

INYO NATIONAL FOREST NHPA SECTION 106 SCOPE OF WORK

West Mono Basin Restoration

April 7, 2026

I. Purpose

Section 106 of the National Historic Preservation Act of 1966 (NHPA, 36 CFR Part 800) requires Federal agencies to take into account the effects of proposed undertakings on historic properties. Inyo National Forest has determined that the *West Mono Basin Project* is an undertaking with respect to the NHPA. Whitebark Institute plans to contract services of individual(s) meeting Secretary of Interior Archeology and Historic Preservation [Professional Qualifications Standards](#) to analyze and formulate a NHPA assessment for historic properties and tribal values of concern for the approximately 160,000 acre project planning area, and to conduct proactive identification and evaluation work in the approximately 14,000 acres identified as a priority for implementation. These acreages are subject to change as additional slope analysis is completed by the proponent. This scope of work describes Forest standards and expectations relating to the identification of historic properties and assessment of project effect relating to the undertaking. Should the proposed action change, the APE and this scope of work will be reconsidered and revised as necessary by the Forest Heritage Program Manager (HPM) or Delegated Heritage Program Staff (DHPS) in accordance with the *Programmatic Agreement among the U.S.D.A. Forest Service, Pacific Southwest Region (Region 5), the California State Historic Preservation Officer, the Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forest of the Pacific Southwest Region* (2018, R5 PA).

II. Project Description

Inyo National Forest, in collaboration with Whitebark Institute, is designing vegetation treatment projects within the west Mono Basin watershed within the Mono Lake Ranger District of the Inyo National Forest. The objective is to reduce the likelihood of severe wildfires, increasing community resilience to wildfire, improving ecosystem resilience to wildfire, reducing the risk to natural and cultural resources and critical infrastructure from wildfire, and enabling the maintenance of fuels reduction treatments by reintroducing fire to the landscape. For the purposes of this Scope of Work, the APE is defined as the 14,000-priority planning area boundary (see attached map). The APE encompasses the area where direct and indirect effects to National Register eligible properties from the project are anticipated to occur.

III. Requirements

a. Permit

Researchers must obtain an archaeological study permit before starting work. Permit contact information:

Laurel Lueders, Archaeologist (DHPS)
760-873-2522, laurel.lueders@usda.gov

b. Background Research

Archaeological studies and site records on file for the project area at the Inyo National Forest and the California Historical Resources Information System (CHRIS), the California Native American Heritage

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Commission (NAHC) and other pertinent sources of information (e.g., mineral and land ownership records, historic maps, local museum collections) will be consulted prior to starting fieldwork. To facilitate this review, the DHPS will provide GIS shapefiles for previous identification efforts and known resource locations within the 14,000 priority acres. Previous survey work will be critically assessed to determine if reliable coverage is provided for any portion of the APE. The assessment will consider survey age, methodology, changes in field conditions, thoroughness of documentation, cumulative coverage and/or other indications of reliability.

The assessment will inform a proposed survey strategy developed by the permittee that may exclude areas where previous identification efforts have been deemed sufficient for the purposes of this project. The INF HPM or DHPS will be provided the opportunity to comment on the final proposed survey coverage effort, and the rationale for excluding areas from survey based on previous adequate survey, prior to starting fieldwork. The rationale for exempting portions of the survey area from new survey based on previous adequate survey also will be clearly articulated and mapped in the final survey report.

c. Field Inventory

Surface intensive coverage of the APE will be performed using parallel adjacent pedestrian transects spaced no more than 15-30 m apart within the practical limits of safety, topography, vegetation, water or other constraints. Transects need not be straight lines but should meander opportunistically to take advantage of soil exposures, topographic probabilities and to examine suspected cultural resources. Periodic boot scrapes will be implemented during the transects in areas where duff limits visibility of the soil. Survey of unnavigable steep terrain (> 30 degree slopes) will emphasize pedestrian and/or visual examination of likely or suspected site locations as practical (e.g., rock shelters, quarries, game drives, hunting blinds, mining adits, trails, roads, logging features). Proposed adaptations to the survey strategy once in the field will be discussed with the Forest HPM. The project report will accurately depict and describe precise methodologies employed, including description and rationale for any areas in the APE not surveyed (e.g., impenetrable brush, wetlands, cliffs) and actual survey transects shall be documented with GPS.

All previously documented National Register of Historic Place (NRHP) eligible and unevaluated cultural resource sites (historic properties) in and adjacent to the APE not documented or visited in the past ten years will be inspected and updated. Inspected sites will be completely examined, with at least broad scale observations made for portions of the site extending beyond the survey area, unless otherwise negotiated with the HPM or HPS. If existing site records meet current documentation standards, and no appreciable changes or significant new information is found, then a concise site update containing only pertinent information to supplement the existing record is needed (e.g., information about current condition, additional diagnostic artifacts or features located, current photographs, information relating to the assessment of effect or protection recommendations, adjusted shapefiles, additional sketches or maps). If these conditions are not met, then comprehensive site documentation will occur. Historic properties recorded or updated within the past ten years need only be inspected if current documentation does not meet standards, new information or data is found, or information for assessing effects of the current undertaking is lacking. Sites previously determined ineligible for listing on the NRHP need only be examined and updated if reconsideration of previous determinations based on new information or changed conditions is recommended. When these latter two types of inspections occur, the same documentation procedures described above will apply.

