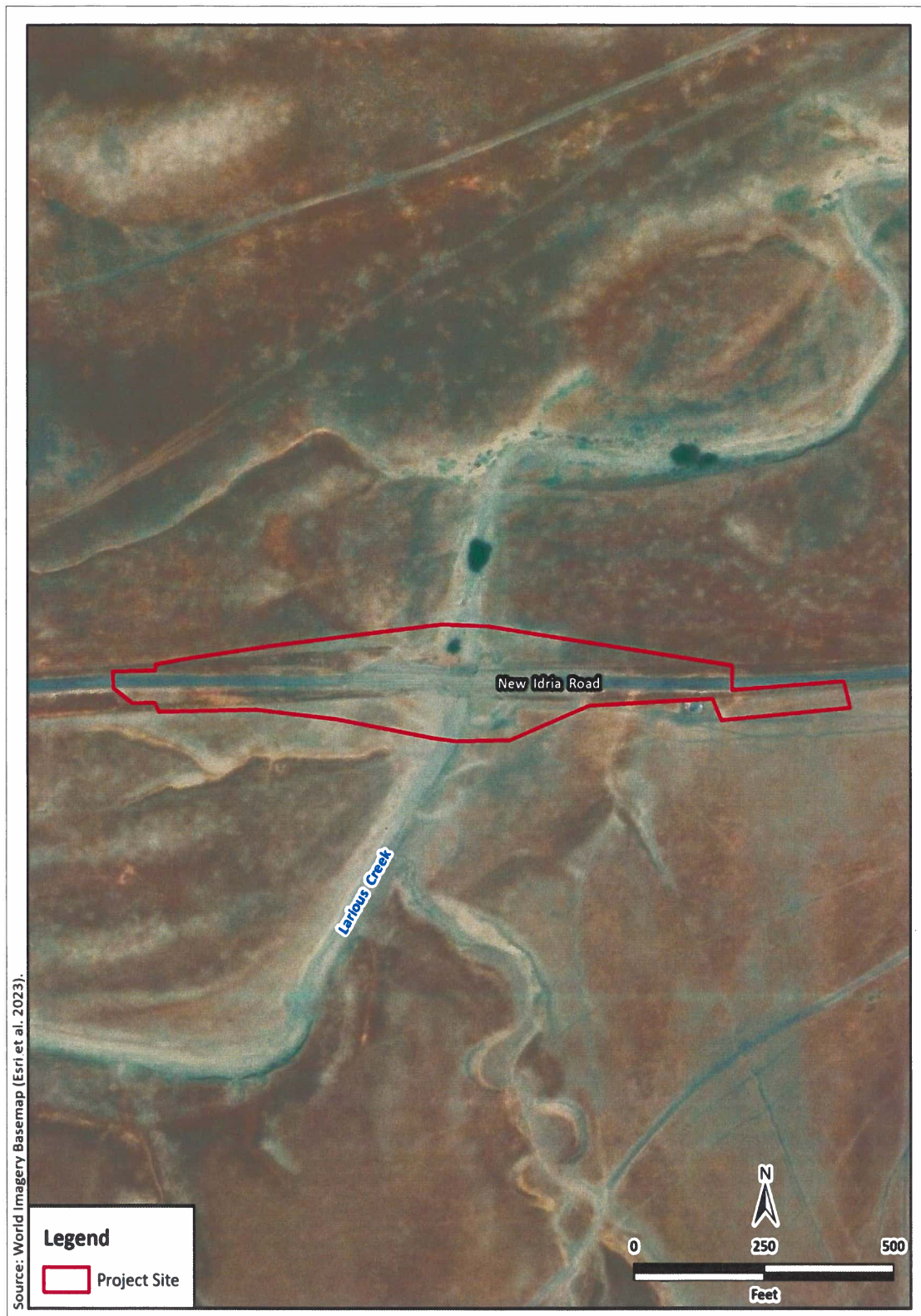


Figure 2. Project site map.



2.0 Methods

One level II (S. Doria) and one level I (C. Reid) blunt-nosed leopard lizard surveyor conducted protocol surveys for blunt-nosed leopard lizard on the Project site and a surrounding 50-foot buffer (Appendix A, Figure 3). Surveys were conducted in accordance with the established protocol for projects resulting in habitat removal (CDFW 2019, Appendix B). The protocol required surveys over 17 days, 12 during the optimal active period for adult lizards (15 April – 15 July) and five during the optimal active period for juveniles (15 August – 30 September). The surveyors walked parallel transects across the entire Project site in a manner that ensured thorough visual coverage. The Project site and a surrounding 50-foot buffer were scanned periodically with the aid of 10 x 42 binoculars. Survey start and stop times, air temperatures, wind speeds, cloud cover, and lizard species observed were recorded during each survey, and photographs were taken to document land cover and site conditions. As blunt-nosed leopard lizard requires small mammal burrows for temperature regulation, cover, and nesting, small mammal burrows in the survey area were mapped before surveys were conducted. In accordance with the protocol for projects in San Benito County, the Carrizo Plain Ecological Reserve on the Elkhorn Plain was visited before conducting surveys at the Project site to verify blunt-nosed leopard lizard activity in the region.



Figure 3. Survey area map.



3.0 Results

The survey area consisted of annual grassland, a streambed, and a dirt road (Figures 4–6). A total of 25 small mammal burrows were found and mapped in the survey area (Figure 7). Visiting the Carrizo Plain Ecological Reserve on the Elkhorn Plain on 1 May 2024 confirmed blunt-nosed leopard lizard activity, with more than 10 adults observed. Twelve surveys were conducted during the adult optimal survey period (15 April–15 July), and five surveys were conducted during the hatchling and sub-adult optimal survey period (15 August–30 September). Air temperatures were in the optimal range of 77–95°F, cloud cover remained below the 90% threshold, and wind speed remained below 10 miles per hour (Table 1) as required by the protocol (CDFW 2019). Common side-blotched lizard (*Uta stansburiana*) was the only lizard species observed during the surveys (Table 1).



Figure 4. Photograph of annual grassland on the Project site.



Figure 5. Photograph of the Larios Creek streambed on the Project site.



Figure 6. Photograph of New Idria Road at the bridge washout over Larios Creek.

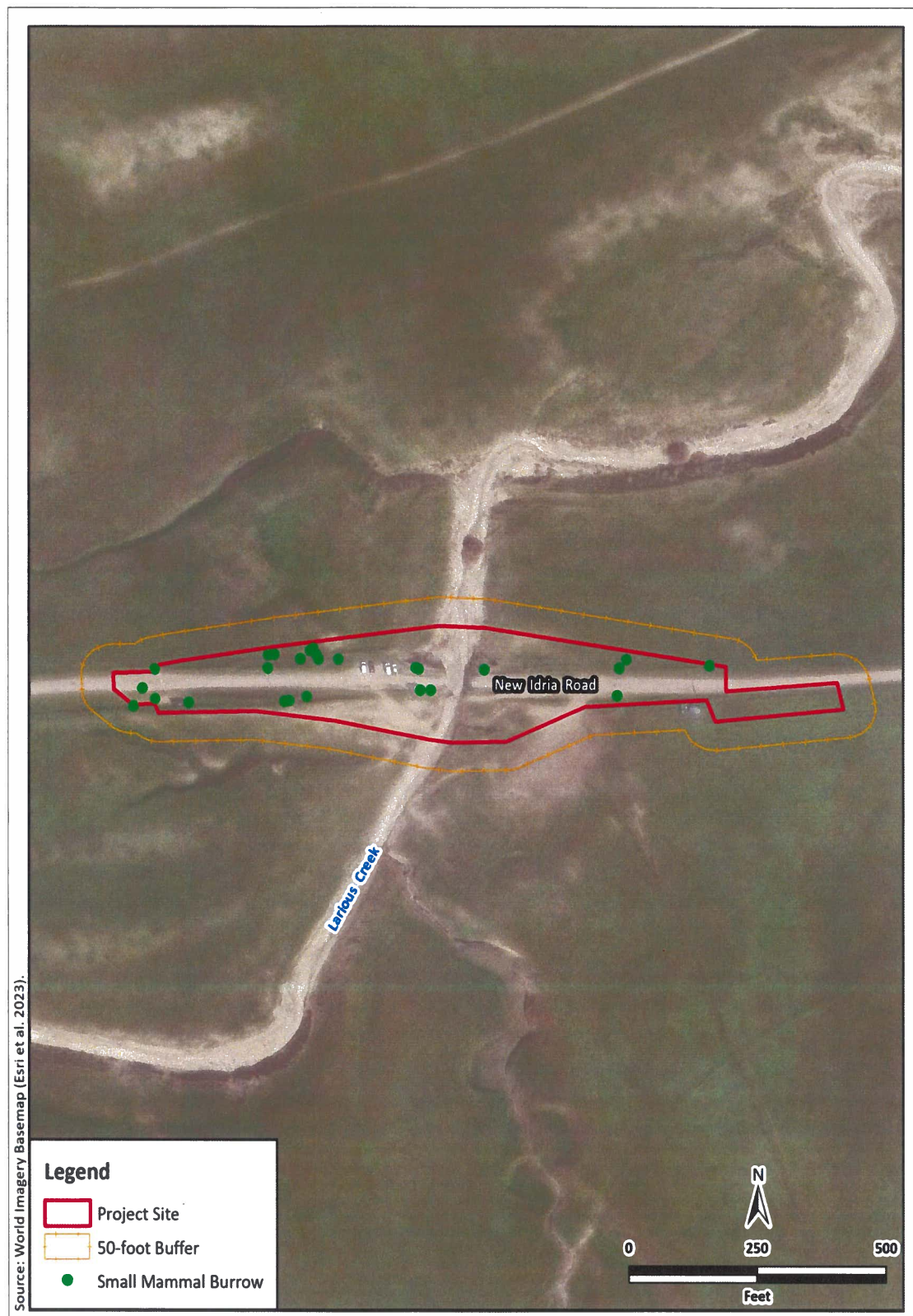


Figure 7. Burrow distribution map.

**Table 1.** Survey results.

Date	Time		Air Temp ¹		Wind ²		Cloud Cover ³	Uta ⁴	WW ⁵	BNLL ⁶
	Start	Stop	Start	Stop	Start	Stop				
Adult Surveys										
05/02/2024	1030	1130	78	83	0	1	0	0	0	0
05/07/2024	1045	1135	78	86	1	2	0	0	0	0
05/08/2024	945	1040	77	81	2	5	0	0	0	0
05/09/2024	920	1020	79	81	2	0	0	1	0	0
05/10/2024	905	1010	80	85	1	0	0	0	0	0
05/13/2024	835	938	77	86	0	0	0	0	0	0
05/14/2024	825	925	77	87	0	0	0	0	0	0
05/15/2024	820	920	77	87	0	0	0	0	0	0
06/25/2024	800	900	86	93	3	1	0	0	0	0
06/26/2024	800	900	85	90	0	0	0	0	0	0
06/27/2024	800	900	77	84	0	1	0	0	0	0
06/28/2024	800	900	77	79	1	0	0	0	0	0
Juvenile Surveys										
08/15/2024	805	905	82	91	2	0	0	1	0	0
08/16/2024	810	910	77	80	0	1	0	1	0	0
09/06/2024	0800	855	77	86	1	1	0	0	0	0
09/20/2024	0850	0935	77	81	0	2	0	0	0	0
09/23/2024	0820	0900	77	79	0	1	0	0	0	0

¹Fahrenheit, ²miles per hour, ³percent, ⁴Common side-blotched lizard (*Uta stansburiana*), ⁵Western whiptail (*Aspidoscelis tigris*), ⁶Blunt-nosed leopard lizard (*Gambelia sila*).



4.0 Discussion

Blunt-nosed leopard lizard was not detected during protocol surveys in the survey area for the New Idria Road Bridge Replacement Project. Therefore, no further action is warranted regarding this species at this location during the anticipated work schedule. However, if work is delayed beyond one year from the date these surveys were completed (i.e., after 23 September 2025), new surveys should be conducted before the start of construction (CDFW 2019).



5.0 Literature Cited

California Department of Fish and Wildlife (CDFW). 2019. Approved Survey Methodology for the Blunt-nosed Leopard Lizard.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=174900&inline>.



Appendix A. Resumes of Blunt-nosed Leopard Lizard Surveyors.

**Areas of Expertise**

California flora and fauna
Special-status species surveys
Biological compliance monitoring
Nesting bird surveys
Vegetation surveys
Science Education

Education

M.S., Biology,
CSU Fresno, 2023

B.S., Evolution, Ecology and Biodiversity
UC Davis, 2017

A.S. Biology
College of the Sequoias, 2015

Selected Professional Experience

Staff Scientist,
Colibri Ecological Consulting,
2023 – present

Science Educator,
Fresno Discovery Center,
2021 – 2023

Animal Care Keeper,
Fresno Chaffee Zoo,
2022

Trainings and Qualifications

Yosemite Toad Biological Monitor Training,
USFS, 2024

Level II Surveyor for Blunt-nosed Leopard
Lizard

SCE Level 1 Waters Monitor

Professional Affiliations

The Wildlife Society – Western Section &
San Joaquin Valley Chapter

California Native Plant Society – Sequoia
Chapter

Key Publications

Doria, S. L. 2023. Life Table Analysis and
Spatial Ecology of the Endangered Blunt-
Nosed Leopard Lizard (*Gambelia sila*) in the
Panoche Hills. M.S. thesis. California State
University, Fresno, 2023.

sdoria@colibri-ecology.com
9493 N Fort Washington Road
Suite 108
Fresno, CA 93730
559.415.8934
colibri-ecology.com

Stephanie L. Doria, M.S.**Staff Scientist**

Stephanie is a biologist with five years of professional field experience. As a Staff Scientist at Colibri, she conducts pre-construction surveys, nesting bird surveys, special-status plant and animal surveys, and botanical surveys; presents environmental awareness trainings to work crews; monitors activities to ensure environmental compliance; and prepares survey and monitoring reports for projects throughout California. She is a Level II blunt-nosed leopard lizard surveyor and has conducted more than 100 days of surveys for the species.

While working with the United States Forest Service, Stephanie surveyed for *Armillaria* species, spruce beetle, and bark beetle in Colorado national forests and conducted hazard tree surveys. She identified insects in the field from pheromone traps and tree damage; developed reports on tree health and hazard assessment for campsites; and collected spatial, quantitative, and qualitative data following project protocols.

During her time at California State University – Fresno and University of California – Davis, Stephanie conducted routine surveys and radio telemetry surveys for blunt-nosed leopard lizard, assisted with predator detection for blunt-nosed leopard lizard using camera traps and clay models, conducted radio telemetry surveys for salt marsh harvest mouse, and recorded vegetative data regarding salt marsh harvest mouse habitat and diet.

Since 2023, Stephanie has monitored and surveyed for numerous special-status species throughout the San Joaquin Valley and Sierra Nevada. She has over 1000 hours of experience surveying and monitoring for Yosemite toad, Sierra Nevada yellow-legged frog, California red-legged frog, foothill yellow-legged frog, California tiger salamander, limestone salamander, blunt-nosed leopard lizard, giant garter snake, western pond turtle, California condor, fisher, Sierra marten, San Joaquin antelope squirrel, San Joaquin kit fox, Tipton kangaroo rat, and giant kangaroo rat. She is approved by the U.S. Forest Service to conduct surveys and monitoring for Yosemite toad and fisher in Sierra National Forest. Stephanie also completed a basic wetlands delineation training and field practicum through the Wetland Training Institute in 2024.

Stephanie completed a master's degree in biology at California State University Fresno in May 2023. Her work focused on the endangered blunt-nosed leopard lizard spatial land use in the Panoche Hills. She has conducted over 400 hours of surveys for the species in occupied habitat.

**Areas of Expertise**

Special-Status Species Surveys
Nesting Bird Surveys
Environmental Compliance Monitoring

Education

B.S., Biology, California State
University, Fresno, 2022

A.S., Biology, Fresno City, Fresno, 2019

Selected Professional Experience

Field Scientist,
Colibri Ecological Consulting,
2023–present

Cameron Reid*Field Scientist*

Cameron is an ecologist with about about two years of professional experience. As a field scientist at Colibri, he conducts pre-construction surveys, nesting bird surveys, special-status plant and animal surveys, and botanical surveys; presents environmental awareness trainings to work crews; monitors activities to ensure environmental compliance; and prepares survey and monitoring reports for projects throughout California. He has surveyed and monitored for Crotch bumble bee, Yosemite toad, western spadefoot, Sierra Nevada yellow-legged frog, California red-legged frog, foothill yellow-legged frog, California tiger salamander, blunt-nosed leopard lizard, western pond turtle, burrowing owl, bald eagle, golden eagle, peregrine falcon, fisher, Tipton kangaroo rat, giant kangaroo rat, San Joaquin antelope squirrel, San Joaquin kit fox, and Buena Vista Lake shrew. Cameron has also conducted desktop reviews to identify potential impacts to biological and water resources and associated resource protection measures as components of the Master Special Use Permit notifications for Southern California Edison.

Since 2023, Cameron has surveyed and monitored for special-status species throughout the southern Sierra Nevada including in Mariposa, Madera, Fresno, Tulare, and Kern counties. He has over 200 hours of surveying and monitoring experience in Yosemite toad habitat in Fresno County for SCE and PG&E projects.

Cameron has conducted live trapping surveys for giant kangaroo rat and San Joaquin antelope squirrel in Fresno and Kern counties and has handled dozens of each species as an assistant to a permitted biologist. He also hand-excavated burrows of these species as a mortality reduction measure. Cameron has conducted 32 days of protocol surveys for blunt-nosed leopard lizard in Fresno, San Benito, and Tulare counties.

During his time at Fresno City College and at California State University – Fresno, Cameron took ecology, conservation biology, and field-based classes that focused on species identification and recognition in the Sierra Nevada mountains. He has volunteered with the Boy Scouts of America to clean up parks and campgrounds to maintain a safe environment for wildlife.

Cameron participated in a 40-hour wetlands delineation training course through the Wetland Training Institute in 2024.



Appendix B. Approved Survey Methodology for the Blunt-nosed Leopard Lizard.

October 2019

Dear blunt-nosed leopard lizard surveyor,

Attached is the revised survey methodology for the blunt-nosed leopard lizard (*Gambelia sila*). The protocol was developed by the Central and South Coast Regions of the California Department of Fish and Wildlife (CDFW) with input from the United States Fish and Wildlife Service (USFWS), the Bureau of Land Management, and various species experts. This protocol supercedes previous versions of CDFW survey protocols for the blunt-nosed leopard lizard (BNLL). The range-wide decline of population numbers in the past decade has provided the impetus for development of a more rigorous methodology to detect species presence. Additionally, since CDFW is not able to issue any form of take authorization for the blunt-nosed leopard lizard due to its status as a fully protected animal pursuant to Fish and Game Code section 5050, except as allowed in a Natural Communities Conservation Plan under Fish and Game Code section 2800 et seq., detection of species presence on a project site is crucial.

This standard methodology has been developed to provide consultants, local, state and federal agencies with minimum acceptable standards for surveys conducted to determine the status of this State and federally endangered species. The survey methods described within this protocol were designed to optimize the likelihood of detecting the presence of blunt-nosed leopard lizards should they occur on a project site.

When the presence of blunt-nosed leopard lizards is detected, we request that you notify the appropriate CDFW Region (Central or South Coast Regions) Permitting and Project Review staff for further instructions of additional information needed to assess the project's potential impact on the species. This will assist in expediting the review of the project and help control the project proponent's biological survey costs. Additionally, the USFWS should be contacted for further advice since this is also a federally-listed species. Use of this protocol and notification of CDFW does not exempt you from any required consultation with the USFWS.

CDFW is willing to coordinate with surveyors who have circumstances or needs not addressed by this protocol and who may wish to propose alternative methods to comply with State law prohibiting take of BNLL. If you have any questions or comments regarding this methodology or if you want to propose the use of a different methodology, please contact CDFW's Central Region Habitat Conservation Planning staff at (559) 243-4014 or South Coast Region Habitat Conservation Planning staff at (858) 467-4201 (for Santa Barbara and Ventura Counties).

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

APPROVED SURVEY METHODOLOGY FOR THE BLUNT-NOSED LEOPARD LIZARD October 2019 (Revised)

Blunt-nosed leopard lizard, *Gambelia sila*

STATUS: State Endangered, Federal Endangered, State fully protected

This protocol has been developed to provide a minimum level of protection for blunt-nosed leopard lizards (BNLL) when projects or maintenance activities are scheduled to occur within potential BNLL habitat. Disturbing activities should not proceed until appropriate surveys are conducted to determine if the species is present on the site. Surveys conducted according to the following protocol by qualified biologists provide a reasonable, although not conclusive, indication of BNLL presence at a particular site and yield critical information needed to prevent mortality and minimize impacts to the species. Individuals conducting the surveys are expected to understand the basic biological requirements of the species and have the ability to recognize potential BNLL habitat. This protocol satisfies the California Department of Fish and Wildlife (CDFW) requirements when it is determined that formal (e.g. "Protocol Level") BNLL surveys are needed. [Note: This protocol is appropriate for pre-project BNLL surveys, however, population monitoring over time on a site is best conducted using a permanent survey grid, such as described in Tollestrup (1976).]

METHODS:

A minimum of two surveyors, walking parallel on adjacent transects, should conduct a BNLL survey. Optimum BNLL activity periods occur when air temperature is between 25C-35C (77F-95F) (Tollestrup 1976; USFWS 1985, 1998). Surveys must be conducted when the air temperature falls within the optimal range. Air temperature should be measured at 1-2 cm above the ground over a surface most representative of the area being surveyed. Surveyors must shade the thermometer from direct sunlight while taking the reading. Surveys may begin after 0800 hours and the minimum air temperature criterion is met and must end by 1400 hours or when the maximum temperature is reached, whichever occurs first (Tollestrup 1976; Germano *in press*). Time of day and air temperature should be recorded at the start and end of each survey. Air temperature should be periodically checked to ensure that the maximum has not been exceeded. Other factors that affect BNLL activity, such as soil temperature (measured at 1 cm below soil surface with a shaded thermometer) and weather conditions, must be recorded at the start and end of each survey. Surveys should not be conducted on overcast days (cloud cover >90%) or when sustained wind velocity exceeds 10 mph (force >3 on Beaufort wind scale) (Montanucci 1965; Tollestrup 1976; J. Vance, pers. comm.).

