



**US Army Corps  
of Engineers®**

Appendix C

## **Cultural Resources Appendix**

Watsonville Slough Ecosystem Restoration Project  
San Francisco District



Continuing Authorities Program (CAP), Section 1135

# **Watsonville Slough Feasibility Study: Overview and Summary of Coordination and Consultation for NHPA and NEPA**

**July 2025**

## **TABLE OF CONTENTS**

### **1. Summary of Tribal Coordination and Consultation**

#### **1.1 Summary of SHPO Coordination and Consultation**

### **2. Sample Letter sent to Tribes for NEPA Participation**

### **3. Sample Letter sent to Tribes for Initiating NHPA Consultation on the APE**

### **4. Copy of SHPO Concurrence Letters**

## **Tribal Coordination and Consultation for NHPA and NEPA**

USACE obtained a list of Tribes culturally affiliated with the Project area from the Native American Heritage Commission (NAHC) on 14 March 2020. The following Ohlone tribes were identified as Tribal consulting parties under Section 106 and participating agencies under NEPA:

- The Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Costanoan Ohlone Rumsen-Mutsun Tribe
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the SF Bay Area.

Tribal parties were invited to participate in several planning workshops early on before the formulation of alternatives on September 1, 2021. In June of 2022, the Tribes listed above were consulted again for this study and invited to participate in site visits or cultural resource surveys for the identification of tribal resources. In December of 2022, follow up emails and phone calls were made to the Tribes. Beginning in April 2024, the USACE has been consulting regularly with the Amah Mutsun Tribal Band for this project.

The Amah Mutsun Tribal Band is interested in collaborating on all projects located within their ancestral territory, which includes the entire Pajaro River Basin. The Tribe has specifically requested that the USACE utilize Indigenous Knowledge to identify tribal resources. Overall, the ongoing tribal consultation emphasizes collaboration efforts, the importance of cultural resource management using Indigenous Knowledge, and the Amah Mutsun Tribal Band's desire for meaningful involvement in the planning and execution phases of local projects.

Following tribal consultation with the Amah Mutsun Tribal Band, USACE will continue to work with the Tribe on developing the Monitoring and Adaptive Plan and conducting restoration activities. The Tribe will be invited on site visits to identify culturally significant plants suitable for restoration in the study area. This work will take place during the project's design phase. USACE also intends to collaborate with the Tribe to develop interpretive signage for the project.

## **SHPO Coordination and Consultation for NHPA and NEPA**

The USACE initiated SHPO consultation for Section 106 of the NHPA and invited the SHPO to participate in the study as a participating agency beginning in January 2022. Consultation for the preliminary APE was sent on June 16, 2022, and a comment was received from SHPO on July

26, 2024. USACE will conclude Section 106 consultation with the SHPO by providing a Finding of Effect for the undertaking by August 2025. SHPO concurrence is expected by October 2025.



**DEPARTMENT OF THE ARMY**  
**SAN FRANCISCO DISTRICT, U.S. ARMY CORPS OF ENGINEERS**  
**450 GOLDEN GATE AVENUE**  
**SAN FRANCISCO, CALIFORNIA 94102-3404**

September 1, 2021

**SUBJECT: Cooperating and Participating Agency Invitation for the Watsonville Slough Ecosystem Restoration Feasibility Study, Santa Cruz County, California**

Dear Chairperson Lopez,

The U.S. Army Corps of Engineers, San Francisco District (USACE) in partnership with the non-federal sponsor the Pajaro Storm Drain Maintenance District (PSDMD) has initiated the Watsonville Slough Ecosystem Restoration Feasibility Study. The study is being conducted under the authority of Section 1135 of the Water Resources Development Act (WRDA) of 1986 (P.L. 99-662). Section 1135 studies are part of the larger Continuing Authorities Program, which allows USACE to plan, design, and restore degraded ecosystems through modification of USACE structures, operations, or implementation of measures in affected areas.

