*Delivered by email*: May 19, 2022

Kevin Conway

Cal Fire State Forest Manager

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The Archaeological Subcommittee of the Government to Government Consultation Team of the Coyote Valley Band of Pomo Indians was only recently apprised of Cal Fire proposed amendments to the Soda Gulch THP which involve incremental small modifications of buffer zones and diminishing the size of the proposed landing deck, etc.

In response we continue to demand the following:

1. The road through the site must not be used for log removal from the proposed landing deck adjacent to the area that the Registered Professional Foresters have determined to be the boundary for the sacred site. We insist that the entire slope running from Park Gulch at the ridge top through Soda Gulch to the Noyo River below be protected as *cultural landscape*under CEQA. (Cal. Pub. Rec. Code § 21074(b));
2. We continue to assert that due to the conflict of interest inherent in having the representatives of those who seek to cut the trees determine sacred site boundaries, we have no faith and confidence that the boundaries have been adequately established.  It is in CAL FIRE Registered Professional Foresters interest to define them as narrowly as possible in order to extract more trees. Improper and insufficient designation of ancestral Native American site boundaries is a repeated pattern we have experienced at the hands of not only Cal Fire but also Cal Trans hired archaeologists during highway building projects which adversely impacted ancestral sacred sites. Conflict free, independent archaeologists, who are not employed by CAL FIRE should be assigned to resurvey site boundary determinations;
3. All the ancestral cultural sites within JDSF must be resurveyed and a road maintenance and site protection plan must be developed as per the recommendations of the state sponsored Betts Report of 1999;
4. As per the recommendations of the state sponsored Betts Report, no logging operations should be allowed to occur in the vicinity of these sites until they can be independently surveyed by conflict free archaeologists and adequately protected from road building activities. Kevin Conway's response to our team anthropologist Dr. Patterson as to why the site boundaries were never resurveyed was that Cal Fire did not have sufficient staff to do so. This is unacceptable.  Cal Fire has sufficient staff to crank out THP's for logging but not to protect our ancestral heritage in this State Forest;
5. We, once again, as we have repeated throughout all government to government consultations of the Archaeological Subcommittee to date, request the creation of a protective zone around the sacred site on the Soda Gulch THP and the ridge top villages and ancient trail systems connecting them in the Soda Gulch, Park Gulch and proposed Gulch 16 THP's. The Gulch 16 THP proposes to rebuild a road smack through the middle of the most important archaeological site in all of Mendocino County, 3 Chop Village;
6. We also oppose the building of the landing deck and skid trails on the steep slopes of the Soda Gulch THP sacred site and the reconstruction of the road straight through it.
7. There are alternate back road entries on the northern portion of the Soda Gulch THP from which logs can be extracted without rebuilding the road though the Soda Gulch sacred site and under a CEQA analysis we should be able to have the state consider these alternate roads for log extraction.
8. Also, once again, we believe that in so far as it comes to sacred site protection CAL FIRE has been far from candid, open and transparent with us throughout the government to government consultation process.  Why did we have to learn of the most recent Cal Fire proposed amendments regarding the protection of the sacred site on the Soda Gulch THP from a member of our team who happened to be reviewing the Cal Trees website?  Why were the Archaeological Subcommittee members not formally notified of these amendments?
9. We have requested several times a site visit to Park Gulch, the ancestral village site that abuts the Soda Gulch THP up on the ridge top, and to be shown the ancestral trail system running between the ridge top villages and down to the Noyo River.  We have never been taken to Park Gulch or shown the trails connecting Park Gulch, Soda Gulch and 3 Chop Village.  We deserve more respect to our site visit requests than this.

Your immediate attention to these concerns is hereby requested as well as a response to us in writing regarding these concerns prior to the approval of the Cal Fire proposed amendments to the Soda Gulch THP

Sincerely,

Priscilla Hunter, Tribal Historic Preservation Officer

Coyote Valley Band of Pomo Indians

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