USDA
United States Department of Agriculture

January 30, 2024

Alex Watts-Tobin, Tribal Historic Preservation Officer
Karuk Tribe
PO Box 282
Orleans, CA, 95556

Via email: atobin@karuk.us

RE: Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California, and Klamath County, Oregon

Dear Alex Watts-Tobin:

The Natural Resources Conservation Service California (NRCS) wishes to initiate consultation with you pursuant to 36 CFR § 800.3(f)(2) regarding the proposed Tulelake Irrigation District Modernization Project. The Tulelake Irrigation District (TID) has applied to the NRCS for funding assistance through the NRCS Watershed Flood Prevention and Operations (WFPO) Program, the purpose of which is to protect and restore America's watersheds. Information about the WFPO program can be found on our website at https://www.nrcs.usda.gov/programs-initiatives/watershed-and-flood-prevention-operations-wfpo-program.

The expenditure of federal funds for WFPO Program projects is an undertaking subject to review under the National Historic Preservation Act (Title 54 USC 306108) of 1966, as amended. Section 106 of the Act requires federal agencies to take into consideration the effects of undertakings on historic properties listed in or eligible for listing in the National Historic Register of Historic Places pursuant to 36 CFR § 800 Protection of Historic Properties.

The TID Modernization Project would automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and upgrading pumps that convey irrigation water through the system. SCADA automation equipment would be installed at up to 79 locations on irrigation canals, and pump upgrades would take place at up to 28 locations on irrigation canals. Attached you will find a project description of these proposed activities (Attachment 1) and two maps, one showing the location of the proposed SCADA and pump upgrade activities (Attachment 2), and one illustrating the NRCS's proposed area of potential effects (APE) for Section 106 review of this undertaking pursuant to 36 CFR 800.4(a) (Attachment 3). The map in Attachment 3 also shows the general location and type of known cultural resources relative to the APE according to records on file with the California and Oregon State Historic Preservation Offices as of August 2023:

State	Primary	Resource Type
CA	P-25-000035	Pre-Contact
CA	P-25-000122	Pre-Contact
CA	P-25-000185	Pre-Contact
CA	P-25-002653	Pre-Contact
CA	P-47-000002	Pre-Contact

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CA	P-47-000215	Pre-Contact
CA	P-47-000216	Pre-Contact
CA	P-47-000233	Pre-Contact/Unknown
CA	P-47-001491	Pre-Contact
OR	35-KL-03627	Pre-Contact
OR	35-KL-03628	Pre-Contact
OR	35-KL-03629	Historic
OR	35-KL-03630	Historic
OR	35-KL-03626	Historic

The NRCS would like to know if you wish to share information with us about potential impacts to historic properties of cultural or religious significance that you feel could be affected by the proposed project. The NRCS is committed to addressing your concerns. We respectfully request that you respond within 30 days of receipt of this letter if you wish to consult with the NRCS about this project. If so, please contact me at Christopher.Null@usda.gov, or (530) 792-5621.

Thank you for your helping the NRCS protect California's important cultural resources.

Sincerely,



CHRISTOPHER NULL
State Archaeologist, NRCS CA – Davis

Attachment 1: Tulelake Irrigation District Modernization Project Description - Proposed SCADA Activities
Attachment 2: Map of proposed TID Modernization Project locations
Attachment 3: Proposed NRCS Section 106 Review APE map for the TID Modernization Project

cc: Michael Petrozza, State Archaeologist, NRCS OR – Portland
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis
Ernesto De La Riva, State Conservation Engineer, NRCS CA – Davis

United States Department of Agriculture

January 29, 2024

Robert Burkybile, Chief
Modoc Nation
29718 State Hwy 299 E
Canby, CA, 96015

RE: Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California, and Klamath County, Oregon

Dear Chief Burkybile:

The Natural Resources Conservation Service California (NRCS) wishes to initiate consultation with you pursuant to 36 CFR § 800.3(f)(2) regarding the proposed Tulelake Irrigation District Modernization Project. The Tulelake Irrigation District (TID) has applied to the NRCS for funding assistance through the NRCS Watershed Flood Prevention and Operations (WFPO) Program, the purpose of which is to protect and restore America's watersheds. Information about the WFPO program can be found on our website at https://www.nrcs.usda.gov/programs-initiatives/watershed-and-flood-prevention-operations-wfpo-program.