All newly identified sites are completely documented, including portions extending beyond the APE. In the case of historic roads or trails, documentation will extend at least to the nearest intersection with a paved road, or an intersection with another road or trail, or the Forest Service boundary. Other alternative

documentation methods may be negotiated with the HPM or DHPS on a case-by-case basis for sites that extend an extreme distance beyond the APE.

No permanent field datums are established without prior approval from the HPM. Site reference points are recorded with a GPS unit using NAD 83, UTM Zone 11. Testing, excavation, and artifact collection are not permitted without approval of the HPM.

d. Definitions and Documentation Standards

Cultural resources are objects or definite locations of human activity, occupation, or use identifiable through field survey, historical documentation or oral evidence. Cultural resources are prehistoric, historic, archaeological, or architectural sites, structures, places, or objects and traditional cultural properties (FSM 2360.5).

Cultural resource sites are loci of purposeful and interpretable prehistoric or historic human activity that are 45 or more years old and exhibit at least one of the following characteristics:

- One or more features, with or without associated artifacts. A tool cache is considered a feature.
- An occurrence of cultural materials (e.g., lithics, ground stone, ceramics and/or historic artifacts) in densities sufficient to indicate purposeful human activity (at least one (1) item per square meter and in no case less than ten (10) artifacts).

In general, cultural activity loci separated by 20 or more meters of sterile landscape are documented as individual sites.

Cultural resources that do not meet these criteria, and in the opinion of a cultural resource specialist are not classifiable as sites, are considered isolates. Isolated occurrences consist of one or a few lost or randomly discarded artifacts, or extremely low densities of artifacts dispersed over large areas (less than one item per square meter) with little to no research potential. Some isolated sites consist of ephemeral cultural remains or lack associations meaningful in broader historic contexts. These types of isolated occurrences will be summarily recorded (e.g., location information, summary descriptions and/or photographs) in table format. Formal site records are not required.

Historic Property is any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to a community that meet National Register criteria (36 CFR 800.16).

All newly identified cultural resource sites and previously recorded cultural resource sites are documented on California Department of Parks and Recreation Primary Form (DPR 523A) and appropriate attachments (DPR 523B-L). The HPM or DHPS will assign agency numbers to all newly documented sites during the review of the report draft for inclusion in the final study.

e. NHPA Section 106 Compliance Report Standards, Deliverables and Consultation

The cultural resource inventory report will meet National Forest ([FSM 2363.16](#)) standards and [California Office of Historic Preservation Archaeological Resource Management Report Recommended Contents and Format](#) (1990). It will include background research, historic contexts, oral histories, survey design, field methods, cultural resource findings, NRHP eligibility recommendations, project effect recommendations, maps, site forms, photographs and collection logs as applicable. Draft reports are submitted to the HPM for a thirty day review period. Forest report and site numbers are assigned during

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the draft review for inclusion in the final report. The final submitted package includes an unbound original color copy of the report, one additional copy of all site records, electronic files (MS Word, Adobe PDF), applicable shapefiles (e.g., APE, survey area, survey transects, cultural resource locations), field notes, negatives, collected artifacts and logs (as applicable).

INF maintains responsibility for reaching determinations in compliance with Section 106 of the NHPA in accordance with terms of the 36 CFR 800 or alternative procedures and for consulting with the California State Historic Preservation Officer (SHPO) as appropriate. The contractor may support project consultation by drafting letters and/or other documents and assisting with coordination and logistics for consultation meetings in field and office settings. The contractor will not distribute materials directly to SHPO or act as a representative of the Forest in any discussions with SHPO.