Surveys must be conducted on foot, and all areas with potential BNLL habitat must be surveyed. BNLL are often difficult to detect, particularly in areas where shrubs are fairly numerous (>30% cover) and/or the herbaceous vegetation is dense and tall (>30 cm). In such conditions, no greater than 10-meter-wide transects should be walked at a slow pace. In areas with few shrubs and shorter herbaceous vegetation (<10 cm), transects as wide as 20 meters are acceptable. When feasible, transects should be walked in a north-south orientation to minimize glare from the sun. The surveyor should stop periodically and scan

the transect for BNLL using close-focusing binoculars (minimum 7X35 magnification), including areas surrounding the project site. In addition to recording the location of all BNLL observed (UTM or latitude/longitude WGS84 coordinates), the presence of habitat features important for BNLL (washes, playas, relative abundance of small mammal burrows) should also be recorded for each transect. Streambeds, washes, roads, etc., should be walked in addition to transect lines since BNLL are often seen in these areas.

TIMING AND LENGTH OF SURVEY:

Survey intensity should be commensurate with the anticipated level of disturbance to the BNLL habitat. The primary concern for BNLL when disturbance occurs during maintenance activities is direct mortality from equipment or personnel. Removal of intact BNLL habitat has a much greater potential for take due to direct impact on animals aboveground as well as any hibernating animals or eggs underground. A longer survey effort including both spring adult surveys and fall hatchling surveys is therefore required for activities that cause impacts to BNLL habitat. The more intensive survey effort increases the chances of observing the species, even if the population is small. Once a BNLL has been observed, consultation with CDFW must begin regarding whether surveys should continue to determine distribution within the project site and to develop avoidance measures. If BNLL are observed incidentally while conducting surveys for other species, specific surveys for BNLL may not be required since presence has been established unless they are necessary to determine distribution within the project site. Surveys will be accepted for one year from the date of completion.

SURVEYS FOR DISTURBANCES FOR MAINTENANCE ACTIVITIES:

Examples of maintenance activities include grading existing roads, grass mowing on roadsides, and maintaining existing structures (except for maintenance requiring excavation for underground infrastructure). BNLL are active and above ground from April through September, but optimum activity periods for adults occur between April 15 and July 15 (Montanucci 1965; Tollestrup 1979; USFWS 1985, 1998, 2010). BNLL surveys should be conducted for a total of 8 days over the course of the 90-day time span. A minimum of 3 survey days should be conducted consecutively, with a maximum of 6 survey days completed within any 30-day time period. Fall hatchling surveys are not required for activities in this category.

SURVEYS FOR DISTURBANCES LEADING TO HABITAT REMOVAL:

Examples of disturbances that impact intact habitat include establishment of new roads or structures, solar development, oil development, residential development, changes in land use (e.g. conversion to irrigated agriculture), and excavations such as installation or maintenance of underground infrastructure. Adult BNLL surveys should be conducted for 12 days over the course of the 90-day adult optimal survey period (April 15 to July 15), with a maximum of 4 survey days per week and 8 survey days within any 30-day time period. At least one survey session should be conducted for 4 consecutive days. BNLL hatchlings and subadults are most commonly observed from August 15 to September 30, along with a few adults that are still active above ground (Germano et. al 1994; Montanucci 1965; Tollestrup 1979; USFWS 1985, 1998, 2010; J. Battistoni, pers. comm.). In addition to the 12 days of adult BNLL surveys required for activities in this category, 5 additional survey days are required during the hatchling optimal survey period listed above, with at least 2 survey days conducted between August 15-30 and at least 2 survey days between September 15-30, for a total of 17 survey days overall within the same survey season/calendar year.

QUALIFICATIONS OF SURVEYORS:

An acceptable BNLL survey crew should consist of no more than 3 Level I surveyors for every Level II surveyor. This restriction should reduce the number of incorrect/missed identifications. The names and affiliations of all surveyors must be recorded for each survey day.

Level I: Surveyor has demonstrated the ability to distinguish BNLL from other common lizard species that may inhabit the area;

Level II: Surveyor has demonstrated the ability to distinguish BNLL from other common lizard species that may inhabit the area and has participated in at least 50 survey days for BNLL (or 25 survey days and a BNLL identification course recognized by/acceptable to CDFW). Surveyor has made at least one confirmed* field sighting of a BNLL.

Before surveys commence, CDFW recommends that surveyor qualifications be submitted to CDFW for the assessment of surveyor level qualifications.

*A minimum of one confirmed field sighting must be documented for each Level II surveyor and be available to CDFW upon request. As with all BNLL sightings, it should also be submitted to the CNDDDB. Information to be included in documentation of BNLL sighting: Name of surveyor, date of survey, location of survey, names of accompanying Level II surveyors who can confirm the sighting, and details of sighting (distance, BNLL activity, etc).

REPORTING:

All BNLL survey results should be submitted to CDFW. Survey report(s) should include, at a minimum, the project contact, a brief project description, type of habitat disturbance, project location, habitat description, survey methodologies, survey dates, weather conditions, surveyors and their qualifications (identify the Level II surveyor(s)), acres or areas surveyed per day, mapping, other special status species sightings, and survey results with data sheets (sample data sheet is attached). Adequate mapping should include general project location, survey area with aerial imagery, and special status species locations with UTM or latitude/longitude WGS84 coordinates.

In order for a BNLL survey effort (that resulted in a negative finding of BNLL on a project site) to be accepted by CDFW as a negative finding, a survey report must be submitted to CDFW for review a minimum of 30 calendar days prior to Project commencement.

Submit report to:

California Department of Fish and Wildlife
Central Region
ATTN: Habitat Conservation Planning Supervisor
1234 E. Shaw Ave
Fresno, CA 93710

OR

California Department of Fish and Wildlife
South Coast Region
ATTN: Habitat Conservation Planning Supervisor
3883 Ruffin Road
San Diego, CA 92123

In addition, all BNLL observations should be reported to the California Natural Diversity Database (CNDDDB) and the appropriate CDFW Region within 30 days of survey completion. Data submission guidance to CNDDDB can be obtained at <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

SPECIAL REQUIREMENT FOR SURVEYS IN SAN LUIS OBISPO, SAN BENITO, SANTA BARBARA, AND VENTURA COUNTIES

Projects with potential BNLL habitat in San Luis Obispo, San Benito, Santa Barbara, and Ventura Counties have different conditions compared to potential BNLL habitat in the San Joaquin Valley. The sites with habitat in these counties tend to be at higher elevations, where nighttime temperatures can remain low even though daytime temperatures meet minimum survey criteria. In such conditions, BNLL activity is likely to be low and surveys could result in non-detection of the species even though they are present. As such, an additional requirement of a visit to a known voucher site to check for BNLL activity applies to surveys conducted in these counties. Once the species has been observed at the voucher site, formal surveys can begin. The Carrizo Plain ER located on the Elkhorn Plain has been selected as the voucher site for these counties.

CONTACT INFORMATION

California Department of Fish and Wildlife

Central Region

Habitat Conservation Planning

1234 Shaw Ave

Fresno, CA 93710

(559) 243-4005

South Coast Region

Habitat Conservation Planning

3883 Ruffin Road

San Diego, CA

(858) 467-4201

.....
CDFW is willing to coordinate with surveyors who have circumstances or needs not addressed by this protocol and who may wish to propose alternative methods to comply with State law prohibiting take of BNLL.

LITERATURE CITED

Germano, D.J., D.F. Williams, W. Tordoff III, 1994. Effect of drought on blunt-nosed leopard lizards (*Gambelia sila*). *Northwestern Naturalist* 75(1): 11-19.

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USFWS. 2010. Blunt-nosed leopard lizard (*Gambelia sila*) 5-year review: summary and evaluation. Sacramento Fish and Wildlife Office, USFWS, Sacramento, CA, USA.

PERSONAL COMMUNICATIONS

Julie Vance, California Department of Fish and Wildlife, Central Region, 1234 East Shaw Ave., Fresno, California, 93710.

John Battistoni, California Department of Fish and Wildlife, Central Region, 1234 East Shaw Ave., Fresno, California, 93710.

Blunt-Nosed Leopard Lizard Survey Reporting Form

SURVEY DATE(S) (up to 5 days of surveys from a single site can be reported on this form):

SURVEYORS: _____

SITE NAME [Please also attach or sketch a map on back]: _____

County: _____ Landowner/Mgr: _____

Quad Name: _____ Elevation: _____

T _____ R _____ $\frac{1}{4}$ of Section _____

UTM Zone (10,11): _____ Datum: _____ (NAD83, NAD27, WGS84, other)

Source (GPS, map & type, other): _____ Point Accuracy _____ meters

COORDINATES: _____

SURVEY RESULTS

DATE	START TIME	END TIME	START AIR TEMP	END AIR TEMP	# BNLL OBSERVED Adults/Hatchlings	PERSON-HOURS (# Surveyors) X (# Hours Walked)	APPROXIMATE DISTANCE COVERED (IN TENTHS OF A MILE)
					/		
					/		
					/		
					/		
					/		

TOTAL NUMBER OF OBSERVATIONS FOR THE THREE MOST COMMON LIZARD SPECIES ENCOUNTERED (combined numbers for all survey days):

Species _____ Number Observed: _____

Species _____ Number Observed: _____

Species _____ Number Observed: _____

HABITAT DESCRIPTION: General description of vegetation community, overall habitat quality, surrounding land use, threats, etc: _____

HABITAT DESCRIPTION: Estimation of Average Vegetative Cover on the Site
[circle the correct value]:

% Shrub:	0-10%,	10-25%,	25-50%,	50-75%,	>75%
% Forb:	0-10%,	10-25%,	25-50%,	50-75%,	>75%
% Grass:	0-10%,	10-25%,	25-50%,	50-75%,	>75%
% Bare Ground:	0-10%,	10-25%,	25-50%,	50-75%,	>75%

NOTES ABOUT THE SURVEY/HABITAT/SPECIAL-STATUS SPECIES/ETC:

PLEASE RETURN THIS SURVEY REPORTING FORM TO THE APPROPRIATE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE REGION AT THE FOLLOWING ADDRESS:

California Department of Fish and Wildlife
Central Region
ATTN: Habitat Conservation Planning Supervisor
1234 East Shaw Avenue
Fresno, CA 93710

OR

California Department of Fish and Wildlife
South Coast Region
ATTN: Habitat Conservation Planning Supervisor
3883 Ruffin Road
San Diego, CA 92123

*****ALL OBSERVATIONS OF BLUNT-NOSED LEOPARD LIZARDS AND OTHER SPECIAL STATUS SPECIES SHOULD BE PROMPTLY REPORTED TO THE CALIFORNIA NATURAL DIVERSITY DATABASE (CNDDB). SUBMISSION OF THIS FORM DOES NOT ENTAIL REPORTING TO THE DATABASE, WHICH IS MAINTAINED BY THE BIOGEOGRAPHIC DATA BRANCH OF CDFW. PLEASE SEE THE SURVEY PROTOCOL FOR DIRECTIONS ON REPORTING TO CNDDB.**

Appendix D: Archaeological Survey Report & Historic Resource Evaluation



ARCHAEOLOGICAL SURVEY REPORT & HISTORIC RESOURCE EVALUATION

NEW IDRIA ROAD WASHOUT PROJECT PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

Prepared for:

County of San Benito
2301 Technology Parkway
Hollister, CA 95023

Prepared by:

Nicholas Radtkey, M.A., RPA
Alta Archaeological Consulting
2681 Cleveland Avenue
Santa Rosa, CA 95403

Project No.: ALTA2022-16

Key Words: USGS 7.5' Idria Quadrangle; 3.0-acre survey area; Township 17 South, Range 12 East, Section 7, Mount Diablo Base and Meridian; Historic-era stream crossing; Evaluated as ineligible for NRHP; Categorically exempt from CEQA.

December 21, 2023

ABSTRACT

Purpose and Scope

The following Archaeological Survey Report and Historic Resource Evaluation, prepared by architectural historian Nicholas Radtkey of Alta Archaeological Consulting (ALTA), documents the adequacy of identification efforts and presents the results of investigations within the limits of the proposed project, hereafter referred to as the Area of Potential Effects (APE). The project requires a 404 permit from the United States Army Corps of Engineers and is a federal undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended. The study was designed to identify any historic properties, defined as resources eligible for listing in the National Register of Historic Places (NRHP) present in the APE that may be affected by the current undertaking. A Categorical Exemption from the California Environmental Quality Act (CEQA) is being prepared; the County of San Benito will act as the CEQA lead agency for the exemption.

Project Description

The County of San Benito Department of Public Works proposes to construct a new bridge on the existing alignment of New Idria Road over Larious Creek. The new structure will be a 90-foot-long single span bridge and have a total bridge width of 27 feet 6 inches. The abutments will be of a seat-type, supported on 18-to-24-inch piles. A minimum freeboard of three feet for the 100-year flood level per the County requirements will be provided. During construction, traffic on New Idria Road will be detoured around the area of project implementation on a one-lane temporary low water crossing constructed upstream of the existing structure. The temporary low water crossing will be approximately 18 feet wide and a minimum of 100 feet long. After construction of the new bridge is complete, the temporary low water crossing will be removed, and the channel will be graded to the final condition.

Project Results

Fieldwork was conducted on October 10, 2023 by ALTA archaeologist Samantha Beck. The survey entailed an architectural evaluation of the remains of a historic-era stream crossing present within the APE. A historic context was developed for the resource for its evaluation under the Criteria for Evaluation for the NRHP (36 CFR 60.4). The historic context facilitated the identification of an Area of Significance, a Period of Significance, and a Level of Significance, for identifying an appropriate boundary for the potential historic resource. One Area of Significance for the property, Industry, was identified. The Period of Significance is 1861-1972, corresponding with the active dates of the New Idria Mercury Mine. The date of construction of the bridge lies between 1947 and 1958. The Level of Significance is local. This resource was evaluated as *ineligible* for the NRHP due to a lack of significance under all criteria and lack of integrity.

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Attachment B – Native American Outreach
Attachment C – Historical Organization Outreach
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Attachment E – Site Record

I. INTRODUCTION

ALTA was retained to conduct a cultural resources inventory for the replacement of a washed-out stream crossing over Larios Creek, in rural San Benito County, California. A field survey was completed by ALTA on October 10, 2023 for the purpose of identifying potential historic resources within the APE and evaluating the remains of a historic-era stream crossing. For the purposes of this investigation, the entire APE was surveyed, totaling approximately 3.0 acres. The remains of a historic-era stream crossing are present within the APE, and are herein evaluated as *ineligible* for the NRHP. The following report documents the adequacy of identification efforts, presents the results of investigations within the APE boundaries, and makes recommendations for management of resources present in the APE. This report addresses the responsibilities of the NHPA, as amended.

Qualifications of Preparer

Nicholas Radtkey is an SOI-qualified architectural historian who has been actively conducting and assisting with cultural resource management studies in architectural history and archaeology for over seven years. In 2015, Mr. Radtkey earned his Bachelor of Arts at University of California, Davis, where he majored in History with a minor in Archaeology. He received field training through the Anthropology Department's archaeological field school. He completed a Master's degree in Cultural Resources Management from Sonoma State University. His thesis work focused on community collaboration in evaluating the significance and integrity of the built environment of the historic-era apple industry in Annapolis, California. Mr. Radtkey specializes in architectural and historical archaeological resources of the North Coast Ranges, particularly in agricultural and industrial contexts. Mr. Radtkey maintains roles as an architectural historian, senior archaeologist, crew chief, and small projects manager in his current position. He holds active memberships in professional and academic organizations and maintains engagement in professional societies.

Project Description

The County of San Benito Department of Public Works proposes to construct a new bridge on the existing alignment of New Idria Road over Larios Creek. The new structure will be a 90-foot-long single span bridge and have a total bridge width of 27 feet 6 inches. The abutments will be of a seat-type, supported on 18 or 24-inch piles cast-in-drilled hole (CIDH), cast-in-steel-shell (CISS), or HP-piles if the abutments are designed conventionally. If the abutments need to be design as piers, due to high velocities and scour, larger CIDH or CISS piles of approximately 48" will be required. A minimum freeboard of 3 feet for the 100-year flood level per the County requirements will be provided. During construction, traffic on New Idria Road will be detoured around project implementation on a one-lane temporary low water crossing constructed upstream of the existing structure. The temporary low water crossing will be approximately 18 feet wide and a minimum of 100 feet long. After construction of the new bridge is complete, the temporary low water crossing will be removed, and the channel will be graded to the final condition.

The two adjacent properties of the bridge, both located on the south side of New Idria Road, would be used for construction staging activities, including equipment and materials storage. One staging area would be located on the west side and one would be located on the east side of the bridge.

Work in Larious Creek is required to remove the existing culvert, original bridge foundations and concrete structures, construct the temporary low water crossing, and construct the new bridge abutments. If encountered, existing piles will need to be removed to a minimum of three feet below original ground.

Current minimum American Association of State Highway and Transportation Officials (AASHTO) highway design standards require that a new bridge carrying an ADT of less than 400 vehicles per day shall have a minimum of 11-foot lanes with 2-foot shoulders. This requirement results in a clear roadway width of 26 feet. Current AASHTO Guidelines for Geometric Design of Low-Volume Roads requires a minimum of 22-foot total roadway width, including traveled way and shoulders. At the request of the County, the proposed roadway and bridge will consist of two 10-foot lanes and two-foot shoulders, resulting in a 24-foot roadway.

Vertically, the approach roadways would need to conform to the new bridge by placing a small amount of fill to meet the new required bridge grade. Approximately 430 feet of approach work is required on the west approach and approximately 320 feet on the east approach. Midwest guardrail systems will be installed at all four corners of the bridge approximately 75 feet in advance of the new bridge abutments.

Project Location

The APE is located in a rural area southeast of the community of Panoche in San Benito County, California (Figure 1). It is situated on the USGS 7.5' Idria Quadrangle in section 7 of Township 17 South, Range 12 East, in the Mount Diablo Base and Meridian (Figure 2). The APE is set on a 54-acre parcel (029-270-02-10). It has no physical address, but is located 15.9 miles from the intersection of Panoche Road and New Idria Road. The APE is located in largely undeveloped ranch land, and is bisected by Larious Creek. Figure 3 provides a site plan of the proposed project.

Definition of Undertaking

Since the project requires submittal of a Section 401 permit application for coverage of impacts to potential Waters of the State from the United States Army Corps of Engineers (USACE), the NHPA and its implementing regulations (16 USC 470 et seq., 36 CFR Part 800, 36 CFR Part 60, and 36 CFR Part 63) apply to the project, requiring the USACE to consider whether the project would affect historic properties on meeting the criteria for listing on the NRHP. The USACE will be the lead agency for NHPA Section 106 compliance and consultation with the SHPO and the ACHP.

Area of Potential Effects

At this time, the USACE has defined the APE for this project as the lands subject to grading as well as staging areas, encompassed by the stream and its approaches (Figure 3). The USACE has not defined an indirect APE for this project.