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The TID Modernization Project would automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and upgrading pumps that convey irrigation water through the system. SCADA automation equipment would be installed at up to 79 locations on irrigation canals, and pump upgrades would take place at up to 28 locations on irrigation canals. Attached you will find a project description of these proposed activities (Attachment 1) and two maps, one showing the location of the proposed SCADA and pump upgrade activities (Attachment 2), and one illustrating the NRCS's proposed area of potential effects (APE) for Section 106 review of this undertaking pursuant to 36 CFR 800.4(a) (Attachment 3). The map in Attachment 3 also shows the general location and type of known cultural resources relative to the APE according to records on file with the California and Oregon State Historic Preservation Offices as of August 2023:

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CA	P-47-000215	Pre-Contact

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CA	P-47-000216	Pre-Contact
CA	P-47-000233	Pre-Contact/Unknown
CA	P-47-001491	Pre-Contact
OR	35-KL-03627	Pre-Contact
OR	35-KL-03628	Pre-Contact
OR	35-KL-03629	Historic
OR	35-KL-03630	Historic
OR	35-KL-03626	Historic

The NRCS would like to know if you wish to share information with us about potential impacts to historic properties of cultural or religious significance that you feel could be affected by the proposed project. The NRCS is committed to addressing your concerns. We respectfully request that you respond within 30 days of receipt of this letter if you wish to consult with the NRCS about this project. If so, please contact me at Christopher.Null@usda.gov, or (530) 792-5621.

Thank you for your helping the NRCS protect California's important cultural resources.

Sincerely,



CHRISTOPHER NULL
State Archaeologist, NRCS CA – Davis

Attachment 1: Tulelake Irrigation District Modernization Project Description - Proposed SCADA Activities
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cc: Michael Petrozza, State Archaeologist, NRCS OR – Portland
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis
Ernesto De La Riva, State Conservation Engineer, NRCS CA – Davis

USDA United States Department of Agriculture

January 29, 2024

Richard Lash
Chairperson
Cedarville Rancheria of Northern Paiute Indians
300 West 1st Street
Alturas, CA, 96101

Via email: cedranch@citlink.net

RE: Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California, and Klamath County, Oregon

Dear Chairperson Lash:

The Natural Resources Conservation Service California (NRCS) wishes to initiate consultation with you pursuant to 36 CFR § 800.3(f)(2) regarding the proposed Tulelake Irrigation District Modernization Project. The Tulelake Irrigation District (TID) has applied to the NRCS for funding assistance through the NRCS Watershed Flood Prevention and Operations (WFPO) Program, the purpose of which is to protect and restore America's watersheds. Information about the WFPO program can be found on our website at https://www.nrcs.usda.gov/programs-initiatives/watershed-and-flood-prevention-operations-wfpo-program.

The expenditure of federal funds for WFPO Program projects is an undertaking subject to review under the National Historic Preservation Act (Title 54 USC 306108) of 1966, as amended. Section 106 of the Act requires federal agencies to take into consideration the effects of undertakings on historic properties listed in or eligible for listing in the National Historic Register of Historic Places pursuant to 36 CFR § 800 Protection of Historic Properties.

The TID Modernization Project would automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and upgrading pumps that convey irrigation water through the system. SCADA automation equipment would be installed at up to 79 locations on irrigation canals, and pump upgrades would take place at up to 28 locations on irrigation canals. Attached you will find a project description of these proposed activities (Attachment 1) and two maps, one showing the location of the proposed SCADA and pump upgrade activities (Attachment 2), and one illustrating the NRCS's proposed area of potential effects (APE) for Section 106 review of this undertaking pursuant to 36 CFR 800.4(a) (Attachment 3). The map in Attachment 3 also shows the general location and type of known cultural resources relative to the APE according to records on file with the California and Oregon State Historic Preservation Offices as of August 2023:

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CA	P-25-000185	Pre-Contact
CA	P-25-002653	Pre-Contact

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CA	P-47-000002	Pre-Contact
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OR	35-KL-03628	Pre-Contact
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OR	35-KL-03630	Historic
OR	35-KL-03626	Historic

The NRCS would like to know if you wish to share information with us about potential impacts to historic properties of cultural or religious significance that you feel could be affected by the proposed project. The NRCS is committed to addressing your concerns. We respectfully request that you respond within 30 days of receipt of this letter if you wish to consult with the NRCS about this project. If so, please contact me at Christopher.Null@usda.gov, or (530) 792-5621.

