Examining Tribal Sovereignty over Cannabis Permitting on Native Ancestral Lands

Final Report to the California Department of Cannabis Control

Investigators:

Dr. Jeremy Sorgen, Northeastern University
Seth LaRosa, PhD Candidate, UC Berkeley
Dr. Van Butsic, UC Berkeley (Co-PI)
Dr. Peter Nelson, UC Berkeley (Co-PI)
Dr. Jennifer Sowerwine, UC Berkeley (PI)

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ABSTRACT

California has the largest Native American population in the United States; it is home to 110 federally recognized Tribes and dozens of non-recognized Tribes who still maintain their connection to their ancestral land. Due to genocide and land theft in the late 19th century, including failure of the California government to ratify treaties with California Tribes, today only 0.6% of Native ancestral lands are governed by Tribes. However, many Tribes are actively engaged in government-to-government consultation with land-managing agencies, as mandated by state and federal law. Government-to-government consultation is a critical component of affirming Tribal sovereignty and protecting sacred sites and cultural resources in land use and decision making; it provides opportunities to enhance eco-cultural restoration that can lead to positive human and environmental health outcomes. It is also subject to significant barriers and inconsistencies in implementation. Taking California's cannabis permitting process as its research case, this report documents the findings of a two-year study of consultation on Tribal Cultural Resources (TCRs) and cannabis permitting on Tribal ancestral lands in California, in which we examined and analyzed these barriers using participatory research methods. California Assembly Bill 52 (AB 52, 2014) provides a mechanism for Tribal consultation on a per-project basis, giving Tribes decision-making authority where TCRs are concerned. Yet our study finds that AB 52 is not consistently applied in land use decision making across California and is further undercut by asymmetrical power relations, which have been codified into policy through provisions such as "agency discretion," lack of full disclosure, insufficient mapping and technical resources, and unfunded mandates. Our focus on AB 52 in cannabis permitting provides a lens for evaluating Tribal consultation and TCR protection more generally. Both Tribal and agency study respondents agreed that meaningful consultation requires equitable Tribal-agency relations, which depend on policies that affirm Tribal authority in land use decision making, as well as agency and Tribal capacity building, with equitable funding for Tribal staff time, agency training in Tribal culture, history, and cultural resource policy, and Tribal-agency relationship building. This report explores our research findings and recommendations for policies that can help make the consultation process more supportive of Tribal sovereignty and more productive of results acceptable to both agencies and Tribes.

ACKNOWLEDGMENTS

This research was made possible through the generous support of the **California Department of Cannabis Control** and the dedicated participation of Tribal and agency representatives statewide.

Throughout this project, we relied upon the deep experience and generous sharing of knowledge and time provided by our Tribal Advisory Committee members:

- Earl Crosby (retired Deputy Director of Natural Resources, Karuk Tribe)
- Robert Geary (THPO, Habematolel Pomo of Upper Lake)
  Shasta Gaughen (THPO, Pala Tribe)
- Keduescha Lara-Colegrove (THPO, Hoopa Tribe)
- Melanie McCavour (former THPO, Bear River Rancheria)
- Anna Starkey (Cultural Regulatory Manager, United Auburn Indian Community of the Auburn Rancheria (UAIC)
- Tom Littlebear Nason (Chairperson, Esselen Tribe of Monterey County)

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We thank the 22 THPOs, cultural resource specialists and Indian law experts who participated in developing and revising the "By Tribes, For Tribes" Consultation Policy Template produced as a key product of this research.

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- UC Berkeley Cannabis Research Center
- National Indian Justice Center (NIJC)
- California Tribal Historic Preservation Officers
- California Indian Museum & Cultural Center (CIMCC)
- California Rural Indian Health Board (CRIHB)
- UC Berkeley Center for Indigenous Law & Justice

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Cover image: Map of DCC Cannabis permit applications and California Tribes' ancestral lands, from the UC Berkeley Cannabis Site Mapping Tool created for this project.

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EXECUTIVE SUMMARY

OVERVIEW

This report documents systemic challenges for Native American Tribal governments regarding meaningful consultation and cultural resource protection in cannabis permitting and other areas of development and offers recommendations to agencies for best practices and policy reform. Native American Tribes have an intrinsic connection to Tribal cultural resources (TCRs), which are cultural and ceremonial sites, heritage items, and other features of Tribal ancestral territories and landscapes. Access to and protection of TCRs is an integral part of Tribal sovereignty and self-determination. In 2014, Assembly Bill 52 amended the California Environmental Quality Act (CEQA) to mandate consultation requirements at the local level. AB 52 follows California SB 18 and other important statutes and executive orders at the state and federal levels to afford Tribes standing in land use and development.

This project examined practices of Tribal consultation and cultural resource management through the lens of cannabis permitting. Over the course of two years, we studied how and to what extent legalization of cannabis production has impacted California Native American Tribal communities and whether the implementation of AB 52 further supports Tribal sovereignty and protects TCRs in land use decision making. Our findings show that AB 52 strengthens Tribes' decision making authority and increases the frequency of consultation, yet more meaningful consultation requires further policy change and consultation infrastructure.

