

March 2, 2026

Zac Quentmeyer, Deputy Public Works Director
City of Grass Valley
125 E. Main Street
Grass Valley, CA 95945

Subject: Revised Scope and Budget Augmentation Request to Provide a Cultural Resource Report for the Memorial Park Magenta Drain Restoration Project

Dear Zac Quentmeyer:

Dudek initially provided a proposal for a streamlined project delivery for the Memorial Park Magenta Drain Restoration project. The original scope of work assumed that the project would be exempt from the California Environmental Quality Act (CEQA) under the Statutory Exemption for Restoration Projects (SERP) process through the California Department of Fish and Wildlife (CDFW) and that the project would have no impacts to aquatic resources under the jurisdiction of the U.S. Army Corps of Engineers (USACE). Under these assumptions, the project would not require a cultural resources assessment because without a federal permit, i.e., a Clean Water Act permit from the USACE, the project would not be subject to the requirements of the National Historic Preservation Act and the use of a CEQA Statutory Exemption only requires that a lead agency demonstrate that a project is consistent with the criteria for that exemption.

However, as discussed during our meeting on January 8th, 2026 and during our pre-application meeting on February 19th, 2026, USACE has claimed jurisdiction over the Magenta Drain, and thus a USACE Clean Water Act permitting process is required. A cultural resources assessment meeting the requirements of Section 106 of the National Historic Preservation Act is a critical component of the USACE Clean Water Act permitting process. Given that the cultural resources assessment is required for the USACE permitting, we recommend an alternate pathway for CDFW permitting under the Habitat Restoration and Enhancement Act (HREA). This process is faster and more cost-effective than the SERP process, but it requires use of the CEQA Class 33 Categorical Exemption for Small Habitat Restoration Projects. Use of a Categorical Exemption instead of a Statutory Exemption also requires a cultural resources assessment.

Thus, to meet the requirements of the Clean Water Act permitting through USACE and the CEQA Class 33 Categorical Exemption requirements to support the HREA process, we propose to conduct the following cultural resources investigation and analysis tasks.

Scope of Services

Task 5.2.1 Archaeological Resources Inventory

Inventory

Dudek will conduct a records search for the full project boundary and a half-mile radius around the boundary at the North Central Information Center to obtain information on previously recorded cultural resources and

investigations. We anticipate direct costs for the records search to be no more than \$1,500 and that this search may require up to 6-8 weeks to return results.

We will also initiate correspondence with the Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File for any known Native American resources identified within the project site. As part of the results of this search, the NAHC will provide a Contact List of tribal individuals and organizations that may have additional information concerning resources in the vicinity. Dudek assumes that Native American coordination and/or consultation pursuant to Assembly Bill (AB) 52 will be completed by the City.

Following archival research, Dudek will complete an intensive pedestrian survey of the project site. This is anticipated to take one archaeologist a single 8-hour day of fieldwork, including travel time. It is assumed that the project survey area will not exceed 2 acres and that access will be arranged by the City prior to survey for any portions of the survey area that are not publicly accessible. For the purposes of this scope, Dudek assumes that no new archaeological resources will be identified. Dudek also assumes that no previously recorded archaeological resources will require updated documentation or evaluation. We assume that if any tribes request for a Native American monitor to be present during our field survey, any associated costs will be the responsibility of the City. It is our understanding that the City will be responsible for all communication and consultation with Native American tribes pursuant to the requirements of AB 52. For Section 106 compliance, Dudek will conduct Tribal outreach in coordination with the City to ensure no conflict with the CEQA AB 52 process.

Deliverables:

- Information Center Records Search
- NAHC Sacred Lands File search

Assumptions:

- Total survey area will not exceed 2 acres.
- No residual hazardous materials are present within the project site that would be disturbed or require removal.
- Native American coordination and/or consultation pursuant to Assembly Bill (AB) 52 will be completed by the City.