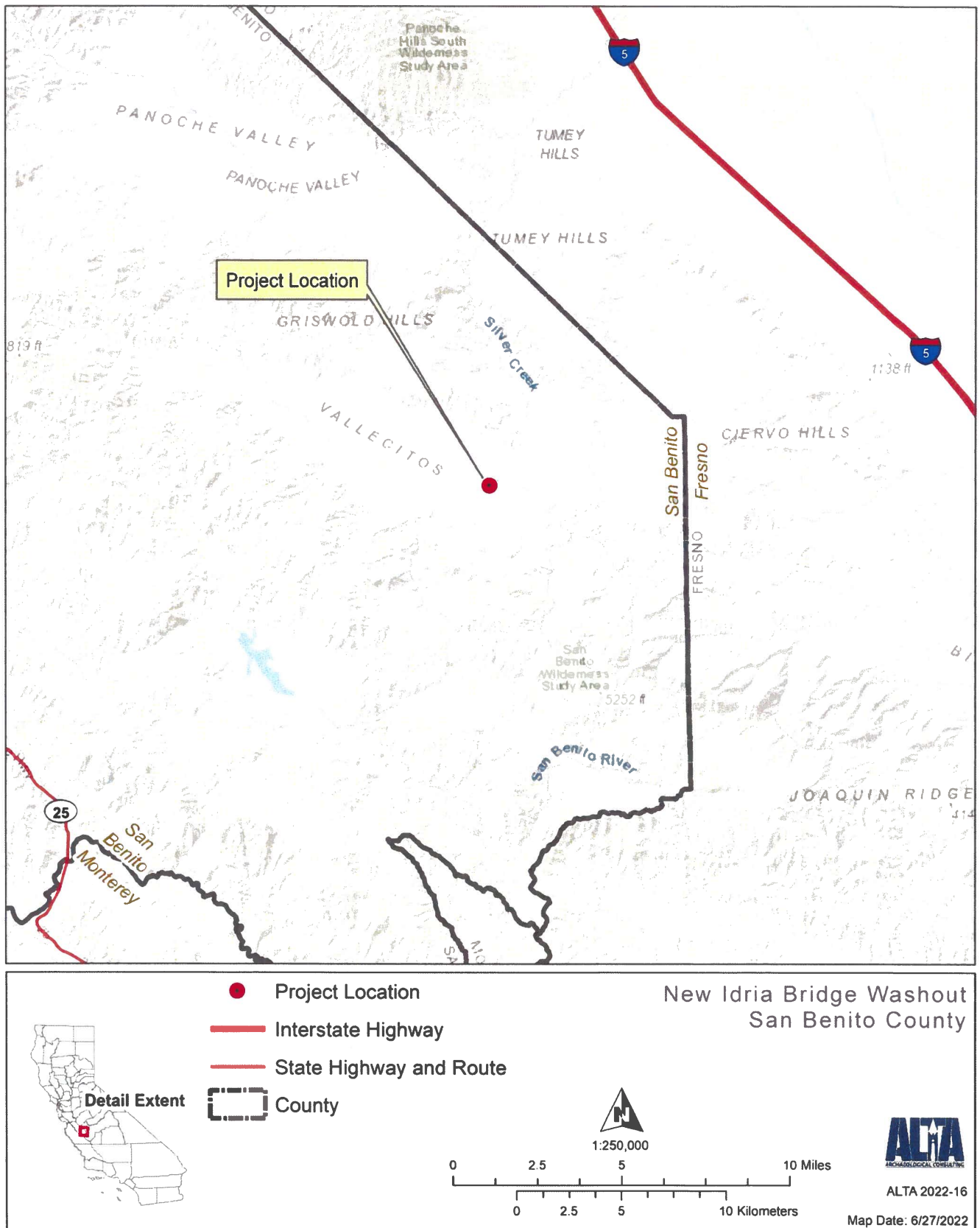


Figure 1. Project Vicinity

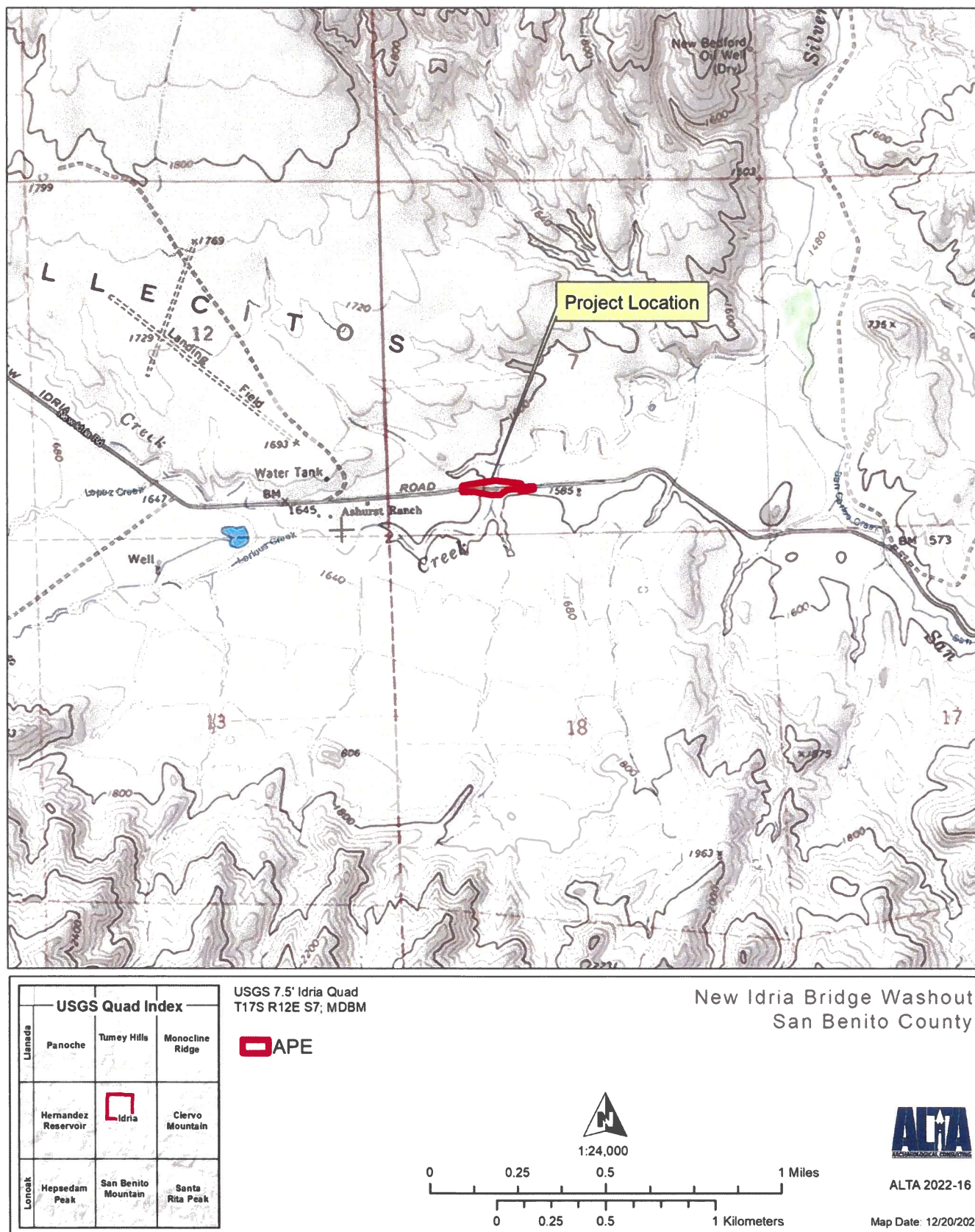
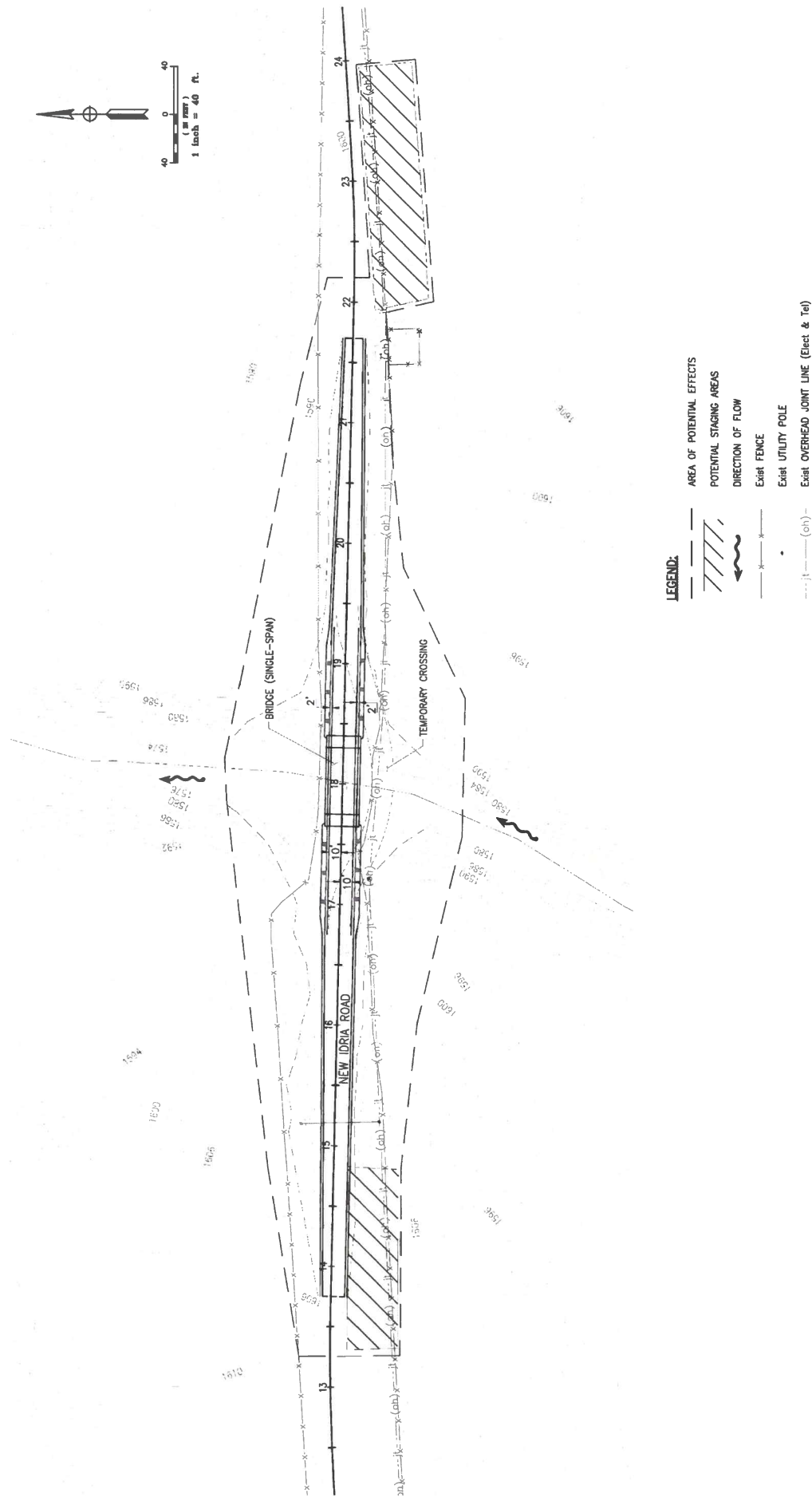


Figure 2. Project Location



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II. REGULATORY CONTEXT

This section briefly discusses the nature and extent of State regulations that apply to the Project. The project requires a 401 permit from the United States Army Corps of Engineers and is a federal undertaking subject to Section 106 of the NHPA, as amended, described in 35 CFR 800. The project is categorically exempt from CEQA.

National Historic Preservation Act

The NHPA established the federal government's policy on historic preservation and the programs, including the NRHP, through which the policy is implemented. Section 106 (16 USC 470f) of the NHPA requires federal agencies, prior to implementing an "undertaking" (e.g., issuing a federal permit or allocating federal funds), to consider the effects of the undertaking on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on any undertaking that could adversely affect historical properties eligible for listing on the NRHP. As defined in 36 CFR 800.5(a)(1) "Adverse effects occur when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion in the National Register".

Under the NHPA, the quality of significance in cultural resources is present in districts, sites, 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 patterns of our history; or
- B. That are associated with the lives of significant persons in or past; or
- 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; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

In general, historic sites are evaluated in terms of Criteria A through C, while prehistoric sites are most often evaluated in terms of Criterion D, which refers to the research potential of the site (36 CFR 60.4). Whether or not a site is considered important is determined by the capacity of the site to address pertinent local and regional research themes.

III. BACKGROUND

As the significance of cultural resources is best assessed with regard to environmental and cultural contexts, descriptions of the natural and cultural setting of the region surrounding the APE are presented below.

Environment

The APE is situated within the Coast Range geologic province (Jennings et al. 2010). The North Coast Ranges are comprised of numerous rugged north-south trending ridges and valleys that run parallel to a series of faults and folds. Formation of these ranges is generally attributed to events associated with subduction of the Pacific Plate beneath the western border of North America. The bedrock that underlies the region is a complex assemblage of highly deformed, fractured, and weathered sedimentary, igneous, and metamorphic rocks. The bedrock geology of the APE consists of Jurassic-Cretaceous-age Franciscan Formation rock (Jennings et al. 2010; Schoenherr 1992:7). Rocks of this formation, the oldest in the area, are often weakly metamorphosed, and consist of greywacke shale interspersed with discontinuous bodies of ultramafic rock such as greenstone, schist, and serpentine. The repeated folding and faulting are reflected in the complex structure of Franciscan rocks and area topography (Schoenherr 1992:265). The specific bedrock geology of the APE is composed of Plio-Pleistocene and Pliocene loosely consolidated deposits, dating to between the Miocene and Pleistocene. This is a sedimentary formation whose major lithologic constituents are conglomerates and sandstone, with minor inclusions of mudstone, siltstone, evaporite, sedimentary-breccia, and limestone (Jennings et al. 2010).

Soils in the APE consist of Docas series silty clay loam. Soils of this series are formed in silty alluvium from shale formations. The A horizon extends to approximately 23 inches below surface and consists of gray (10YR 6/1) silty clay loam. The C horizon continues from the A horizon to approximately 62 inches below surface, and consists of a light gray (2.5Y 7/2) silty clay loam (United States Department of Agriculture 2006).

The APE is located near the community of Panoche, southeastern San Benito County, with elevations varying from approximately 1480 to 1500 feet above mean sea level. It is situated near the center of Vallecitos, a valley separated from Panoche Valley by the Griswold Hills. The nearest water source is Larios Creek, a seasonal stream, which bisects the APE. The APE is within an undeveloped rural ranch sparsely populated with native and nonnative annual and perennial grasses. Native trees in the mountains surrounding the area primarily consist of cottonwood (*Populus sp.*), gray pine (*Pinus sabiniana*), and California blue oak (*Quercus douglasii*) (Little 1980). Undergrowth consists largely of chamise (*Adenostoma fasciculatum*), poison oak (*Toxicodendron diversilobum*) and manzanita (*Arctostaphylos sp.*). This area is characterized by a relatively dry Mediterranean climate that averages between 10 and 14 inches of rainfall annually (United States Department of Agriculture 2006). The winters are cool and wet, and the summers are warm and dry.

Prehistory

As a result of local geomorphic processes—which have buried or destroyed archaeological sites throughout the region—there are limitations to the understanding of the prehistory of the southern San Joaquin Valley. Despite these limitations, there is a long history of archaeological research that informs current understanding of the prehistory of the region. Research conducted within the southern San Joaquin Valley has resulted in the identification and definition of a number of temporal components, periods, or phases that reflect prehistoric human lifeways and land use patterns. This research has predominately focused on sites situated along the ancient shoreline of Buena Vista Lake (Fredrickson and Grossman 1977; Gifford and Schenck 1926; Hartzell 1992; Riddell 1951; Walker 1947; Wedel 1941) and in the Tulare Basin area (Angel 1966; Hewes 1941; Siefkin 1999).

Recent archaeological research conducted by Hartzell (1992) at sites along the southwestern margin of Buena Vista Lake (Wedel Site #1 and #2; CA-KER-116) and near Buena Vista Slough (CA-KER-180 and CA-KER-1611) has resulted in the refinement of the lakeshore's chronological sequence as it relates to the Holocene epoch. A similar approach was taken by Siefkin et al. (1996) for the neighboring Tulare Basin area. Cumulatively, these studies provide definition of three broad temporal periods for the larger southern San Joaquin Valley area: (1) Early Holocene, (2) Middle Holocene, and (3) Late Holocene. While no single cultural-historical framework currently exists that represents the entire prehistoric record for the Central Valley, this chronological sequence best describes the cultural changes for the purposes of this document.

Since the early 1930s, a number of schemes have been set forth by researchers to organize the archaeological data of California into a chronological framework. A scheme that was originally devised for chronologically organizing sites from Central California, the Sacramento Delta, and the northern San Joaquin Valley was refined by Beardsley (1954a, 1954b) and came to be known as the Central California Taxonomic System (Moratto 2004:181). The system relies on identifying certain characteristics such as burial patterns (whether the body is flexed or extended), shell bead types, stone tools, and even where the sites tend to occur (along the San Francisco Bay or inland). These traits and characteristics are used to place a site in a specific time period. The system is still widely used by archaeologists. It organizes the archaeology of the region as follows:

- Paleoindian: earlier than 8,000 years ago
- Early Horizon: 8,000 to 2,500 years ago
- Middle Horizon: 2,500 to 1,100 years ago
- Late Horizon: 1,100 to 200 years ago
- Historic: 200 years ago to modern times

Scholars have debated whether the Early Horizon inhabitants of the Central Valley were culturally related to inhabitants of the San Francisco Bay, or if they developed independently (Bickel 1981; Gerow and Force 1968). The exact dynamics of cultural change and interchange between these two groups is still being unraveled by archaeologists. The earliest dates for human occupation in this region are unknown. Although sites from the Paleoindian period likely exist (dating from 12,000 to 8,000 B.P.), sites from a Central Valley occupation dating from about 7,000 to 6,000 B.P. are thought to be buried under alluvium, and are therefore not well documented in this part of California (Moratto 2004:214). It has been suggested that the Early Middle Horizon (4,500 to 2,500 years ago), now referred to as the Windmillers, is associated with an influx of peoples from outside of California who brought with them an adaptation to river-wetland environments (Moratto 2004:217). Typical Windmillers sites are often situated in riverine, marshland, and valley floors, settings that offer a variety of plant and animal resources. These sites often contain burials that are extended ventrally and oriented to the west. Burial artifacts include a variety of fishing paraphernalia (net weights, spear points, and bone hooks) and large projectile points, as well as large and small mammal remains.

The subsequent Middle Horizon or Berkeley Pattern covers a period from 2,500 to 1,500 years ago in Northern California. This pattern overlaps somewhat with Windmillers attributes at the beginning and with late Prehistoric artifacts at the end. Berkeley Pattern sites are much more common and well documented; therefore, they are better understood than the Windmillers sites. The sites are distributed in more diverse environmental settings, although a riverine focus is common. As described by Rosenthal et al. (2007:156), sites from this period include deeply stratified midden deposits containing large assemblages of milling and grinding stones for the processing of vegetal

resources as well as smaller, lighter projectile points. Further distinguishing traits from earlier patterns include artifacts such as slate pendants, steatite beads, stone tubes, and ear ornaments. A shift in burial patterning is also evident with variable directional orientation, flexed body positioning, and a general reduction in mortuary goods (Fredrickson 1973; Moratto 2004).

Fredrickson (1973) defined the later prehistoric period, which ranges from 1,500 to 150 years ago, as the Augustine Pattern. The pattern is characterized by intensive hunting, fishing, and gathering, a focus on acorn processing, large population increases, intensified trade and exchange networks, more complex ceremonial and social attributes, and the practice of cremation in addition to flexed burials. As pointed out by Rosenthal et al. (2007:157–158), certain artifacts also typify the pattern: bone awls for use in basketry manufacture, small notched and serrated projectile points, the introduction of the bow and arrow, occasional pottery, clay effigies, bone whistles, and stone pipes. The Augustine Pattern and the late prehistoric period can be characterized as the apex of Native American cultural development in this part of California.

Ethnography

The APE lies in the traditional territory of the Northern Valley Yokuts. The following ethnographic summary is not intended as a thorough description of Yokuts culture, but is instead meant to provide a background to the present cultural resource investigation with specific references to the APE. In this section, the past tense is sometimes used when referring to Native peoples because this is a historical study. This convention is not intended to suggest that the Yokuts only existed in the past. To the contrary, many Yokuts people have strong cultural and social identities today.

The Yokuts language is one of many in California which originates in the Penutian language group (Gayton 1945:409; Golla 2011:130). Yokutsian is considered a distinct Penutian language group in itself, but was only recently distinguished from the Utian languages of Ohlone and Miwok peoples (Callaghan 1997, 2001).

The Yokuts (“people”) historically lived in a large swath of the San Joaquin Valley, from Stockton County to Bakersfield. Between 40 and 50 bands of Yokuts lived throughout the territory, each numbering around 350 individuals. Villages each had a central semi-subterranean sweathouse, and each nuclear and extended family lived in a *kawi*, a gabled ovate house constructed of tule mats tied to a horizontal ridge beam (Gayton 1948:13). These villages were more or less permanent, and people only left at length for seasonal gathering rounds (Gayton 1945:412).

Yokuts social organization was primarily patrilineal, and partly totemic. Paternal lineages were represented by totem animals. Totemic lineages included Eagle, Falcon, Dove, Crow, Magpie, Coyote, Bear, Cougar, and Rattlesnake, among others. Headmen of tribes often came from Eagle lineage. Messengers, attachés to the headmen, often came from the Dove lineage (Gayton 1945:415). Headmen of individual villages were endowed with disciplinary power and often received tributes of food from their village, but were subject to similar authority of broader district headmen (Gayton 1948:50).

Yokuts peoples in the San Joaquin Valley depended largely on fish and waterfowl of the San Joaquin River as main parts of their diet. Large game, including antelope, elk, and deer, also made a sizable portion of their diet, and were hunted with bow and arrow (Gayton 1948:49). Staple plant foods included soaproot, cattail roots, and manzanita berries. While acorns, the staple of many

California Native peoples' diets, were used, they were not considered as significant as other parts of their diet (Gayton 1948:9).

The band of Yokuts peoples who occupies the APE are likely the Nopchinchí (Cook 1955; Kroeber 1925:485; Wallace 1978:462). This band of Yokuts peoples was not studied in depth by Kroeber (1925) and Schenck (1926:141). Cook (1955:51–52) suggests that most of the population of the Nopchinchí were taken into the missions during raids between 1806 and 1816. A Mexican raid of the Nopchinchí in the 1830s was thought to have captured approximately 300 people. Their numbers around 1816 were estimated at around 1,800.

History

Early Exploration

The earliest documented foray into San Benito County was that of Father Juan Crespi in 1772. During his expedition, he named a stream after Saint Benedict. This name eventually grew to name the valley through which it ran (Gudde and Bright 2004:330). The mission at San Juan Bautista, established in 1797, took fifteen years to construct. It drew heavily on the region's Native population; some 5,467 neophytes are buried on the premises (Tinkham 1910:323). No specific Spanish or Mexican incursions into Vallecitos or the APE are known. The first American to arrive in the area was Patrick Breen, a survivor of the Donner Party expedition. As the Mexican-American War drew to a close, the Breens quickly profited from the influx of gold seekers that overran California by establishing a hotel in San Juan Bautista (Tinkham 1910:324).

The American Period

When California was made a state, the land encompassing San Benito County was originally administered by Monterey County. San Benito County was separated from Monterey County in 1874. The town of Hollister, a relatively -new hamlet in comparison to the towns of Gilroy and San Juan Bautista, was chosen for the county seat. The extension of the Southern Pacific Railroad through the county bolstered its agricultural output, which remains its economic backbone to the present (San Benito County 2008).

