

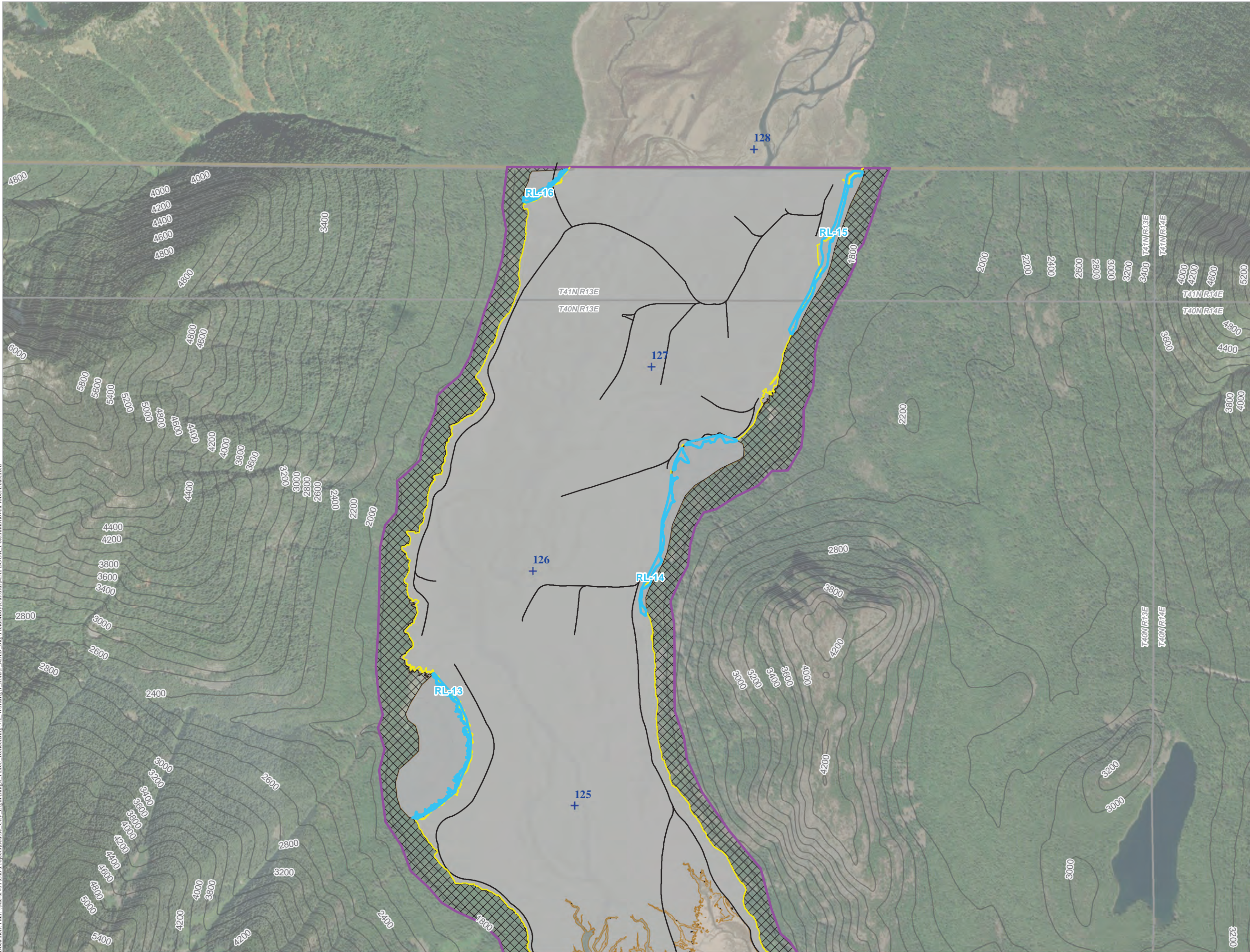
**CULTURAL RESOURCES SURVEY RESEARCH DESIGN**

**ATTACHMENT B**

**SURVEY AREA MAPBOOK**



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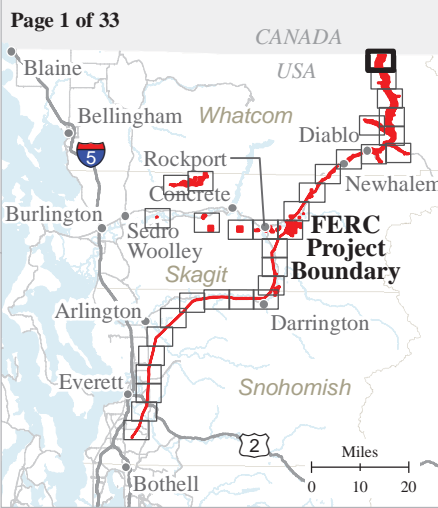
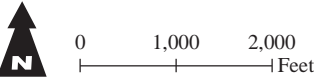
CR-02 SURVEY  
AREAS MAPBOOK

- + Project River Miles (PRM)
- Study Area
- Proposed Pedestrian Survey Area  
(to average low water level, 1530 ft CoSD)
- Not Planned for Survey During the Study
- Potential Subsurface Survey Areas
- Study Routes (will be pedestrian surveyed if accessible)

Lowest Extent of High Ross  
Inundation Zone (1602.5 ft CoSD)

CoSD = City of Seattle Datum

Notes:  
1. If additional activities that could cause adverse effects to historic properties are proposed at a future date, City Light commits to full compliance with NHPA Section 106.  
2. If lower elevation areas within reservoirs are exposed during the survey period, they will be pedestrian surveyed

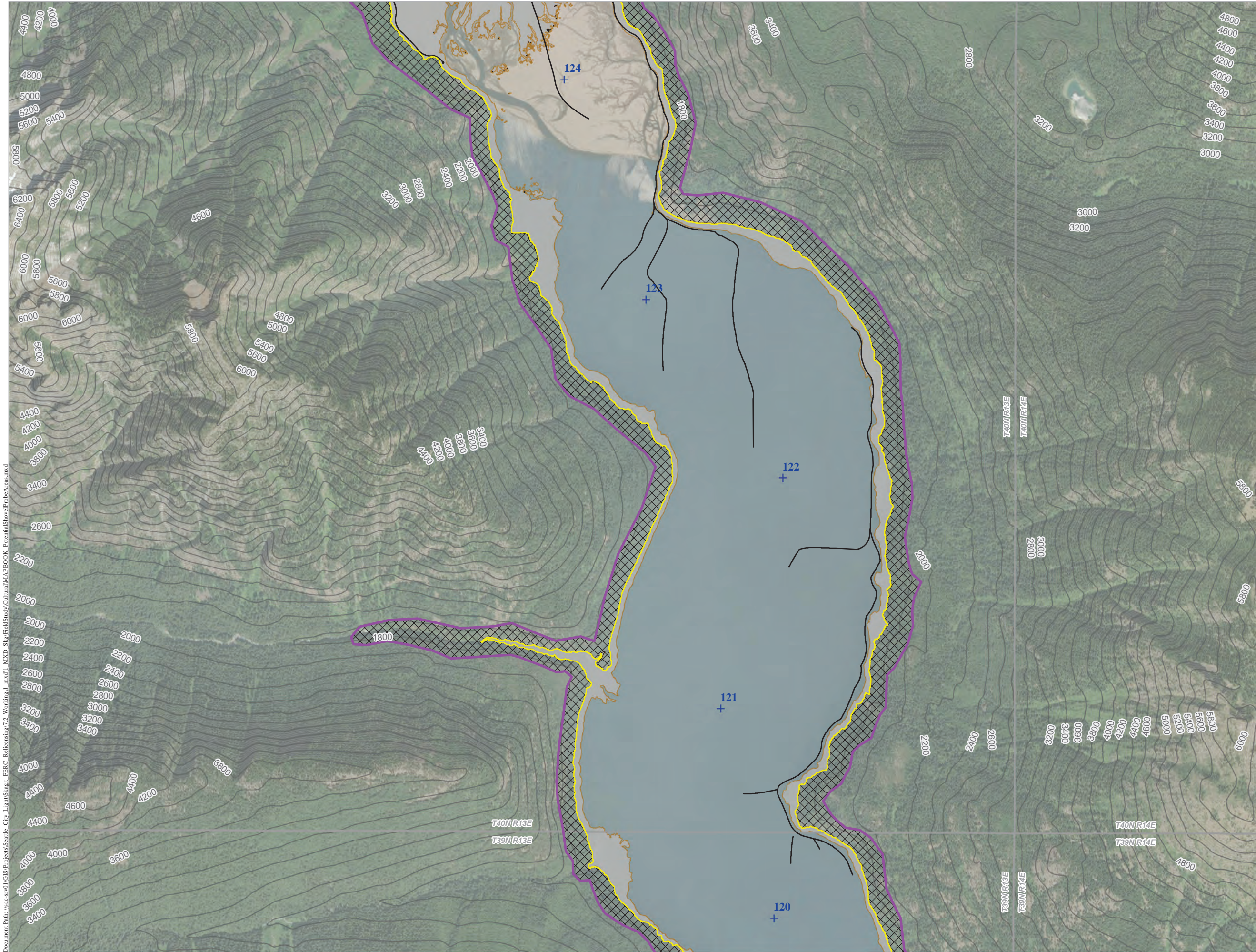


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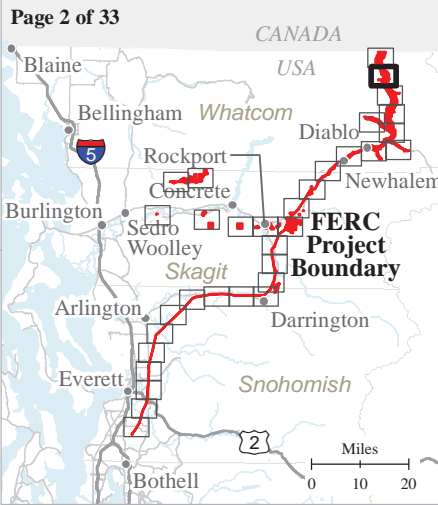
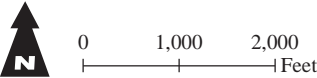


## CR-02 SURVEY AREAS MAPBOOK

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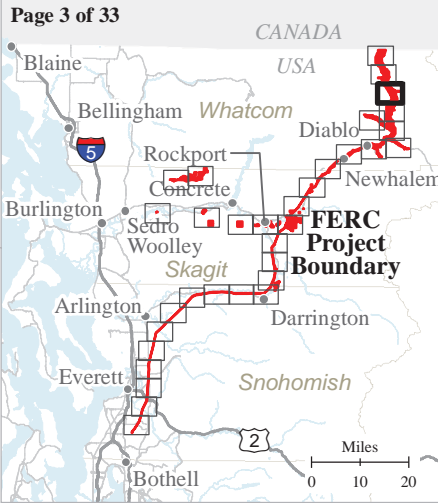
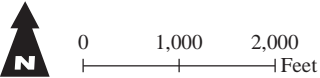


## CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
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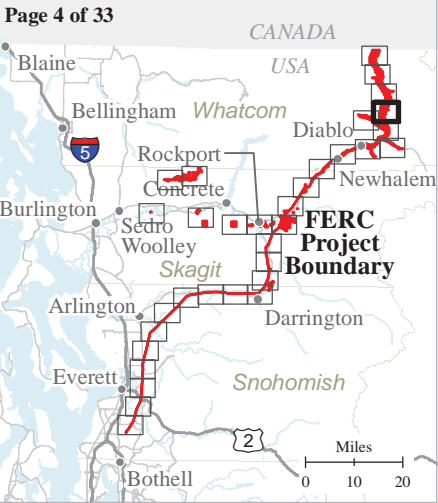
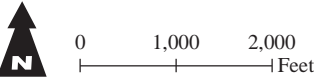


## CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
- Study Area
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- Not Planned for Survey During the Study
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### SKAGIT RIVER HYDROELECTRIC PROJECT (FERC NO. 553)









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## CR-02 SURVEY AREAS MAPBOOK

-  Project River Miles (PRM)
-  Major Facilities
-  Study Area
-  Proposed Pedestrian Survey Area  
(to average low water level, 1530 ft  
CoSD)
-  Not Planned for Survey During  
the Study
-  Potential Subsurface Survey Areas
-  Study Routes (will be pedestrian  
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-  Lowest Extent of High Ross  
Inundation Zone (1602.5 ft CoSD)