The purpose of the study is to determine if there is a technically feasible, economically justified, and environmentally acceptable recommendation to restore degraded tidal marsh habitat at the Watsonville Slough study area. USACE and PSDMD reached out to all affiliated tribes identified through the Native American Heritage Commission (Figure 1) to attend early planning workshops earlier this year. We are now reaching out to your tribe to invite you to be a cooperating agency in the environmental review process.

The study area (Figure 1) is located along the Watsonville Slough near the mouth of the Pajaro River, Santa Cruz County, California, where the Pajaro River discharges into the Pacific Ocean. The inland side of the study area is surrounded by farmland development that began around the 1930s, while the seaward side is bordered by residential development.

Most of the original Watsonville Slough and its associated tidal marsh system have been reclaimed for agriculture and further constrained by adjacent residential development. Furthermore, existing undersized bridges and culverts contributes to the slough's poor hydrologic connectivity. These actions combined have reduced the total area of the slough and degraded the remaining tidal marsh habitat.

Currently the study is in the early stages of alternatives development. Alternatives will consist of one or more structural and non-structural measures that address the purposes of this study. Structural measures under consideration may include improving hydrologic connectivity of the slough and its associated tidal marsh system, creating topographic complexity, removing invasive vegetation, and/or planting native marsh vegetation.

At this time, we would like to invite the Amah Mutsun Tribe to participate in the environmental review process under the National Environmental Policy Act (NEPA) as a cooperating agency for this project, per requirements of 40 CFR Part 1501.8. In

addition, our office would like to solicit your input with respect to issues or opportunities related to the Amah Mutsun Tribe's concerns or interests that should be considered in the study area. We recognize that tribal and native communities have been stewards of the study area's land and resources for thousands of years. We welcome your expertise and interests to ensure our study is holistic and comprehensive in addressing habitat restoration. This includes the opportunity to consider elevating Traditional Ecological Knowledge for our proposed measures, when appropriate.

USACE will also invite your tribe to consult early next year soon pursuant to Section 106 Review of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108). Please note that the request to participate in the NEPA process as a cooperating agency is not the same as the formal consultations under Section 106, where we consult to identify historic properties within the study area. USACE is currently conducting a records search at the Northwest Information Center at Sonoma State University and will provide that in our upcoming consultation under Section 106.

We ask that you respond in writing to confirm or reject your participation as a cooperating or participating agency by August 13th, 2021. Consistent with 40 CFR Part 1501.8 we will assume your agency to be a cooperating or participating agency if no response is received. Please note, new information and comments will be accepted throughout the study process. As the study progresses additional information may be found on the project website: <https://www.spn.usace.army.mil/Missions/Projects-and-Programs/Projects-A-Z/>

If you have any comments, questions, or require further information you may contact Cultural Resources Lead Ruzel Ednalino, at [Ruzel.B.Ednalino@usace.army.mil](mailto:Ruzel.B.Ednalino@usace.army.mil) or our Tribal Liaison, Sarafina Maraschino, at [sarafina.s.maraschino@usace.army.mil](mailto:sarafina.s.maraschino@usace.army.mil). Thank you!

Sincerely,

Tessa E. Beach, Ph.D.  
Chief, Environmental Services Branch  
San Francisco District  
US Army Corps of Engineers

Provided via Electronic Copy Only  
Enclosure



**DEPARTMENT OF THE ARMY**  
**SAN FRANCISCO DISTRICT, U.S. ARMY CORPS OF ENGINEERS**  
**450 GOLDEN GATE AVE.**  
**SAN FRANCISCO, CA 94102**

June 16, 2022

**SUBJECT:** Initiation of Tribal Consultation for the Continuing Authorities Program, Watsonville Slough Study

Amah Mutsun Tribal Band  
Chairperson Valentin Lopez  
P.O. Box 5272  
Galt, CA 95632

Honorable Chairperson Lopez,

The U.S. Army Corps of Engineers, San Francisco District (USACE) is writing to initiate Section 106 review of the National Historic Preservation Act (54 U.S.C. § 306108) with your office for the Continuing Authorities Program, Section 1135 Watsonville Slough Study (CAP study). The CAP study is being completed in partnership with our non-federal sponsor, the Pajaro Storm Drain Maintenance District (PSDMD), to address ecological restoration opportunities in Santa Cruz County. The USACE is writing to consult with your Tribe directly under 36 C.F.R. § 800 for this undertaking.