New Idria Mine and New Idria Road

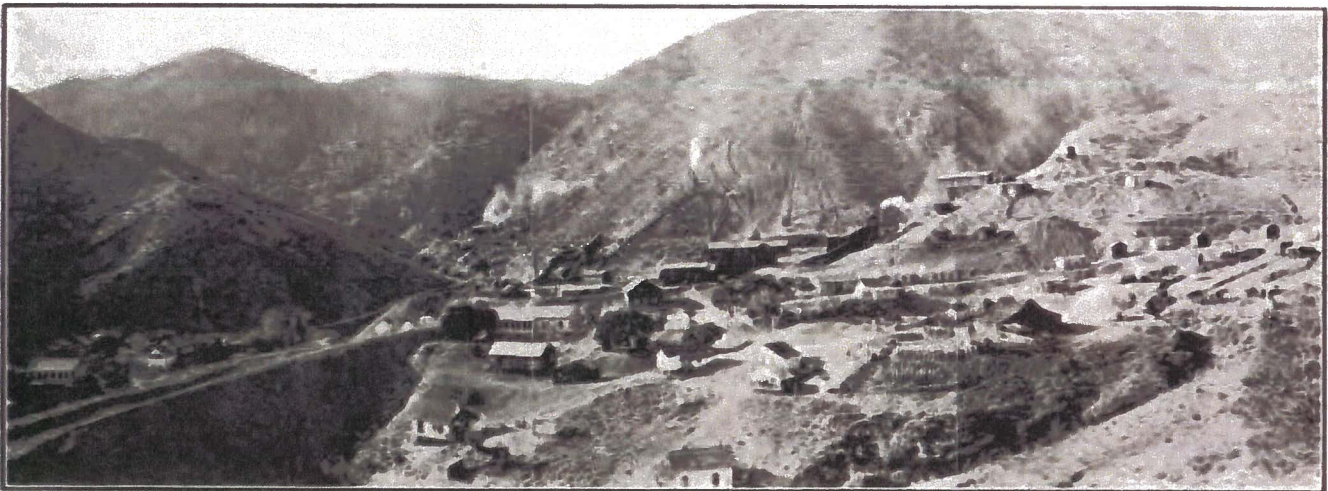


Figure 4. Panoramic view of New Idria Mine (Bradley 1918:108).

The road spanning the APE, New Idria Road, has deep connections to the mercury industry. Local legend holds that cinnabar was identified in this part of the Diablo Range by padres from the mission at Monterey; Native peoples were known to use it at this time (Barrows and Ingersoll 1893:122). Claims on the mine date to as early as 1854. The claim was named for Idrija Mine in Austria, and quickly rose to prominence as the second most productive mercury mine in the United States, after the New Almaden mine (Elliott and Moore 1881:153). As early as 1861, between 200 and 300 men worked at the New Idria mines (Kyle et al. 1990:302). By the turn of the century, as the New Almaden mine declined, New Idria became California's most productive (Bradley 1918:93). Around 97% of San Benito County's mercury output between 1858 and 1917 came from the New Idria Quicksilver Mining Company's 240 acres of holdings. At that time, it had produced 306,475 flasks (23,292,100 pounds) of mercury (Bradley 1918:109).

In 1895, the New Idria Quicksilver Mining Company assumed operation of the site (Bradley 1918:109). A furnace building featuring four Gould rotary furnaces was constructed in 1918, significantly modernizing its operations (Bradley 1918:248–250). The corporation was succeeded by the New Idria Mining and Chemical Company, established in 1936. In 1972, this final company closed the property, which quickly became a ghost town (Kyle et al. 1990:302).

Kate Woods, a noted mariachi musician and journalist, purchased the abandoned New Idria mine property in the 1980s. She subsequently spent decades advocating for the designation of the New Idria Mine as an EPA Superfund site (Morris 2017). In 2011, the property was proposed as a Superfund site, claiming adverse effects to wildlife in San Carlos Creek, Silver Creek, and Panoche Creek (United States Environmental Protection Agency 2011).

Ashurst Ranch



Figure 5. John Ashurst (San Jose Mercury-News 1904:5).

The APE lies within the bounds of the Ashurst Ranch. As a boy, John Ashurst crossed the plains with his parents in 1866. He established the eponymous Ashurst Ranch in 1871 to supply beef to the New Idria Mine, and quickly amassed thousands of acres (Santa Cruz Sentinel 1933:7). In the early 1870s, the outlaw Tiburcio Vasquez and his gang stole cattle and “terrorized the settlers” of Vallecitos (Boessenecker 2010:213). Ashurst responded by heavily arming himself and physically defending his property. He claimed many close encounters with the Vasquez gang before their exodus to southern California (San Jose Mercury-News 1904:5). He was embroiled in scandal in 1897 after killing local rancher Frank Lynch, who he claimed was stealing his cattle alongside three Mexican men (Sacramento Daily Union 1897:1). He was acquitted on the basis of his self-defense claim (San Francisco Call 1897:3). By the turn of the century, Ashurst was regarded with fear by the Latino community (San Jose Mercury-News 1904:5).

In 1901, Ashurst drilled the first oil well on his ranch (Los Angeles Herald 1901:11). The property continues to operate as both an oil field and a cattle ranch to the present. When it was put on the market in 2019, it was considered one of the largest continuous cattle ranch properties in California, spanning

58,154 acres over both San Benito and Fresno Counties. This included 27,994 deeded acres and 30,210 acres of BLM grazing leases (Brown 2019).

APE History

In the 1850s, a stage road was established from the area to San Juan Bautista, 68 miles distant. This became the primary access route to New Idria, and, despite some improvements, has remained in a nearly identical alignment to its original course. Crossings over Larious Creek appear in aerial imagery in all reviewed photos (Cartwright and Company 1958; Fairchild Aerial Surveys 1939, 1947).

The value of the road was summed up by William Brewer, who visited the area in 1861. Brewer noted that “all the necessities of life have to be brought from a great distance in wagons in the hot sun,” and noted that the distance facilitated exorbitant price gouging (Brewer 1930 [1864]:142–143). The road was the sole artery for the New Idria mines, carrying all goods in and taking flasks of mercury to San Juan, where they would be then sent to Alviso for distribution. Communities along the road, including Panoche, Paicines, and Tres Pinos, grew to service traffic to and from New Idria (Kyle et al. 1990:302).

Historically, stream crossings on New Idria Road have been prone to washing out. As an example, a major flood in 1911 washed out bridges on the only two roads to New Idria, isolating it from resources for two weeks and nearly causing mass starvation (Fresno Republican 1911:7). New Idria Road has also been the subject of multiple disputes between the county government in Hollister and local businesspeople, the latter of whom have aggressively campaigned for improvements to New Idria Road, such as bridges suitable for heavier traffic and higher water flow (Salinas Daily Post 1938:1; Santa Cruz Sentinel 1940:10). The dispute had become so embittered in the late 1930s that the Panoche Valley threatened to secede from San Benito County and join Fresno County. This move failed largely because the New Idria Mining and Chemical Company refused to support it (Salinas Daily Post 1938:1). No specific mention of the crossing spanning Larious Creek appeared in historic newspaper articles.

IV. SOURCES CONSULTED

Records Search

On June 28, 2022, ALTA archaeologist Jamie Frattarelli conducted a records search (File Number 21-2188) at the Northwest Information Center (NWIC) located on the campus of Sonoma State University. The NWIC, an affiliate of the State of California Office of Historic Preservation is the official state repository of archaeological and historical records and reports for an 18-county area that includes San Benito County. The records search included a review of all study reports and resources on file within a half-mile radius of the APE. Sources consulted include archaeological site and survey base maps, survey reports, site records, and historic General Land Office (GLO) maps.

Included in the review were:

- California Inventory of Historical Resources (CA Dept. of Parks and Rec. 1976)
- California Historical Landmarks for San Benito County (CA-OHP 1990)
- California Points of Historical Interest (CA-OHP 1992)
- Built Environment Resources Directory Listing (BERD) (CA-OHP January 2020)

- Historic Properties Directory (CA-OHP April 2012), including the National Register of Historic Places, California Historical Landmarks, and California Points of Historical Interest

Review of historic registers and inventories indicate that no historical landmarks or points of interest are present in the APE. No NRHP-listed or eligible properties are located within the half-mile visual area of the APE.

Review of archaeological site and survey maps revealed that five cultural resource studies have been previously performed within a half-mile radius of the APE (Table 1). None of the half-mile records search radius has been previously surveyed. No studies have been conducted within the APE.

Table 1. Summary of Previous Cultural Resources Studies within Search Radius

Report No.	Authors	Year	Description
S-003260	A. R. Pilling	-	Notes on artifact collections in San Benito County
S-007850	Gary S. Breschini, Trudy Haversat, R. Paul Hampson, MaryEllen Ryan, Charles R. Smith, Georgia Lee, and Laurence H. Shoup	1983	A Cultural Resources Overview of the Coast and Coast-Valley Study Areas
S-020395	Donna L. Gillette	1998	PCNs of the Coast Ranges of California: Religious Expression or the Result of Quarrying?
S-030204	Donna L. Gillette	2003	The Distribution and Antiquity of the California Pecked Curvilinear Nucleated (PCN) Rock Art Tradition.
S-032596	Randall Milliken, Jerome King, and Patricia Mikkelsen	2006	The Central California Ethnographic Community Distribution Model, Version 2.0, with Special Attention to the San Francisco Bay Area, Cultural Resources Inventory of Caltrans District 4 Rural Conventional Highways

No cultural resources are documented within a half-mile radius of the APE. There are no cultural resources documented within the APE.

Historic Map Review

Review of historic maps of the area was completed to better understand the timing of development within the APE and recognize historic features. The following narrative presents a summary of this review.

The earliest map of the APE is an 1871 cadastral survey plat illustrated by surveyors of the General Land Office. This map identifies the area as the "Vallecitos Valley." A road labeled "Road from New Idria Mine to San Juan" appears in the present alignment of New Idria Road, crossing Larious Creek and proceeding southeast along San Carlos Creek before arriving at New Idria. Aside from Ashurst Ranch to the west, the nearest depicted house to the APE is that of R. Valdez, west of the center

of section 8 (General Land Office 1871). By 1881, Valdez's house is not shown. A grain field appears to cross the line of sections 7 and 8, between the junction of Larious Creek and San Carlos Creek. A fork from the New Idria road appears just east of the APE, and is labeled "Road from Zacatecas to Silver Creek" (General Land Office 1881).

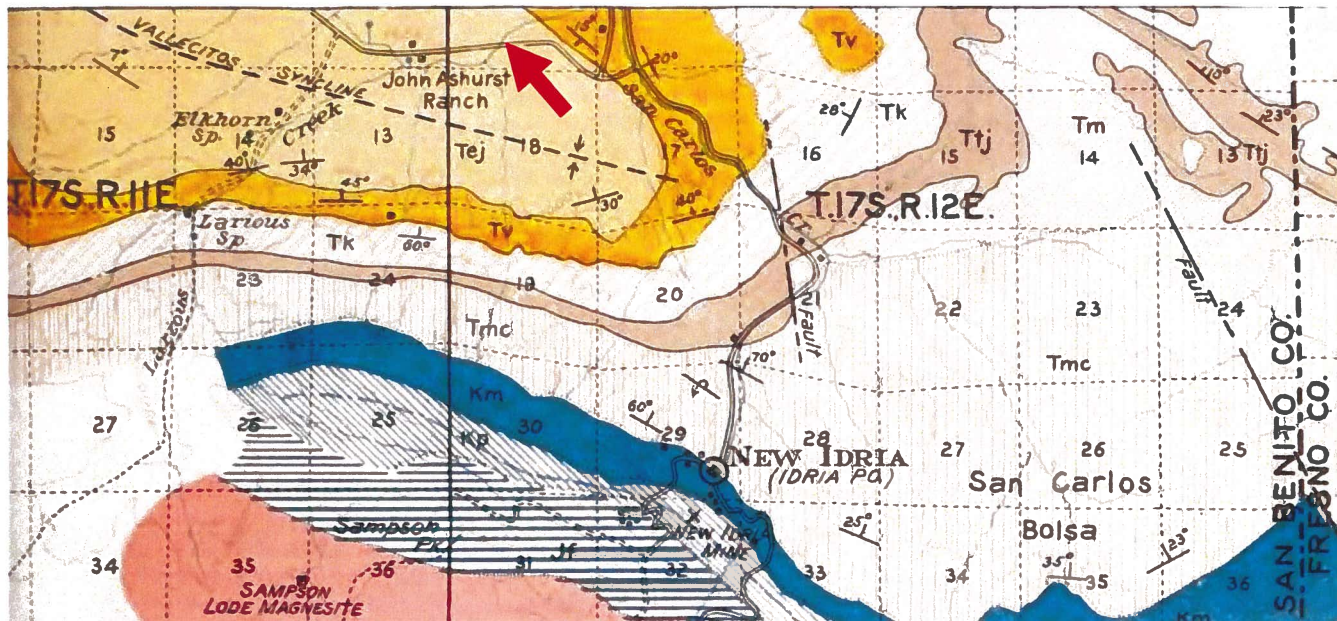


Figure 6. Detail of adapted USGS topographic map (Bradley 1918:Plate XII). APE indicated by red arrow.

By 1915, the road appears in its present alignment, symbolized as an improved road. The John Ashurst Ranch is noted to the west of the property. Another structure to the northeast, along a road leading north from New Idria Road, is unlabeled. A number of springs are noted in the greater area, including Eugene Spring, Dixon Spring, Elkhorn Spring, and Larious Spring. The stream crossing through the APE is labeled Larious Creek (USGS 1915). This depiction remains roughly consistent on USGS quads for 28 years (Bradley 1918; USGS 1915, 1927, 1937, 1943a). By 1943, the only change on USGS quads is the absence of the unnamed house northeast of the APE (USGS 1943b). The 1934 survey of highways in San Benito County indicates that the road was a low-volume county highway (California Division of Highways 1935). A landing strip appears north of the Ashurst Ranch in 1956. A windmill appears approximately 1500 feet east-southeast of the APE (USGS 1956). This depiction remains consistent through subsequent historical topographic maps (USGS 1973, 1980).

The earliest aerial image of the APE shows a structure spanning Larious Creek. The resolution of this image is too low to discern the type of structure (Fairchild Aerial Surveys 1939). The subsequent aerial photo, dated 1947, shows a broad shadow on the north side of the crossing, and no embankments appear on the streambanks on the edges of the crossing. This may suggest the presence of a more formal bridge at this time (Fairchild Aerial Surveys 1947). By 1959, a shadow in the same location casts more narrowly, and embankments appear on all four corners of the crossing. This suggests the presence of a culvert rather than a formal bridge (Cartwright and Company 1958).



Figure 7. 1939 aerial image of New Idria Road over Larious Creek.



Figure 8. 1947 aerial image, featuring broad shadow and no embankments.



Figure 9. 1958 aerial image, featuring narrow shadow and embankments.

Ethnographic Literature Review

Available ethnographic literature was reviewed to identify cultural resources in the vicinity of the APE. As previously discussed, the APE lies in the territory of the Nopchinchí band of Yokuts speakers (Cook 1955:51; Kroeber 1925:485; Schenck 1926:133). A handful of villages were known to exist along the San Joaquin River near Mendota, some 26 miles northeast of the APE (Cook 1955:53–54). No ethnographically-known villages are located within the APE.

Native American Outreach

54 USC 302706(b) requires that in the process of carrying out the responsibilities of Section 106, the lead federal agency must consult with any tribe that attaches religious and cultural significance to historic properties that may be affected by the undertaking. As the federal government interacts with federally-recognized tribes as sovereign nations, consultation occurs between agencies and these tribes on a government-to-government level. 36 CFR Section 800.2(c)(2) specifies the process by which agencies are required to make good faith efforts to consult with tribes actively and early in planning the undertaking. Native American outreach undertaken by ALTA for this project does not constitute formal consultation. USACE, as the federal lead agency, is responsible for initiating consultation.

ALTA archaeologist Nicholas Radtkey contacted the NAHC on September 20, 2022 to request a review of the Sacred Lands file for information on Native American cultural resources in the APE and to request a list of Native American contacts in this area. On September 26, 2022, Cody Campagne of the NAHC advised that staffing turnover at the NAHC would delay a response by between six and eight weeks. On October 13, 2022, Campagne forwarded a response which indicated that the result of a search of the Sacred Lands File was negative. Campagne included a list of contact information for representatives of tribes associated with the APE.

On November 14, 2022, a letter was sent to the Tribal Historic Preservation Officer (THPO) or appropriate representative of each tribal group associated with the APE. The recipients were chosen from a list provided by the NAHC for a previous project in the nearby vicinity. On December 13, 2022, Samantha McCarty, Cultural Specialist II with the Santa Rosa Rancheria of the Tachi-Yokut Tribe, contacted Radtkey via email to solicit information about the project. Radtkey returned a summary of the project on December 15, and informed McCarty that the project had been placed on hold until environmental concerns could be addressed. On June 6, 2023, Radtkey called McCarty to reestablish dialogue about the project and to invite a tribal monitor to be present during field survey. McCarty requested an updated description of the project, and said that she would present the project information to her supervisors to discuss their involvement. Though follow-up communications continued through September 2023, stating the intention of presenting the project to the tribal council, no further communications resulted in tribal participation. Attachment B provides copies of the Native American correspondences.

Agency Correspondence

On September 23, 2022, ALTA archaeologist Nicholas Radtkey contacted the San Benito Assessor's Office by phone to ask about historical documents pertaining to the remnants of the historic-era stream crossing in the APE. The Assessor's Office could not find records of any bridge construction in the APE, and recommended contacting the county's Planning and Land Use Division. On September 26, 2022, Radtkey emailed Assistant Planner Jonathan Olivas. Later that morning, Olivas called Radtkey and advised that no records could be found either in CalTrans bridge records or county records.

Historical Organization Outreach

On September 26, 2022, ALTA archaeologist Nicholas Radtkey contacted the San Benito County Historical Society (SBCHC) to request a query of their records. Sheila Prader of the SBCHC replied later that day, expressing willingness to review records in the SBCHC Research Center. To date, no further correspondence has been received. Attachment C documents this correspondence.

V. FIELD METHODS

ALTA archaeologist Samantha Beck conducted a field survey of the APE on October 10, 2023. Project design drawing, project maps and aerial imagery were used to correctly identify the APE. Ground surface visibility was high, between 90 and 100%, throughout the survey area due to a general absence of vegetation. The full APE was surveyed, totaling 3.0 acres of land (Figure 4). The APE was surveyed using intensive survey coverage with transects no greater than 10-meter intervals. The architectural portion of the survey was designed to identify details of the remains of the crossing over Larious Creek, including its age, materials, style, construction methods, chronology, and evidence of remodeling/modification in sufficient detail to write an evaluation for inclusion on the NRHP. The remains were documented to describe both original and later construction, and photographed from all angles. Digital photos were taken of the APE and surroundings (Attachment D).

VI. STUDY FINDINGS AND MANAGEMENT RECOMMENDATIONS

Study Findings

As previously discussed, this study was designed to address the responsibilities of Section 106 of the NHPA (36 CFR Part 800). No cultural resources were identified within the APE as a result of the records search, literature review, or Native American communication. The remains of a crossing over Larious Creek were identified and recorded during field survey, and documented on Department of Parks and Recreation Form 523 (see Attachment E). The resource is described below. No other cultural resources were identified during field survey.

Resource Description

New Idria Road Crossing over Larious Creek

This resource consists of the remains of a crossing spanning Larious Creek. The culvert and soil prism which most recently stood at this location was destroyed during a storm in 2021, revealing the remains of a timber stringer bridge. The remains include two concrete retaining walls, a concrete footer, steel mesh wingwalls, and strewn concrete fragments throughout the streambed. The resource is in overall poor condition, retaining only the most resilient of its construction materials and conveying very little information about its origins and history through its remains.

Concrete retaining walls lie on the eastern and western ends of the stream bed, supporting prisms of soil. The retaining walls appear to be built as simple rectangular abutments, with a short concrete wingwall visible on the northeastern corner. The walls measure 20 feet wide by 15 feet tall, and are separated by approximately 60 feet. Impressions of boards used for forms remain from the pouring process, indicating that the bridge was constructed in place. Vertical marks on the surface of the

wall suggest that the former bridge was supported by four bents. Remaining anchors for four bents project from a single concrete footer in the center of the stream. Four rotted wooden posts and a mudsill remain embedded in the footing of the western wall. Trapezoidal panels of perforated steel mesh grates, oriented at the inlet and outlet of the culvert as wingwalls, remain on all but the northeastern corner of the stream bed. The panels are welded to cut sections of railroad track piles, which appear to stand in the stream bed without reinforcement. Fragments of concrete and steel grates are strewn through the stream bed, as far as 100 feet north. Broken concrete fragments exhibit steel rebar reinforcement. It is unclear what components of the former crossing they represent.

The County of San Benito retains no information about the bridge. No other archival documents exist to verify the construction date and original form of the crossing. No diagnostic features which would identify the date of construction or the builder were evident. Historical aerial imagery places a potential construction date of the most recent iteration of the crossing—a steel culvert under a soil prism, which replaced the former bridge—between 1947 and 1958 (Cartwright and Company 1958; Fairchild Aerial Surveys 1947).

Historic Resource Evaluation

As previously discussed, in order for a property to be considered eligible for listing in the NRHP, it must possess historical significance by fulfilling at least one of four criteria, and retain sufficient integrity, defined by seven aspects (36 CFR 60.4). This section outlines the evidence for significance and integrity of each of the three properties based on these criteria.

The preceding historic context was developed for the properties for their evaluation under the Criteria for Evaluation for the NRHP (36 CFR 60.4). The historic context facilitated the identification of an Area of Significance, a Period of Significance, a Level of Significance, and for identifying an appropriate boundary for the potential historic resource.

For the remains of the stream crossing, the Area of Significance is Industry. The Period of Significance is 1861 to 1972, corresponding with the operation of the New Idria Mercury Mine. The date of construction of this structure dates to between 1947 and 1958. The Level of Significance is local.

Criteria for Significance

Criterion A

NRHP Criterion A identifies significant resources as those “that are associated with events that have made a significant contribution to the broad patterns of our history” (36 CFR 60.4(a)). New Idria Road was known as the primary thoroughfare from the New Idria mines to distributors and buyers. Though the crossing is associated with the mine at New Idria by virtue of physical connection, the crossing cannot be said to directly relate to that context in such an important manner that it is significant under Criterion 1. The period of significance of the mine at New Idria is much earlier than the likely construction date of the concrete wingwalls and footings of the former crossing. Similarly, the location of the crossing near the historic-era Ashurst Ranch is not enough to associate the two. Though New Idria Road bridges have been the subject of heated dispute in San Benito County politics, this crossing is not clearly associated with those events. Therefore, the crossing does not meet the requirement of significance to be eligible under Criterion A.

Criterion B

NRHP Criterion B identifies significant resources as those “that are associated with the lives of persons significant in our past” (36 CFR 60.4(b)). During a review of historical literature about the area, no individuals or entities could be clearly identified with this crossing. Therefore, the crossing does not meet the threshold of significance under Criterion B.