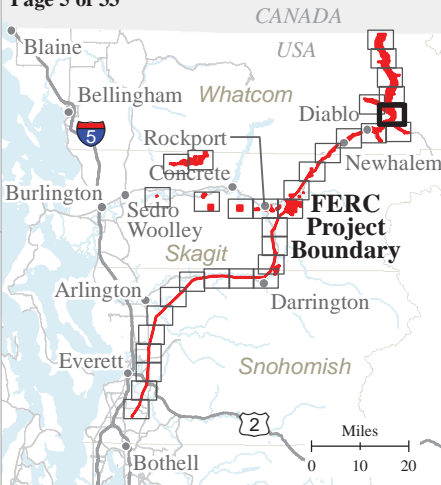
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0 1,000 2,000  
Feet

Page 5 of 33



 Seattle City Light

## SKAGIT RIVER HYDROELECTRIC PROJECT (FERC NO. 553)

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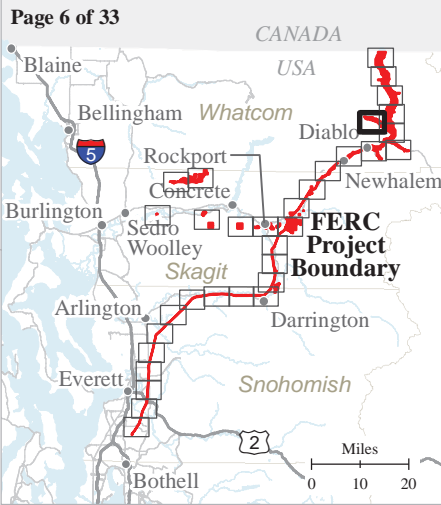
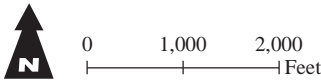


# CR-02 SURVEY AREAS MAPBOOK

- Study Area
- Proposed Pedestrian Survey Area  
(to average low water level, 1530 ft CoSD)
- Not Planned for Survey During the Study
- Potential Subsurface Survey Areas
- Lowest Extent of High Ross Inundation Zone (1602.5 ft CoSD)

Notes:

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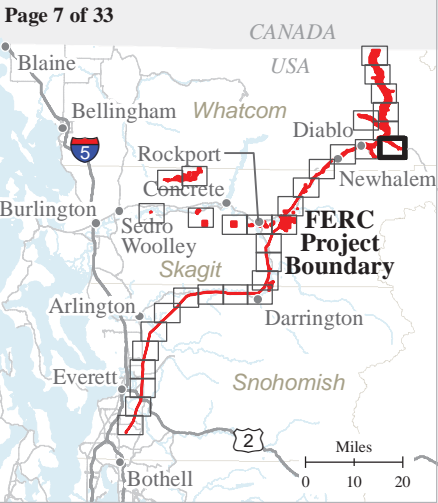
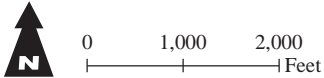


CR-02 SURVEY  
AREAS MAPBOOK

- Study Area
- Proposed Pedestrian Survey Area  
(to average low water level, 1530 ft CoSD)
- Not Planned for Survey During the Study
- Lowest Extent of High Ross Inundation Zone (1602.5 ft CoSD)

Notes:

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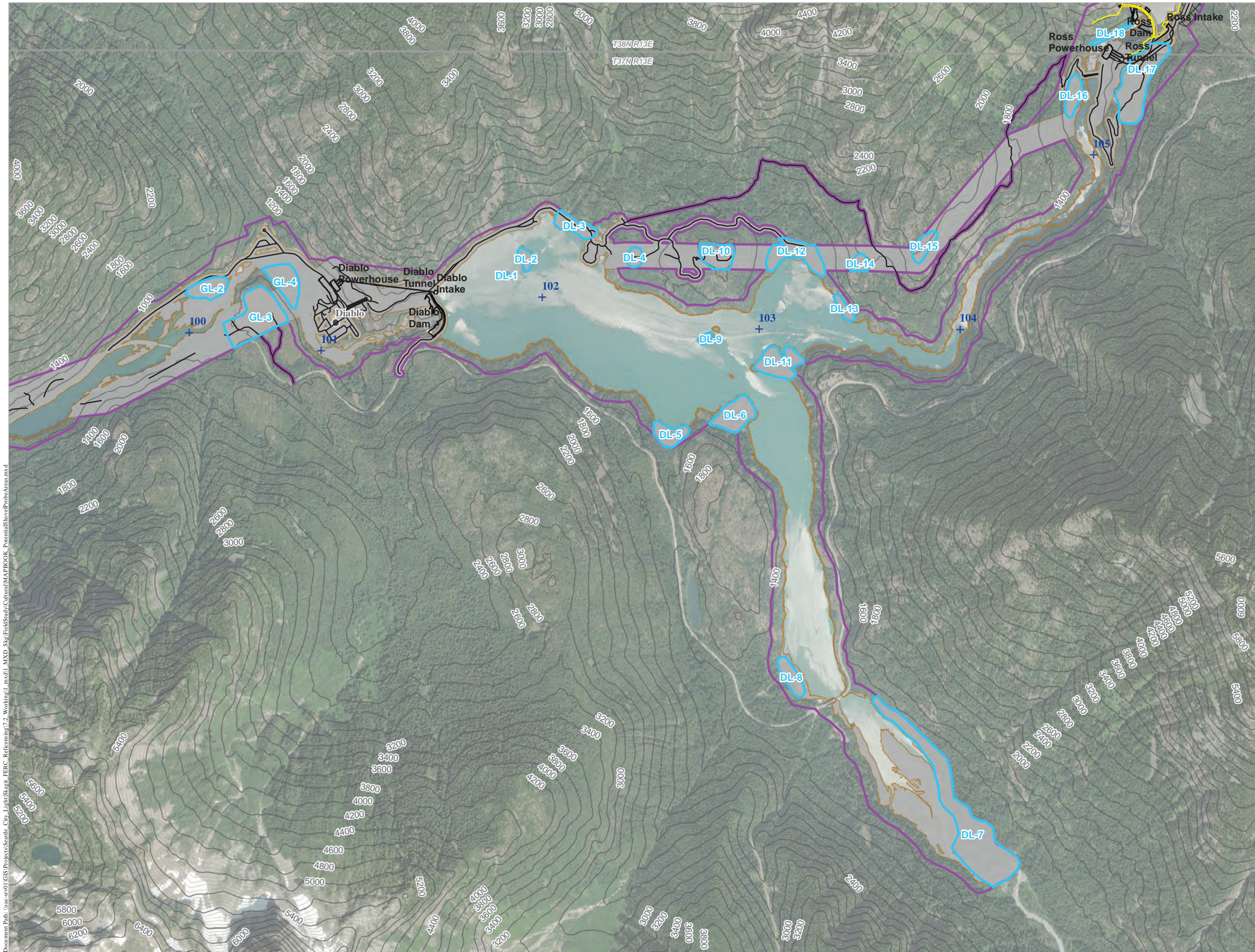


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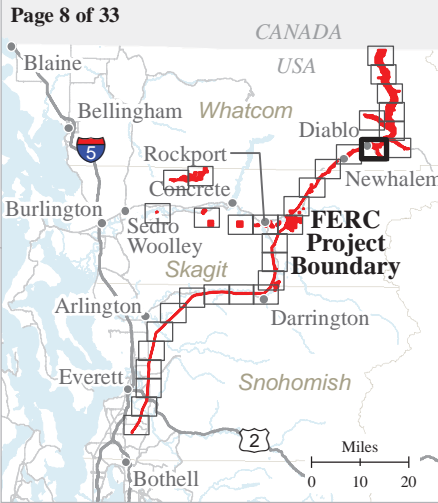
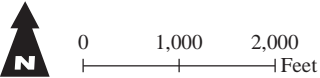
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# CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
- Major Facilities
- Study Area
- Proposed Pedestrian Survey Area
- Not Planned for Survey During the Study
- Potential Subsurface Survey Areas
- Study Routes (will be pedestrian surveyed if accessible)
- Lowest Extent of High Ross Inundation Zone (1602.5 ft CoSD)

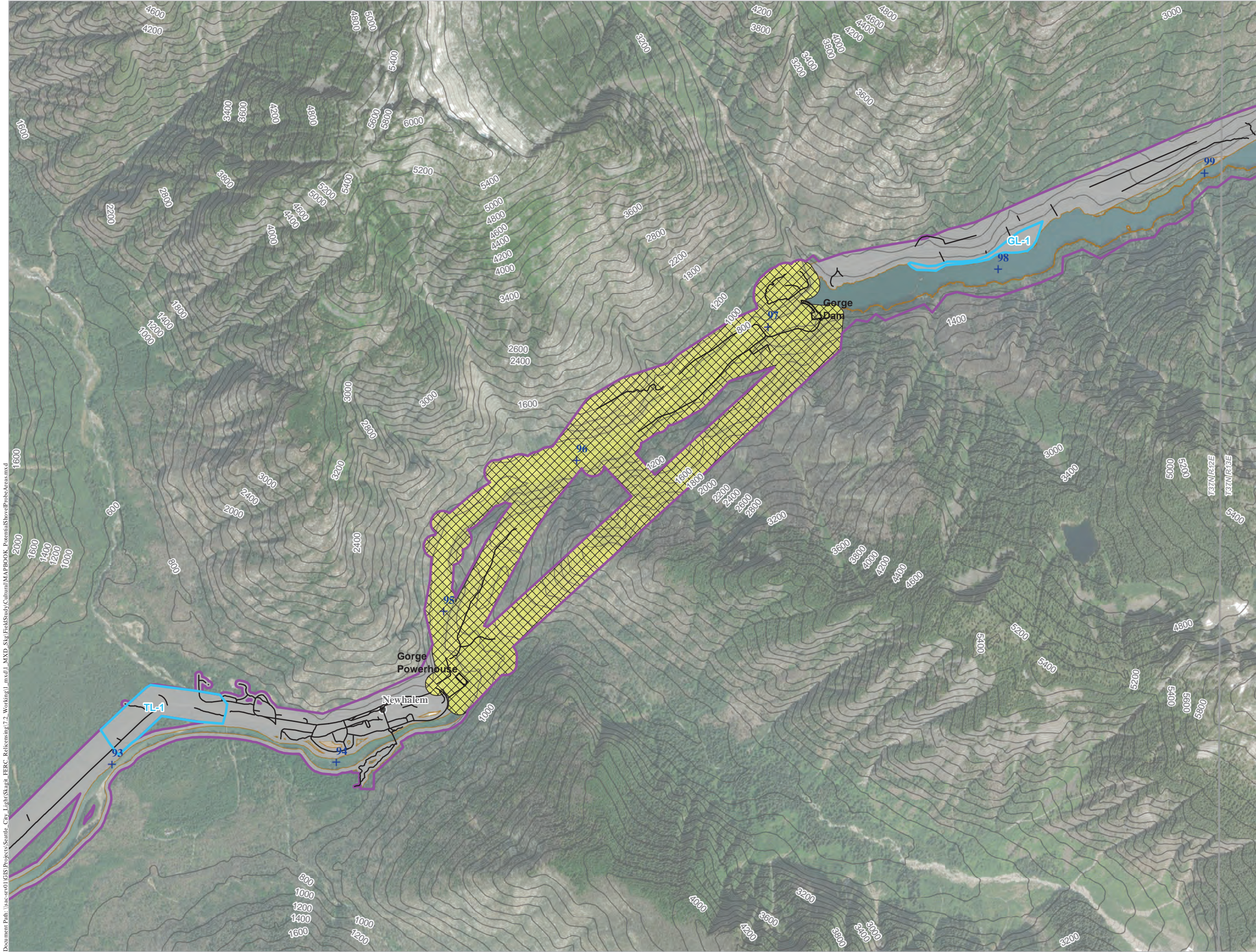
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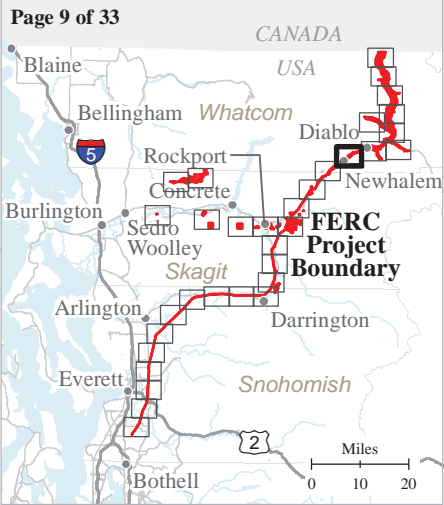
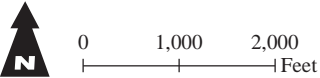




# CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
- Major Facilities
- Study Area
- Proposed Pedestrian Survey Area
- CR-03 Study Area (Surveyed in 2021)
- Not Planned for Survey During the Study
- Potential Subsurface Survey Areas
- Study Routes (will be pedestrian surveyed if accessible)

Notes:  
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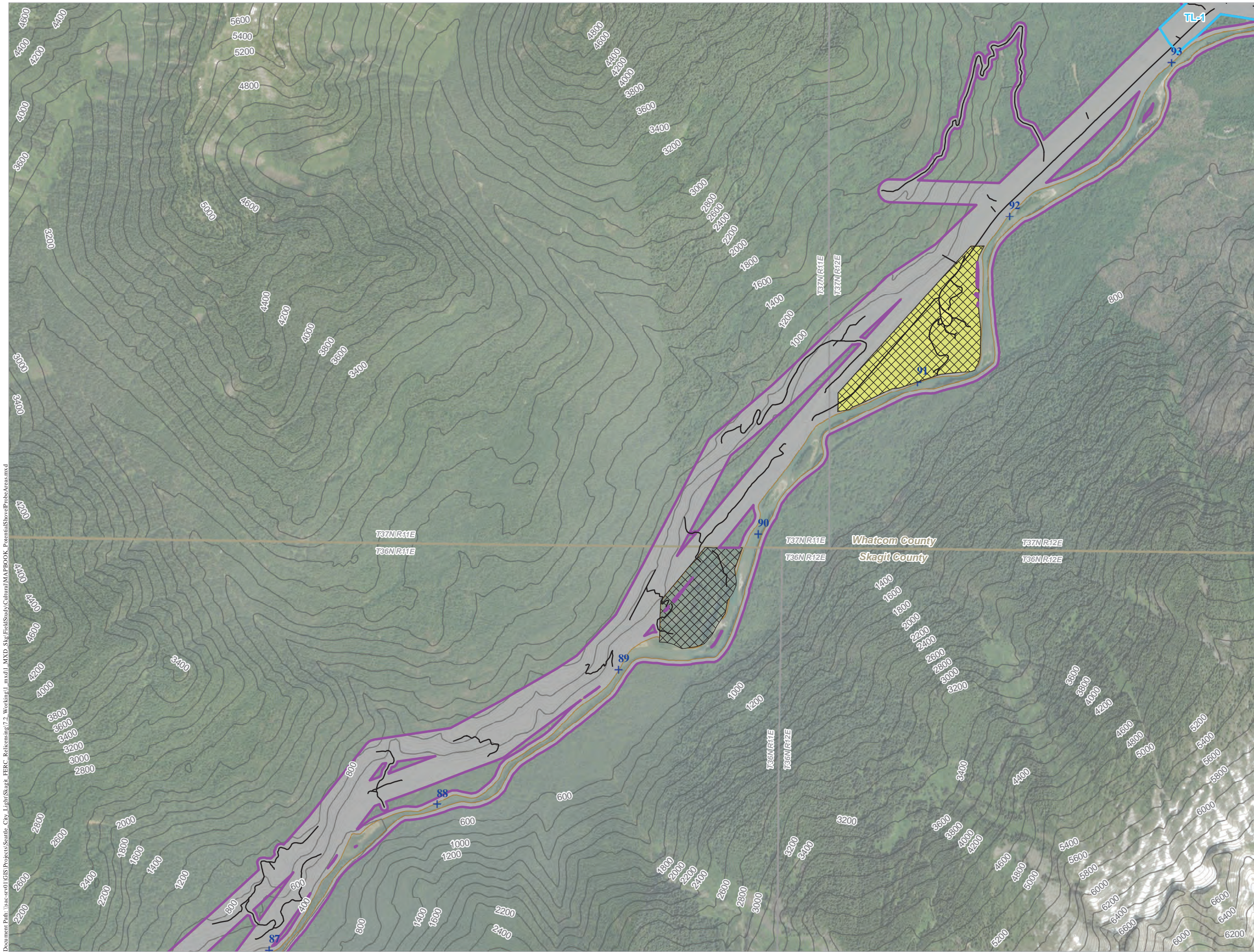


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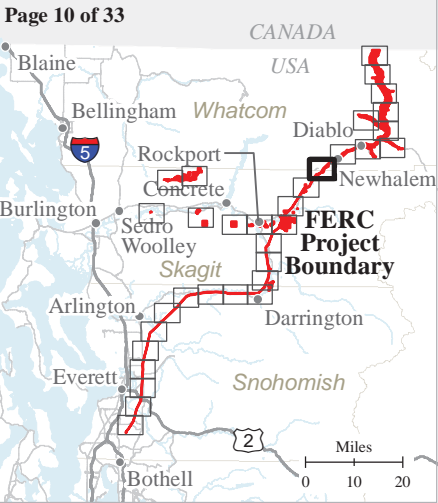
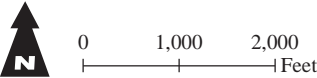
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## CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
- Study Area
- Proposed Pedestrian Survey Area
- Aggregate Storage Survey Area (2020)
- Not Planned for Survey During the Study
- Potential Subsurface Survey Areas
- Study Routes (will be pedestrian surveyed if accessible)

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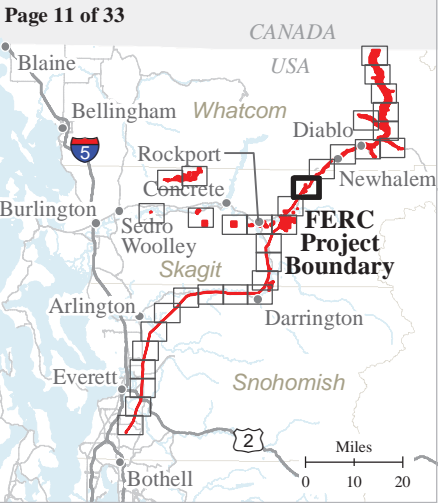
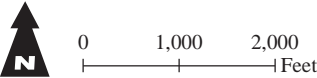
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## CR-02 SURVEY AREAS MAPBOOK

- + Project River Miles (PRM)
- Study Area
- Proposed Pedestrian Survey Area
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- Study Routes (will be pedestrian surveyed if accessible)

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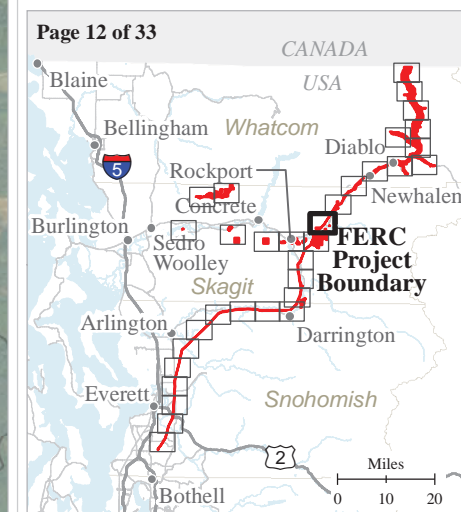
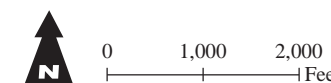
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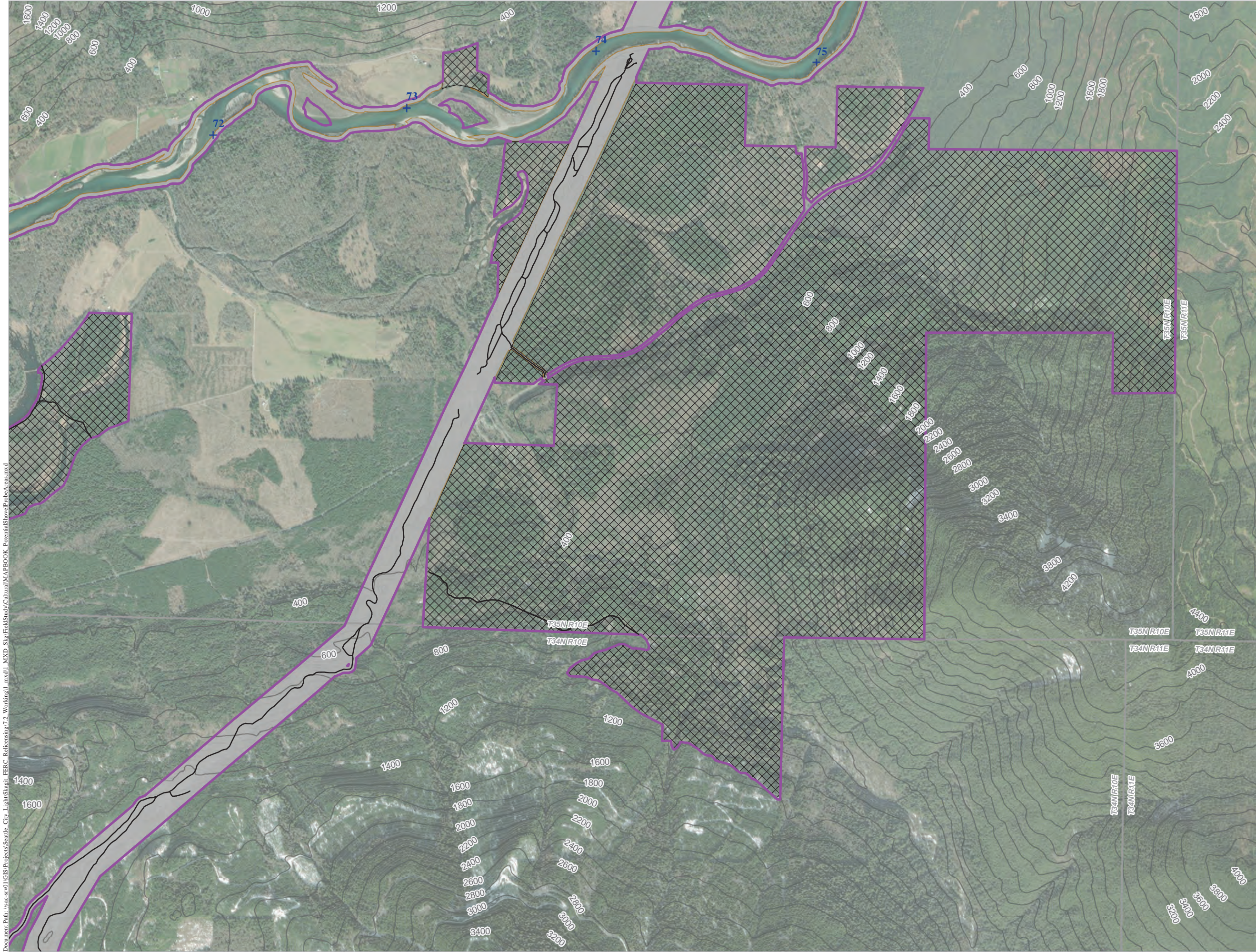
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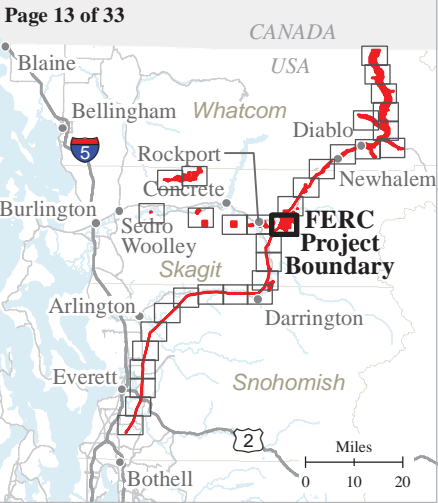
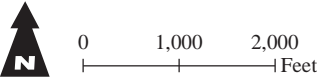




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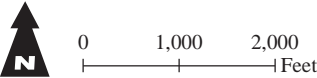
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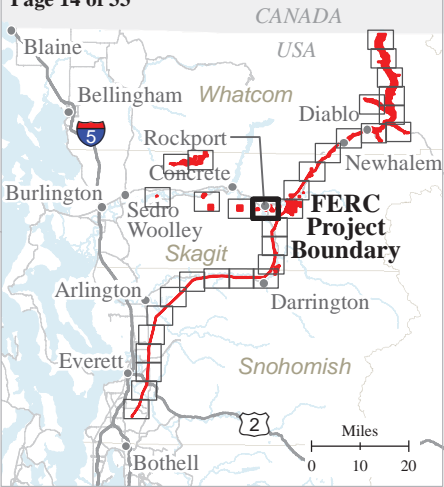
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Seattle City Light

