

3.3 Copies of Comment Letters Received

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-4082
 (916) 657-5390 - Fax



SA-1

February 7, 2001

Maria C. Sosa, Senior Environmental Planner
 Department of General Services/Real Estate Services Division
 Professional Services Branch/Environmental Services Section
 1102 Q Street, Suite 5100
 Sacramento, CA 95814

RE: SCH# 99021015 - DEIR for the Draft Management Plan for the California Division of Forestry and Fire Protection's (CDF) Historic Buildings and Archaeological Sites

Dear Ms. Sosa:

The Native American Heritage Commission has reviewed the above mentioned Draft Environmental Impact Report. The commission applauds CDF efforts to manage the archaeological resources in its care and mitigate potential impacts. Site avoidance appears prominently in the measures outlined, which will always be our preferred alternative. It also applauds CDF for adopting a gathering policy for local Native American groups wishing to gather materials on CDF parcels. However, the level of involvement of the Native American community in crafting this the plan is unclear. While acknowledgment is made of involvement of a few individuals and tribal groups whom "reviewed the Draft Plan and provided important comments." (DEIR, p. 38). Whether there was a specific, planned, and documented meaningful Native American Consultation program is not clear. Furthermore, the lack of identifying specific tribal governments, over identifying a few specific individuals, elevates individual status over that of tribal governments. If you would like to discuss this matter further you may contact me at (916) 653-4082.

SA-1-1

SA-1-2

SA-1-3

SA-1-4

Sincerely,

Larry Myers
 Executive Secretary

CC: State Clearinghouse

STATE OF CALIFORNIA

Gray Davis Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-4082
 (916) 657-5390 - Fax



SA-2

February 7, 2001

Andrea Tuttle
 Director
 Department of Forestry and Fire Protection
 1416 9th Street
 Sacramento, CA 95814

RE: DEIR for the Draft Management Plan for the California Division of Forestry and Fire Protection's (CDF) Historic Buildings and Archaeological Sites

Dear Director Tuttle:

The Native American Heritage Commission has reviewed the above mentioned Draft Environmental Impact Report. The document raises the question of what efforts were made by CDF to comply with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)? The document makes reference to CDF involvement in data recovery activities over the years. It is clear that these activities have resulted in collections of Native American cultural objects, for example:

SA-2-1

1. CDF acknowledges that "There are 166 known archaeological sites on lands owned or managed by CDF." It is stated that, "Known archaeological sites are fully recorded, and most are protected by complete avoidance." It is noted, however that "there are a few exceptions where complete avoidance is not possible, and excavation is done when feasible." (DEIR, "Executive Summary," p. 4)
2. Data recovery archaeological testing conducted at the Salt Creek Ridge Site (CA-TUL-472) in the wake of the 1987 Case Fire in Tulare County. (Draft Management Plan, p. 46)
3. References to artifacts collected within the Boggs Mountain Demonstration State Forest
 - A collection of artifacts recovered over the years on the forest when it was under the management of Cliff Fargo. (Draft Management Plan, p. 56)
 - Collections under contract surveys by Sonoma State University, beginning in 1993, at a number of sites, including: CA-LAK-1258, CA-LAK-1377, CA-LAK-1377, CA-LAK-1553, CA-LAK-1758, and CA-LAK-1759. (Draft Management Plan, pp. 57- 59)
4. Reference to artifacts recovered at the Hurley Forest Fire Station between 1988 and 1999. Collections included tools and beads of steatite, olivella and bone, within area identified as a prehistoric village site (Draft Management Plan, p. 62).
5. Reference to numerous artifacts collected over the years at the Ishi Conservation Camp, beginning as early as 1956. A management statement also appears here stating: "The CDF Archaeologist shall arrange for curation of artifacts per State developed guidelines. This policy does not prohibit collections made under the supervision of the CDF Archaeologist." (Draft Management Plan, p. 64)
6. Reference to over 48 archaeological surveys conducted over a period of twenty years at the Jackson Demonstration State Forest. Three Chop Village is noted as a significant site. In connection with this site it states that excavation will be undertaken when opportunities become available. It is also noted that the forest has "A small collection of artifacts..." from previous studies conducted in the forest. (Draft Management Plan, pp. 66-67)
7. Reference to a small artifact collection at the Latour Demonstration State Forest curated by CDF. (Draft Management Plan, p. 71)
8. Reference to a prehistoric occupation site with "abundant surface artifacts, and possibly a prehistoric cemetery based on records revealing discovery of human remains during construction at the watertank in 1941." (Draft Management Plan, p. 73)