Criterion C

NRHP Criterion C identifies significant resources as those “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” (36 CFR 60.4(c)). So little remains of the original structure spanning Larious Creek that its original form is nearly indistinguishable. The single remaining footing, which may suggest that it was a timber stringer bridge, is not substantially informative enough about the original structure to make inferences about much of its construction, the skill of its builder, artistic value, or its importance to a larger entity. Thus, the remains of this crossing fail to meet any element of significance under Criterion C.

Criterion D

Criterion D identifies significant resources as those “that have yielded, or may be likely to yield, information important in prehistory or history” (36 CFR 60.4(d)). The almost-complete obliteration of this crossing simultaneously destroyed whatever novel data could have been derived from the remains of the former concrete structure. Neither of the remaining elements of this structure, conventional concrete wingwalls poured in wooden forms and a concrete footing, are likely to inform contemporary research questions in history, historical archaeology, engineering, or other germane disciplines of research on material culture.

Aspects of Integrity

Location

The remaining concrete elements of the former crossing over Larious Creek appear to have been poured in place rather than imported. Therefore, the aspect of integrity remains high.

Design

What remains of the former structure, the concrete wingwalls and footing, are not sufficiently intact to discuss design in any meaningful way. Integrity of design is thus low.

Setting

The general area surrounding the crossing remains rural, and continues to operate as a cattle ranch, much as it did in the time of John Ashurst. The landscape at large does not suggest dramatic change since that time, making integrity of setting high.

Materials

Most materials are absent from the elements of the concrete crossing, likely replaced during the installation of a culvert in this location. Because this structure was mostly dismantled, integrity of materials is low.

Workmanship

As with the prior elements of integrity, so little of this former crossing remains that it is nearly impossible to interpret the workmanship which went into the construction of the structure. Integrity of workmanship is naturally low.

Feeling

So little of the crossing remains that it barely conveys its original appearance, much less its aesthetic relationship to its period of construction. A sense of history is not evident from a pair of concrete wingwalls and a single footing. Therefore, integrity of feeling is low.

Association

No clear association with a period of construction, an individual, an entity of people, or any notable historical events was evident through literature review nor field survey of the remaining components. Its presence along New Idria Road alone is insufficient to associate it with the most important activities of the mine. Similarly, its proximity to the Ashurst Ranch does not *ipso facto* make it an associated feature. This site thus lacks integrity of association.

In conclusion, this evaluation finds that the remains of the New Idria Road crossing over Larious Creek meets only the most basic aspects of integrity—location and setting—and none of the four criteria for eligibility for the NRHP. Therefore, the crossing is evaluated herein is recommended as *ineligible* for inclusion on the NRHP. The project is not anticipated to cause a substantial adverse change in the significance of a historical resource as defined in 36 CFR 800.5(a)(1).

Management Recommendations

We make the following recommendations to ensure that cultural resources are not adversely affected by the proposed project. As presently designed, the project is not expected to have an adverse effect on cultural resources.

Unanticipated Discovery of Cultural Resources

If previously unidentified cultural resources are encountered during project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist should be contacted to evaluate the situation. Project personnel should not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

Encountering Native American Remains

Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a “Most Likely Descendant” can be designated and further recommendations regarding treatment of the remains is provided.



Figure 10. Survey Coverage

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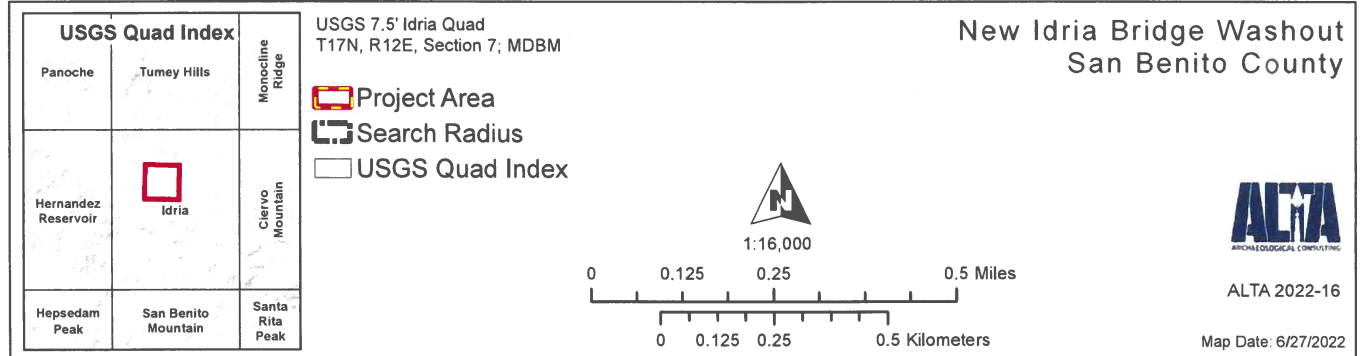
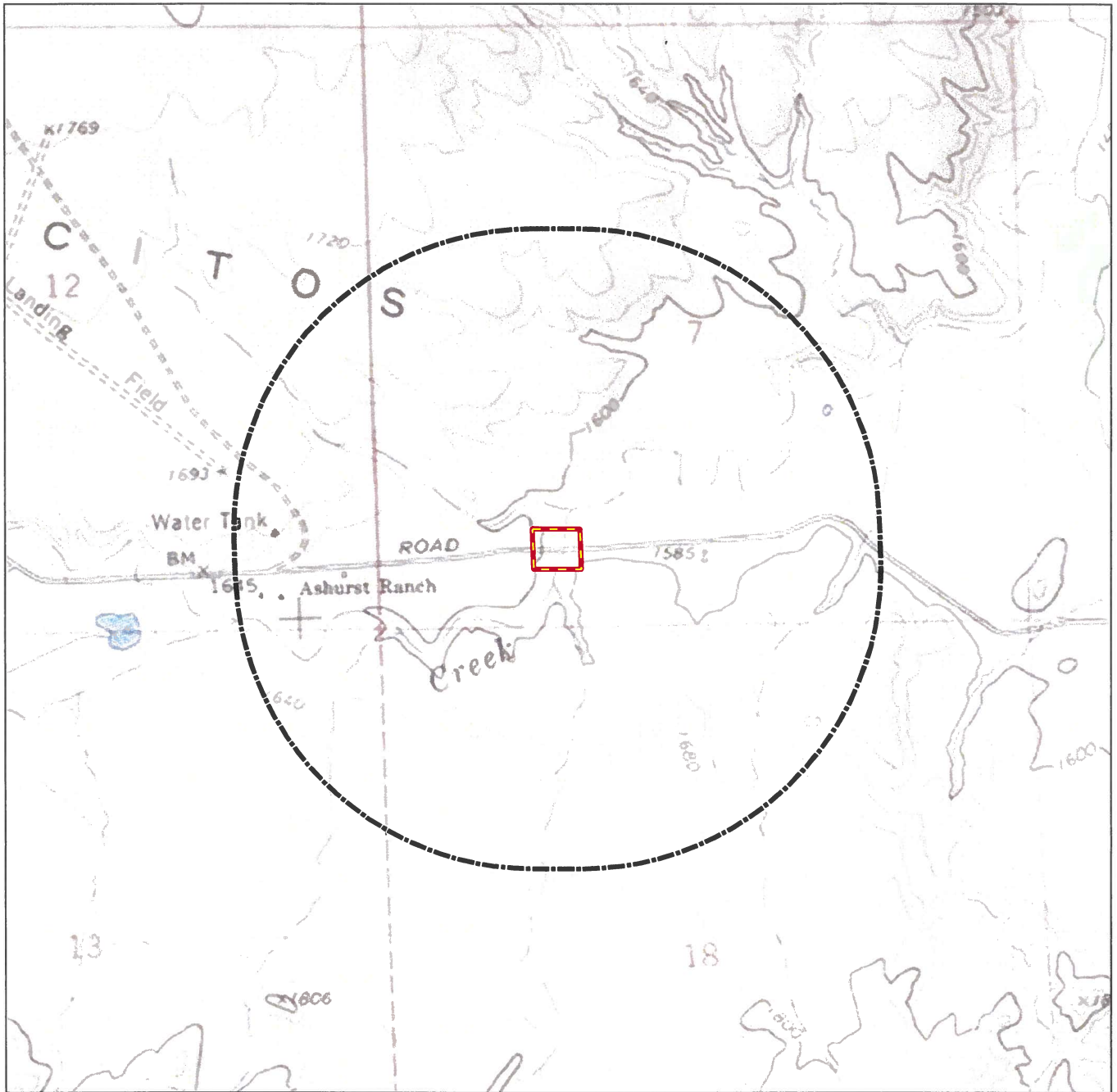
Attachment A – Records Search Results

NEW IDRIA ROAD WASHOUT PROJECT PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

Confidential Information

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CALIFORNIA
HISTORICAL
RESOURCES
INFORMATION
SYSTEM



ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE

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MENDOCINO
MONTEREY
NAPA
SAN BENITO

SAN FRANCISCO
SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1400 Valley House Drive, Suite 210
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
https://nwic.sonoma.edu

NWIC Billing Worksheet

IC File Number: 21-2188

Client Name: Jamie Frattarelli

Phone: (707) 775-1761

Affiliation: Alta Archaeological Consulting

Email: frattare@sonoma.edu

Proj Name/Number: "ALTA2022-79ALTA2022-16"

Date Request Rec'd: 6/28/2022

Date of Response: 6/28/2022

Check In: 12:56:00 PM Check Out: 2:17:00 PM

Check In: Check Out:

In-person Time:	Hour(s): 1.35	\$	150.00
Staff Time:	Hour(s):	\$	0.00
Shape Files:	Number:	\$	0.00
Custom Map Features:	Number:	\$	0.00
Digital Database Record:	Number of Row(s): 50	\$	12.50
Quads:	Number:	\$	0.00
Address-mapped Flat Fee:		\$	0.00
Hard Copy (Xerox/Computer) Pages:	Page(s):	\$	0.00
Labor Charge:	Hour(s): 1	\$	40.00
PDF Pages:	Page(s): 683	\$	102.45
PDF Flat Fee:		\$	0.00
Other: CHRIS Data Request		\$	0.00
Subtotal		\$	304.95

Rapid response surcharge of 50% of total cost: \$ 0.00

Total: \$ 304.95

Information Center Staff:

Dana Marty

Sonoma State University Customer ID:

0001001960

Sonoma State University Invoice No.:

CHRIS Access and Use Agreement No.:

****This is not an invoice. Sonoma State University will send separate invoice.****

CA-SBN-197

CA-SBN-197

The records for this resource have been moved to the Primary Files. Please see the following file number:

P-35-000188

28 July, 2006
Liz Black
Admin. Asst.

AC


State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATIONARCHEOLOGICAL SITE RECORD
Continuation Sheet

Permanent Trinomial: CA-SBN-197

10 192
Mo. Yr.

Other Designations: AC-1281-IDR-6

Page ____ of ____ .

Item No.	Continuation
	<p>It is of the opinion of BLM archaeologists that this is not really a prehistoric site and that it should not be issued a trinomial.</p> <p>The site is described in the original site record as two boulders, each contains "one possible weathered bedrock mortar hole. These are described as "possible" in that other sandstone rocks and outcrops contained in the drainage to the east bear natural concavities."</p> <p>The site was revisited by BLM archaeologists after the initial recording by Archaeological Consulting personnel. Each "BRM" was examined in detail and there is no evidence that these holes were utilized. They bear none of the distinctive wear that traditional BRMs exhibit. The insides of the holes are very rough, as they are on the outside. Although the boulders are sandstone, they are hard enough (indurated) to withstand substantial weathering.</p> <p>It should be noted that these "geofacts" exist throughout major portions of the south Coast Ranges, and that they have been verified by the BLM geologist to have been made naturally. BRMs in this region are very distinct and should not be confused with these naturally occurring holes.</p> <p>The valley in which these "BRMs" exist is very dry; all drainages are ephemeral, containing only minimal water even in the winter months. There are currently no oak trees within the immediate vicinity, however prehistoric vegetation patterns may have been different.</p> <p>There were no other cultural material found within the immediate vicinity of these rocks. The BLM again requests that the trinomial assigned to this location be deleted from the inventory.</p> <p>This site was field inspected by Linda Hylkema, Area Archaeologist for the Hollister BLM office. This took place in late August, when mulch conditions were very low and ground visibility was excellent. No other cultural material was observed even with the excellent ground visibility.</p> <div style="text-align: center; margin-top: 20px;"> <p>These holes are rounded:</p> <p>Profile view: </p> <p style="margin-left: 300px;">MOST BEAMS look more or less like this due to the up-down motion of a pestle</p> </div>



P-35-000188 / CA-SBN-197

United States Department of the Interior

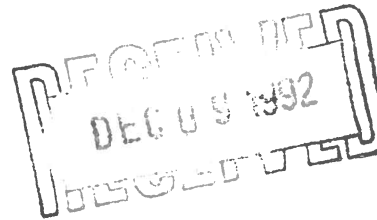
BUREAU OF LAND MANAGEMENT HOLLISTER RESOURCE AREA

20 Hamilton Ct
Hollister CA 95023



IN REPLY REFER TO:

Ms. Leigh Jordan
California Archaeological Inventory
Department of Anthropology
Sonoma State University
Rohnert Park, CA 94928



8100
CA-19.71

DEC 7 1992

RE: Removing three sites: CA-SBN-197, AC-1281-TRM1-A, AC-1281-TRM1-B, from the Trinomial System.

Dear Leigh:

Approximately two months ago, the Hollister BLM office sent a package containing three Site Continuation forms and a bag of rocks, requesting that all three sites be eliminated from the trinomial system due to their lack of cultural material. The bag of "debitage" was included to illustrate the nature of the lithic material comprising one of the "sites".

When I spoke to Maggie regarding these sites, she told me that your facility had only received one of the three site records from Archaeological Consulting (AC). I have since learned from AC that they had not sent you the other two site forms, which probably caused some confusion for you when you read my Continuation Sheets. (They are not planning to send them, after-all). Please disregard the site continuation forms for sites AC-1281-TRM1-A and AC-1281-TRM1-B (and the bag). I apologize for any confusion that this may have caused.

The remaining site, CA-SBN-197, is the focus of this letter. Again, in my discussions with Maggie, I was informed that in order for your facility to "eliminate" this trinomial, you needed a letter from me.

I am the field official who inspected the "site" after it was recorded for the BLM by AC. I am enclosing another Continuation Sheet; it is the same except that it has my name on it as the archaeologist who inspected it after it was recorded.

Although the xerox photos of the rock at CA-SBN-197 appear to look like BRM's; physical inspection showed no obvious physical modification of the bedrock. There is nothing whatsoever to give the slightest indication that this could be considered a site. The holes are rough and very rounded (spherical) as opposed to real BRM's that are typically cylindrical in profile. In other words, the sides of these "BRM's" are rounded, not straight as they would

be from the up/down motion that a pestle would have created. We hope that this is enough documentation for your facility to consider "undoing" the trinomial, or at least putting a special notation with it. Please note that even the original recorder was hesitant to call them BRM's, apparently, he was not convinced either and "gave them the benefit of the doubt" (see page two of the site record).

If you have any questions regarding this matter, please call me in Hollister at (408) 637-8183.



Linda Hylkema
Area Archaeologist

Enclosure



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BAKERSFIELD DISTRICT
HOLLISTER RESOURCE AREA OFFICE

LINDA HYLKEMA
ARCHAEOLOGIST

20 HAMILTON COURT
HOLLISTER, CA 95023

(408) 637-8183

Archaeological Consulting P.O. Box 3377 Salinas, CA 93912		Permanent Trinomial: CA-SBN-197 County: San Benito Temporary Number: AC-1281-IDR-6 Agency Designation: - Date First Recorded: January 13, 1992 Date of this Form: January 13, 1992	
Recorded by: Larry Bourdeau and Toby Edwards		AC Control No. 66 Page 1 of 6	
USGS Quadrangle: Name: Idria Size: 7.5' Date: 1969 Photorevised: -	UTM Coordinates: Zone: 10 Easting: 7.0669 Northing: 40.3584 (4035900 N.) Elevation (ft): 1800	Cadastral Coordinates: Township: T17S Range: R12E Base Meridian: MDM <div style="display: flex; justify-content: space-between;"> <div> SE 1/4 of SW 1/4 of NW 1/4 of SE 1/4 of </div> <div style="text-align: right;"> Section: 18 </div> </div>	
Map Coordinates from NW Corner: <div style="display: flex; justify-content: space-between;"> <div>mms South</div> <div>240</div> </div> <div style="display: flex; justify-content: space-between;"> <div>mms East</div> <div>209</div> </div>			
Location: <p>Access to the site area is via a dirt road which leads south of New Idria Road at a large water tank and gate approximately 0.6 mile east of the Russel (Ashurst) Ranch headquarters. The dirt road passes over open meadow and grazing land for 0.9 mile to an obscure dirt track, then west 160 meters to the site.</p>			
Description: <p>Two separate sandstone boulders, designated "A" and "B," situated on a grassy bluff/terrace rim. Each boulder contains one possible weathered bedrock mortar hole. These are described as "possible" in that other sandstone rocks and outcrops contained in the drainage to the east bear natural concavities. BRM A has a single hole measuring 8 cm deep and 19 cm diameter; BRM B has a single hole measuring 5.5 cm deep and 16 cm diameter. Center to center distance between the two BRMs is 3.07 meters. Boulder A is 87 cm long by 54 cm wide by 28 cm high. Boulder B is 106 cm long, 49 cm wide, and 32 cm high.</p>			
Area and Depth: Length: 3.92 meters Width: 0.54 meters Area: About 2 square meters Method: Measurement Depth: - Method: -		Features: Two BRM boulders	
Artifacts: None noted		Non-Artifactual Constituents: None noted	

APR 10 1992

a.

Archaeological Consulting
P.O. Box 3377
Salinas, CA 93912

Permanent Trinomial: CA-SBN- 197
County: San Benito
Temporary Number: AC-1281-IDR-6
Agency Designation: -
Date First Recorded: January 13, 1992
Date of this Form: January 13, 1992

Site Integrity:

The two BRMs are worn at the rims, probably from cattle.
 Weathering and erosion have also deteriorated these boulders.

AC Control No. 66

Page 2 of 6

Human Remains:

None noted

Ecological Background Data:

Vegetation community (site): Introduced grasses
Vegetation community (area): Same
Reference(s): None
Plant list: None
Nearest water: Seasonal drainage about 200 m to the east
Nearest large body of water: None
Site soil: Medium reddish-brown sandy silt with sandstone pebbles/cobbles
Surrounding soil: Medium to dark reddish-brown sandy silt with sandstone pebbles/cobbles
Geology: Tertiary and Cretaceous Marine sandstones
Landform: Bluff and terrace land along the south side of Vallecitos Valley
Slope: Less than 10° gradient from south to north on terrace
Exposure: Open to the north and west

Ownership Data:

Owner: Bureau of Land Management
Address: P.O. Box 365, Hollister, CA 95023

Remarks:

The two BRMs were given the benefit of the doubt as they more closely resemble prehistoric cultural features than do any of the other (natural) sandstone holes and pockets which were observed elsewhere on this parcel.

Project Data:

Type of Project: Mixed strategy cultural resources reconnaissance
Name or Number of Project: AC Project 1281
Reference(s): "Mixed Strategy Cultural Resources Reconnaissance of BLM Lands for the Eade Land Exchange, Monterey, San Benito, and Fresno Counties, California" (Gary S. Breschini and Trudy Haversat, in progress).

Photographs:

On file, Archaeological Consulting, Salinas

Curation:

No materials collected

a.

Archaeological Consulting
P.O. Box 3377
Salinas, CA 93912

Permanent Trinomial: CA-SBN- 197
County: San Benito
Temporary Number: AC-1281-IDR-6
Agency Designation: -
Date First Recorded: January 13, 1992
Date of this Form: January 13, 1992

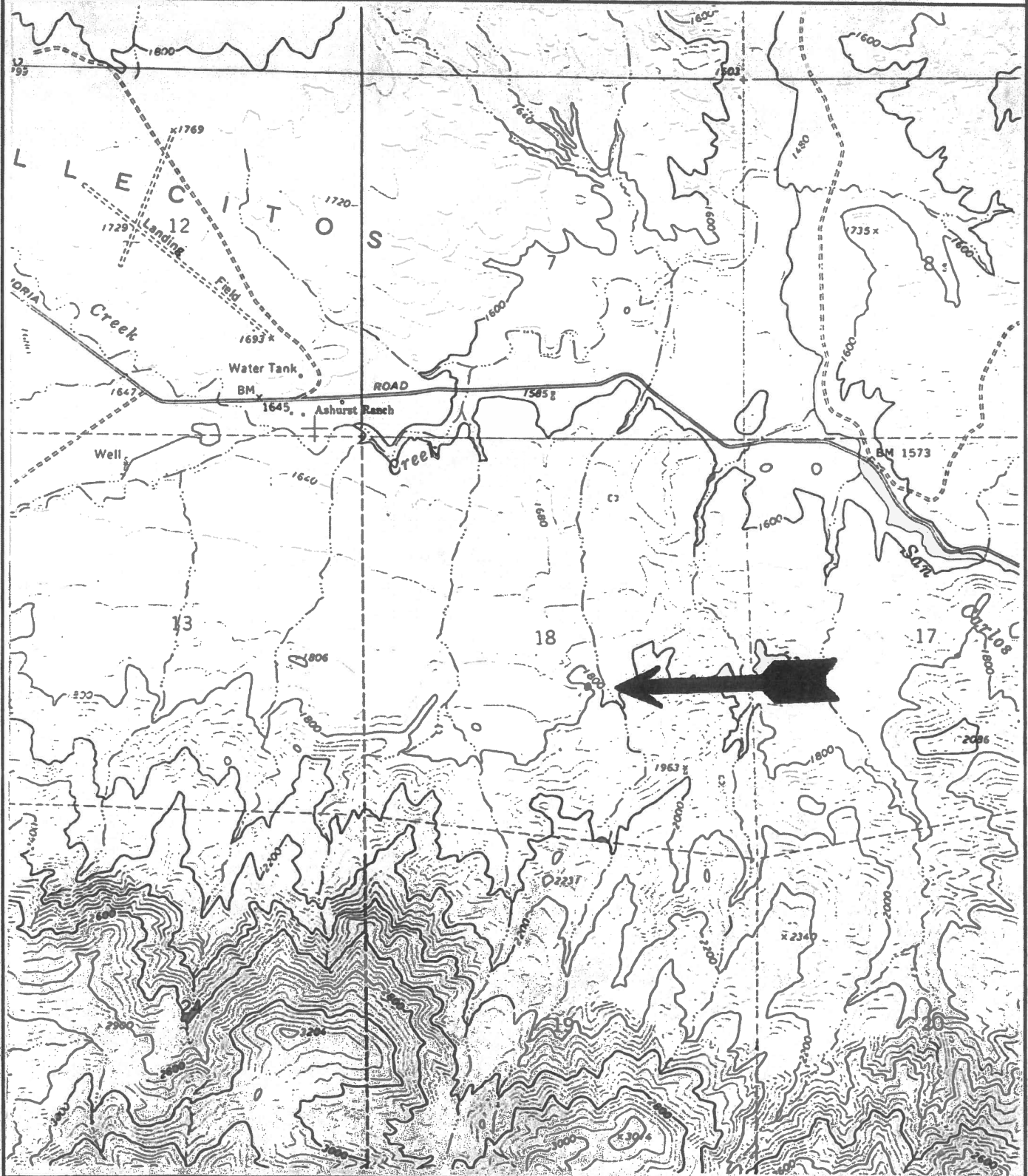
Archaeological Site Location Map:

Quadrangle: Idria

Scale: 1:24,000

AC Control No. 66

Page 3 of 6



a.