**Description of the Undertaking**

The proposed ecological restoration project at Watsonville Slough is in Santa Cruz County at the mouth of the Pajaro River, where the Pajaro River discharges to the Pacific Ocean (Figure 1). The lower reach of the Pajaro River forms the boundary between Santa Cruz and Monterey Counties in central California. The proposed project is located on the lower Watsonville Slough in Santa Cruz County, situated between extensive farmland and the Pajaro Dunes Community (Figure 2).

The primary purpose of the Watsonville Slough Aquatic Ecosystem Restoration Study is to restore Watsonville Slough and protect the nearby community from rising sea levels. Major objectives of the Watsonville Study include restoring tidal marsh, coastal wetland habitat, and natural vegetation while reducing non-native vegetation; restoring a more natural hydrological regime and connection with tidal flows; restoring and improving habitats for federally listed species; decreasing environmental impacts resulting from the need to mechanically breach the sandbar; and increasing recreational opportunities and public education near Watsonville Slough.

The CAP study is in the process of formulating alternatives that will consist of one or more measures. Measures currently being considered include enhancing 23-78 acres of existing seasonal wetlands so that they would remain wet throughout the year; grub and remove topsoil; constructing earthworks; planting native wetland vegetation; removal of invasive species; raising of Beach Road; and the reoperation of Shell Road Pump Station.




## **Defining the Area for the Watsonville Study**

The CAP study is currently at the early stages of scoping before formulating an array of alternatives which will ultimately redefine the APE. The USACE is defining the preliminary horizontal APE for direct effects to cover the ~3 miles of the Watsonville Slough (Figure 3). The CAP study's APE is expected to be modified as new and existing alternatives are developed. The measures being considered for alternatives will determine the vertical extent of the APE. The USACE will provide the APE's depth of disturbance once the horizontal area is redefined based on the final array of alternatives.

## **Cultural Resources Previously Identified in the APE**

SPN completed a records search on 2 December 2021 at the Northwest Information Center located in Sonoma State University (NWIC File No: 21-0722). 22 archaeological survey reports were reviewed within a one-mile radius of the APE. The entire study area has gone through extensive reconnaissance as well as archival research, in addition to limited testing and excavation. Surveys have been funded by developers since the 1970's to identify archaeological resources within the Watsonville Slough and Pajaro Dunes area. The results of the records search show there is one eligible archaeological resource (CA-SCR-102/P-44-000106) located within the APE, and 12 cultural resources are located within a one-mile radius of the study area.



## **Section 106 Consulting Parties Identified**

SPN contacted the Native American Heritage Commission (NAHC) requesting an updated Native American tribal consultation list for the CAP study. The Sacred Lands File search was negative. USACE obtained a tribal consultation list from the Native American Heritage Commission (NAHC) on 14 March 2020. The following Ohlone Tribes were identified as tribal consulting parties under Section 106 and NEPA: The Amah Mutsun Tribal Band, Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Ohlone Rumsen-Mutsun Tribe, Indian Canyon Mutsun Band of Costanoan, and the Muwekma Ohlone Indian Tribe of the SF Bay Area. Consultation with the SHPO is ongoing.

A larger flood risk management project, also being completed by the San Francisco District, is located within the same watershed upstream of the Pajaro River (Figure 3). USACE is currently completing the section 106 compliance and consultation requirements for the Pajaro River Flood Risk Management Project in phases, using a Programmatic Agreement. The USACE would like to offer combining Tribal outreach efforts for both projects, if it is convenient, to address environmental and cultural issues that may arise from either undertaking located



within the Pajaro River watershed. Your Tribe is invited to participate in site visits or cultural resource surveys for the proposed projects.