9. At the Mountain Home Demonstration State Forest it states "Artifacts that have been collected on the State Forest are kept in storage at the State Forest Headquarters. Selected artifacts are put out for public view in a locked display case at the State Forest Summer Office." (Draft Management Plan, p. 78)
10. At Murphy's Forest Fire Station data recovery was performed at what was noted to be a significant site and artifacts were recovered, including tools and "several hundred red and white glass trade beads. (Draft Management Plan, p. 80)
11. At Sugar Pine Conservation Camp "Archeological data was recovered and documented by Shasta College through a contract with the State..." (Draft Management Plan, p. 86).

It is clear from the foregoing that CDF possesses collections of Native American Cultural objects, or is in control of such objects, in terms of contracted arrangements with universities and colleges who may hold collections taken from CDF land. Specifically, NAGPRA states that the law is applicable to any "institution or State or local government agency (including any institution of higher learning) that has possession of, or control over, human remains, funerary objects, sacred objects, or objects of cultural patrimony and receives Federal funds." (43 CFR Part 10 Subpart A 10.2-Definitions) *Possession* means "having physical custody" over these cultural objects, and *control* means "having a legal interest" in these cultural objects whether or not they are in their "physical custody" (43 CFR Part 10 Subpart A 10.2-Definitions). Receipt of Federal funds includes "Federal funds received by a larger entity of which the museum [defined as including government agencies] is a part..." (43 CFR Part 10 Subpart A 10.2-Definitions).

NAGPRA states that agencies must submit a written *Summary* of "collections that may contain unassociated funerary objects, sacred objects, and objects of cultural patrimony..." and an *Inventory*, defined as a "Item-by-item description of human remains and associated funerary objects." (43 CFR Part 10 Subpart A 10.2-Definitions). Summaries were to have been completed by November 16, 1993. Agencies were required to "consult with tribes officials and traditional religious leaders" most likely to be culturally with the cultural objects represented by the summaries. Copies of the summary were also to be provided to the National Park Service Consulting Archeologist (43 CFR Part 10 Subpart C 10.8). Inventories were to establish cultural affiliation for collections of human remains and associated funerary objects through a detailed process of consultation with the lineal descendants and Indian tribes most likely to be culturally affiliated with these collections. The inventory was required to provide "A summary of the evidence including results of consultation used to determine the cultural affiliation of the human remains and associated funerary objects...". A notice of inventory completion was to be submitted to the National Park Service Consulting Archeologist by November 16, 1995 (43 CFR Part 10 Subpart C 10.9). Some institutions have applied for and received extensions to enable them to complete their inventories and summaries. Civil penalties have been established for institutions not complying with NAGPRA (43 CFR Part 10, NAGPRA; Interim Rule, January 13, 1997).

I have contacted the National Park Service Archeological Assistance Division, administrators of NAGPRA, and was informed that CDF has not submitted a summary, inventory, or any report in compliance with NAGPRA. The NAHC requests that CDF provide evidence of their efforts to comply with the Native American Graves Protection and Repatriation Act of 1990, at the earliest possible date. If you would like to discuss this matter further you may contact me at (916) 653-4082.

Sincerely,



Larry Myers
Executive Secretary

CC: Dan Foster, CDF Archaeology Office
Tim McKeown, National Park Service

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460
Website: www.fire.ca.gov
(916) 653-4298



R26

February 22, 2001

Mr. Larry Myers
Executive Secretary
Native American Heritage Commission
915 Capitol Mall, Room #364
Sacramento, California 95814

Dear Mr. Myers:

Thank you for your letter dated February 7, 2001, in which you submitted comments on our Draft Environmental Impact Report and Draft Management Plan for California Department of Forestry and Fire Protection's (CDF) Historic Buildings and Archaeological Sites. The regulations specified in the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) do indeed apply to CDF as we are a State agency that receives federal funds. We have searched our collections and have nothing reportable under the Act. Specifically, we do not have in our possession or control any human remains, funerary objects, sacred objects, or objects of cultural patrimony as defined in the NAGPRA regulations. CDF is not required to submit a report to the National Park Service, as we do not have any restricted items in our possession or control.