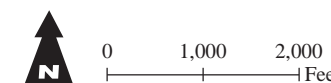
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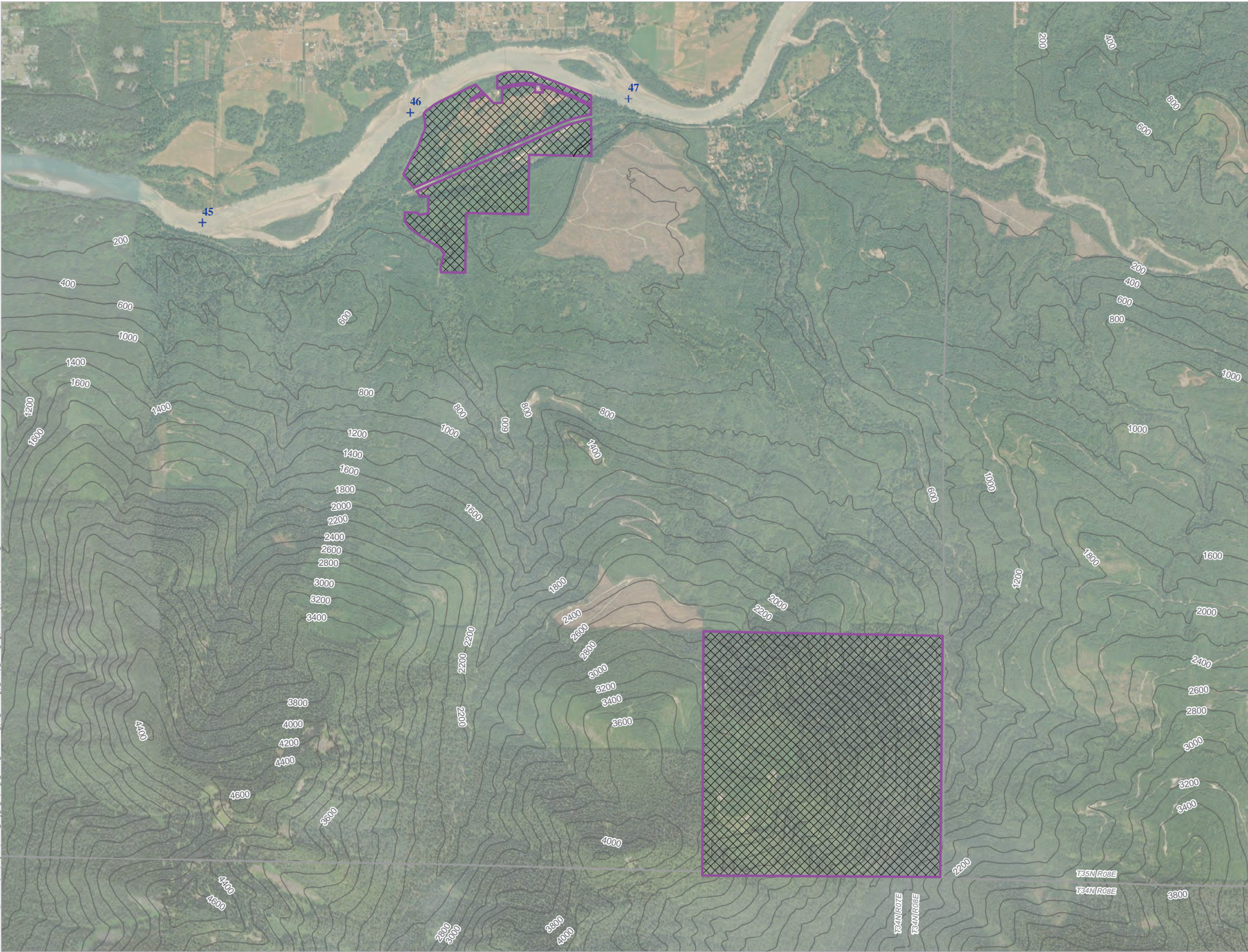


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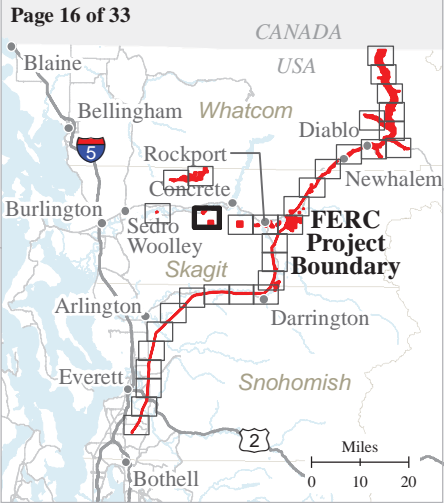
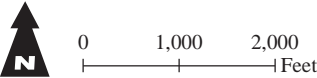
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CR-02 SURVEY  
AREAS MAPBOOK

- + Project River Miles (PRM)
- Study Area
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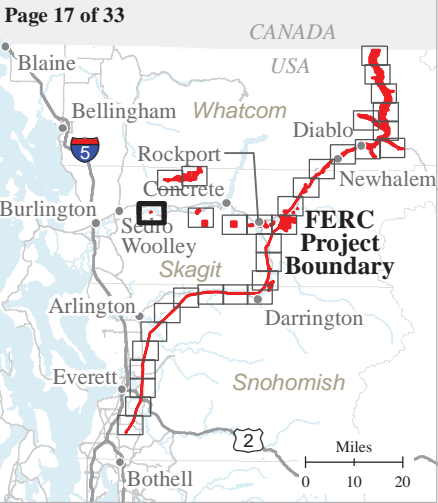
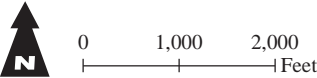
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## CR-02 SURVEY AREAS MAPBOOK

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- Study Area
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Notes:  
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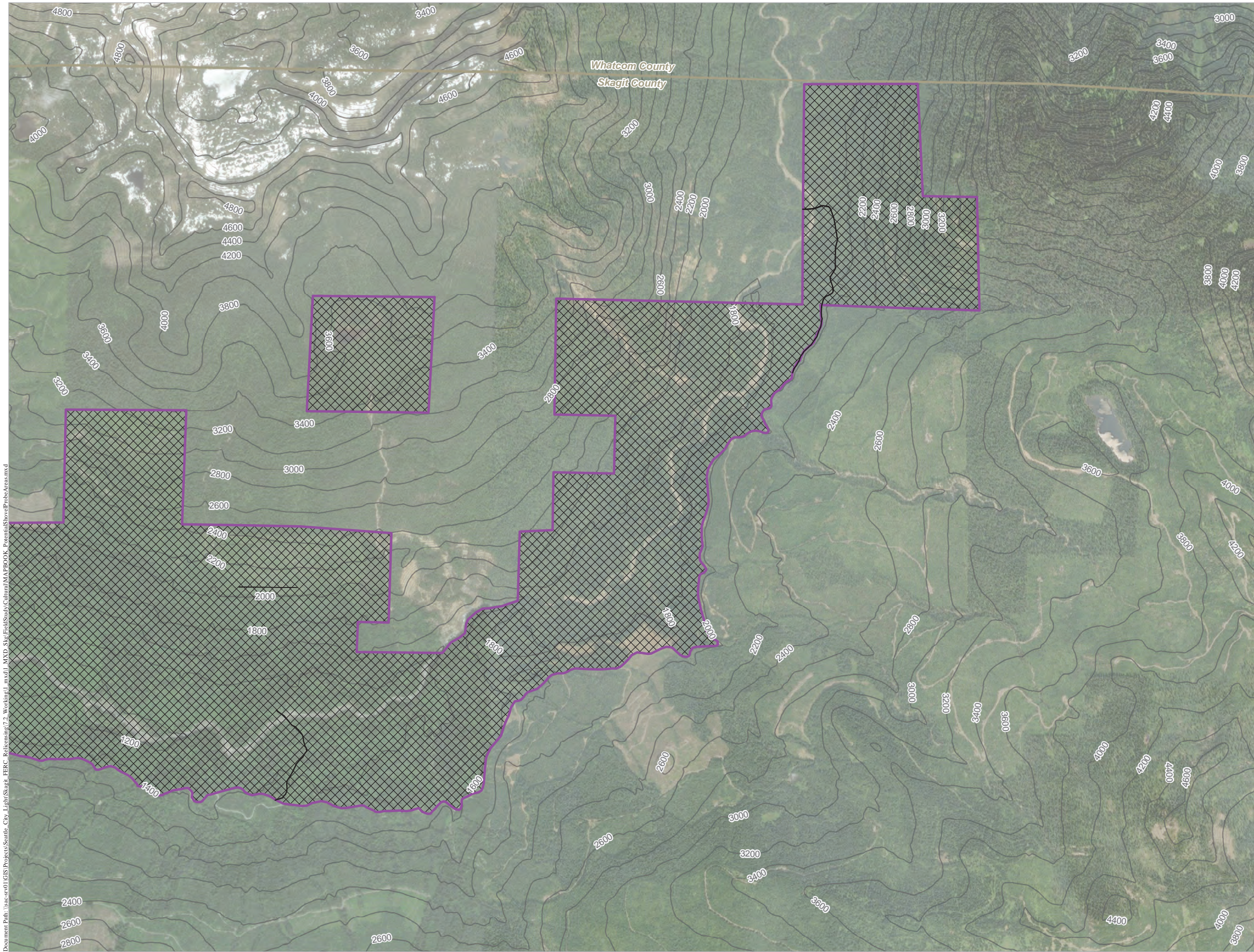


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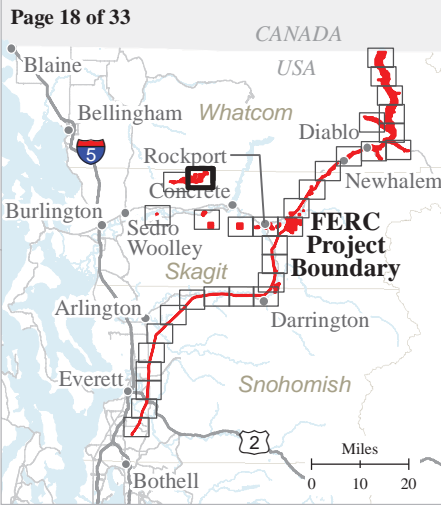
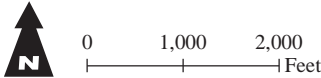
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## CR-02 SURVEY AREAS MAPBOOK