### **National Environmental Policy Act and Early Public Scoping**

A NEPA document will be prepared to describe the affected environment, alternatives, and analyze the potential associated effects, pursuant to Section 102 of NEPA as implemented by the regulations promulgated by the Council on Environmental Quality (40 C.F.R. Parts 1500-1508). The NEPA document is currently assumed to be an Environmental Assessment unless significant unavoidable adverse effects are determined to result from the proposed action. We invite your Tribe to participate in the environmental review process as a participating agency, per requirements of 40 C.F.R. Part 1501.8. We ask that you respond in writing to confirm or reject your participation.

### **Future Tribal Consultation**

SPN will continue consulting with Tribes as the CAP study progresses into alternatives formulation. Once a final array of alternatives is compiled and a tentatively selected plan is identified, USACE will consult again on our identification efforts and assessment of effects to historic properties within the APE pursuant to 36 C.F.R. § 800.4 and 36 C.F.R. § 800.5.

Currently, we are seeking your agreement on our delineation of the preliminary APE and to have your Tribe serve as a NEPA participating agency. Furthermore, if your Tribe would like to participate in site visits or cultural resource surveys for projects in the Pajaro River watershed, we would welcome the opportunity to coordinate meetings at your convenience. Thank you for your time reviewing this project, and we look forward to any input concerning Tribal resources or values within the project area. Please contact San Francisco District archaeologist Stephanie Bergman by email or phone at [Stephanie.M.Bergman@usace.army.mil](mailto:Stephanie.M.Bergman@usace.army.mil) (415-503-6844), to set up a site visit, meeting, or to discuss any other questions or concerns at this time.

Sincerely,

Julie R. Beagle  
Chief, Environmental Planning Section  
San Francisco District

#### **Enclosures**

- Figure 1. Regional Setting of Study Area.
- Figure 2. Watsonville Slough Ecosystem Restoration Study Area.
- Figure 3. Watsonville Study in relation to other ongoing USACE projects in the Pajaro River watershed.
- Figure 4. Map of the APE, with previously identified cultural resources.