CDF's management plan should include a discussion of the management of our current and future archaeological collections, in addition to the sites themselves, and we shall expand this discussion in the final plan. We will clarify that both NAGPRA and the Guidelines for the Curation of Archaeological Collections (1993), a policy developed specifically for state agencies by the State Historical Resources Commission pursuant to Public Resources Code Section 5020.5(b), apply to CDF's archaeological collections.

Thanks again for your assistance in the development of a comprehensive plan to protect and manage California's heritage resources within CDF's jurisdiction.

Sincerely,

Andrea E. Tuttle
Director

pga

cc: Tim McKeown, National Park Service

218

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



March 1, 2001

RECEIVED BY
Director's Office

MAR 07 2001

Department of Forestry and
Fire Protection

Andrea Tuttle
Director
Department of Forestry and Fire Protection
1416 9th Street
Sacramento, CA 95814

RE: California Division of Forestry and Fire Protection's (CDF) Compliance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)

Dear Director Tuttle:

Thank you for your response to my letter of February 7, 2001, which raised questions regarding CDF efforts to comply with NAGPRA. As detailed in my previous letter, it is clear from your Draft Management Plan for the California Division of Forestry and Fire Protection Historic Buildings and Archaeological Sites, that CDF has possession or control of Native American artifact collections.

NAGPRA states that agencies possessing collections that may contain unassociated funerary objects, sacred objects, and objects of cultural patrimony, must complete a summary of these collections. As the law states, "The purpose of the summary is to provide information about the collections to lineal descendants and culturally affiliated Indian tribes or Native Hawaiian organizations that may wish to request repatriation of such objects." (43 CFR Part 10 Subpart C 10.8(a)). The summary reports make it possible for lineal descendants, tribal officials, and religious leaders to consult with the agencies that have materials in their possession or control, and to fully participate in identifying which "Kinds of cultural items," originating in their aboriginal lands, they consider to be unassociated funerary objects, sacred objects or objects of cultural patrimony. (43 CFR Part 10 Subpart C 10.8(d)) *Consultation*, see attached).

If you still believe that CDF is not required to complete a summary report and consult on its Native American collections, I would urge you to solicit concurrence from the National Park Service. This would show a good faith effort at compliance with NAGPRA. Lineal descendants, tribal governments and traditional religious leaders are going to be suspicious of any organization that unilaterally decides not to share its information. Please keep me informed as to your department's plan of action.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Myers".

Larry Myers
Executive Secretary

CC: Tim McKown, National Park Service



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



RECEIVED

JAN 24 2001

GENERAL SERVICES DIVISION
Steve Nissen
ACTING DIRECTOR

ACKNOWLEDGEMENT OF RECEIPT

SA-3

DATE: January 19, 2001
TO: Maria Sosa
California Department of Forestry and Fire Protection (CDF)
DGS, 1102 Q Street
Suite 5100
Sacramento, CA 95814
RE: Draft Management Plan for Historic Buildings and Archaeological Sites
SCH#: 1999021015

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: January 8, 2001
Review End Date: February 21, 2001

SA-3-1

We have distributed your document to the following agencies and departments:

SA-3-2

- California Highway Patrol
- Caltrans, Division of Transportation Planning
- Department of Conservation
- Department of Fish and Game, Headquarters
- Department of General Services
- Department of Parks and Recreation
- Department of Toxic Substances Control
- Native American Heritage Commission
- Office of Historic Preservation
- Reclamation Board
- Resources Agency
- State Lands Commission
- State Water Resources Control Board, Division of Water Quality

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
PROJECT MANAGEMENT
State Clearinghouse BRANCH

2001 FEB 15 P 12: 30



Steve Nissen
DIRECTOR

MEMORANDUM

SA-4

DATE: February 7, 2001
TO: State Reviewing Agencies
FROM: Brian Grattidge, Project Analyst
RE: **Correction Notice** for SCH # 1999021015
Title: Draft Management Plan for CDF's Historic Buildings and
Archaeological Sites

The State Clearinghouse distributed the above named document to your agency on January 8, 2001. We regret that we made an error in the review dates for this project.