Archaeological Consulting
P.O. Box 3377
Salinas, CA 93912

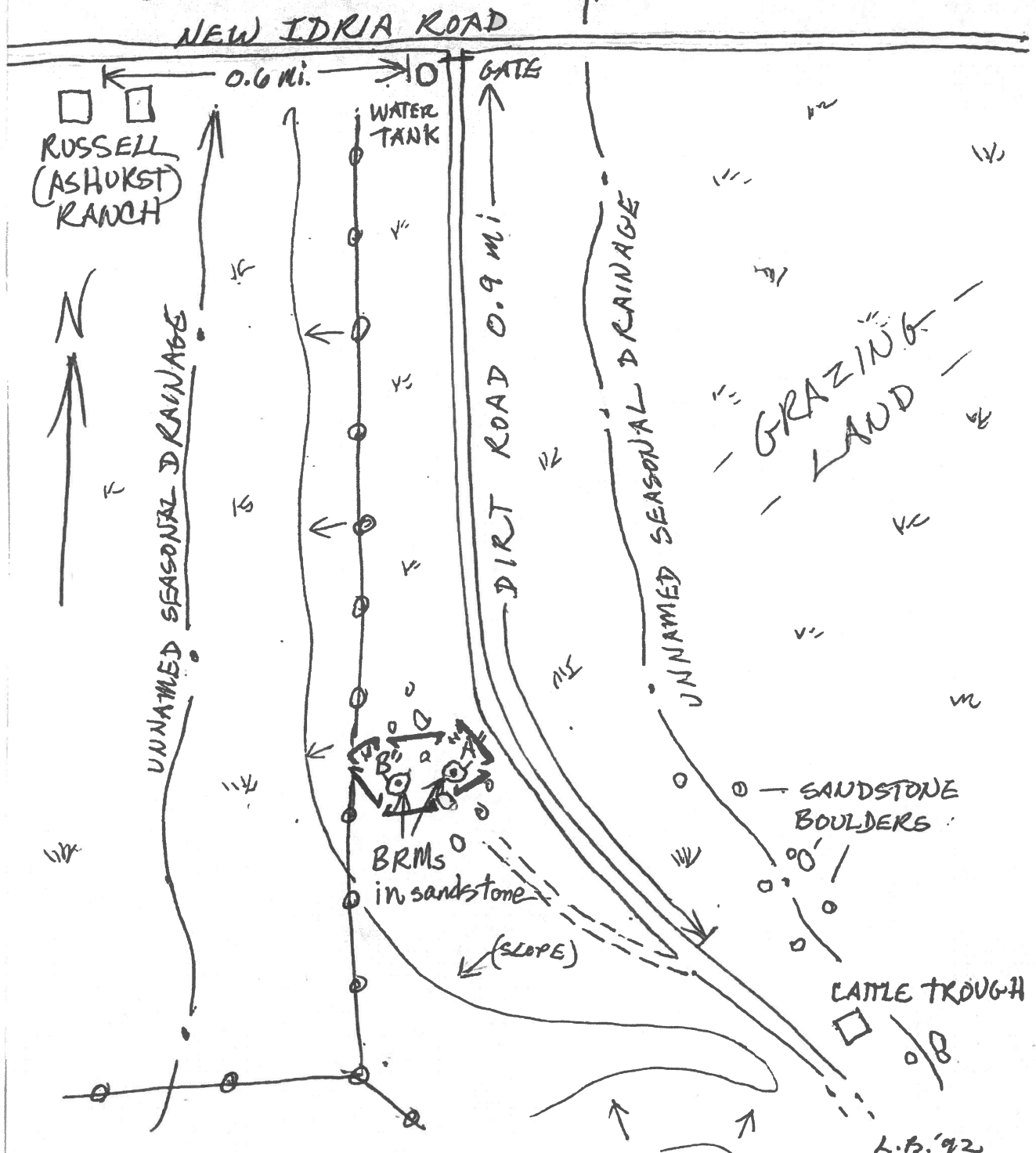
Permanent Trinomial: CA-SBN-197
County: San Benito
Temporary Number: AC-1281-JDR-6
Agency Designation: -
Date First Recorded: January 13, 1992
Date of this Form: January 13, 1992

Archaeological Site Sketch Map:

AC Control No. 66

Page 4 of 6

SKETCH MAP - NOT TO SCALE



a.

Archaeological Consulting
P.O. Box 3377
Salinas, CA 93912

Permanent Trinomial: CA-SBN- 197
Monterey: San Benito
Temporary Number: AC-1281-IDR-6
Agency Designation: -
Date First Recorded: January 13, 1992
Date of this Form: January 13, 1992

Continuation Form

AC Control No. 66

Page 5 of 6

Plate 1. Location of two possible BRMs, on terrace. View looking toward northwest from bluff with Russell/Ashurst Ranch in distance at left. 1/13/92.

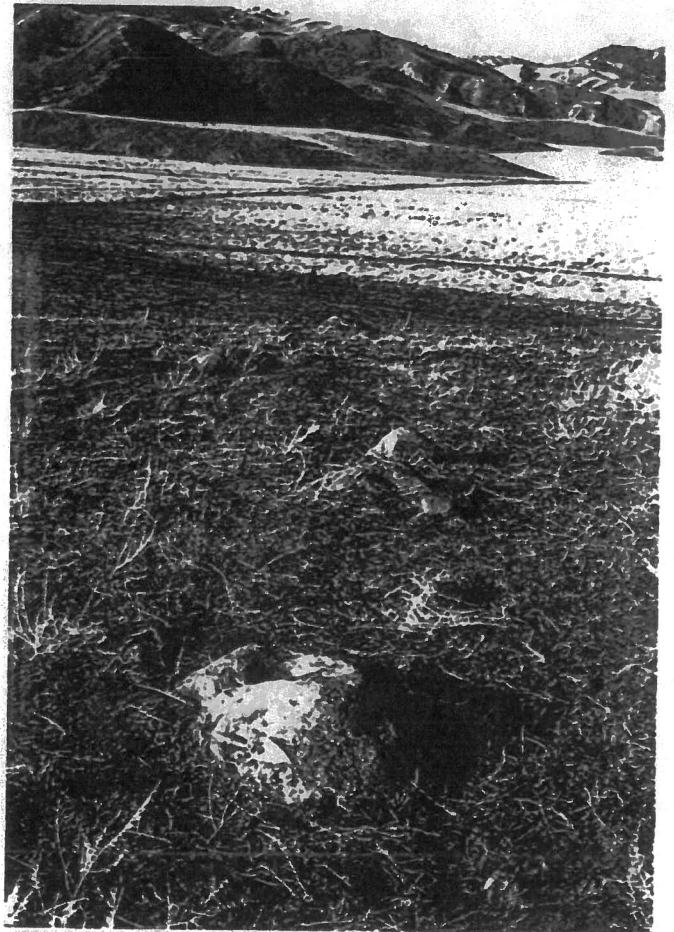


Plate 2. BRM "A" (foreground) and "B" (right center), located on bluff. View is toward west/southwest from bluff. 1/13/92.



Archaeological Consulting
P.O. Box 3377
Salinas, CA 93912

Permanent Trinomial: CA-SBN- 197
County: San Benito
Temporary Number: AC-1281-IDR-6
Agency Designation: -
Date First Recorded: January 13, 1992
Date of this Form: January 13, 1992

Continuation Form (continued)

AC Control No. 66

Page 6 of 6

Plate 3. BRM "A"

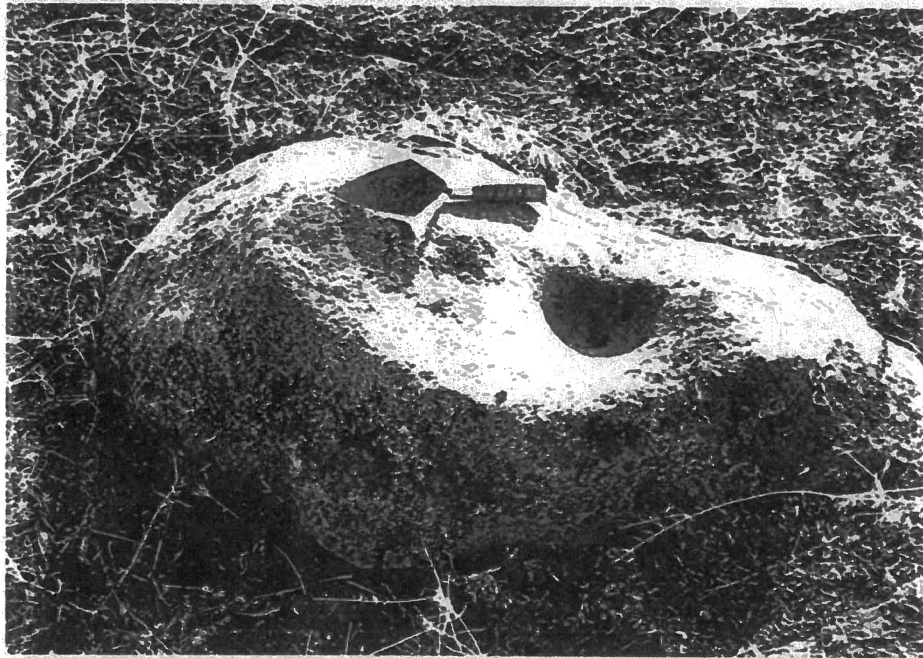


Plate 4. BRM "B"



a.



Attachment B – Native American Outreach

NEW IDRIA ROAD WASHOUT PROJECT PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

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Local Government Tribal Consultation List Request
NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

DATE: 9/20/2022

Type of List Requested

☒ **CEQA Tribal Consultation List (AB 52) – *Per Public Resource Code §21080.3, subs. (b), (d), (e) and 21080.3.2***

☐ **General Plan (SB 18) – *Per Government Code §65352.3.***

Local Action Type:

☐ General Plan ☐ General Plan Element ☐ General Plan Amendment
☐ Specific Plan ☐ Specific Plan Amendment ☐ Pre-planning Outreach

Required Information

Project Title: ALTA2022-16 New Idria Road Washout Project
Local Government/Lead Agency: County of San Benito
Contact Person: Nicholas Radtkey
Street Address: 2681 Cleveland Avenue
City: Santa Rosa Zip: 95403
Phone: 707-544-4206 Fax: 707-546-2135
Email: nick@altaac.com

Specific Area Subject to Proposed Action

County: San Benito

City/Community: Panoche

Project Description:

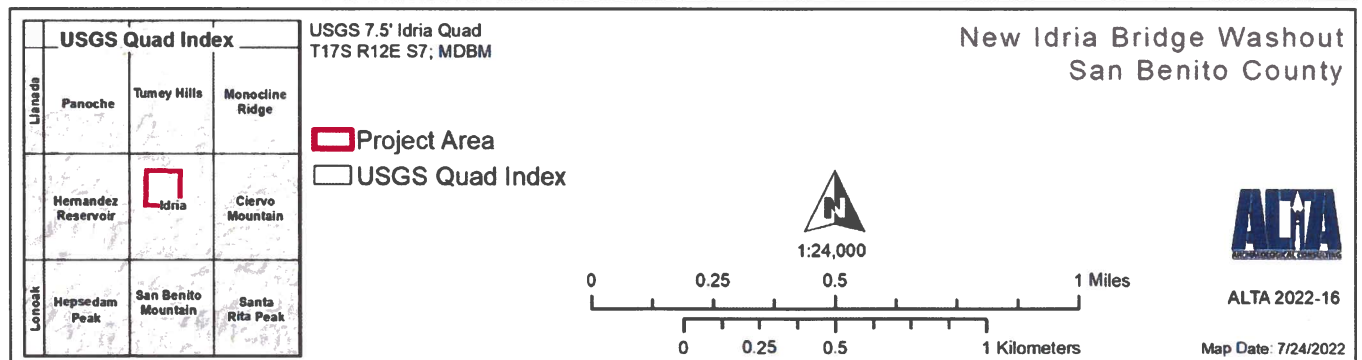
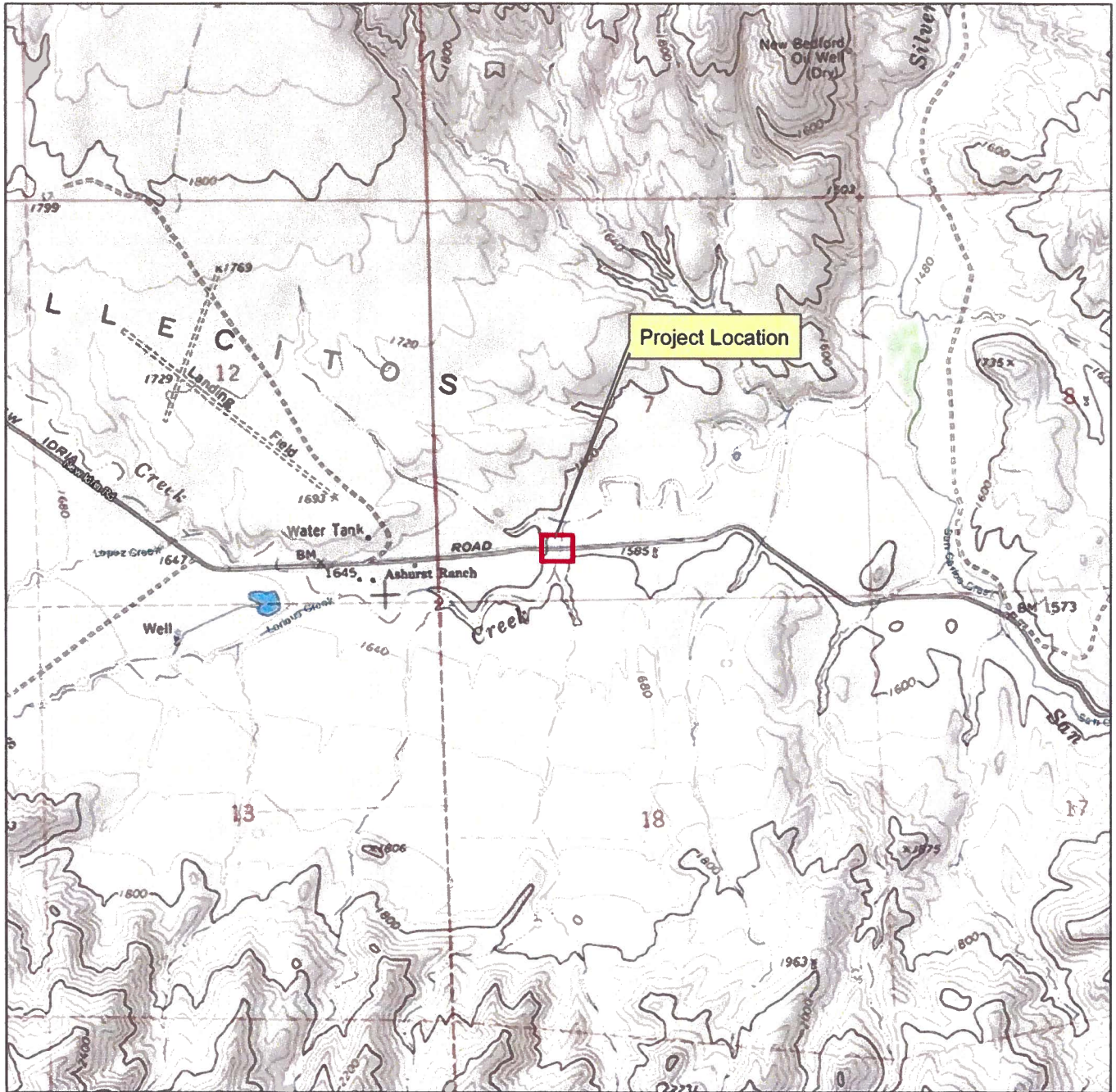
The project entails a replacement of a washed-out bridge on New Idria Road over Los Pinos Creek, in southeastern San Benito County. This project is located on a county road through a private ranch.

Additional Request

☒ ***Sacred Lands File Search – Required Information***

USGS 7.5' Quadrangle(s): Idria

Legal Description: Township 17S, Range 12E, Section 7, Mount Diablo B.M. (Map attached)





Nicholas Radtkey <nick@altaac.com>

ALTA2022-16 New Idria Road Washout Project

NAHC@NAHC <NAHC@nahc.ca.gov>

Mon, Sep 26, 2022 at 3:00 PM

To: Nicholas Radtkey <Nick@altaac.com>

Cc: "Campagne, Cody@NAHC" <Cody.Campagne@nahc.ca.gov>

Hello,

Thank you for your message. We're in receipt of your request. We have recently hired new staff, and this change in our office is creating some delays. We estimate a turn-around time of 6-8 weeks and don't anticipate responding sooner than the end of that time frame. Please let us know if you have any questions.

Kind regards,

Native American Heritage Commission

1550 Harbor Blvd. Suite 100

West Sacramento, CA 95691

(916) 373-3710

[Quoted text hidden]



ALTA2022-16 CEQA Request Form NAHC.pdf

183K



NATIVE AMERICAN HERITAGE COMMISSION

October 13, 2022

Nicholas Radtkey
Alta Archaeological Consulting

Via Email to: nick@altaac.com

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Raymond C. Hittcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, ALTA2022-16 New Idria Road Washout Project, San Benito County

Dear Mr. Radtkey:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Cody.Campagne@nahc.ca.gov.

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Tribal Consultation List
San Benito County
10/13/2022**

Amah Mutsun Tribal Band

Valentin Lopez, Chairperson
P.O. Box 5272
Galt, CA, 95632
Phone: (916) 743 - 5833
vlopez@amahmutsun.org

Costanoan
Northern Valley
Yokut

***Santa Rosa Rancheria Tachi
Yokut Tribe***

Leo Sisco, Chairperson
P.O. Box 8
Lemoore, CA, 93245
Phone: (559) 924 - 1278
Fax: (559) 924-3583

Southern Valley
Yokut

***Amah Mutsun Tribal Band of
Mission San Juan Bautista***

Irene Zwielerlein, Chairperson
3030 Soda Bay Road
Lakeport, CA, 95453
Phone: (650) 851 - 7489
Fax: (650) 332-1526
amahmutsuntribal@gmail.com

Costanoan

Tule River Indian Tribe

Neil Peyron, Chairperson
P.O. Box 589
Porterville, CA, 93258
Phone: (559) 781 - 4271
Fax: (559) 781-4610
neil.peyron@tulerivertribe-nsn.gov

Yokut

***Indian Canyon Mutsun Band of
Costanoan***

Ann Marie Sayers, Chairperson
P.O. Box 28
Hollister, CA, 95024
Phone: (831) 637 - 4238
ams@indiancanyons.org

Costanoan

***Wuksache Indian Tribe/Eshom
Valley Band***

Kenneth Woodrow, Chairperson
1179 Rock Haven Ct.
Salinas, CA, 93906
Phone: (831) 443 - 9702
kwood8934@aol.com

Foothill Yokut
Mono

***Indian Canyon Mutsun Band of
Costanoan***

Kanyon Sayers-Roods, MLD
Contact
1615 Pearson Court
San Jose, CA, 95122
Phone: (408) 673 - 0626
kanyon@kanyonconsulting.com

Costanoan

Xolon-Salinan Tribe

Karen White, Chairperson
P. O. Box 7045
Spreckels, CA, 93962
Phone: (831) 238 - 1488
xolon.salinan.heritage@gmail.com

Salinan

North Valley Yokuts Tribe

Timothy Perez,
P.O. Box 717
Linden, CA, 95236
Phone: (209) 662 - 2788
huskanam@gmail.com

Costanoan
Northern Valley
Yokut

North Valley Yokuts Tribe

Katherine Perez, Chairperson
P.O. Box 717
Linden, CA, 95236
Phone: (209) 887 - 3415
canutes@verizon.net

Costanoan
Northern Valley
Yokut

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed ALTA2022-16 New Idria Road Washout Project, San Benito County.