-  Study Area
-  Proposed Pedestrian Survey Area
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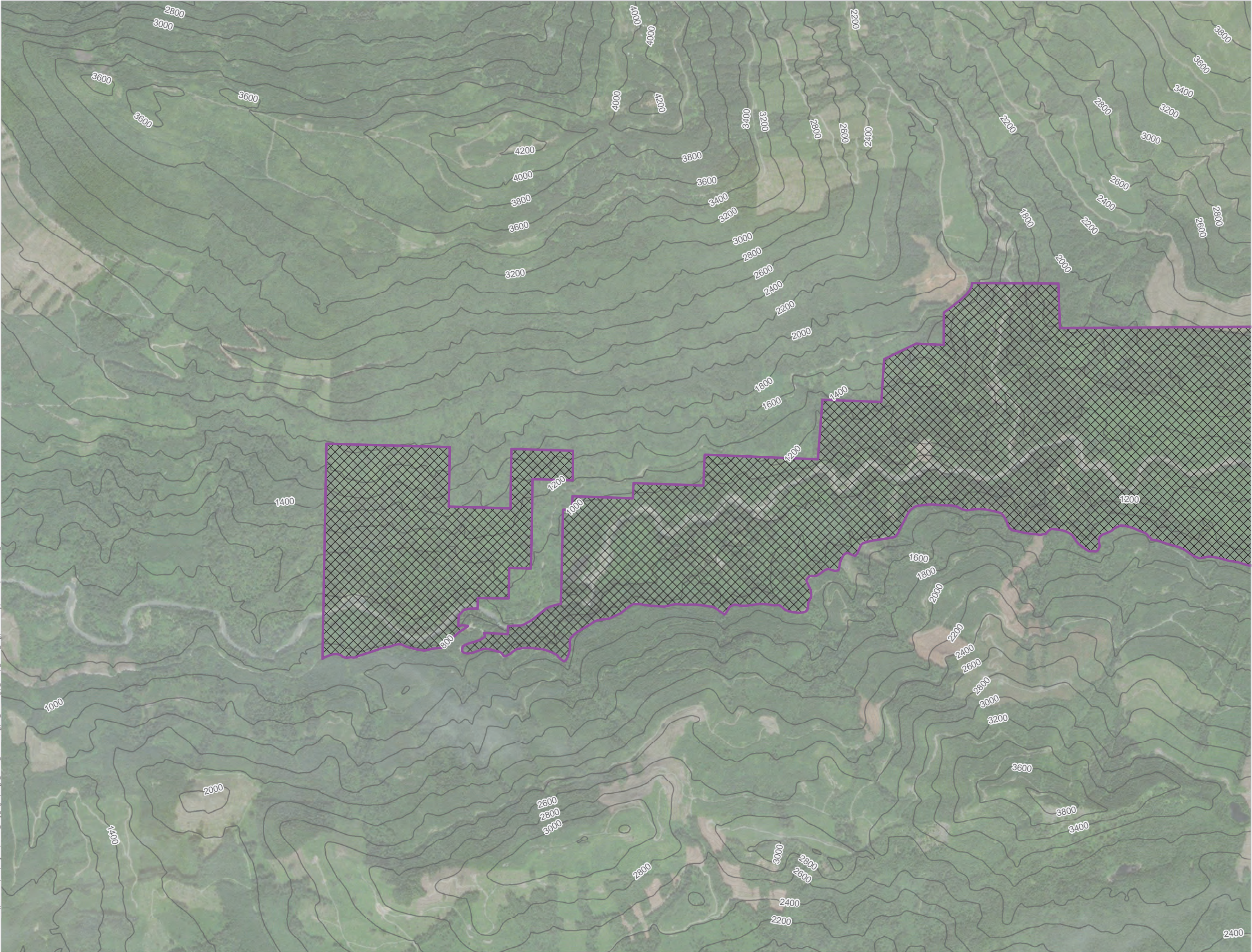


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### CR-02 SURVEY AREAS MAPBOOK

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A north arrow pointing upwards, labeled with 'N'. Below it is a scale bar with markings for 0, 1,000, and 2,000 feet.

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A regional map showing the Skagit River area. The map includes labels for various locations: Blaine, Bellingham, Rockport, Concrete, Sedro Woolley, Arlington, Everett, Bothell, Darrington, Newhalem, and Diablo. It also shows the Skagit River, Whatcom, and Snohomish. A red line indicates the FERC Project Boundary. The map includes a scale bar for miles (0, 10, 20) and labels for CANADA, USA, and I-5.

Seattle City Light

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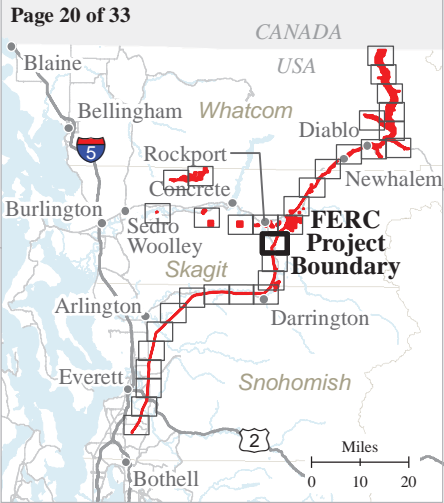
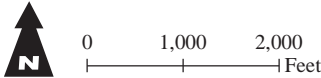
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CR-02 SURVEY  
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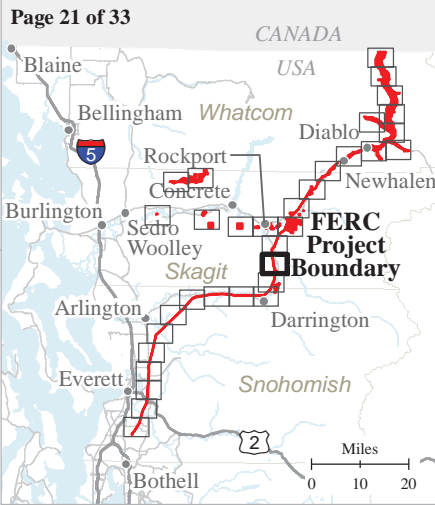
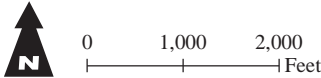
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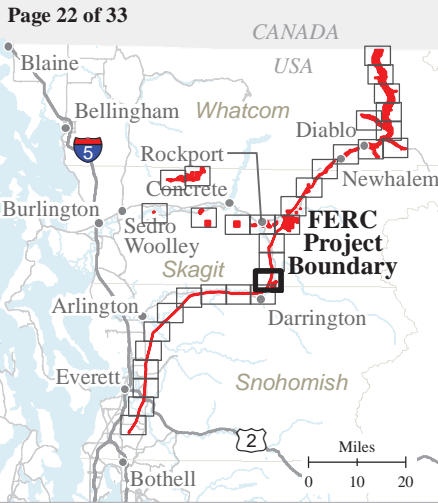
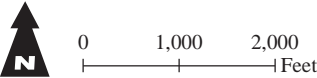
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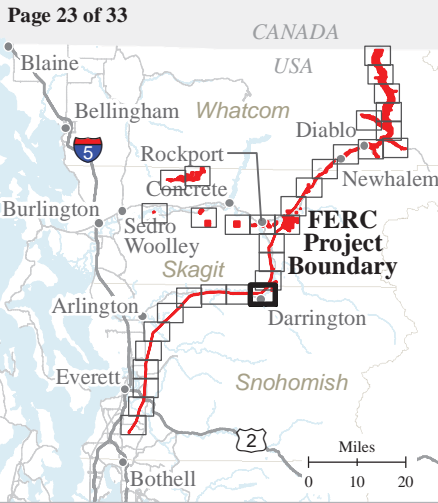
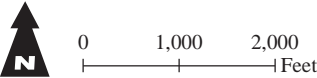
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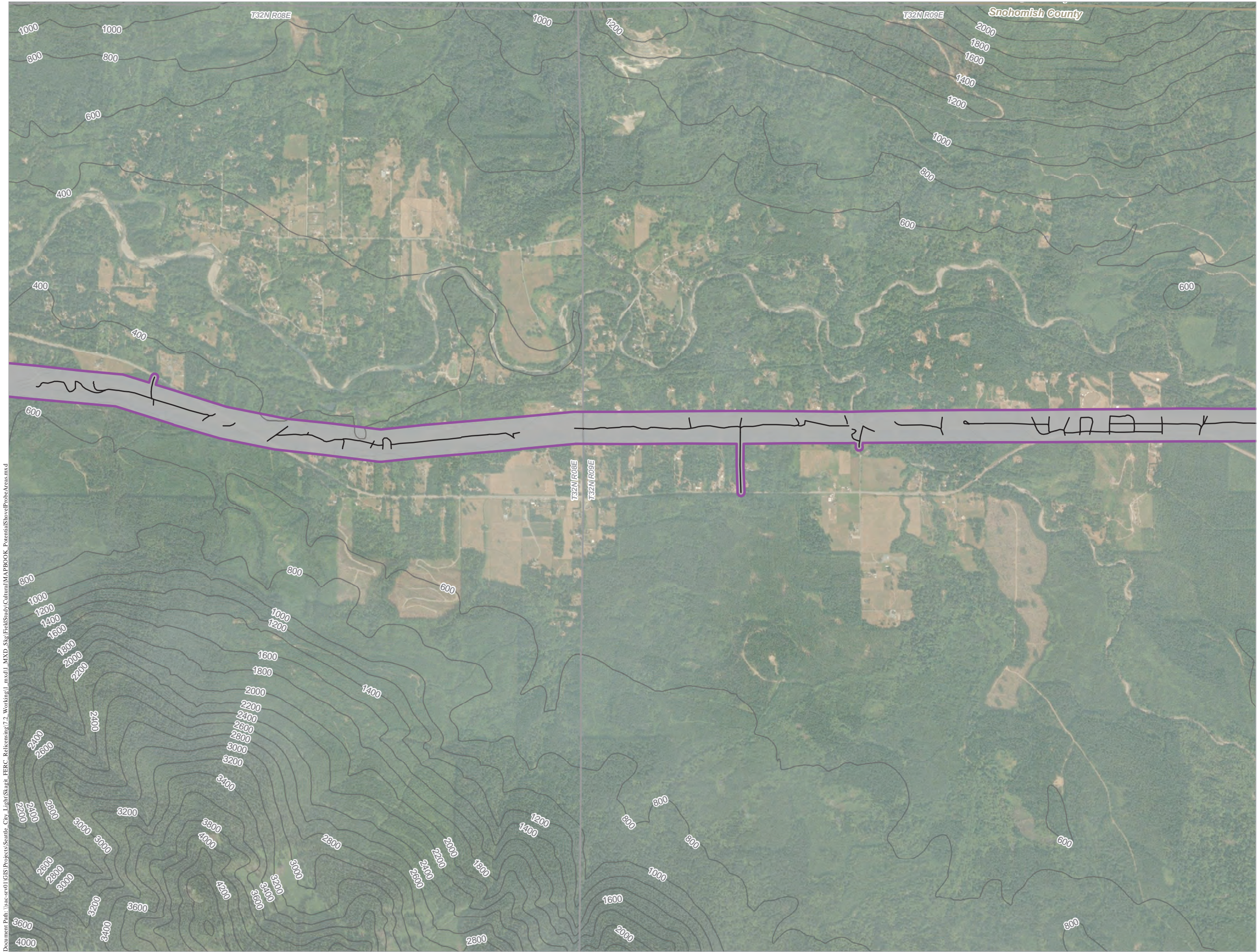