I apologize for this error, and request that you note the following **corrected** information for your files:

Review Period Closes: 02/21/2001

SA-4-1

Distribution:

- Resources Agency
- Conservation
- Fish and Game Headquarters
- Historic Preservation
- Parks and Recreation
- Reclamation Board
- CHP
- Trans Planning
- General Services
- SWRCB: Wtr Quality
- Toxic Substance Control
- NAHC
- State Lands Commission

SA-4-2

Cc: Maria C. Sosa
California Department of Forestry and Fire Protection (CDF)
Department of General Services
1102 Q Street, Suite 5100
Sacramento, CA 95814



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

RECEIVED

FEB 28 2001

GENERAL SERVICES
REAL ESTATE SERVICES DIVISION

February 22, 2001

SA-5

Maria Sosa
California Department of Forestry and Fire Protection (CDF)
DGS, 1102 Q Street
Suite 5100
Sacramento, CA 95814

Subject: Draft Management Plan for Historic Buildings and Archaeological Sites
SCH#: 1999021015

Dear Maria Sosa:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 21, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

SA-5-1

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

SA-5-2

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

RC00 26FEB01 PM 2:07

**Document Details Report
State Clearinghouse Data Base**

SCH# 1999021015
Project Title Draft Management Plan for Historic Buildings and Archaeological Sites
Lead Agency Forestry and Fire Protection, Department of

Type EIR Draft EIR
Description The California Department of Forestry and Fire Protection (CDF) is considering approval of the Management Plan for CDF's Historic Buildings and Archaeological Sites (March 2000). This Plan proposes to protect and manage the Department's significant heritage resources. These resources include both historic buildings and known prehistoric and historic archaeological sites. The Plan identifies 86 historically significant CDF buildings, and proposes a list of 29 of these buildings for preservation.

Lead Agency Contact

Name Maria Sosa
Agency California Department of Forestry and Fire Protection (CDF)
Phone 916/322-3522 **Fax**
email
Address DGS, 1102 Q Street
 Suite 5100
City Sacramento **State** CA **Zip** 95814

Project Location

County
City
Region
Cross Streets Statewide
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Archaeologic-Historic

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Headquarters; Office of Historic Preservation; Department of Parks and Recreation; Reclamation Board; California Highway Patrol; Caltrans, Division of Transportation Planning; Department of General Services; State Water Resources Control Board, Division of Water Quality; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 01/08/2001 **Start of Review** 01/08/2001 **End of Review** 02/21/2001

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



FEB 15 2001

February 7, 2001

Maria C. Sosa, Senior Environmental Planner
Department of General Services/Real Estate Services Division
Professional Services Branch/Environmental Services Section
1102 Q Street, Suite 5100
Sacramento, CA 95814

*Clear
2/21/01
e*

RE: SCH# 99021015 - DEIR for the Draft Management Plan for the California Division of Forestry and Fire Protection's (CDF) Historic Buildings and Archaeological Sites

Dear Ms. Sosa:

The Native American Heritage Commission has reviewed the above mentioned Draft Environmental Impact Report. The commission applauds CDF efforts to manage the archaeological resources in its care and mitigate potential impacts. Site avoidance appears prominently in the measures outlined, which will always be our preferred alternative. It also applauds CDF for adopting a gathering policy for local Native American groups wishing to gather materials on CDF parcels. However, the level of involvement of the Native American community in crafting this the plan is unclear. While acknowledgment is made of involvement of a few individuals and tribal groups whom "reviewed the Draft Plan and provided important comments." (DEIR, p. 38). Whether there was a specific, planned, and documented meaningful Native American Consultation program is not clear. Furthermore, the lack of identifying specific tribal governments, over identifying a few specific individuals, elevates individual status over that of tribal governments. If you would like to discuss this matter further you may contact me at (916) 653-4082.