Alta Archaeological Consulting, LLC
15 Third Street
Santa Rosa, CA 95401
office (707) 544-4206
fax (707) 546-2135
www.altaac.com

November 14, 2022

Irene Zwierlein, Chairperson
Amah Mutsun Tribal Band of Mission San Juan Bautista
3030 Soda Bay Road
Lakeport, CA 95453

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Zwierlein,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

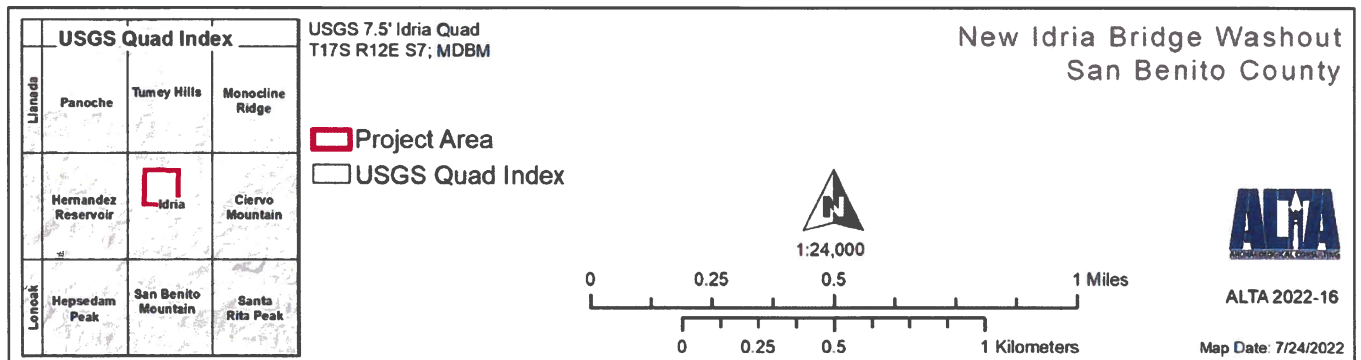
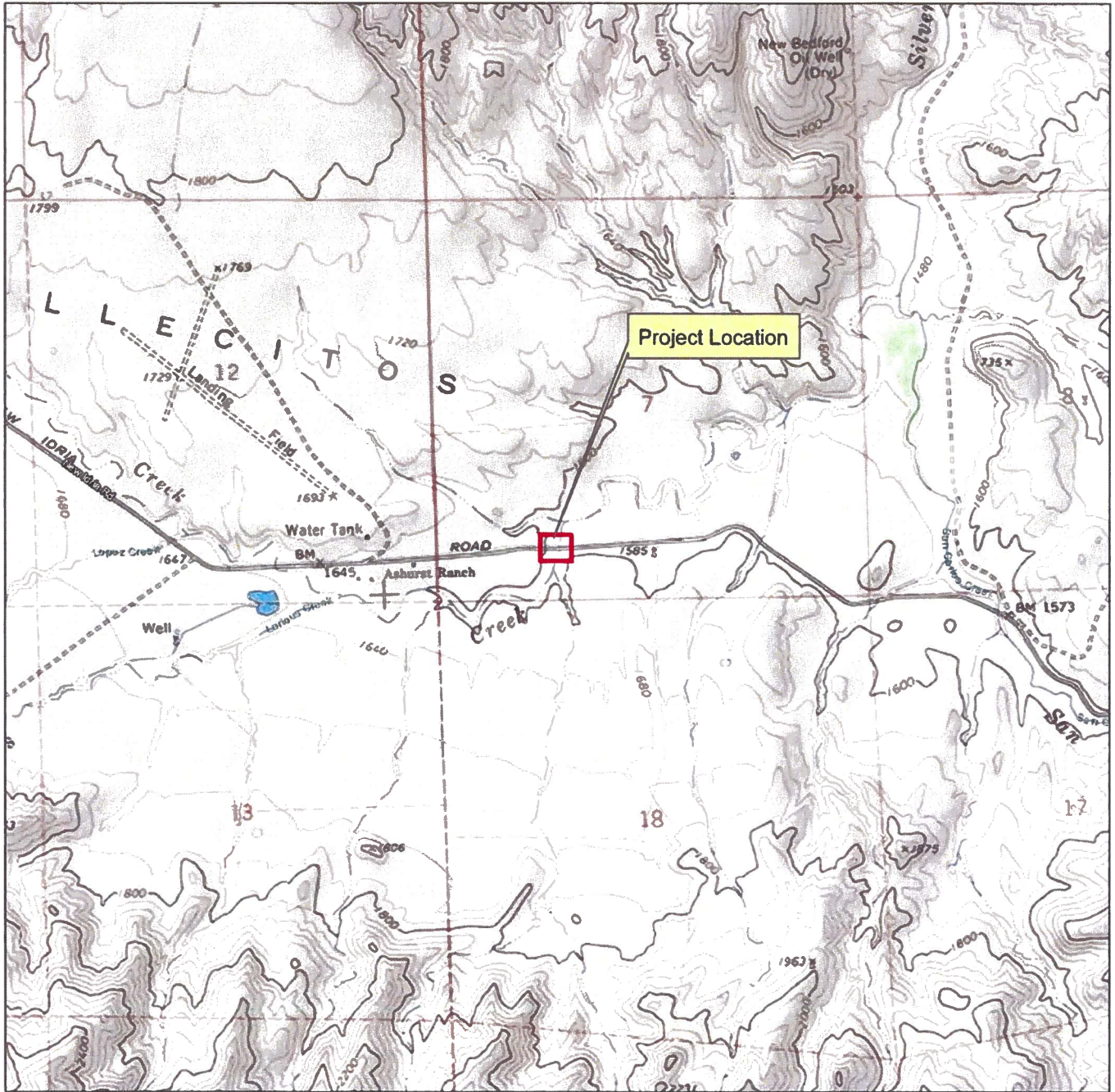
The project is located on one parcel (APN 142-010-013) totaling approximately 54 acres. The APE still has yet to be defined. It is situated on the USGS 7.5' Idria Quadrangle in section 7 of Township 17 South, Range 12 East, in the Mount Diablo Base and Meridian.

The Native American Heritage Commission provided your name and contact information regarding this project. We are contacting you to inform you of the proposed project and to inquire if you are aware of any cultural resources that may be present in the area and to solicit your input or concerns. Please contact me at the address listed below.

Sincerely,

A handwritten signature in blue ink, appearing to read "N. Radtkey", with a stylized flourish at the end.

Nicholas Radtkey, M.A.
Senior Archaeologist/Architectural Historian
2681 Cleveland Avenue
Santa Rosa, CA 95403
nick@altaac.com
(707) 544-4206 office
(707) 546-2135 fax
(707) 291-4645 mobile



New Idria Bridge Washout San Benito County



Alta Archaeological Consulting, LLC
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Santa Rosa, CA 95401
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fax (707) 546-2135
www.altaac.com

November 14, 2022

Valentin Lopez, Chairperson
Amah Mutsun Tribal Band
P.O. Box 5272
Galt, CA 95632

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Lopez,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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(707) 291-4645 mobile



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November 14, 2022

Ann Marie Sayers, Chairperson
Indian Canyon Mutsun Band of Costanoan
P.O. Box 28
Hollister, CA 95024

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Sayers,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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November 14, 2022

Kanyon Sayers-Roods, MLD
Indian Canyon Mutsun Band of Costanoan
1615 Pearson Court
San Jose, CA 95122

Re: ALTA2022-16 New Idria Washout Project

Dear Mr. Sayers-Roods,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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November 14, 2022

Timothy Perez, MLD
North Valley Yokuts Tribe
P.O. Box 717
Linden, CA 95236

Re: ALTA2022-16 New Idria Washout Project

Dear Mr. Perez,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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November 14, 2022

Katherine Perez, Chairperson
North Valley Yokuts Tribe
P.O. Box 717
Linden, CA 95236

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Perez,

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November 14, 2022

Leo Sisco, Chairperson
Santa Rosa Rancheria Tachi Yokut Tribe
P.O. Box 8
Lemoore, CA 93245

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Sisco,

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November 14, 2022

Neil Peyron, Chairperson
Tule River Indian Tribe
P.O. Box 589
Porterville, CA 93258

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Peyron,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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November 14, 2022

Kenneth Woodrow, Chairperson
Wuksache Indian Tribe/Eshom Valley Band
1179 Rock Haven Ct.
Salinas, CA 93906

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson Woodrow,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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November 14, 2022

Karen White, Chairperson
Xolon-Salinan Tribe
P.O. Box 7045
Spreckels, CA 93962

Re: ALTA2022-16 New Idria Washout Project

Dear Honorable Chairperson White,

Alta Archaeological Consulting (ALTA) has been retained to complete an archaeological field survey at the New Idria Road crossing over Los Pinos Creek in San Benito County. The project proponent is proposing to replace a washed-out bridge with a concrete box culvert.

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Nicholas Radtkey <nick@altaac.com>

ALTA2022-16 New Idria Washout Project

4 messages

Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Tue, Dec 13, 2022 at 4:01 PM

To: "nick@altaac.com" <nick@altaac.com>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Dear Nicholas,

Thank you for reaching out to the Santa Rosa Rancheria Tachi-Yokut Tribe regarding: ALTA2022-16 New Idria Washout Project. Before the Tribe provides any recommendations, could you please provide us with more information regarding what kind of activities/ground disturbance this project will have?

If you have any questions, comments, and or concerns please contact myself or the Santa Rosa Rancheria Cultural Department. Thank you

Sincerely,

Samantha McCarty

Santa Rosa Rancheria Tachi-Yokut Tribe

Cultural Specialist II

SMcCarty@tachi-yokut-nsn.gov

Office: (559) 924-1278 x 4091

Cell: (559) 633-6640

***PLEASE KEEP ALL CULTURAL STAFF IN EMAILS UNLESS STATED OTHERWISE**

Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Thu, Dec 15, 2022 at 12:52 PM

To: "nick@altaac.com" <nick@altaac.com>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Hi Nick,

I am following up to make sure my email from Tuesday (December 13, 2022) reached you? I also wanted to add a another question to my original one; who is the lead agency of this project?

I hope all is well and we look forward to hearing from you soon. Thank you.

Sincerely,

Samantha McCarty

Santa Rosa Rancheria Tachi-Yokut Tribe

Cultural Specialist II

SMcCarty@tachi-yokut-nsn.gov

Office: (559) 924-1278 x 4091

Cell: (559) 633-6640

***PLEASE KEEP ALL CULTURAL STAFF IN EMAILS UNLESS STATED OTHERWISE**

[Quoted text hidden]

Nicholas Radtkey <Nick@altaac.com>

Thu, Dec 15, 2022 at 1:13 PM

To: Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Good afternoon,

Sorry I missed your previous email! My son was born just over two weeks ago, so I am treading water while taking care of my 17-month-old daughter. I'm on family leave, but will be happy to answer your questions, as this was my project from start to where it is (on hold).

The former bridge (actually a culvert covered in a prism of imported soils) was washed out in a large flood in January of 2019. They put a temporary replacement in, but will have to do some cutting and filling to install a permanent concrete box culvert which can handle the stormwater capacity that washed out the first crossing. It looks like they will have to remove the temporary crossing, remove a couple of concrete retaining walls in the bank, prep the banks and stream bed, drop in the box culvert, and build up the approaches on each side. This isn't a set-in-stone description, though. This has a horizontal APE as well for staging and parking, although the client (TRC) has not given me an APE map yet.

The project is currently on hold until further notice, because the soil contains a high volume of mercury. I saw in photos from the client that there was a large red vein in the soil which looked like a natural cinnabar deposit, which would make sense, given the presence of the New Idria mine just down the road. You can see it in this news article: <https://benitolink.com/repairs-to-new-idria-road-after-2021-washout-estimated-at-3-9-million/>.

I believe the lead agency is the County of San Benito. They are receiving funding from the California Office of Emergency Services. I am not aware of a federal nexus. My main contact so far has been Justina Conklin at TRC, the contractor for the project (JConklin@trccompanies.com). My role is to do an archaeological survey and to evaluate the remains of a bridge which preceded the bridge which was washed out for eligibility for the CRHR under CEQA. Feel free to email or call my mobile phone with more questions, and I will be happy to answer what I can.

My best,

Nicholas Radtkey

Senior Archaeologist/Architectural Historian

=====

Alta Archaeological Consulting LLC

2681 Cleveland Avenue

Santa Rosa, CA 95403

o: 707.544.4206 | f: 707.546.2135 | c: 707.291.4645

12/19/23, 3:33 PM

Alta Archaeological Consulting Mail - ALTA2022-16 New Idria Washout Project

Nick@AltaAC.com

www.ProfessionalArchaeologist.com | www.CremainsRecovery.com

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DBE | WOSB | WBE | SB | GSA

[Quoted text hidden]

Nicholas Radtkey <Nick@altaac.com>

Tue, Dec 20, 2022 at 4:03 PM

To: Alex DeGeorgey <Alex@altaac.com>, Risa DeGeorgey <risa@altaac.com>

NA outreach communication as previously referenced.

Thanks,

Nick

[Quoted text hidden]

--

[Quoted text hidden]



Nicholas Radtkey <nick@altaac.com>

6/6/2023 10:15AM Phone Call About San Benito County Project

9 messages

Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Tue, Jun 6, 2023 at 10:21 AM

To: "nick@altaac.com" <nick@altaac.com>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Hi Nick,

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Sincerely,

Samantha McCarty

Santa Rosa Rancheria Tachi-Yokut Tribe

Cultural Specialist II

SMcCarty@tachi-yokut-nsn.gov

Office: (559) 924-1278 x 4091

Cell: (559) 633-6640

***PLEASE KEEP ALL CULTURAL STAFF IN EMAILS UNLESS STATED OTHERWISE**

Nicholas Radtkey <Nick@altaac.com>

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To: Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

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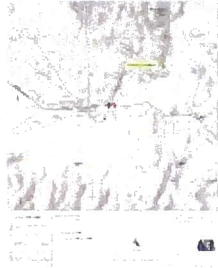
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2 attachments



ALTA2022-16 Project Location.jpg
2694K



439344_APE-Draft Rev for 60 mph.pdf
217K

Nicholas Radtkey <Nick@altaac.com>

Mon, Jun 26, 2023 at 8:58 AM

To: Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Cc: Nichole Escalon <nescalon@tachi-yokut-nsn.gov>, Shana Powers <SPowers@tachi-yokut-nsn.gov>

Good morning,

I'm just following up on this project to see how things are going on your end. Hoping we can work together soon!

Best,
Nick

On Tue, Jun 6, 2023 at 11:20 AM Nicholas Radtkey <Nick@altaac.com> wrote:

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Nicholas Radtkey <Nick@altaac.com>

Wed, Jul 12, 2023 at 4:25 PM

To: Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

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Office: (559) 924-1278 x 4091

Cell: (559) 633-6640

PLEASE KEEP ALL CULTURAL STAFF IN EMAILS UNLESS STATED OTHERWISE*Nicholas Radtkey** <Nick@altaac.com>

Fri, Sep 1, 2023 at 1:25 PM

To: Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Good afternoon,

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Samantha McCarty <SMcCarty@tachi-yokut-nsn.gov>

Tue, Sep 5, 2023 at 9:24 AM

To: Nicholas Radtkey <Nick@altaac.com>

Cc: Shana Powers <SPowers@tachi-yokut-nsn.gov>, Nichole Escalon <nescalon@tachi-yokut-nsn.gov>

Hi Nicholas,

I am so sorry about our delayed response. I will get back to you ASAP regarding our answer.

Sincerely,

Samantha McCarty

Santa Rosa Rancheria Tachi-Yokut Tribe

Cultural Specialist II

SMcCarty@tachi-yokut-nsn.gov

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Subject: Re: 6/6/2023 10:15AM Phone Call About San Benito County Project

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Senior Archaeologist/Architectural Historian
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Alta Archaeological Consulting LLC
2681 Cleveland Avenue

Santa Rosa, CA 95403

o: 707.544.4206 | f: 707.546.2135 | c: 707.291.4645

Nick@AltaAC.com

www.ProfessionalArchaeologist.com | www.CremainsRecovery.com

i | t | fb

DBE | WOSB | WBE | SB | GSA

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Nicholas Radtkey <Nick@altaac.com>
To: Melanie Radtkey <melanie@altaac.com>

Tue, Oct 10, 2023 at 10:07 AM

----- Forwarded message -----

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Date: Wed, Oct 4, 2023 at 5:23 PM
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Attachment C – Historical Organization Outreach

NEW IDRIA ROAD WASHOUT PROJECT PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

Confidential Information

This report contains confidential information. The distribution of material contained in this report is restricted to a need to know basis. To deter vandalism, artifact hunting, and other activities that can damage cultural resources, the location of cultural resources should be kept confidential. The provision protecting the confidentiality of archaeological resources is in California Government Code 6245 and 6245.10, and the National Historic Preservation Act of 1996, Section 304.



Nicholas Radtkey <nick@altaac.com>

New Idria Road bridge

4 messages

Nicholas Radtkey <Nick@altaac.com>

Mon, Sep 26, 2022 at 4:02 PM

To: research@sbchistoricalsociety.org

Good afternoon,

I hope this finds you well. I am an architectural historian working on the bridge replacement project for the washed-out bridge on New Idria Road over Los Pinos Creek. I'm supposed to write a historic resource evaluation of the previous bridge in order to see if it is a significant site worthy of preservation or meriting consideration as a cultural resource (what's left, anyway). But to do that, I need to find some historical documentation about its construction (permits, as-builts, photographs, etc.). I've called both the Assessor's Office and the Planning and Land Use Division, both of whom have nothing. The CalTrans bridge inventory has nothing as well. I know that New Idria Road goes back into the 1850s, but the bridge remnants appear to date to the mid- to late 20th century.

Based on aerial imagery, it looks like prior to the washout, it was just a prism of soil over a large box culvert, but the project managers who visited the site before it was temporarily rebuilt claim to have seen footings for a bridge in the stream bed. There are remnant wing walls in the bank which also suggest a formal bridge was in place at some point. Based on a review of historical newspapers, it looks like bridges have washed out on New Idria Road a few times since the 1910s, so I don't know how old these wing walls are. Are you aware of any documentation in your archives which might be able to fill in this gap?

I see that you have a long wait time, and appreciate your efforts. I run a historical society myself, and know how challenging these times can be.

Sincerely,
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Sheila Prader <sheleebebo@aol.com>

Mon, Sep 26, 2022 at 5:25 PM

Reply-To: Sheila Prader <sheleebebo@aol.com>

To: "Nick@altaac.com" <Nick@altaac.com>

Cc: Sheila Prader <sheleebebo@aol.com>, "jfwrobel@sbcglobal.net" <jfwrobel@sbcglobal.net>

Nicolas,

Thanks for contacting the San Benito County Historical Society. I'm sorry that the Assessor's Office and Planning and Land Use have nothing for you. We do have some earlier maps of various locations in the county.

I can't tell you off the top of my head what we might have in our holdings. We're a small volunteer society and basically we're there for research on the second Monday of the month by appointment, or other days as we can arrange to be there.

I'm going to check the partial catalog I have access to at home and also see what else I can come up with. Also, there was a group which used to meet to determine historical sites in the county. They've been reconstituted and I don't

know if they've even met yet. But in our holdings we have some of their earlier lists and writings. I have a few other ideas.

What is your time frame for this project?

Sincerely,
Sheila Prader
Research Center
San Benito County Historical Society
[Quoted text hidden]

Nicholas Radtkey <Nick@altaac.com>
To: Sheila Prader <sheleebebo@aol.com>
Cc: "jfwrobel@sbcglobal.net" <jfwrobel@sbcglobal.net>

Mon, Sep 26, 2022 at 5:53 PM

Dear Sheila,

Thanks so much for your reply! My report is not due until early December. But I probably need to move it through our internal review process before then, because my wife is due with our second baby around that time. I'd say just prior to Thanksgiving is about the time frame I have to work with.

I've visited the site and read enough about the area to get started. (Fascinating, by the way!) I'm attaching here a draft of the historic background and map review sections of the report I'm working on, so your generous volunteers don't have to retread the same work I've already done. It's not especially robust, being that it is tailored more towards figuring out the context of this weird bridge than towards proper local history, and due to a general lack of documentation. You're welcome to hang onto it for your collection if you'd like, although I suspect not much in it is news to you. You're also more than welcome to call me out on any mistakes you happen to find in the text--thankfully, it's still a draft.

Thanks so much,
Nicholas Radtkey
Senior Archaeologist/Architectural Historian
=====

Alta Archaeological Consulting LLC
2681 Cleveland Avenue
Santa Rosa, CA 95403
o: 707.544.4206 | f: 707.546.2135 | c: 707.291.4645
Nick@AltaAC.com
www.ProfessionalArchaeologist.com | www.CremainsRecovery.com
i | t | fb

DBE | WOSB | WBE | SB | GSA

[Quoted text hidden]

 **New Idria Road bridge draft background from ALTA.pdf**
418K

Sheila Prader <sheleebebo@aol.com>
Reply-To: Sheila Prader <sheleebebo@aol.com>
To: "Nick@altaac.com" <Nick@altaac.com>
Cc: "jfwrobel@sbcglobal.net" <jfwrobel@sbcglobal.net>, Sheila Prader <sheleebebo@aol.com>

Mon, Sep 26, 2022 at 6:06 PM

Nicholas,

Thanks for the draft of your report, which will help.

I'll respond to you after reading it and thinking about it. Thanks for being willing to donate it to our collection!

Sheila
[Quoted text hidden]



Attachment D – Photo Sheet

NEW IDRIA ROAD WASHOUT PROJECT

PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

Confidential Information

This report contains confidential information. The distribution of material contained in this report is restricted to a need to know basis. To deter vandalism, artifact hunting, and other activities that can damage cultural resources, the location of cultural resources should be kept confidential. The provision protecting the confidentiality of archaeological resources is in California Government Code 6245 and 6245.10, and the National Historic Preservation Act of 1996, Section 304.

PHOTO SHEET
NEW IDRIA ROAD, PANOCHE, CALIFORNIA



IMG_9388, view northeast, 10/30/2023, crossing from western approach.



IMG_9391, view northwest, 10/30/2023, concrete retaining wall under western approach to crossing.

PHOTO SHEET

NEW IDRIA ROAD, PANOCHE, CALIFORNIA



IMG_9392, view northeast, 10/30/2023, concrete retaining wall under eastern approach to crossing.



IMG_9393, view north, 10/30/2023, footing in bed of Larious Creek.

PHOTO SHEET
NEW IDRIA ROAD, PANOCHE, CALIFORNIA



IMG_9389, view north, 10/30/2023, steel grate wingwalls south of crossing.



IMG_9404, view southeast, 10/30/2023, concrete fragments in Larious Creek north of crossing.