Thank you for your helping the NRCS protect California's important cultural resources.

Sincerely,

CHRISTOPHER NULL
State Archaeologist, NRCS CA – Davis

Attachment 1: Tulelake Irrigation District Modernization Project Description - Proposed SCADA Activities
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cc: Michael Petrozza, State Archaeologist, NRCS OR – Portland
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis
Ernesto De La Riva, State Conservation Engineer, NRCS CA – Davis

USDA
United States Department of Agriculture

June 29, 2026

Russell Attebery
Chairman
Karuk Tribe
PO Box 1016
Happy Camp, CA, 96039

Via email: battebery@karuk.us

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Attebery:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal

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Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies

and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

References cited:

Parametrix. 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*. Prepared for Farmers Conservation Alliance by Parametrix, Puyallup, Washington. February 2026.

Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Yatch Bamford
Chairman
Pit River Tribe of California
36970 Park Ave
Burney, CA, 96013

Via email: chairman@pitrivertribe.org; ta@pitrivertribe.org

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Bamford:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

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As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal

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Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

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The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies

and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

References cited:

Parametrix. 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*. Prepared for Farmers Conservation Alliance by Parametrix, Puyallup, Washington. February 2026.

Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Harold Bennett
Chairperson
Quartz Valley Indian Community
13601 Quartz Valley Road
Fort Jones, CA, 96032

Via email: tribalchairman@qvir-nsn.gov

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairperson Bennett:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze

Natural Resources Conservation Service
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potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

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Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Janice A. Crow
Chairman
Shasta Indian Nation
PO Box 195 Macdoel, OR 96058

Via email: chairman@shastaindiannation.org

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Crow:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section

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106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering

features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District

The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

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Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Phillip Del Rosa
Chairman
Alturas Rancheria of Pit River Indians
104 Arnold Lane Medford, OR 97501

Via email: air530@yahoo.com

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Del Rosa:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section

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106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

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Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering

features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

References cited:

Parametrix. 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*. Prepared for Farmers Conservation Alliance by Parametrix, Puyallup, Washington. February 2026.

Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Clayton Dumont
Chairman
Klamath Tribe
P.O. Box 436
Chiloquin, OR, 97624

Via email: christina.rubidoux@klamathtribes.com

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Dumont:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze

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potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District
The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

References cited:

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Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Natalie Forrest-Perez
Tribal Historic Preservation Officer
Pit River Tribe of California
36970 Park Ave
Burney, CA, 96013

Via email: THPO@pitrivertribe.org

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Ms.Forrest-Perez:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze

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potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District
The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

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Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Cindy Hogue
Secretary Councilwoman
Wintu Tribe of Northern California
P.O. Box 732
Anderson, CA, 96007

Via email: wintu.tribe1@gmail.com

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Secretary Councilwoman Hogue:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

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As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal

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Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

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Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies

and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

References cited:

Parametrix. 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*. Prepared for Farmers Conservation Alliance by Parametrix, Puyallup, Washington. February 2026.

Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

USDA
United States Department of Agriculture

June 29, 2026

Carla Keene
Chairman
Cow Creek Band of Umpqua Indians
2371 N.E. Stephens Suite 100, Roseburg, OR, 97470-1399

Via email: CKeene@cowcreek-nsn.gov

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairman Keene:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section

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106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering

features and association with federal reclamation efforts to develop agriculture in Oregon and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis

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Attachments:

Attachment A: Bureau of Reclamation letter dated April 27, 2026, designating NRCS Lead Federal Agency (BOR #24-KBAO-006); US Fish and Wildlife Service letter dated September 22, 2023, designating NRCS Lead Federal Agency.

Attachment B: Parametrix 2026. *Cultural Resources Assessment for the Tulelake Irrigation District Infrastructure Modernization Project – Klamath County, Oregon, Siskiyou County and Modoc County, California*

Attachment C: Proposed Tule Lake Historic District - DPR523A form

United States Department of Agriculture

June 29, 2026

Richard Lash
Chairperson
Cedarville Rancheria of Northern Paiute Indians
300 West 1st Street
Alturas, CA, 96101

RE: Continued Section 106 Consultation for the Natural Resources Conservation Service Tulelake Irrigation District Modernization Project in Modoc and Siskiyou counties, California and Klamath County, Oregon – notice of *no adverse effect to historic properties*

Dear Chairperson Lash:

The Natural Resources Conservation Service California State Office (NRCS) is continuing consultation with you regarding the Tulelake Irrigation District Modernization Project. The NRCS plans to provide technical and financial assistance to the project Sponsor, Tulelake Irrigation District (TID), through the NRCS Watershed Protection and Flood Prevention Operations (WFPO) program. We previously communicated with you regarding this undertaking on January 30, 2024, and March 11, 2024. This letter and attached documentation is provided in support of our finding of *no adverse effect to historic properties* pursuant to 36 CFR § 800.5(b).