Sincerely,

Larry Myers
Executive Secretary

CC: State Clearinghouse

**CALIFORNIA
HISTORICAL
RESOURCES
INFORMATION
SYSTEM**



ALAMEDA
COLUSA
CONTRA COSTA
LAKE

MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO

SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, California 94928-3609
Tel: 707.664.2494 • Fax: 707.664.3947
E-mail: nwic@sonoma.edu

February 21, 2001

File No. 01-8E

RLA-1

Ms. Maria C. Sosa, Senior Environmental Planner
Department of General Services/Real Estate Services Division
Professional Services Branch/Environmental Services Section
1102 Q Street, Suite 5100
Sacramento, Ca. 95814

re: Draft Environmental Impact Report for the Draft Management Plan for the California
Department of Forestry and Fire Protection's Historic Buildings and Archaeological Sites

Dear Ms. Sosa;

Thank you for including the Northwest Information Center in the environment review process
for the proposed project. We examined the above-referenced document and due to the high to
moderate sensitivity of the areas being considered this office is recommending a project by
project evaluation.

RLA-1-1

Thank you for our continued concern for protecting our historical heritage.

Sincerely,

K. Thorne
Record Search Coordinator for
Leigh Jordan, M.A.
Coordinator

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FEB 27 2001

GENERAL SERVICES
REAL ESTATE SERVICES DIVISION
Director

COMMUNITY DEVELOPMENT DEPARTMENT

BUILDING AND SAFETY - CODE COMPLIANCE - FIRE PREVENTION - PLANNING



48 W. Yaney, Sonora
Mailing: 2 S. Green Street
Sonora, CA 95370
(209) 533-5633
(209) 533-5616 (fax)

February 22, 2001

RLA-2

Attn: Maria Sousa, Environmental Project Mgr.
Department of General Services
Real Estate Services Division
1102 Q Street, Suite 5100
Sacramento, CA 95814

RE: Draft Environmental Impact Report for the CDF Management Plan for Historical Buildings and Archaeological Sites

Dear Ms. Sousa:

Thank you for providing this opportunity to comment on the Draft Environmental Impact Report for the CDF Management Plan for Historical Buildings and Archaeological Sites. We note that Table 2 of the CDF Management Plan for Historical Buildings and Archaeological Sites sent to our office on January 8, 2001, as part of this review lists only a lookout, residence and residential garage at the Rushing Mountain Fire Lookout Station as significant cultural resources located within Tuolumne County under CDF jurisdiction. However, CDF also has fire stations and/or lookout facilities at Twain Harte, Columbia, Sonora, Green Springs, Lake Don Pedro (Blanchard), Penon Blanco (on the County line with Mariposa County) and Groveland in Tuolumne County. Of these resources, the Columbia Air Attack Base, Sonora Forestry and Fire Station, Penon Blanco Lookout and Groveland Forestry and Fire Station were also evaluated in 1994, and it was found that the Columbia Tower and Sonora Station were not eligible for the National Register of Historic Places, but that buildings at the Groveland Forestry and Fire Station may become eligible for the National Register of Historic Places and the Penon Blanco Lookout is eligible for the National Register of Historic Places. We wonder if the other resources at Twain Harte, Green Springs, and Lake Don Pedro (Blanchard) were also evaluated for cultural resource significance, since no mention is made of these resources.

RLA-2-1

We also note that there was no mention in the Draft Environmental Impact Report of the individual status of the resources in Tuolumne County under the California Register of Historical Resources. We also note that the evaluations under the National Register criteria for these resources were done for CDF's Management Plan six years ago, in 1994, prior to the adoption of the California Register of Historical Resources. However, the project description notes that only 78 of CDF's evaluated resources were also eligible for the California Register of Historical Resources. When were those evaluations done?

RLA-2-2

The basis for deciding the significance of these resources, under both the National Register of Historic Places and the California Register of Historical Resources, may be outdated at this time, since some of the evaluated resources have subsequently become eligible for either the National Register of Historic Places or California Register of Historical Resources, as noted in Section 2.6.2 of the Draft Environmental Impact Report. Section 2.6.3 of the Draft Environmental Impact Report proposes to re-evaluate CDF's resources every 10 years because of the large size of the project

RLA-2-3

area. However waiting until 2010 as proposed would be 16 years since the evaluations were done in 1994, not ten years.