Attachment E – Site Record

NEW IDRIA ROAD WASHOUT PROJECT PANOCHÉ, SAN BENITO COUNTY, CALIFORNIA

APN 029-270-02-10

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State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #:
HRI #:
Trinomial:
NRHP Status Code:

Other Listings:
Review Code:

Reviewer: Date:

Page 1 of 10

*Resource Name or #: New Idria Road Crossing over Larios Creek

P1. Other Identifier: None.

*P2. Location: ☒ Not for Publication ☐ Unrestricted

*a. County: San Benito

*b. USGS 7.5' Quad: Idria Date: 2018 T17S; R12E; SW of SW of Sec. 7; Mount Diablo B.M.

c. Address: 15970 New Idria Road City: Panoche ZIP: 95043

d. UTM: Zone 10S, 705972mE/ 4037409mN (centroid) (NAD83 CONUS)

e. Other Locational Data: From the intersection of Panoche Road and New Idria Road, follow New Idria Road for 15.9 miles.

*P3a. Description: This resource consists of the remains of a crossing spanning Larios Creek. The culvert and soil prism which most recently stood at this location was destroyed during a storm in 2021, revealing the remains of a timber stringer bridge. The remains include two concrete retaining walls, a concrete footer, steel mesh wingwalls, and strewn concrete fragments throughout the streambed. The resource is in overall poor condition, retaining only the most resilient of its construction materials and conveying very little information about its origins and history through its remains. (See Continuation Sheet, page 4)

*P3b. Resource Attributes: HP19. Bridge; AH11. Walls/fences

*P4. Resources Present: ☐ Building ☒ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other:

P5a. Photograph



P5b. Description of Photo: Crossing from northwestern bank, view southeast, IMG_9405, 10/30/2023.

*P6. Date Constructed/Age and Source:

☒ Historic ☐ Prehistoric
☐ Both

*P7. Owner and Address:

Scott Raven
5700 E Clarkson Ave
Selma, CA, 93662-9644

*P8. Recorded by:

Samantha Beck, M.A., RPA
Nicholas Radtkey, M.A., RPA
Alta Archaeological Consulting
2681 Cleveland Avenue
Santa Rosa, CA 95403

*P9. Date Recorded: 10/30/2023

*P10. Survey Type: Intensive for historic resource evaluation

*P11. Report Citation:

Radtkey, Nicholas

2022 *Archaeological Survey Report and Historic Resource Evaluation for the New Idria Road Washout Project*. Manuscript on file at the Northwest Information Center of the California Historical Resources Information System, Rohnert Park, CA.

*Attachments: ☐ NONE ☒ Location Map ☐ Sketch Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

Page 2 of 10

*Resource Name or #: New Idria Road Crossing over Larios Creek

B1. Historic Name: Unknown

B2. Common Name: None.

B3. Original Use: Stream crossing

B4. Present Use: Destroyed, no longer in use

*B5. **Architectural Style:** The former bridge which spanned Larios Creek appears to have been a column bent structure, utilizing both concrete and untreated lumber.

*B6. **Construction History:** The date of this bridge's construction is unclear, but likely postdates 1900. Aerial imagery suggests its replacement occurred in the mid-20th century, between 1947 and 1958.

*B7. **Moved?** ☒ No ☐ Yes ☐ Unknown

Date: NA

Original Location: NA

*B8. **Related Features:** None.

B9a. Architect: Unknown

b. Builder: Unknown

*B10. **Significance:** **Theme:** Mercury mining **Area:** New Idria, CA

Period of Significance: 1861-1972

Property Type: Bridge

Applicable Criteria: None.

Historic Context

New Idria Mercury Mine

When California was made a state, the land encompassing San Benito County was originally administered by Monterey County. San Benito County was separated from Monterey County in 1874. The town of Hollister, a relatively new hamlet in comparison to the towns of Gilroy and San Juan Bautista, was chosen for the county seat. The extension of the Southern Pacific Railroad through the county bolstered its agricultural output, which remains its economic backbone to the present (San Benito County 2008).

New Idria Road has deep connections to the mercury industry. Local legend holds that cinnabar was identified in this part of the Diablo Range by padres from the mission at Monterey; Native peoples were known to use it at this time (Barrows and Ingersoll 1893:122). Claims on the mine date to as early as 1854. The claim was named for Idrija Mine in Austria, and quickly rose to prominence as the second most productive mercury mine in the United States, after the New Almaden mine (Elliott and Moore 1881:153). As early as 1861, between 200 and 300 men worked at the New Idria mines (Kyle et al. 1990:302). By the turn of the century, as the New Almaden mine declined, New Idria became California's most productive (Bradley 1918:93). Around 97% of San Benito County's mercury output between 1858 and 1917 came from the New Idria Quicksilver Mining Company's 240 acres of holdings. At that time, it had produced 306,475 flasks (23,292,100 pounds) of mercury (Bradley 1918:109). (See Continuation Sheet, page 4)

B11. Additional Resource Attributes: HP19. Bridge, AH11. Walls/fences

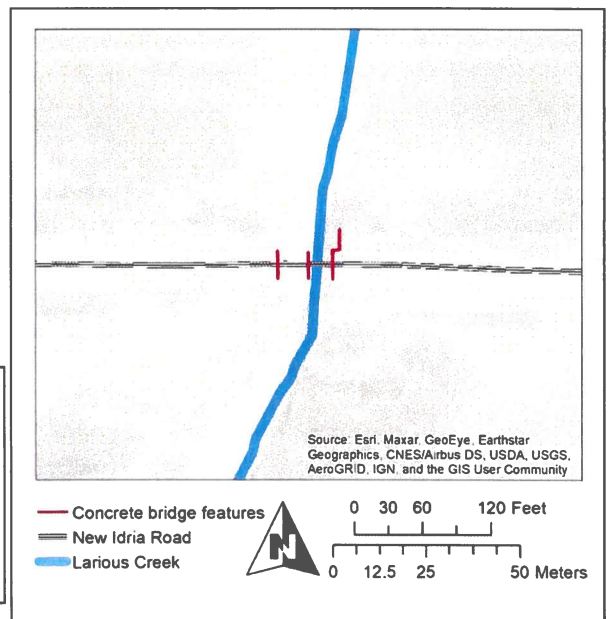
*B12. **References:** See Continuation Sheet, pages 6-7.

B13. Remarks: None.

*B14. **Evaluator:** Nicholas Radtkey, M.A., RPA

*Date of Evaluation: 10/30/2023

(This space reserved for official comments.)

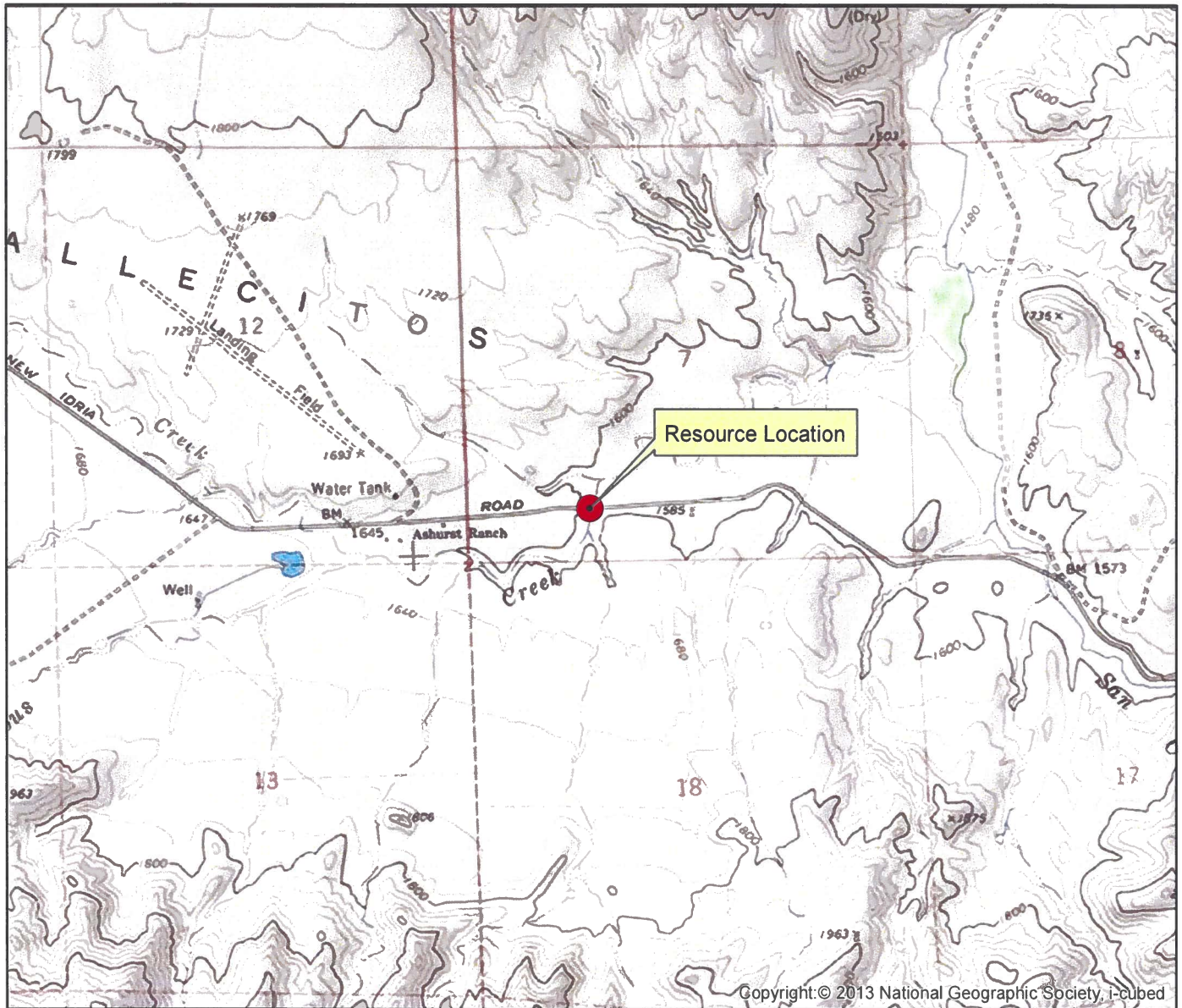


State of California -- The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary #:
HRI #
Trinomial

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*Resource Name or #: New Idría Road Crossing over Larious Creek

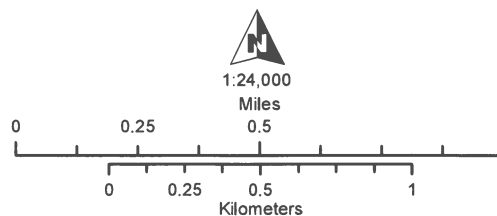


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Llanada	Panoche	Turney Hills	Monocline Ridge
	Hernandez Reservoir	Idria	Ciervo Mountain
Lonoak	Hepesdam Peak	San Benito Mountain	Santa Rita Peak

Sources: Esri, USGS, NOAA

 Resource Location



Map Date: 12/20/2023

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*Resource Name or #: New Idria Road Crossing over Larios Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update

P3a. Description (continued from page 1)

Concrete retaining walls lie on the eastern and western ends of the stream bed, supporting prisms of soil. The retaining walls appear to be built as simple rectangular abutments, with a short concrete wingwall visible on the northeastern corner. The walls measure 20 feet wide by 15 feet tall, and are separated by approximately 60 feet. Impressions of boards used for forms remain from the pouring process, indicating that the bridge was constructed in place. Vertical marks on the surface of the wall suggest that the former bridge was supported by four bents. Remaining anchors for four bents project from a single concrete footer in the center of the stream. Four rotted wooden posts and a mudsill remain embedded in the footing of the western wall. Trapezoidal panels of perforated steel mesh grates, oriented at the inlet and outlet of the culvert as wingwalls, remain on all but the northeastern corner of the stream bed. The panels are welded to cut sections of railroad track piles, which appear to stand in the stream bed without reinforcement. Fragments of concrete and steel grates are strewn through the stream bed, as far as 100 feet north. Broken concrete fragments exhibit steel rebar reinforcement. It is unclear what components of the former crossing they represent.

The County of San Benito retains no information about the bridge. No other archival documents exist to verify the construction date and original form of the crossing. No diagnostic features which would identify the date of construction or the builder were evident. Historical aerial imagery places a potential construction date of the most recent iteration of the crossing—a steel culvert under a soil prism, which replaced the former bridge—between 1947 and 1958 (Cartwright and Company 1958; Fairchild Aerial Surveys 1947).

B10. Significance (continued from page 2)

Historic Context (continued)

In 1895, the New Idria Quicksilver Mining Company assumed operation of the site (Bradley 1918:109). A furnace building featuring four Gould rotary furnaces was constructed in 1918, significantly modernizing its operations (Bradley 1918:248–250). The corporation was succeeded by the New Idria Mining and Chemical Company, established in 1936. In 1972, this final company closed the property, which quickly became a ghost town (Kyle et al. 1990:302).

Kate Woods, a noted mariachi musician and journalist, purchased the abandoned New Idria mine property in the 1980s. She subsequently spent decades advocating for the designation of the New Idria Mine as an EPA Superfund site (Morris 2017). In 2011, the property was proposed as a Superfund site, claiming adverse effects to wildlife in San Carlos Creek, Silver Creek, and Panoche Creek (United States Environmental Protection Agency 2011).

Ashurst Ranch

The APE lies within the bounds of the Ashurst Ranch. As a boy, John Ashurst crossed the plains with his parents in 1866. He established the eponymous Ashurst Ranch in 1871 to supply beef to the New Idria Mine, and quickly amassed thousands of acres (Santa Cruz Sentinel 1933:7). In the early 1870s, the outlaw Tiburcio Vasquez and his gang stole cattle and “terrorized the settlers” of Vallecitos (Boessenecker 2010:213). Ashurst responded by heavily arming himself and physically defending his property. He claimed many close encounters with the Vasquez gang before their exodus to southern California (San Jose Mercury-News 1904:5). He was embroiled in scandal in 1897 after killing local rancher Frank Lynch, who he claimed was stealing his cattle alongside three Mexican men (Sacramento Daily Union 1897:1). He was acquitted on the basis of his self-defense claim (San Francisco Call 1897:3). By the turn of the century, Ashurst was regarded with fear by the Latino community (San Jose Mercury-News 1904:5).

In 1901, Ashurst drilled the first oil well on his ranch (Los Angeles Herald 1901:11). The property continues to operate as both an oil field and a cattle ranch to the present. When it was put on the market in 2019, it was considered one of the largest continuous cattle ranch properties in California, spanning 58,154 acres over both San Benito and Fresno Counties. This included 27,994 deeded acres and 30,210 acres of BLM grazing leases (Brown 2019).

History of New Idria Road

In the 1850s, a stage road was established from the area to San Juan Bautista, 68 miles distant. This became the primary access route to New Idria, and, despite some improvements, has remained in a nearly identical alignment to its original course. Crossings over Larios Creek appear in aerial imagery in all reviewed photos (Cartwright and Company 1958; Fairchild Aerial Surveys 1939, 1947).

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #:
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*Resource Name or #: New Idria Road Crossing over Larios Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update

The value of the road was summed up by William Brewer, who visited the area in 1861. Brewer noted that “all the necessities of life have to be brought from a great distance in wagons in the hot sun,” and noted that the distance facilitated exorbitant price gouging (Brewer 1930 [1864]:142–143). The road was the sole artery for the New Idria mines, carrying all goods in and taking flasks of mercury to San Juan, where they would be then sent to Alviso for distribution. Communities along the road, including Panoche, Paicines, and Tres Pinos, grew to service traffic to and from New Idria (Kyle et al. 1990:302).

Historically, stream crossings on New Idria Road have been prone to washing out. As an example, a major flood in 1911 washed out bridges on the only two roads to New Idria, isolating it from resources for two weeks and nearly causing mass starvation (Fresno Republican 1911:7). New Idria Road has also been the subject of multiple disputes between the county government in Hollister and local businesspeople, the latter of whom have aggressively campaigned for improvements to New Idria Road, such as bridges suitable for heavier traffic and higher water flow (Salinas Daily Post 1938:1; Santa Cruz Sentinel 1940:10). The dispute had become so embittered in the late 1930s that the Panoche Valley threatened to secede from San Benito County and join Fresno County. This move failed largely because the New Idria Mining and Chemical Company refused to support it (Salinas Daily Post 1938:1). No specific mention of the crossing spanning Larios Creek appeared in historic newspaper articles.

Historic Resource Evaluation

In order for a property to be considered eligible for listing in the NRHP, it must possess historical significance by fulfilling at least one of four criteria, and retain sufficient integrity, defined by seven aspects (36 CFR 60.4). This section outlines the evidence for significance and integrity of each of the three properties based on these criteria.

The preceding historic context was developed for the properties for their evaluation under the Criteria for Evaluation for the NRHP (36 CFR 60.4). The historic context facilitated the identification of an Area of Significance, a Period of Significance, a Level of Significance, and for identifying an appropriate boundary for the potential historic resource.

For the remains of the stream crossing, the Area of Significance is Industry. The Period of Significance is 1861 to 1972, corresponding with the operation of the New Idria Mercury Mine. The date of construction of this structure dates to between 1947 and 1958. The Level of Significance is local.

Criteria for Significance

Criterion A

NRHP Criterion A identifies significant resources as those “that are associated with events that have made a significant contribution to the broad patterns of our history” (36 CFR 60.4(a)). New Idria Road was known as the primary thoroughfare from the New Idria mines to distributors and buyers. Though the crossing is associated with the mine at New Idria by virtue of physical connection, the crossing cannot be said to directly relate to that context in such an important manner that it is significant under Criterion 1. The period of significance of the mine at New Idria is much earlier than the likely construction date of the concrete wingwalls and footings of the former crossing. Similarly, the location of the crossing near the historic-era Ashurst Ranch is not enough to associate the two. Though New Idria Road bridges have been the subject of heated dispute in San Benito County politics, this crossing is not clearly associated with those events. Therefore, the crossing does not meet the requirement of significance to be eligible under Criterion A.

Criterion B

NRHP Criterion B identifies significant resources as those “that are associated with the lives of persons significant in our past” (36 CFR 60.4(b)). During a review of historical literature about the area, no individuals or entities could be clearly identified with this crossing. Therefore, the crossing does not meet the threshold of significance under Criterion B.

Criterion C

NRHP Criterion C identifies significant resources as those “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” (36 CFR 60.4(c)). So little remains of the original structure spanning Larios Creek that its original form is nearly indistinguishable. The single remaining footing, which may suggest that it was a timber stringer bridge, is not substantially informative enough about the original structure to make inferences about much of its construction, the skill of its builder, artistic value, or its importance to a larger entity. Thus, the remains of this crossing fail to meet any element of significance under Criterion C.

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
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Primary #:
HRI #:
Trinomial:

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*Resource Name or #: New Idria Road Crossing over Larios Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update

Criterion D

Criterion D identifies significant resources as those "that have yielded, or may be likely to yield, information important in prehistory or history" (36 CFR 60.4(d)). The almost-complete obliteration of this crossing simultaneously destroyed whatever novel data could have been derived from the remains of the former concrete structure. Neither of the remaining elements of this structure, conventional concrete wingwalls poured in wooden forms and a concrete footing, are likely to inform contemporary research questions in history, historical archaeology, engineering, or other germane disciplines of research on material culture.

Aspects of Integrity

Location

The remaining concrete elements of the former crossing over Larios Creek appear to have been poured in place rather than imported. Therefore, the aspect of integrity remains high.

Design

What remains of the former structure, the concrete wingwalls and footing, are not sufficiently intact to discuss design in any meaningful way. Integrity of design is thus low.

Setting

The general area surrounding the crossing remains rural, and continues to operate as a cattle ranch, much as it did in the time of John Ashurst. The landscape at large does not suggest dramatic change since that time, making integrity of setting high.

Materials

Most materials are absent from the elements of the concrete crossing, likely replaced during the installation of a culvert in this location. Because this structure was mostly dismantled, integrity of materials is low.

Workmanship

As with the prior elements of integrity, so little of this former crossing remains that it is nearly impossible to interpret the workmanship which went into the construction of the structure. Integrity of workmanship is naturally low.

Feeling

So little of the crossing remains that it barely conveys its original appearance, much less its aesthetic relationship to its period of construction. A sense of history is not evident from a pair of concrete wingwalls and a single footing. Therefore, integrity of feeling is low.

Association

No clear association with a period of construction, an individual, an entity of people, or any notable historical events was evident through literature review nor field survey of the remaining components. Its presence along New Idria Road alone is insufficient to associate it with the most important activities of the mine. Similarly, its proximity to the Ashurst Ranch does not *ipso facto* make it an associated feature. This site thus lacks integrity of association.

In conclusion, this evaluation finds that the remains of the New Idria Road crossing over Larios Creek meets only the most basic aspects of integrity—location and setting—and none of the four criteria for eligibility for the NRHP. Therefore, the crossing is evaluated herein is recommended as *ineligible* for inclusion on the NRHP. The project is not anticipated to cause a substantial adverse change in the significance of a historical resource as defined in 36 CFR 800.5(a)(1).

B12. References (continued from page 2)

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State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
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*Resource Name or #: New Idria Road Crossing over Larios Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update

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San Jose Mercury-News

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1933 John Ashurst is Dead at His San Benito Co. Ranch. *Santa Cruz Sentinel*, March 16, 1933.

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2011 *New Idria Mercury Mine Proposed for Superfund List*. EPA Region 9, San Francisco.

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #:
HRI #:
Trinomial:

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*Resource Name or #: New Idria Road Crossing over Larious Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update

Photographs



IMG_9388, view northeast, 10/30/2023, crossing from western approach.



IMG_9391, view northwest, 10/30/2023, concrete retaining wall under western approach to crossing.

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary #:
HRI #:
Trinomial:

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*Resource Name or #: New Idria Road Crossing over Larios Creek

*Recorded by: S. Beck and N. Radtkey

*Date: 10/30/2023

☒ Continuation ☐ Update



IMG_9392, view northeast, 10/30/2023, concrete retaining wall under eastern approach to crossing.



IMG_9393, view north, 10/30/2023, footing in bed of Larios Creek.



IMG_9389, view north, 10/30/2023, steel grate wingwalls south of crossing.



IMG_9404, view southeast, 10/30/2023, concrete fragments in Larious Creek north of crossing.