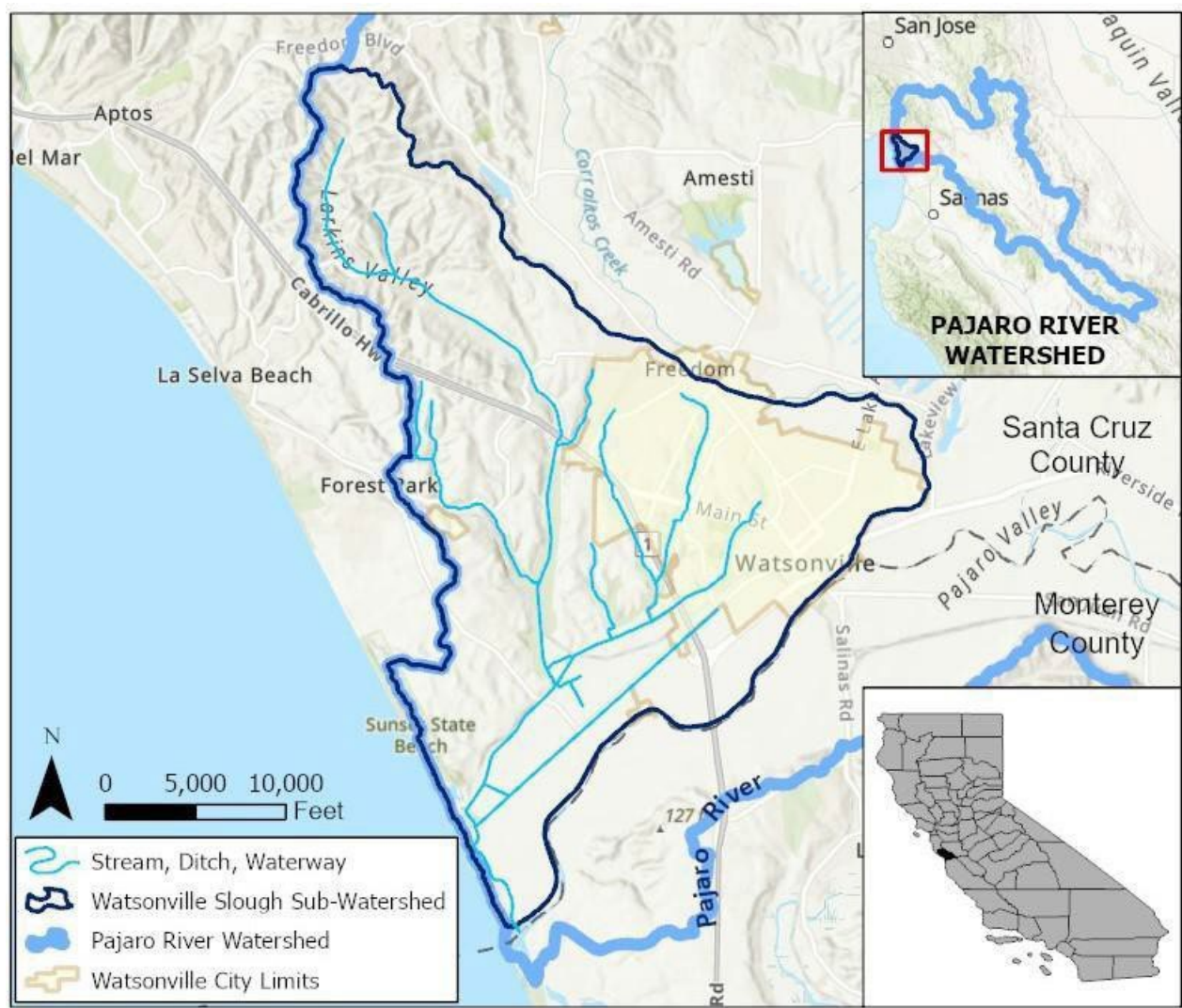


Figure 1: Regional Setting of the Study Area.