The project description provided to this office states that the CDF Management Plan identified 86 significant historic buildings, but proposes to preserve only 29 of its significant historic buildings. Yet none are proposed to be saved in Tuolumne County. The Rushing Mountain and Penon Blanco facilities were determined eligible for the National Register of Historic Places and it was determined in 1994 that the buildings at the Groveland Forestry and Fire Station may become eligible for the National Register of Historic Places, but these buildings were not proposed to be preserved by CDF's Management Plan. Those CDF resources located on County owned or private lands within Tuolumne County should be processed to be consistent with Chapter 9 (Cultural Resources Management) of the Tuolumne County General Plan, which is implemented in Title 14 of the Tuolumne County Ordinance Code, and which call for the conservation of this County's significant historic buildings and archaeological sites. The Rushing Mountain facilities are on private property and the Columbia Air Attack Base is on County property, both are on County jurisdictional lands. The proposed CDF Management Plan, therefore, seems to be in conflict with our County General Plan. The only alternative proposed that would be consistent with the Tuolumne County General Plan, is Alternative 1 (full preservation of all significant historical resources).

RLA-2-4

If more than 60 percent of CDF's identified significant historic buildings are not to be retained statewide, the rarity of the remaining CDF buildings will increase with the expected attrition. CDF should, therefore, re-evaluate the significance of all of its buildings by 2004 (ten year span), for changes in priority status under the criteria of the California Register of Historical Resources and National Register of Historic Places. If the 2004 re-evaluation shows the status of additional facilities are elevated to a significant level, then the CDF Management Plan should be revisited at that time and additional historical resources should be conserved in 2004 as part of the CDF Management Plan, even if they were not originally inventoried as significant or potentially significant in 1994.

RLA-2-5

The CDF Management Plan should be revised to require that prior to any demolition of an historic historical resource 50 years old or older, CDF must have the rarity status of that resource re-evaluated based on the extant inventory of CDF buildings and facilities on the date of the proposed demolition, since it is likely that the rarity of the remaining CDF resources will increase with the expected attrition of the existing structures. If that pre-demolition re-evaluation raises the status of the building or facility to a level of significance (1, 2 or 3), then every effort should be made to preserve that historical resource.

RLA-2-6

Also, we note that there is no apparent listing of other historic CDF properties within the buildings to be conserved, such as antique fire safety equipment, antique furnishings, relics, historic records and documents. These should also be addressed in the proposed Management Plan and its Draft Environmental Impact Report.

RLA-2-7

If you would like to discuss the issues raised in this letter, please contact me at the Tuolumne County Planning Division at (209) 533-5633. Thank you again for this opportunity to comment.

Respectfully,



Robin Wood, AICP, Senior Planner

RLA-3

February 28, 2001

Maria C. Sosa, Senior Environmental Planner
State of California
General Services - Real Estate Services Division
1102 Q Street, Suite 5100
Sacramento, CA 95814

Dear Ms. Sosa:

Re: Draft Environmental Impact Report for the Draft Management Plan for the California Department of Forestry and Fire Protection's Historic Buildings and Archaeological Sites

The Fresno County Historic Landmarks & Records Advisory Commission (HLRC) did review the EIR at its January 2001 meeting. While there were no concerns raised at that meeting to file within the public comment period, the HLRC wishes to make you aware that it does maintain a Fresno County List of Historic Places. Should your department be interested in placing any of its historic sites on the list, we would be happy to consider an application.

RLA-3-1

RLA-3-2

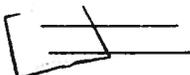
RLA-3-3

Sincerely,


John K. Kallenberg, Secretary
Fresno County Historic Landmarks
& Records Advisory Commission

JKK/em

Enclosure



RECEIVED

JAN 30 2001

**GENERAL SERVICES
REAL ESTATE SERVICES DIVISION**

January 25, 2001

Maria C. Sosa, Senior Environmental Planner
Department of General Services/Real Estate Services Division
Professional Services Division/Environmental Services Section
1102 Q Street, Suite 5100
Sacramento, CA 95814

O-1

SUBJECT: CDF HISTORICAL BUILDINGS AND ARCHAEOLOGICAL SITES

Dear Maria,

I would like to thank you for allowing me the privilege of participating in the public capacity regarding the draft for the Management Plan of CDF's Historical Buildings and Archaeological Sites. The facilities and sites considered for preservation are a vital part of California's history.