Cost for Task 5.2.1 **\$5,984.00**

Task 5.2.2 Built Environment Resources Research and Inventory

This scope of work includes tasks to complete the inventory and evaluation of historic built environment resources in conformance with the California Environmental Quality Act (CEQA), Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act, and all applicable local municipal guidelines and regulations.

Records Search Review and Background Research: Dudek built environment cultural resources staff will review the CHRIS records search that will be completed at the North Central Information Center (NCIC) as part of the Archaeological Resource Inventory task. The purpose of the records search is to identify any previously recorded historic built environment resources that may be located within the study area. As part of this task, Dudek will conduct background research to develop an appropriate historic context to evaluate the significance of historic

resources identified within the study area. Dudek assumes that the City will share information about the history of the park and the built resources within it. Dudek will also coordinate with local historical societies, advocacy groups/stakeholders who may have information on the historic resources within the study area. This coordination will include limited outreach via emails and phone calls concerning resources in the area. No follow-up phone calls or in-person meetings are included in this task.

Area of Potential Effects Map and Survey: Upon completion of the records search review, Dudek will delineate an area of potential effects (APE) map in accordance with Section 106 regulations and USACE federal permitting requirements. The map will consider project related potential direct and indirect effects on any historic properties within the APE. Dudek will prepare up to 3 versions of the APE map (2 drafts and 1 final) for review and approval by the USACE. Following approval of the APE map, Dudek qualified staff will conduct an intensive-level field survey to record historic era, built resources (45 years of age or older) in the APE. Dudek assumes that the only built environment resource that will require inventory and evaluation is the Magenta Drain channel. The field survey will be conducted by Dudek qualified staff as part of the archaeological survey.

Deliverables:

- Historical society outreach
- Up to 3 versions of the APE map (2 drafts and 1 final) for review and approval by the USACE

Assumptions:

- The APE will include the four APNs that comprise Memorial Park as well as five individual features within the park.
- The field survey will require two specialists working no more than one 8-hour field day.
- The City will share information about the history of the park and the built resources within it.
- Resources within the APE can be documented from publicly accessible areas.

Task 5.2.3 Cultural Resources Inventory and Evaluation Report

Dudek will prepare a Cultural Resources Inventory and Evaluation Report that will summarize the results of the survey, research, and property significance evaluations for both archaeology and built environment using the USACE Section 106 report template. Dudek assumes that the cultural resources technical report prepared for the USACE will be sufficient to support the findings in the CEQA document.

The report will include a project description, regulatory framework, all sources consulted, research and field methodology, and recommendations for appropriate management. We assume no more than three (3) versions of the APE map and the report will be required.

A schedule for project deliverables will be determined upon notice to proceed, but generally we require 8-10 weeks to prepare a technical report. Should the USACE require additional resources be included in the APE and evaluated, a budget augment will be required. Should the technical report find that there are historic properties in the APE, Dudek can prepare a Section 106 Finding of Effect report in accordance with 36 CFR § 800.5(a). A revised scope of work and budget augment will be submitted at that time.

Deliverables:

- Draft, revised and final Cultural Resources Inventory and Evaluation Report meeting CEQA and Section 106 standards
- DPR Forms

Assumptions:

- The project would not cause a substantial adverse change in the significance of any historical resources; thus, a Section 106 Finding of Effect report will not be required.
- No new archaeological resources will be identified.
- No previously recorded archaeological resources will require updated documentation or evaluation.

Cost for Tasks 5.2.2 and 5.2.3 **\$11,910.00**
TOTAL COST **\$17,894.00**

Please reach out with any questions regarding the scope and budget augmentation request. Dudek is excited to keep advancing the Memorial Park Magenta Drain project goals and helping the City construct a successful and lasting project.

Sincerely,


Nick Deyo
Senior Landscape Architect

Att.: Zac Quentmeyer
cc: Bjorn Jones, Amy Kesler-Wolfson, Katherine Waugh (Dudek)