

From: [Shane O'Riordan](#)
To: [Trish Turner](#)
Subject: [EXTERNAL] Re: AB 52 Consultation Request
Date: Wednesday, October 8, 2025 12:41:55 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[County of Lake - AB 52 Consultation at 15880 Kugelman Street, Lower Lake.pdf](#)

Hey Trish,

Thank you for reaching out in regards to the above proposed project. Upon reviewing the scope of work entailed, Middletown Rancheria Tribal Historic Preservation Department has determined the site location to be within our ancestral area of concern. We therefore respectfully request a consultation so we can further understand the full scope of work and provide insight to the mitigation of disturbance to culturally significant items that the crew may encounter. Please see attached for Middletown's official response letter.

Thank you,

Shane O'Riordan
Middletown Rancheria
Admin & Projects Coordinator
Tribal Historic Preservation Department
PO Box 1035 Middletown, CA 95461
Office: (707) 987-1315
Cell: (415) 408-8460
Email: soriordan@middletownrancheria.com

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On Mon, Oct 6, 2025 at 10:56 AM Trish Turner <Trish.Turner@lakecountyca.gov> wrote:

Please find attached to this email the request for AB 52 Consultation for a Major Use Permit located at 15880 Kugelman Street, Lower Lake. The proposed project is for an Automotive Restoration Facility.

From: [Trish Turner](#)
To: ["Shane O" Riordan"](#)
Cc: ["Michael Rivera"](#)
Subject: RE: [EXTERNAL] Re: AB 52 Consultation Request
Date: Monday, May 4, 2026 4:56:14 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

Hi Shane,

I realized that I never concluded consultation with this project. As we previously discussed that both your Tribe and Koi Nation requested consultation. We are not the subject matter experts and cannot determine whose territory this project falls within. As we last communicated you said that you were going to reach out to Koi as you have done collaboration with them in the past. The Mitigation Measures that will be implemented into this project are the following:

TCR-1: All on-site personnel of the project shall receive tribal cultural resource sensitivity training prior to initiation of ground disturbance activities on the project. The training must be according to the standards of the culturally affiliated tribe(s). Training will address the potential for exposing subsurface resources and procedures if a potential resource is identified. The training will also provide a process for, protection, treatment, care and handling of tribal cultural resources discovered or disturbed during ground disturbance activities of the Project. Tribal monitors will be required to participate in any necessary environmental and/or safety awareness training prior to engaging in any tribal monitoring activities for the project.

TCR-2: If previously unidentified tribal cultural resources are encountered during the project altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated tribe(s) shall be contacted to evaluate the resource and prepare a tribal cultural resources plan to allow for identification and further evaluation in determining the tribal cultural resource significance and appropriate treatment or disposition, in collaboration with an Archeologists.

TCR 3: Prior to commencement of ground disturbing activities, the permittee shall submit documentation to the Community Development Department demonstrating that they have engaged with the culturally-affiliated tribe(s) to provide cultural monitors and that cultural sensitivity training has been provided to site workers, in collaboration with Archeologists.

TCR-4: All ground disturbing activities shall be monitored by qualified tribal monitor(s). Qualified tribal monitor(s) are defined as qualified individual(s) who have experience with identification, collection, and treatment of tribal cultural resources of value to the Tribes. Such individuals will include those who:

- a. Possess the desired knowledge, skills, abilities, and experience established by the Native American Heritage Commission (NAHC) through the NAHC's Guidelines for

Native American Monitors/ Consultants (2005) OR

b. Representatives of culturally affiliated tribe(s) who:

- i. Are culturally affiliated with the project area, as determined by the NAHC; and
- ii. Have been vetted by tribal officials of the culturally affiliated tribe(S) as having the desired knowledge, skills, abilities, and experience.
- iii.

TCR-5: The permittee shall notify all culturally affiliated tribes at least 45 days prior to commencement of ground disturbance activities on the project. All cultural resources unearthed by Project activities shall be evaluated by the Archeologist and monitor(s). The culturally affiliated tribe(s) must have an opportunity to inspect and determine the nature of the resource and the best course of action for avoidance, protection and/or treatment of the resource to the extent permitted by law. If the resource is determined to be a tribal cultural resource of value to a tribe, that tribe will coordinate with the permittee to establish by which the tribe(s) may appropriately protect, treat, and dispose of the resource(s) with appropriate dignity, which may include reburial or preservation of resources. The permittee shall allow the Tribe(s) to facilitate and ensure that the treatment and disposition by the Tribe(s) is followed to the extent permitted by law.

At this time, I will be closing the AB 52 consultation process with Middletown rancheria. Thank you for taking the time to meet with us.

All the best,



Trish Turner
Associate Planner

Community Development Department
255 N. Forbes St.

Lakeport, CA 95453

Phone: (707) 263-2221 x 38112

Fax: (707) 263-2225

Email: trish.turner@lakecountyca.gov

STAY CONNECTED:



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KOI NATION OF NORTHERN CALIFORNIA

October 16, 2025

County of Lake, Community Development Department
Attn: Trish Turner, Planner
255 N. Forbes Street
Lakeport, CA 95453
E: trish.turner@lakecountyca.gov

RE: Kugelman Commercial Shop Building Project, HP-20251006-01

Dear Trish Turner:

Thank you for your project notification letter dated October 6, 2025, regarding cultural information on or near 15880 Kugelman Street, Lower Lake, in Lake County. We appreciate your effort to contact us and wish to respond.