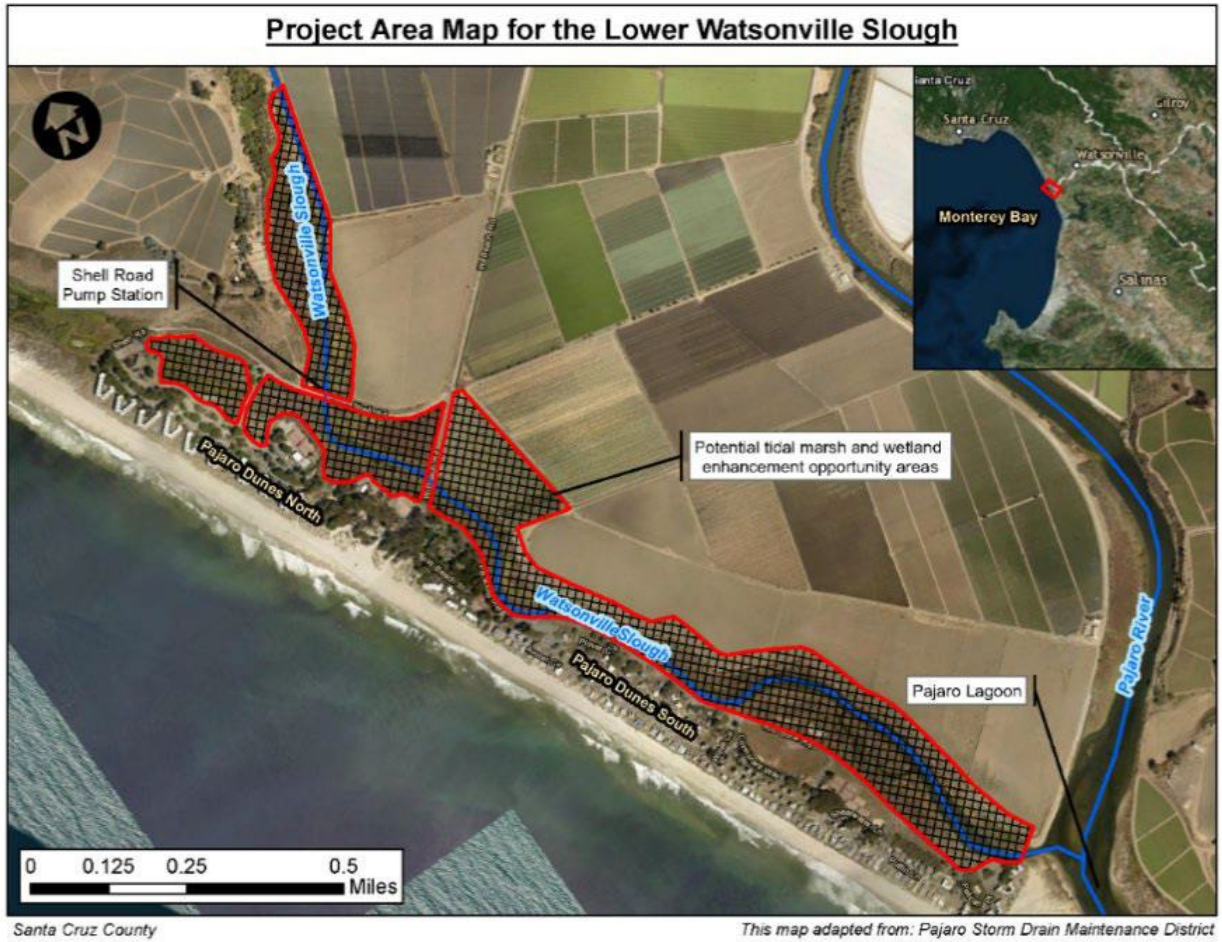


Figure 2. Watsonville Slough Ecosystem Restoration Study Area shown in red polygon.