The TID Modernization project is a multi-agency undertaking between the NRCS, the Bureau of Reclamation (BOR), and the US Fish and Wildlife Service (USFWS). Pursuant to Stipulation IV.a of the NRCS Programmatic Agreement, the NRCS has been designated the LFA for the TID Modernization Project as documented in Attachment A of this letter (BOR letter dated April 27, 2026 [B24-KBAO-006]; USFWS letter dated September 22, 2023).

Description of the Undertaking

The purpose of the TID Modernization Project is to automate manual water control features within the TID system by installing Supervisory Control and Data Acquisition (SCADA) instrumentation along TID canals and laterals, upgrading pumping stations and debris screens that convey irrigation water through the system, and adding power sources to SCADA equipment locations lacking a current power source. As planned, the upgrades will be implemented throughout the TID system at approximately 146 individual, discontiguous locations.

Coordination with the National Environmental Policy Act (NEPA)

As required by NRCS WFPO policy, the Sponsor is preparing a Plan-Environmental Assessment (Plan-EA) document pursuant to the National Environmental Policy Act (NEPA) to analyze potential impacts to cultural and historic resources from the No Action (Project without Federal Funding) and the Modernization Project alternatives. The Plan-EA will fulfill the NRCS's Section 106 review public participation responsibilities consistent with 36 CFR § 800.2(d)(3) in

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accordance with NEPA regulations and NRCS policy at Title 390, Part 500. The draft and final Plan-EA documents will be available for comment on the NRCS California website at https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/california/environmental-compliance-notices.

Area of Potential Effects (APE) Determination

Determination of an appropriate APE was coordinated with NEPA scoping efforts and resulted in development of a cultural resources workplan to guide archaeological and historic built environment identification. The Sponsor's cultural resources consultant, Parametrix, developed the workplan in accordance with a scope of work provided by the NRCS and coordinated with the BOR and USFWS who have jurisdiction over lands where some project activities are proposed. The workplan is included in the technical report (Parametrix 2026) attached to this letter (Attachment B) and includes maps of known cultural resources identified through a search of the California Historical Research Information System (CHRIS) and Oregon Archaeological Records Remote Access (OARRA) and Historic Sites Database as of August 2023.

Scoping and background research for the workplan resulted in the NRCS, as LFA and in consultation with the BOR and USFWS, defining the area of potential effects (APE) for this undertaking as 146 discontiguous locations, each with a 100-foot buffer, where the proposed SCADA equipment installations, pump upgrades, and power source installations for the Modernization Project are located, for an assessment of direct and indirect effects. The proposed APE is documented in the attached technical report (Parametrix 2026:Figures 2.1-2.18) (see Attachment B). Equipment transport and assembly, and construction staging, will utilize existing TID access roads and maintenance areas and are excluded.

Historic Properties Identification and Evaluation

The technical report prepared by the Sponsor's consultant Parametrix (2026) has been reviewed by the NRCS in accordance with 36 CFR § 800.2(a)(3) (see Attachment B). The report documents the results of background research, literature review, historic map review, and pedestrian survey of the APE, with identified resources evaluated for National Register of Historic Places (NRHP) eligibility. These include the historical infrastructure components of the TID system which will be modified for the undertaking and some of which are recommended as contributing resources of the Klamath Project Historic District (KPHD), discussed fully in the report.

The following resources were identified in or adjacent to the APE. All are fully discussed and evaluated in the technical report in Attachment B (Parametrix 2026) except for the Tule Lake Historic District (TLHD), a multi-component historic district identified herein by the NRCS through consultation and review of the technical report findings and treated as eligible for listing in the NRHP. Two archaeological resources, a lithic scatter and isolated artifact, also documented in the report, will be avoided by the undertaking and are not discussed below.