The Koi Nation Cultural Resources Department has reviewed the project and concluded that it is within the aboriginal territories of the Koi Nation. Therefore, we have a cultural interest and authority in the proposed project area and would like to initiate a formal consultation with the lead agency. Based on the information provided, the Tribe has concerns that the project could impact known cultural resources. At the time of consultation, please provide our Cultural Resources Department with the latest cultural resource study for the proposed project.

Please contact the following individuals to coordinate a date and time for the consultation meeting:

Lisa Deas, Administrative Assistant
PO Box 516, Upper Lake, CA 95485
Office: (707) 900-6913
Email: ideas@hpultribe-nsn.gov

Jen Richardson, Administrative Assistant II
PO Box 516, Upper Lake, CA 95485
Office: (707) 900-6931
Email: jrichardson@hpultribe-nsn.gov

Please refer to identification number HP – 20251006-01 in any correspondence concerning this project.

Thank you for providing us with the opportunity to comment.

Sincerely,

Robert Geary
Koi Nation of Northern California
Tribal Historic Preservation Officer Designee



COUNTY OF LAKE
COMMUNITY DEVELOPMENT DEPARTMENT
255 N. Forbes Street – 3rd Floor
Lakeport, California 95453
Planning • Building • Code Enforcement
Phone: (707) 263-2221 • Fax: (707) 263-2225

March 16, 2026

Robert Geary, Tribal Historical Preservation Officer
Koi Nation
P.O. Box 516, Upper Lake, CA 95485

RE: Conclusion of AB 52 Consultation – PL-25-271/ Kugelman

Dear Mr. Robert Geary

On behalf of the County of Lake, Community Development Department, I would like to thank you and your team for participating in the consultation process for the PL-25-271/ Kugelman pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1).

Through our collaborative efforts, we have identified specific concerns regarding potential impacts on tribal cultural resources. To address these concerns and ensure the protection of resources, the County has agreed to incorporate the following Mitigation Measures (TCR-1 through TCR-5) into the Project's Conditions of Approval and Environmental documentation.

Mitigation Measures

Measure ID	Requirement Summary
TCR-1	All on-site personnel of the project shall receive tribal cultural resource sensitivity training prior to initiation of ground disturbance activities on the project. The training must be according to the standards of the culturally affiliated tribe(s). Training will address the potential for exposing subsurface resources and procedures if a potential resource is identified. The training will also provide a process for protection, treatment, care, and handling of tribal cultural resources discovered or disturbed during ground disturbance activities of the Project. Tribal monitors will be required to participate in any necessary environmental and/or safety awareness training prior to engaging in any tribal monitoring activities for the project.
TCR-2	If previously unidentified tribal cultural resources are encountered during the project altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally affiliated tribe(s) shall be contacted to evaluate the resource and prepare a tribal cultural resources plan to allow for identification and further evaluation in determining the tribal cultural resource significance and appropriate treatment or disposition, in collaboration with an Archeologists.
TCR-3	Prior to commencement of ground disturbing activities, the permittee shall submit documentation to the Community Development Department demonstrating that they have engaged with the culturally affiliated tribe(s) to provide cultural monitors and that cultural sensitivity training has been provided to site workers, in collaboration with Archeologists.

Measure ID	Requirement Summary
TCR-4	All ground disturbing activities shall be monitored by qualified tribal monitor(s). Qualified tribal monitor(s) are defined as qualified individual(s) who have experience with identification, collection, and treatment of tribal cultural resources of value to the Tribes. Such individuals will include those who: a) Possess the desired knowledge, skills, abilities, and experience established by the Native American Heritage Commission (NAHC) through the NAHC's Guidelines for Native American Monitors/ Consultants (2005) OR b) Representatives of culturally affiliated tribe(s) who: i. Are culturally affiliated with the project area, as determined by the NAHC; and ii. Have been vetted by tribal officials of the culturally affiliated tribe(S) as having the desired knowledge, skills, abilities, and experience.
TCR-5	The permittee shall notify all culturally affiliated tribes at least 45 days prior to commencement of ground disturbance activities on the project. All cultural resources unearthed by Project activities shall be evaluated by the Archeologist and monitor(s). The culturally affiliated tribe(s) must have an opportunity to inspect and determine the nature of the resource and the best course of action for avoidance, protection, and/or treatment of the resource to the extent permitted by law. If the resource is determined to be a tribal cultural resource of value to a tribe, that tribe will coordinate with the permittee to establish by which the tribe(s) may appropriately protect, treat, and dispose of the resource(s) with appropriate dignity, which may include reburial or preservation of resources. The permittee shall allow the Tribe(s) to facilitate and ensure that the treatment and disposition by the Tribe(s) is followed to the extent permitted by law.

Administrative Notes and Compliance

Per County policy, while the Permittee is required to demonstrate that they have entered into the necessary agreements for monitoring and training with culturally affiliated tribes, the County of Lake will not be a party to, nor will it review or enforce, the specific private terms of those agreements. Those details shall remain confidential between the Permittee and the participating tribe(s).

The County's role is limited to verifying that the required engagement and documentation (as specified in TCR-3) have been submitted to the Community Development Department prior to the issuance of grading or building permits.

Conclusion of Consultation

The County of Lake considers the AB 52 consultation process for this Project to be concluded under Public Resources Code Section 21080.3.2. We appreciate your partnership in ensuring the respectful treatment of tribal cultural resources within our jurisdiction.

If you have any questions regarding the implementation of these measures, please contact Trish Turner, Associate Planner at 707-263-2221 ext. 38112 or at Trish.Turner@lakecountyca.gov.

Sincerely,



Trish Turner
Associate Planner
Community Development Department