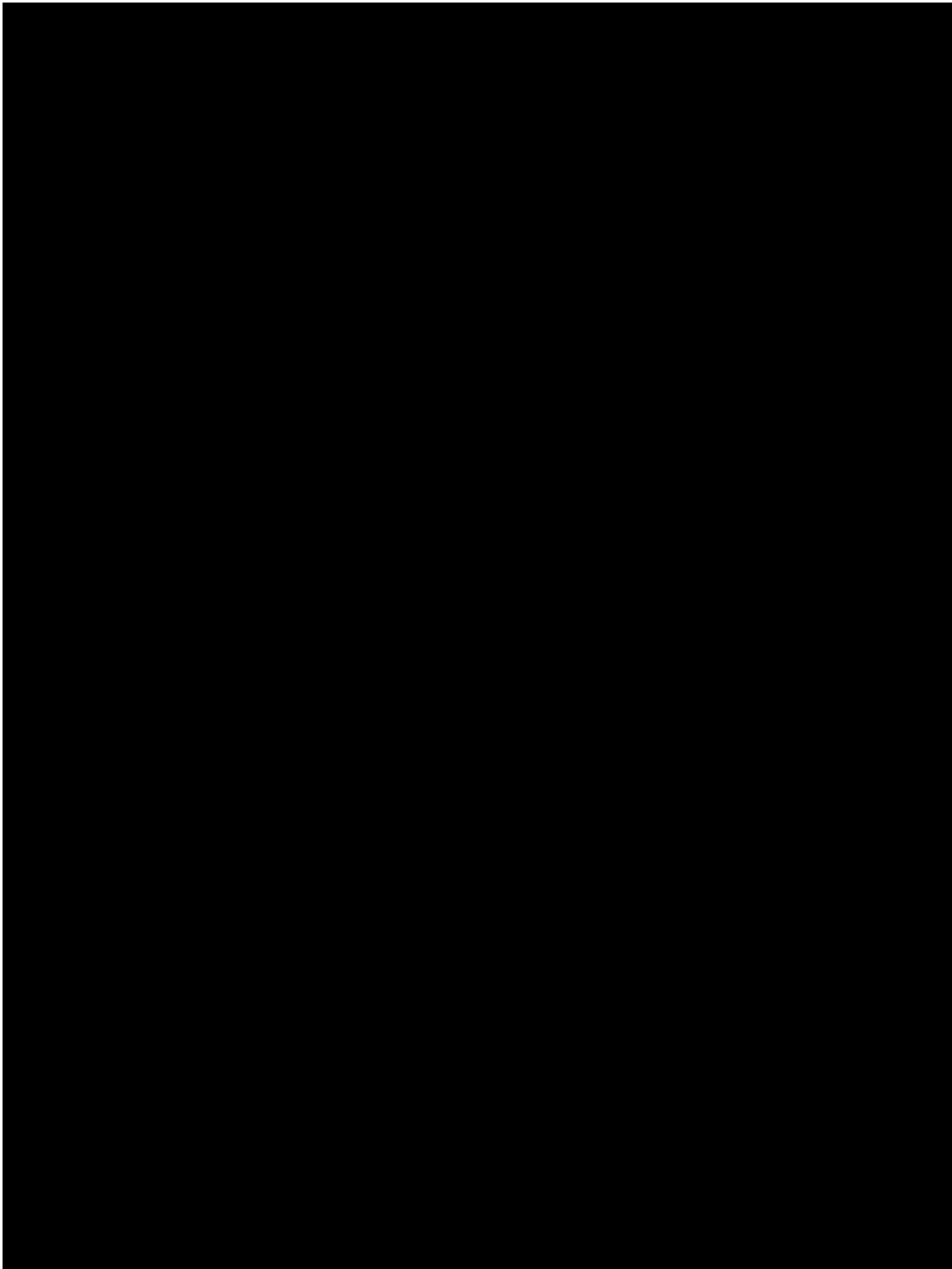


Figure 3: The Watsonville APE in relation to previously recorded archaeological sites. Site CA-SCR-102 intersects the APE in the northwest corner, and a survey and site update will be needed to assess site eligibility and adverse effects once a tentative selected plan is developed.