Klamath Project Historic District

The Klamath Project Historic District is an inter-state irrigation project that has been historically treated as eligible for listing in the NRHP by consensus by federal agencies and the Oregon and California SHPOs under criteria A and C for its for its engineering features and association with federal reclamation efforts to develop agriculture in Oregon

and California. The TID system is an integral part of the KPDH with many of its components evaluated as contributing resources of the district.

Tule Lake National Monument
The Tule Lake National Monument is comprised of the Tule Lake Segregation Center NHL and Camp Tule Lake, historical resources associated with the internment of American citizens during World War II. Agricultural parcels within the TID system are within the historical footprint of Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
Two of the TID system pumps that would be modernized for the undertaking are located within the boundary of the Lower Klamath National Wildlife Refuge. The Refuge is a national historic landmark established by President Theodore Roosevelt in 1908 as the Nation's first waterfowl refuge.

Tule Lake Historic District
The NRCS identified the Tule Lake Historic District through review of background research and reporting for the undertaking (e.g., Parametrix 2026) and the Agency's Native American consultation effort. The Tule Lake Historic District is a multi-component, multi-state district representing the deep and complex cultural history of former Tule Lake and vicinity. The district is geographically bounded by the former lakebed at approximately 4050 feet amsl and centered on the Tule Lake Irrigation District which spans California and Oregon. Archaeological and historic contributing resources present within the district include Petroglyph Point Archaeological District and Modoc Lava Beads Archaeological District; the Tule Lake National Monument; the Lava Beds National Monument; the Lower Klamath National Wildlife Refuge; the Klamath Project; and a possible Traditional Cultural Property/Place important to Native Americans. Significant historical events form the historic context of the district and include pre-and post-Contact indigenous use of Tule Lake; the 1872-73 armed conflict between the Modoc Nation and United States Army referred to as the Modoc War; the internment of Japanese Americans during World War II at Camp Tulelake and establishment of the Tule Lake Segregation Center; and the era of reclamation and federal irrigation/water management efforts beginning in 1902 and leading to construction of the Klamath Project, developed and operated by the U.S. Bureau of Reclamation, of which the Tule Lake Irrigation District is part.

For the purposes of this undertaking, the NRCS elects to treat the TLHD as eligible for listing in the NRHP under criterion A for its association with important events in California history. The proposed TLHD is documented herein as Attachment C; note that it is not included in the inventory of cultural resources presented in the technical report provided in Attachment B (Parametrix 2026).

Assessment of Effects to Historic Properties

The has reviewed and agrees with the recommended assessment of effects from the proposed undertaking documented in the technical report (Attachment B, Parametrix 2026), summarized below. The NRCS has considered the views of consulting parties in its assessment of effects.

Klamath Project Historic District
The NRCS has determined that the proposed TID system modifications installation of SCADA equipment and power sources, and pump station upgrades, would not alter, directly or indirectly, the characteristics that make the KPHD eligible for listing in the NRHP under criteria A and C.

Tule Lake National Monument
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Tule Lake Segregation Center NHL or Camp Tule Lake.

Lower Klamath National Wildlife Refuge NHL
The NRCS has taken into consideration the special protections afforded National Historic Landmarks pursuant to 36 CFR § 800.10 and has determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, any of the characteristics or historical significance of the Refuge.

Tule Lake Historic District
The NRCS has applied the criteria of adverse effect from the undertaking to the proposed TLHD which the NRCS elects to treat as eligible for listing in the NRHP under criterion A and determined that the proposed TID system modifications (SCADA and power source installations, pump station upgrades) would not alter, directly or indirectly, the TLHD's ability to convey its association with the historical events represented by the contributing resources of the district.

Request for Concurrence - No Adverse Effect to Historic Properties

Based on our review of the undertaking, the NRCS proposes a finding of *no adverse effect to historic properties*. We respectfully request that you convey any comment on the finding of effect to us within 30 calendar days of receipt of this letter. Please don't hesitate to contact me with any questions or concerns by phone at (530) 792-5621 or email at Christopher.Null@usda.gov. Thank you for helping the NRCS protect California's important cultural resources.

Sincerely,

CARLOS SUAREZ
State Conservationist, NRCS CA – Davis

cc: Christoper Null, State Archaeologist, NRCS CA – Davis
Jon Gustafson, State Resource Conservationist, NRCS CA – Davis
Denise de Joseph, WFPO Cultural Resources Specialist, NRCS CA – Davis