As a volunteer for the Fire Lookout Host Program on the Angeles and San Bernardino National Forests (USFS) and as a member of the Forest Fire Lookout Association, I am committed to promoting awareness, importance and preservation of fire lookouts. Since that is my "forte", I feel I can only comment on this portion of the draft.

It's exciting that 10 lookouts are included in the management plan for restoration and preservation. As California continues to succumb to constant growth in population and as urban interface slowly entwines into the foothills and mountains, regardless of today's technology, fire lookouts still play a vital role in fire management and public education when staffed.

I am bothered, however, that under this proposal, 14 lookouts weren't considered. However, understanding the significance of accessibility it is clear why the few targeted in the Plan were chosen. On a positive note, it's good to know that the other sites can be transferred to other organizations for management.

O-1-1

Two of the lookouts listed (Chalone Peak Lookout and Cold Spring Lookout), are being considered for removal to fairgrounds. This is a great way to share the lookouts with the general public who may never get the chance to visit a lookout in the mountains. CDF should consider negotiating with the California State Fairgrounds in Sacramento to add a lookout to the Camp Smokey area. I can tell you from personal experience that the general public is not only fascinated with lookouts, but very interested in their historical significance as well. Members of our program were invited to participate at the State Fair last year and it was very successful. We set up an Osborne Fire Finder which we used interactively with the public as well as a display of pictures of our southern California lookouts. Though people were receptive to our program, they wanted to know more about the lookouts in their area or about ones that they had perhaps hiked to when they were younger. Unfortunately, at the time we didn't have that information. We are currently working on a project for the 2001

O-1-2

January 25, 2001

State Fair, showing a map and listing all fire lookouts existing in California. This would be a great opportunity for both CDF and USFS to bring more awareness to these historical lookout sites.

The success of this Management Plan will play an important role in future historical and restoration sites as they become eligible.

On behalf of the Fire Lookout Host Program, we support the Management Plan.

O-1-3

Sincerely,

A handwritten signature in black ink, appearing to read 'Angela Moebius', with a long horizontal flourish extending to the right.

Angela Moebius
USFS Fire Lookout Host Program
Angeles/San Bernardino National Forests

www.sbnfa.org

O-2

February 23, 2001

Maria C. Sosa
Department of General Services
Real Estate Services Division
Professional Services Branch
Environmental Services Section
1102 Q Street, Suite 5100
Sacramento, CA 95814

Re: Draft EIR for the Draft Management Plan for CDF Historic Buildings and Arch. Sites

Dear Ms. Sosa:

Thank you for sending me the Draft EIR and Draft Management Plan so promptly. I spent some time reviewing both documents with interest. The Forest Fire Lookout Association and myself are very interested in the preservation of the remaining fire lookouts. We would prefer that the lookouts remain in place being staffed or included in a rental program, with as a last resort being moved to another site. I found no mention in the historical narrative of the lookouts and feel that they serve an important part of CDF history.

O-2-1

O-2-2

The lookouts I am most familiar with in the North Coast Region were (some of them) included in the Draft Management Plan but not in the EIR. I am hoping that is due to the fact that they are staffed sites with no anticipated changes. There are several sites that should have been included in the Draft Management Plan and were not, Iron Peak in the Mendocino Ranger Unit and Red Mountain in Humboldt Ranger Unit.

O-2-3

O-2-4

The Draft EIR did not state which individual lookouts were included nor which were to be considered reserved or demolished. I strongly feel that the lookouts which are not reserved can be considered for transfer to local groups for care and rental rather than not saved. The Forest Fire Lookout Association has been very successful in helping with partnerships and Memorandum of Understanding's and I will be happy to extend all the help I can give to you. You may contact me at work at 707-983-6118

O-2-5

O-2-6

Sincerely,

Marie Green Hall
Forest Fire Lookout Association
78150 Covelo Rd.
Covelo, CA 95428