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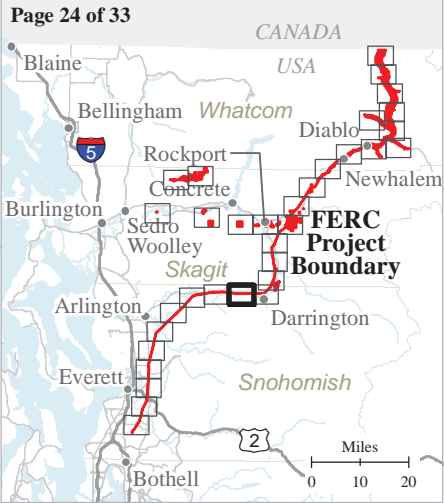
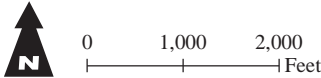
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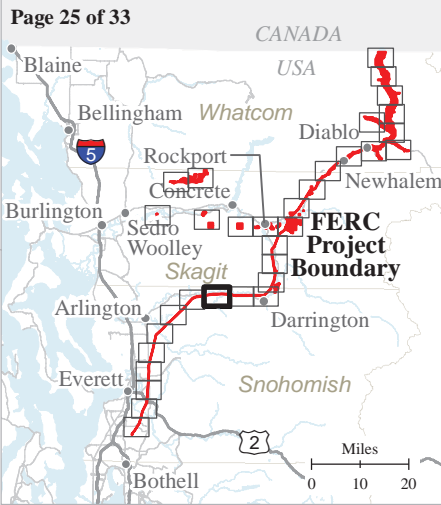
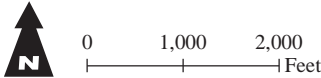
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**CR-02 SURVEY  
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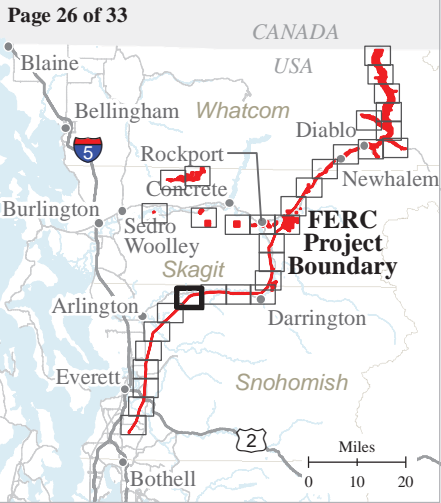
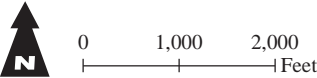
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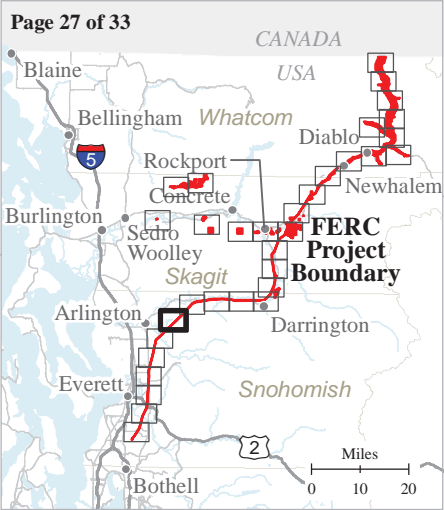
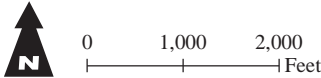
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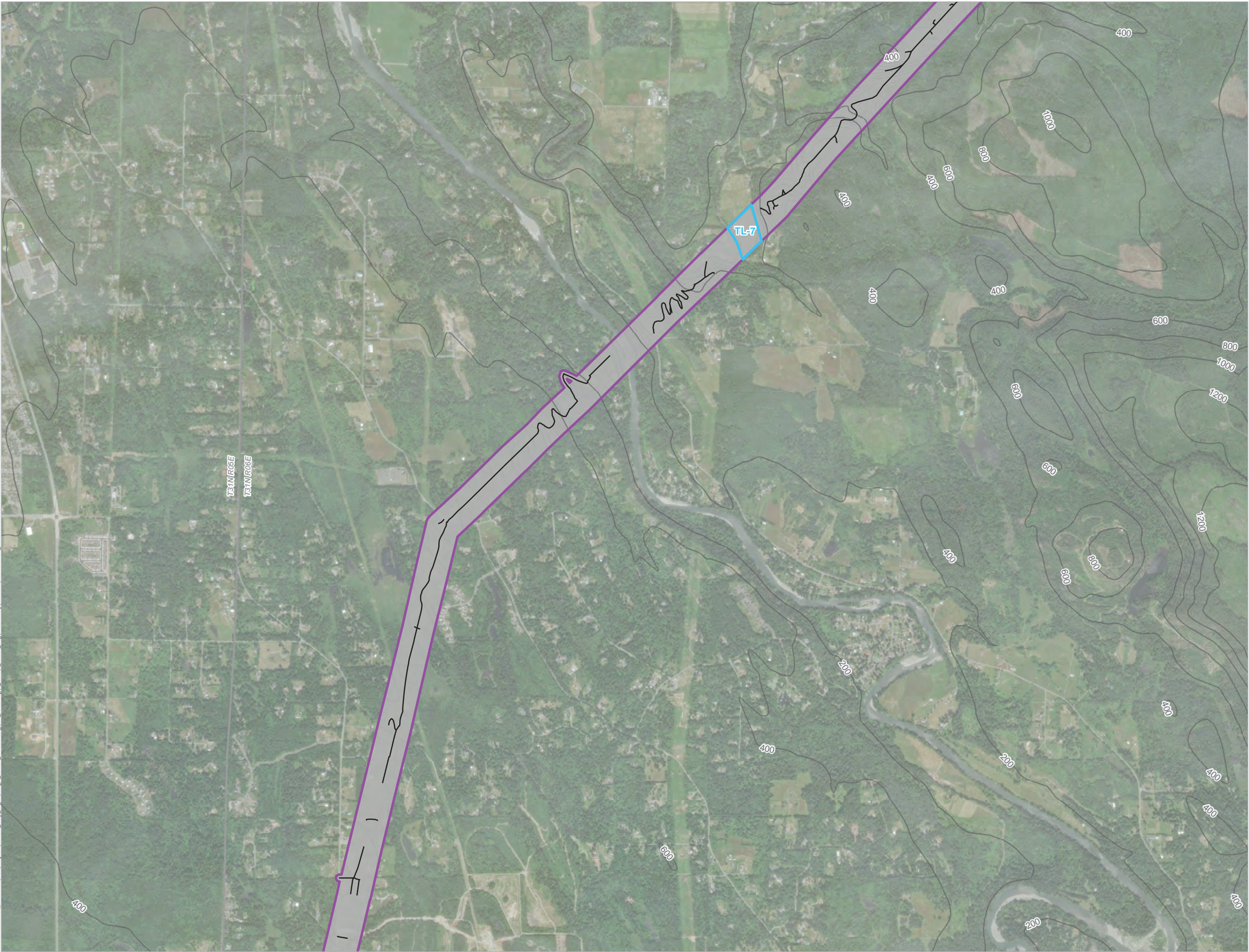


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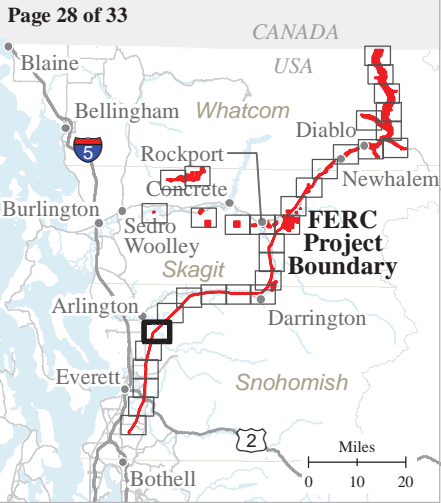
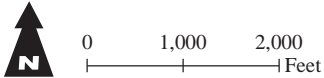
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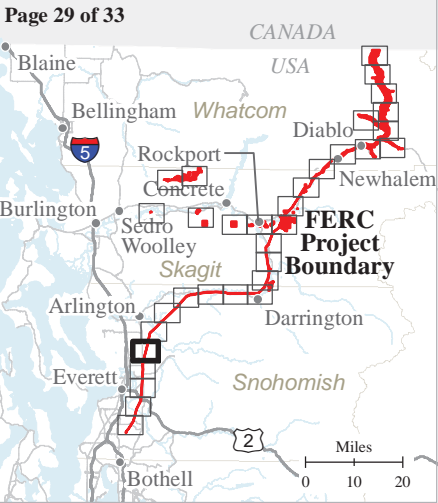
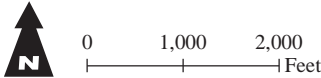
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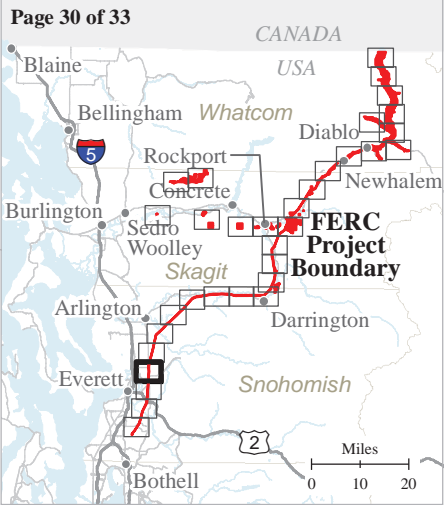
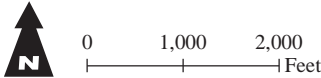
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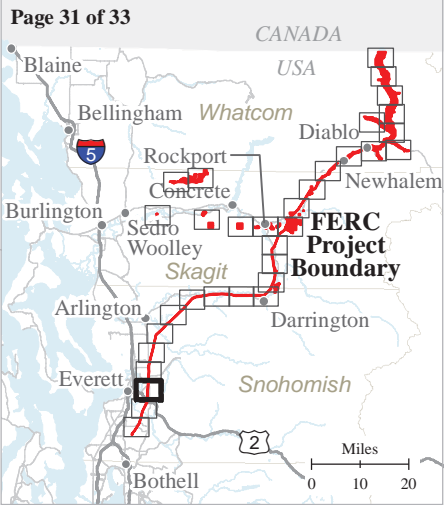
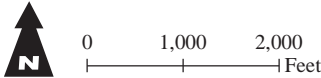
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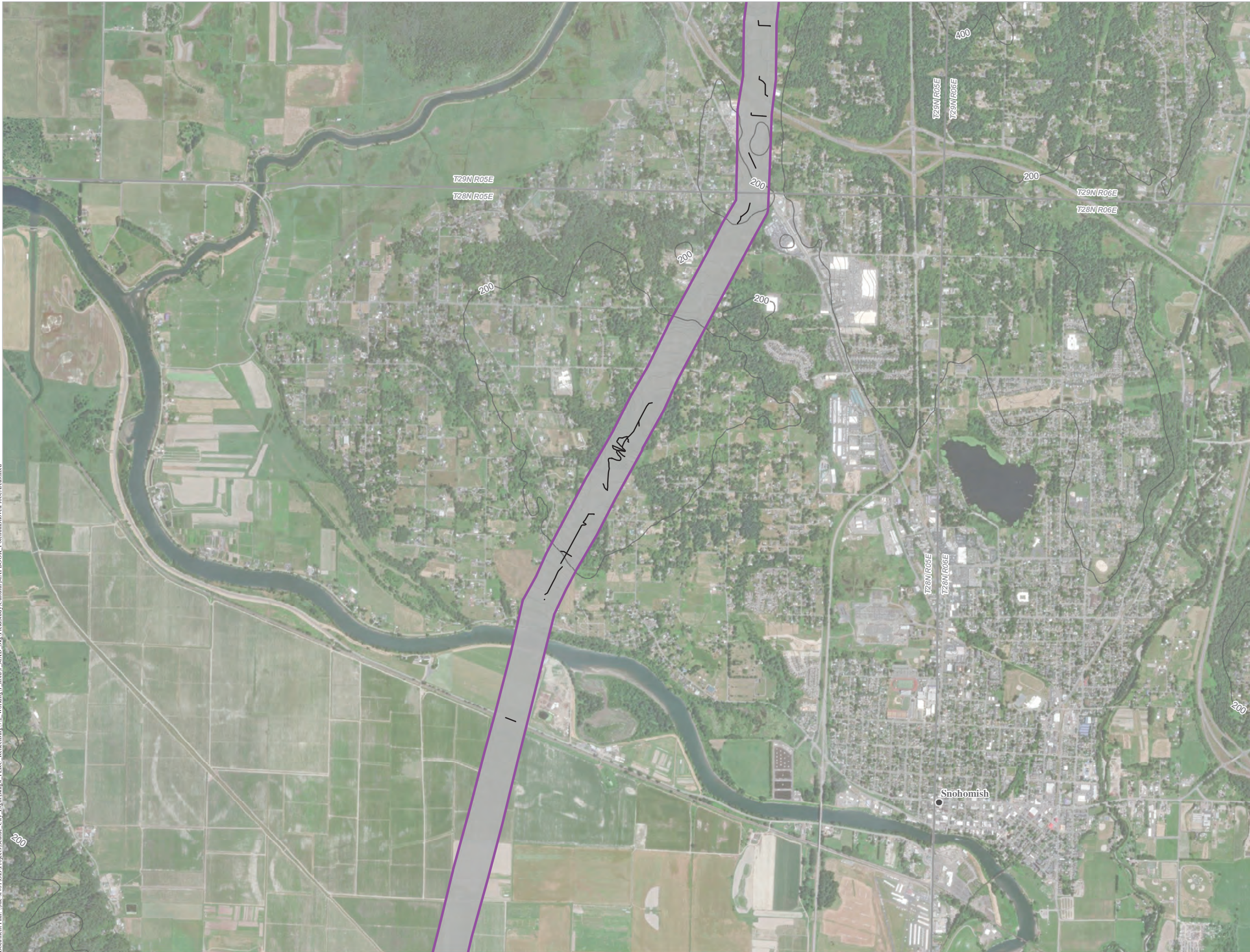