f. NEPA Assessment and Tribal Consultation

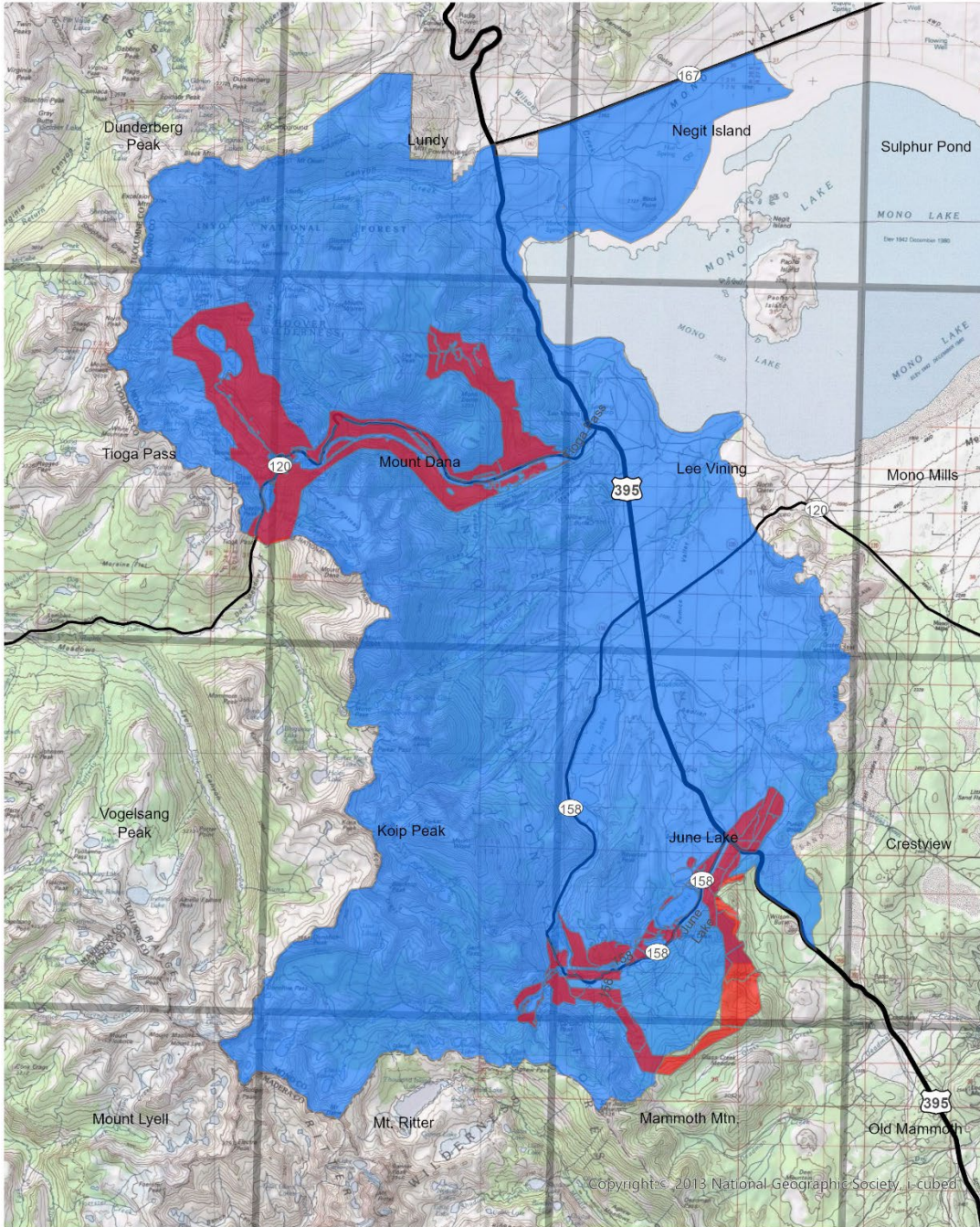
The contractor will provide support for NEPA planning efforts by summarizing legal frameworks for the consideration of cultural resources and tribal concerns, including but not limited to NHPA Section 106 and other applicable statutes (e.g., AIRFA, NAGPRA, EO11593), background research, methodologies, survey findings, consultation results and agency determinations in manner that informs decision making processes and is suitable for public disclosure. Specific analysis tasks include but are not limited to: developing a framework for analysis of historic properties and tribal values/concerns, working with the interdisciplinary team to identify issues to analyze and units of measures to display across alternatives, determining and documenting land management plan consistency, and conducting a comparative analysis of the proposed action and alternatives that includes evaluation of direct, indirect, and cumulative effects of past, present, and reasonably foreseeable actions.




The INF maintains responsibility for tribal consultation. The contractor may provide support for tribal consultation by drafting letters and/or other documents and assisting with coordination and logistics for consultation meetings in both field and office settings. The contractor will not distribute materials directly to tribes or act as a representative of the Forest in any discussions with tribes.

g. Confidentiality of Information

The proponent and its contractor(s) share a responsibility to ensure the confidentiality of legally protected site location information on public lands pursuant to the NHPA, ARPA and other statutes. No legally protected information will be held or shared with any third party not identified as a qualified professional in the archaeological study permit, nor any external project proponent or contract administrator, without express consent of the HPM or DHPS.

Appendix A: West Mono Basin Project Area of Potential Effect (APE)



<p style="text-align: center;">Legend</p> <p> Priority Planning APE</p> <p> West Mono Basin Planning Area</p>	<p style="text-align: center;">West Mono Basin Overview Priority Planning APE For Survey</p> <p style="font-size: small;">Map by L. Lueders 4/7/2026</p> <div style="text-align: center;">  </div> <p style="font-size: x-small;">Dunderberg Peak, June Mountain, Koip Peak, Lee Vining, Lundy, Negit Island, Mammoth Mountain, Mount Dana, Mount Lyell, Mt. Ritter, and Tioga Pass 7.5' Quads</p>	<div style="text-align: center;">  <p>N</p> <p>Scale: 1:200,000</p>  <p>0 1 2 3 Miles</p> </div>
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