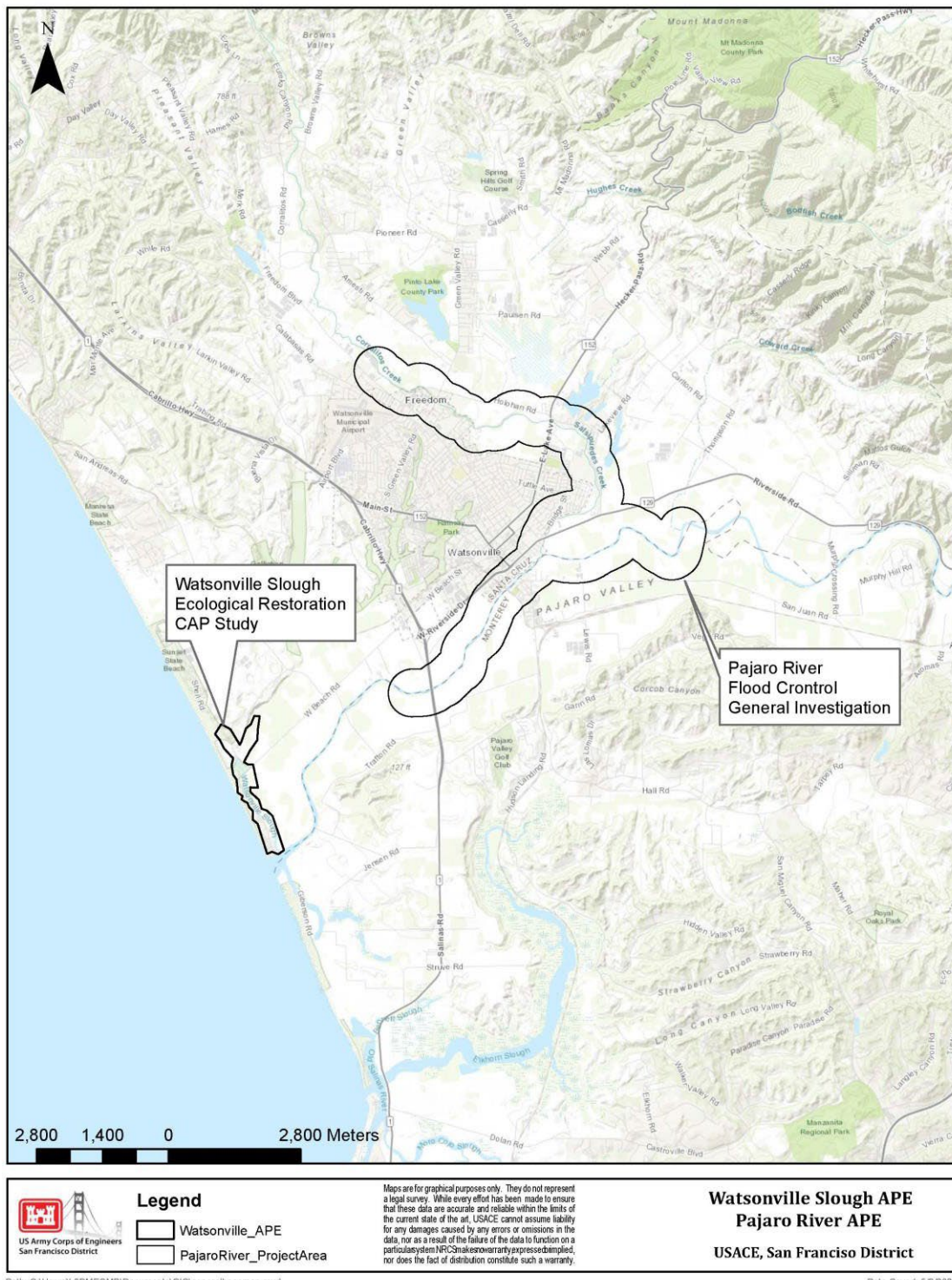


Figure 4: The Project Areas of the Watsonville Study and Pajaro River Flood Risk Management Project are nearby and located within the same watershed. Tribal site visits, meetings, or participation in cultural surveys can be coordinated for convenience if desired.



**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

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July 26, 2022

In reply refer to: COE\_2022\_0208\_001

VIA ELECTRONIC MAIL

Julie R. Beagle  
Chief, Environmental Planning Section  
Army Corps of Engineers, San Francisco District  
450 Golden Gate Ave, 4<sup>th</sup> Floor, Suite 0134  
P.O. Pox 36152  
San Francisco, CA 94102

RE: Cooperating and participating agency invitation for the Watsonville Slough  
Ecosystem Restoration Feasibility study, Santa Cruz County

Dear Julie Beagle,

The U.S. Army Corps of Engineers (COE) is initiating consultation with the State Historic Preservation Officer (SHPO) to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulation at 36 CFR § 800 *et seq.* By letter received on June 24, 2022, the COE is seeking confirmation of the SHPO as a participating agency for the NEPA process, and comments on their preliminary area of potential effects (APE) for the above-referenced undertaking.

By letter received on February 8, 2022, the COE requested the SHPO's acceptance or rejection of their invitation to be a participation in the NEPA-level environmental review process. The SHPO accepted the role as a participating agency, subject to staff availability and scoped appropriately to focus upon issues of cultural resources, by letter on March 8, 2022.

The COE is proposing to delineate areas for implementing ecological restoration projects along an approximate 3-mile stretch of the Watsonville Slough at the mouth of the Pajaro River, between extensive farmland and the Pajaro Dunes Community in Santa Cruz County. The COE defines the preliminary APE for direct effects as approximately 3-miles of the Watsonville slough where the COE is considering implementing restoration projects.

Julie Beagle  
July 26, 2022  
Page 2

OHP File No. COE\_2022\_0208\_001

Thank you for providing the opportunity to comment on the preliminary APE. I anticipate consulting on the formal APE. The COE is encouraged to include the array of alternatives within their APE as these alternatives are designed. The COE is encouraged to consider if the proposed undertaking has the potential to effect nearby buildings and structures, and if so, to include those buildings and structures in the APE. If you require further information, please contact Elizabeth Hodges of my staff at (916) 445-7017 or [Elizabeth.Hodges@parks.ca.gov](mailto:Elizabeth.Hodges@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a horizontal line.

Julianne Polanco  
State Historic Preservation Officer