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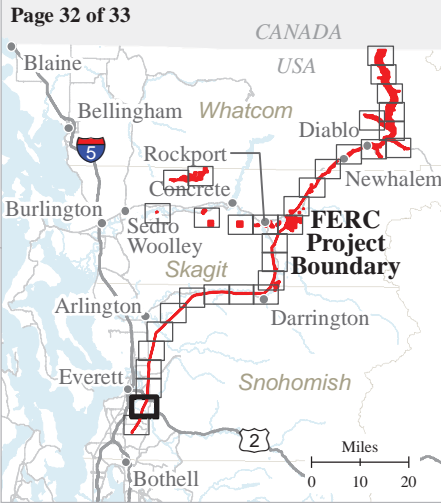
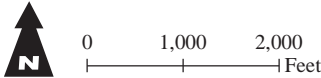
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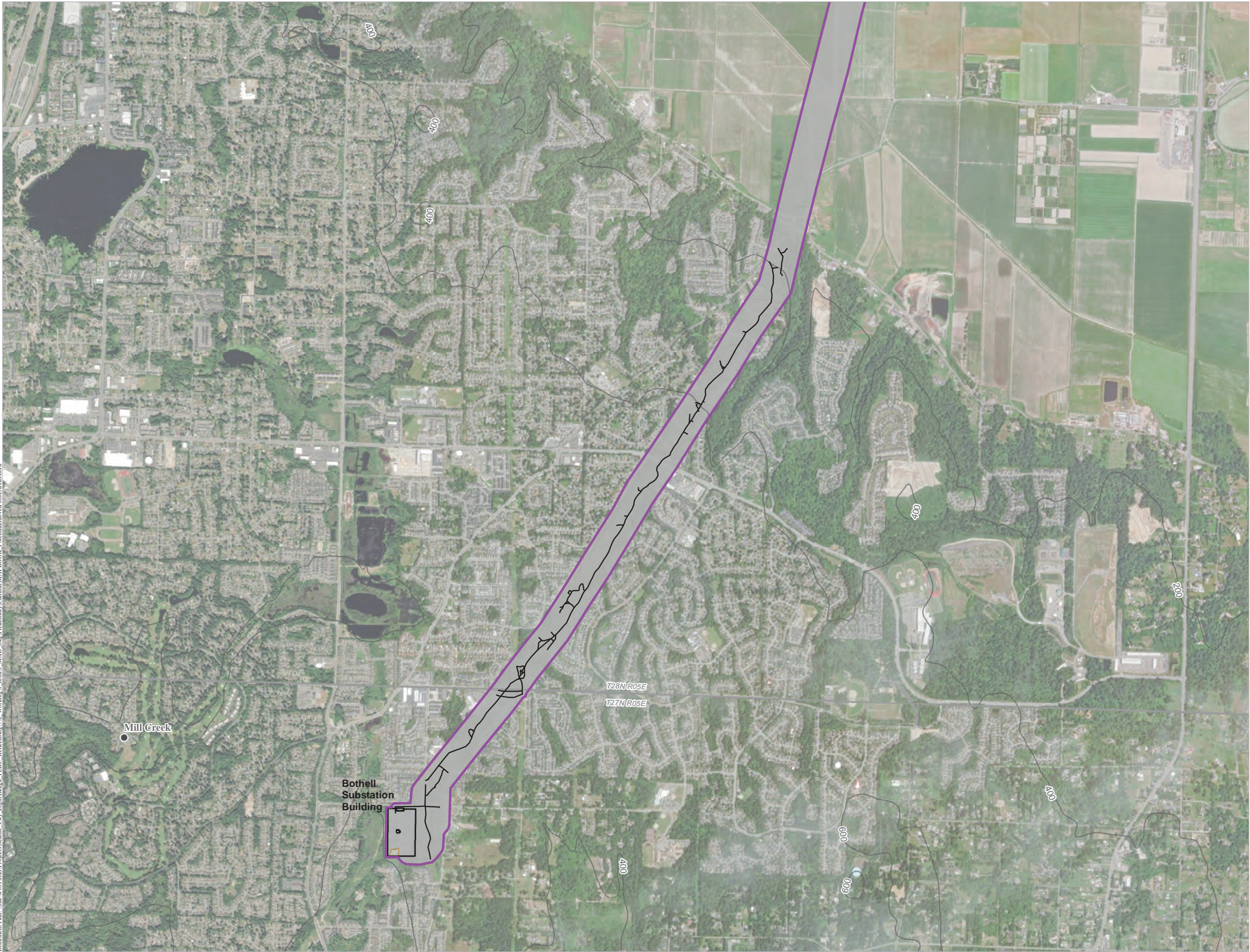


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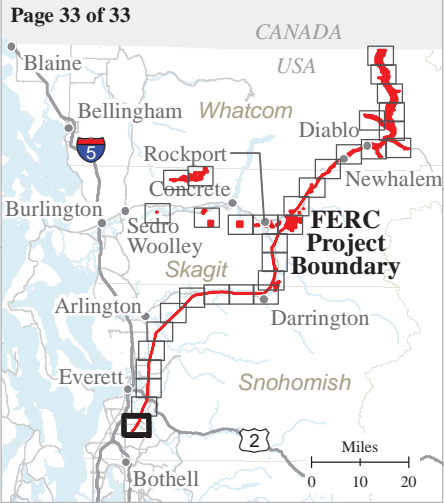
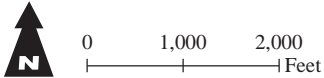
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**CULTURAL RESOURCES SURVEY RESEARCH DESIGN**

**ATTACHMENT C**

**UNANTICIPATED DISCOVERY PLAN**



**UNANTICIPATED DISCOVERY PLAN  
FOR ARCHAEOLOGICAL MATERIALS AND HUMAN REMAINS  
SKAGIT RIVER HYDROELECTRIC PROJECT RELICENSING  
SEATTLE CITY LIGHT  
Whatcom, Skagit, Snohomish Counties, Washington  
August 2021**

## **1.0 INTRODUCTION**

As part of relicensing the Skagit River Hydroelectric Project (Federal Energy Regulatory Commission [FERC] No. 553), Seattle City Light (City Light) will be implementing its Revised Study Plan (RSP). There is potential that archaeological materials or human remains could be discovered when personnel carry out studies for the relicensing. This Unanticipated Discovery Plan (UDP) describes procedures by which City Light and their consultants will respond to and manage unanticipated discoveries of archaeological materials and human remains during implementation of the relicensing studies.

The UDP is intended to provide guidance to City Light personnel and City Light's consultants in order to:

- Comply with applicable laws and regulations, including:
  - Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations [CFR] Part 800; 54 U.S.C. 300101 et seq.)
  - Revised Code of Washington (RCW) Chapter 27.44 Indian Graves and Records, and
  - RCW Chapter 27.53 Archaeological Sites and Resources
- Describe to FERC and Section 106 consulting parties the procedure City Light will follow in the event of an unanticipated discovery during the relicensing study period, and
- Provide proper procedures to study personnel to be followed should an unanticipated discovery occur.

## **2.0 UNANTICIPATED DISCOVERY PROCEDURES**

This UDP serves to minimize damage to the following cultural resources during implementation of the relicensing studies: (1) archaeological materials and (2) human remains, funerary objects, and objects of cultural patrimony. Study personnel are required to follow the appropriate protocol when carrying out the studies.

Cultural resources include objects modified by humans and locations of human activity, occupation, or use, including locations (sites or places) of traditional religious and cultural importance to specified social and/or cultural groups.

### **2.1 Archaeological Materials Discovery Protocol**

In the state of Washington, archaeological materials are the physical remnants from past human activities that are at least 50 years in age, which is the minimum National Register (36 CFR 60)



age threshold. An archaeological material discovery could be from the precontact or historic period and consist of, but not be limited to, the following:

- Precontact features (e.g., hearths, occupational surfaces, middens, charcoal stains, cluster of animal bones or burned rocks in association with stone tools or chips, rockshelters and overhangs, peeled cedar trees, rock cairns, rock pits)
- Precontact artifacts (e.g., arrow or dart points, stone tool, stone chips, modified animal bones)
- Rock art (e.g., pictograph or petroglyph)
- Historic features (e.g., wells, railroad berms, foundations, cluster of tin cans or bottles, utensils, industrial equipment, springboard stumps, blazed trees and trail cairns)
- Historic artifacts (e.g., glass bottles, glass fragments, sanitary cans, bricks, lumber, nails, railroad ties)

If suspected archaeological materials are encountered by City Light staff or consultants, the following protocol will be implemented, no matter how insignificant the items may seem:

**Leave the archaeological material in place** and discretely flag for later recordation. If possible, take a global positioning system (GPS) data point or a location pin with a mobile device. Do not collect the material. Collecting archaeological materials without proper permits is illegal, which is a violation of federal and state laws.

- (1) Personnel will immediately stop study activities adjacent to the discovery and notify the Study Lead, who will immediately contact the City Light Senior Archaeologist Andrea Weiser and/or City Light Consultant Senior Archaeologist Jennifer Ferris via telephone. Photographs may be sent via email as part of the notification process.
- (2) The Study Lead will take appropriate steps to protect the discovery site. At a minimum, the immediate area of the discovery site will be secured. Vehicles, boats, equipment, and unauthorized personnel will not be permitted to traverse the discovery site.
- (3) A restriction area will be established in coordination with Ms. Weiser and/or Ms. Ferris, if needed. The restriction area will be sufficient to provide for the security and protection of the cultural materials while allowing the study to continue away from the discovery. City Light will enforce appropriate security measures.
- (4) Ms. Weiser and/or Ms. Ferris will coordinate inspection of the discovery as timely as possible and will determine whether the discovery constitutes an archaeological resource.
- (5) If the discovery is determined not to be archaeological, no further cultural resources management consideration will be required.
- (6) If the discovery is potentially associated with a traditional cultural property (TCP), Ms. Weiser and/or Ms. Ferris will notify representatives from the associated Indian tribe(s) and First Nation(s).
- (7) If the discovery is determined to be archaeological, Ms. Weiser and/or Ms. Ferris will assess whether the resource is precontact or historic in age.



- (8) Ms. Weiser and/or Ms. Ferris will notify the City Light Project Manager and Consultant Team Project Manager of the discovery.
- (9) Ms. Weiser and/or Ms. Ferris will work with subconsultants, as necessary, to preliminarily assess the find and formulate a determination regarding whether the discovery constitutes an archaeological site or an isolated find. If the study can avoid affecting the discovery, the discovery will be recorded later under the cultural resources relicensing studies.
- (10) If the discovery cannot be avoided, City Light will consult with the FERC, Department of Archeology and Historic Preservation (DAHP), and other consulting parties to determine the appropriate treatment. Treatment may include documentation, mapping, photography, limited probing, sample collection, protection measures, or other activities.
- (11) For long-term management purposes, the discovery will be included in the Historic Properties Management Plan (HPMP) for the new license, as appropriate.

## **2.2 Human Remains Discovery Protocol**

In the event that human remains, funerary objects, and objects of cultural patrimony are discovered during implementation of the studies, the following protocol will be strictly followed:

- (1) Immediately stop all ground disturbing activity within 50 feet of the discovery.
- (2) Ensure at all times that any discovered human remains, funerary objects, and objects of cultural patrimony are treated with dignity and respect.
- (3) Secure the site immediately from any possible disturbance. Do not remove the discovery. Protect the discovery from looting and vandalism.
- (4) If possible, take a GPS data point or a location pin with a mobile device.
- (5) Note the date, time, nature of discovery, and name of the person who made the discovery.
- (6) Notify the Study Lead, City Light Project Manager, and Consultant Team Project Manager of the discovery. The City Light Project Manager will be responsible for assuring that this protocol is followed.
- (7) City Light will notify the appropriate county medical examiner and local law enforcement in the most expeditious manner possible. DO NOT CALL 9-1-1.
- (8) Upon discovery, City Light and its consultants will comply with applicable laws and regulations including RCW Chapter 27.44 (Indian Graves and Records), RCW Chapter 68.60 (Protection of Historic Graves), and the Native American Graves Protection and Repatriation Act (NAGPRA; 25 U.S.C. 3001-3013).
- (9) The Study Lead, City Light Project Manager, and/or Consultant Team Project Manager will immediately contact City Light Senior Archaeologist Andrea Weiser and/or City Light Consultant Senior Archaeologist Jennifer Ferris via telephone.
- (10) If onsite personnel are unable to determine whether the remains are human or animal or associated with an archaeological context, the Study Lead will immediately contact Ms. Weiser and/or Ms. Ferris for confirmation and share photographs with them for identification. Treat all bones with dignity and respect and do not share photographs to additional individuals unless directed.



- (11) If Ms. Weiser or Ms. Ferris determine that the remains are or may be human and/or animal and associated with an archaeological context, a site visit will be coordinated for Ms. Weiser and/or Ms. Ferris to observe the discovery immediately, as feasible, without causing further disturbance.
- (12) Ms. Weiser and/or Ms. Ferris will contact DAHP's Physical Anthropologist for confirmation and may email photographs.
  - a. If the results of the evaluation indicate that the remains are not human and do not have an archaeological association, no further cultural resources management consideration will be required.
  - b. If the evaluation determines the remains are not human but have an archaeological association, the procedures for Archaeological Materials will be followed, as stated above.
  - c. If the results of the evaluation indicate the remains are human, then the Study Lead, City Light Project Manager, Ms. Weiser and/or Ms. Ferris will notify the medical examiner and local law enforcement. Ms. Weiser and/or Ms. Ferris will also notify the consulting Indian tribes and First Nations.
- (13) The medical examiner will be asked to determine whether the remains are forensic or nonforensic, which will be completed within 5 business days of receiving notification.
  - a. The medical examiner will retain jurisdiction over forensic remains.
  - b. The study stoppage in the area will continue until such time that the medical examiner has secured and removed the remains from the discovery site.
  - c. If the medical examiner determines the remains are non-forensic, they will report that finding to the DAHP.
- (14) The state physical anthropologist will make an initial determination of whether nonforensic skeletal human remains are Indian or non-Indian to the extent possible based on the remains within 2 business days of notification of a finding of such nonforensic remains. If the remains are determined to be Indian, the DAHP will notify all affected Indian tribe(s) via certified mail to the head of the appropriate tribal government within 2 business days and contact the appropriate tribal cultural resources staff.
- (15) The affected Indian tribe(s) have 5 business days to respond via telephone or writing to the DAHP as to their interest in the remains. The DAHP will handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.
- (16) City Light and its consultants will resume study activities in the area of the discovery upon receipt of written authorization from either the medical examiner or the DAHP, whoever has jurisdiction under state law.



## 2.3 CONTACTS

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**CULTURAL RESOURCES SURVEY RESEARCH DESIGN**

**ATTACHMENT D**

**PRIVILEGED: PREVIOUSLY RECORDED ARCHAEOLOGICAL  
RESOURCES WITHIN THE STUDY AREA**



NOTE: Because of the potentially sensitive nature of locational information related to archaeological resources, the map contained in Attachment D is not being distributed to the general public. This information has been filed with the Federal Energy Regulatory Commission (FERC) separate from the Research Design with a Privileged designation. It may be obtained by request to Seattle City Light or FERC, subject to confidentiality provisions.



**CULTURAL RESOURCES SURVEY RESEARCH DESIGN**

**ATTACHMENT E**

**CITY LIGHT RESPONSES TO LP COMMENTS ON THE  
RESEARCH DESIGN**



**Table 1. City Light responses to LP comments on the research design.**

<b>No.</b>	<b>Commenting Individual (Organization)</b>	<b>Date</b>	<b>Study Plan Section, Page</b>	<b>Comment</b>	<b>Response</b>
1.	Kim DiCenzo (NPS)	09/21/2021	Section 3.1 Background and Existing Information, Page 3-1	(	Parenthesis added.
2.	Kim DiCenzo (NPS)	09/21/2021	Section 3.1 Background and Existing Information, Page 3-2	mines,	Mines added.
3.	Kim DiCenzo (NPS)	09/21/2021	Section 3.2 Research Questions, Page 3-4	Are there rare or less common site types that can be identified through this large/exhaustive survey? [trying to brainstorm what benefits can be derived from surveying this long swath of land ie. transmission line, that might not otherwise be considered for survey] Did the frequency of sites identified in the HPA, MPA, and LPAs play out as expected? Why and why not? Were there different factors that should have been considered when developing these predictions? None of these questions seem to relate to built environment properties =/	Added additional research questions.
4.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-3	Theres a bunch of redundancy here and below	Removed redundancy.
5.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-4	Sedimentation in the reservoirs affects areas beyond just the shoreline.	Edited to “shorelines and adjacent areas”



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
6.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-5	Can you please clarify what you mean by this? Seems like this should be the flood capacity of the reservoir down to the lowest elevation since sedimentation is an effect. However, you can only survey as low as the reservoir is drawn down.  Actually, now that I look at this heading under "Potential Project effects" I disagree. This should be under the "Existing Project Effects". The rest of your examples are hypothetical but the reservoirs are drawn down annually.	Added new language to Section 4.2.1.1 to clarify: "new/unexpected fluctuations in the flood storage area of Project reservoirs."  Erosion in the drawdown and shorelines is already included in the Existing Project Effects section. The Pedestrian Survey section which describes where pedestrian survey in Ross Lake will occur includes a flood storage area of 2.5 feet above full pool, or 1602.5 feet), which should be ample to respond to flood events: "The upper extent is full pool (1602.5 feet elevation based on City Light's datum) plus 2.5 additional feet for potential surcharge elevation to the top of the spill gates if needed for flood storage (see City Light 2020a Section 3.5.1.1 page 3-49)."
7.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-5	Would this section benefit from a table to simplify what areas are planned for survey? X-axis would be Existing, Potential and no effects; Y-axis would be HPA, MPA, and LPA ?	New tables added to Section 4.2.2.1 summarizing pedestrian and subsurface survey in the three types of areas (HPA, MPA, and LPA).
8.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-5	You did not mention to what extent your 3rd category (#2 above "Potential Project Effects") will be surveyed.	Added "Similar to HPAs, over the course of the new license period, individual undertakings not anticipated during relicensing would follow the standard Section 106 process and can be surveyed at the time an unanticipated undertaking is proposed."
9.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.1.1 Archaeological Resources, Page 4-6	incur existing Project effects? Just trying to keep language consistent.	Added "existing" to first sentence. Clarified second sentence: Revised for clarity: "No survey will occur within LPAs where there are no current nor anticipated Project effects."
10.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2	and historic architecture	Historic architecture added.



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
			Cultural Resources Survey Implementation, Page 4-6		
11.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	After reading this whole document, I wanted to circle back to make an organizational suggestion. Perhaps in the pedestrian and sub surface sections, the general methods could be outlined and then there can be a little more specific discussion for how the survey will be implemented in each of the three broad categories - 1) Reservoirs, 2) Transmission lines + access road/trails, and 3) River banks. I feel like these two sections are a little muddled, ie. there's some discussion on pedestrian survey in Ross, but nothing specific on Diablo, Gorge, and the river banks.	Paragraphs broken up for clarity. Sentence added about Diablo and Gorge Lakes. New table added to Section 4.2.2.1 summarizing survey in the three types of areas (HPA, MPA, and LPA) within the study area (Table 4.2-1).  The reports will clearly outline which methods were used for different areas.
12.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	The top of page 4-6 says that LPAs will be surveyed where they incur project effects.	Added LPA here.
13.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	Capitalize	High Ross capitalized and added "Inundation Zone" as part of the formal name for this area.
14.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	...in Ross Lake. But what about the strategy for the two other reservoirs? I feel like those have been inadvertently overlooked. There aren't seasonal draw downs for Gorge and Diablo but can the survey coincide with a scheduled draw down? What is full pool for each of these reservoirs and what sorts of draw downs are "average". There's a real lack of information on these two reservoirs but they're just as important.	Added language: "Diablo Lake and Gorge Lake fluctuations are minimal compared to Ross Lake but will influence accessibility to the survey area and survey scheduling."



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
15.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	They should be prioritized for survey.	Revised to “If Ross Lake elevations below 1530 feet can be reached at the time of fieldwork, they will be prioritized for survey.”
16.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-8	What is your strategy for surveying the river banks from Newhalem to Rockport?	Added sentence: “Boats will be used to survey the Skagit River, observing the riverbanks for exposed profiles and HPAs.”
17.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-9	Is this consistent with what was agreed upon in the Gorge Bypass survey? It was my understanding that slopes between 30-40 degrees would be assessed by the Crew chief and if determined safe could be surveyed. And also seems reasonable to included that slope above 30 degrees may be crossed in order to reach terraces or other HPA/MPAs	Language added to match language in CR-03 Research Design. “Unsafe, steep slopes will not be surveyed. Generally, slopes greater than 30 degrees may be unsafe to traverse. Slopes of 30 to 40 degrees will be considered for survey or access by the Field Director based upon visual inspection, local conditions, and safety. Survey will also exclude areas that are too vegetated to safely survey or are inundated.”
18.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-10	previously recorded	“Previously recorded” added.
19.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-11	Add a period instead of comma.	Period added.
20.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-11	The second and third sub bullets don't make sense in relation to this heading.	Clarified header and bullets.
21.	Kim DiCenzo (NPS)	09/21/2021	Section 4.2.2.1 Archaeological Resources, Page 4-11	will not be collected? The end of this sentence is missing.	Edited the sentence for clarity. It now reads, “Historic artifacts identified in shovel probes will not be collected if they are 1) non-diagnostic (e.g., glass fragments without maker’s marks), or, 2) are datable but do not



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
					have unique identifiers (e.g., bricks and nails).”
22.	Kim DiCenzo (NPS)	09/21/2021	Section 4.5 Curation, Page 4-17	according to the issued ARPA permit.	Added language.
23.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	The delineated areas for STPs here seem really limited. This whole area on this page marked in gray is pretty flat. Also, Winnebago Flats campground should be evaluated as a potential cultural landscape as the edge of the campground gets eroded and could be a candidate for future erosion control projects.	Noted.  Can evaluate under HPMP.
24.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Is the bottom elevation for this 1530ft? If so, please label.	Added 1530 feet CoSD to map key.
25.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	What are these lines following? Haul roads?	These are submerged/abandoned roads which will be studied, if accessible, during the survey.
26.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	The Lightning creek alluvial fan is pretty flat and a HPA. I'm surprised that there aren't more blue polygons or are you avoiding known sites? Same goes for the area south of Ponderosa Point to 10-mile island.	Your suggestions are appreciated and will be provided to surveyors. Surveyors are not limited to the polygons shown on the map and can add additional subsurface survey areas based on inspection and available time within the study period. Avoiding excavation in known archaeological sites is consistent with the ARPA and NPS research permits for this study. Pedestrian survey crews will be re-establishing known archaeological site locations in these locales during surface survey and determining whether there are areas outside of known archaeological site boundaries that could and should be shovel tested.
27.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Highlighting area south of Ponderosa Point	Noted. Please see number 26 above.



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
28.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Highlighting Lightning alluvial fan as STP candidate	Noted. Please see line number 26 of this table, above.
29.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Highlighting Cat island and the saddle to the east of it as a stp candidate	Noted. Please see line 26 above.
30.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	and here are also flat places that would be good STP candidates.	Noted. Please see line 26 above.
31.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Here	Noted. Please see Number 26 above.
32.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Casino bay - good stp candidate... also Spencer bay above	Noted. Please see line 26 above.
33.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Thorough ped survey... always been interested in this area (and the lands submerged below) due to ethnographic and historic records.	Noted. Please see line 26 above.
34.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Need thorough ped survey here...have heard there may be a rock shelter from Ross Lake Resort staff	Your suggestions are appreciated and will be provided to surveyors.
35.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Interested in this area due to the water fall. Also the "pit house" depression identified on north side was tested by Bob and determined to be a natural depression (with the help of Jon R.). Records are in MMT office only.	Your suggestions are appreciated and will be provided to surveyors. Will seek associated records from NPS office.
36.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	This area should be full of mining properties. Review patent records before survey.	Your suggestions are appreciated and will be provided to surveyors.
37.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	This area seems to have a lot of tribal interest. Also, Colonial Creek campground should be evaluated as a potential cultural landscape. In the next 50 years, sedimentation of Thunder Arm may make the boat launch unusable and may contribute to the instability of Rhode and Colonial Creeks which damage the campground.	Noted. Can evaluate under HPMP.
38.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Recommend thorough pedestrian survey and expansion of STPs	Your suggestions are appreciated and will be provided to surveyors. See line 26, above.



No.	Commenting Individual (Organization)	Date	Study Plan Section, Page	Comment	Response
39.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	Recommend expansion of STPs where feasible. Also Goodell campground should be evaluated as a potential cultural landscape. Campground and raft launch are eroded by the river and this is a sensitive area.	Noted. Can evaluate potential of cultural landscapes under HPMP.
40.	Kim DiCenzo (NPS)	09/21/2021	Attachment B, Page	I don't believe the ag ponds were a part of CR-03 but they were as a part of a different recent survey.	Mapbook legend revised for clarity.

Note: Comments above also triggered the following revisions in attachment order from the prior version of this research design: former Attachment A (Unanticipated Discovery Plan) became Attachment C; a new Attachment A was added (Study Area Mapbook Showing Predictive Model); former Attachment B (Study Area Mapbook) was renamed (Survey Area Mapbook); former Attachment C (Privileged Previously Recorded Archaeological Resources in the Study Area) became Attachment D; Attachment E (City Light Responses to LP Comments on the Research Design) was added.