METHODOLOGY

During the three-year project period, the research team convened a seven-member Tribal Advisory Committee and conducted in-depth research on intergovernmental consultation and Tribal cultural resource protection around cannabis permitting in California. Specifically, we considered intergovernmental engagement under Assembly Bill 52, which requires public agencies to consult with Tribes during environmental review of CEQA-eligible projects. We conducted two statewide surveys, one for agency representatives ($n = 56$) and one for Tribal representatives ($n = 46$), and over 60 semi-structured interviews with 83 Tribal Chairs, Tribal Historic Preservation Officers, cultural resource managers, state and local planners, and cannabis growers. We assessed Tribal concerns about cannabis cultivation, Tribal and agency experiences during the cannabis permitting process, and ongoing barriers to meaningful consultation and Tribal cultural resource protection. We trained and supervised a post-doctoral researcher and a PhD student, who were instrumental in project management, data collection, presentations and publications about project findings and recommendations.

SUMMARY OF KEY FINDINGS

Tribal representatives who participated in this research expressed a high level of concern about cannabis cultivation in California. Our investigation found that while state laws such as the California Environmental Quality Act (CEQA) and Assembly Bill 52 (AB 52) mandate government to government consultation, the process in practice consistently fails to adequately protect Tribal cultural resources (TCRs) or respect Tribal sovereignty.

1. **Geospatial coincidence of cannabis cultivation and TCRs.** The direct coincidence between cannabis and TCR siting (south-facing, near a water source, etc.) means that cannabis cultivators select sites that have a high probability of being considered TCRs. AB 52 has resulted in an unprecedented number of project notifications for Tribal offices; our research reveals that many of those projects likely pose a threat to TCRs.

2. **The "environment" is part of Tribal cultural resources.** Tribes identify ecosystems, wildlife and waterways as TCRs. Agency staff without relevant education will not understand the scope of TCRs as including natural landscapes; archaeological knowledge may not suffice to identify TCRs. Therefore, consultation with Tribal experts is essential to assess the impact of development on TCRs.

3. I**naccurate mapping of Tribal ancestral territories undermines consultation.** The consultation process is predicated on accurately identifying which Tribes have a cultural affiliation with a project area. Our research indicates that the tools currently used for this purpose are deeply flawed and often misrepresent Tribal territories. In many cases, mapping failures lead to systematic under-consultation, where the wrong Tribes are notified and culturally affiliated Tribes are excluded from the process. Exclusion erodes trust and reinforces a history of unilateral state decision making; it also creates inefficiency for agencies. Accurate, tribally-vetted mapping resources are essential for ensuring that consultation is legally compliant, culturally respectful, and substantively meaningful.

4. **Sensitive data presents inherent mapping challenges.** Tribes prefer to keep the geospatial location of sensitive areas confidential to protect them. Thus, agency records and information systems are not an adequate replacement for Tribal consultation. Agency survey respondents showed inadequate understanding of the risks of sharing TCR locations; we found that Tribes must maintain full control of TCR data, sharing information only as necessary and at their discretion.

5. **Experiences with AB 52 consultation vary across county jurisdictions.** While AB 52 mandates local-level consultation for all projects subject to CEQA review and has increased the frequency of consultation, reports on consultation experience are highly variable and speak to lack of resources, education and experience on both sides. Tribes are sometimes unable to consult on projects in which they would like to have input because the projects are exempted from CEQA.

6. **Power imbalances undercut meaningful consultation between Tribes and public agencies.** Meaningful consultation continues to be undermined by systemic challenges, which have a root cause in power differences between Tribes and public agencies. Agency discretion gives agencies the final word on permit approval, CEQA exemption, TCR designation, and mitigation. Deference to agencies undermines Tribal sovereignty, undercuts the possibility of meaningful consultation, potentially damages relationships, and results in poor outcomes for TCRs.

7. **Funding is needed for consultation and TCR management.** Tribes lack funding for many consultation and TCR-related activities, including staff review of permit applications (especially in high volume environments), equipment, and training. Agencies also face funding shortages. Information- and resource-poor environments make consultation less meaningful and effective.

SUMMARY OF KEY RECOMMENDATIONS

Based on our research, we recommend the following actions to make the consultation process more equitable, more compliant with legal requirements, and more consistent with the State of California's goal of repairing relationships with Tribes.

GENERAL RECOMMENDATIONS

1. **Support Tribal authority over the decision-making process.** Elements should include co-design of the consultation process, Tribal discretion in final decision-making, agency deference to Tribal expertise, approaching each Tribe as an individual sovereign nation, and establishing dispute resolution mechanisms.

2. **Establish ongoing and transparent communication.** Implement full disclosure and transparency of project information, engage early and continuously with Tribes, establish agency and Tribal points of contact, use multiple communication strategies, streamline communication, and institute mechanisms for Tribes to provide feedback.

3. **Build Tribal and agency capacity for consultation.** Provide dedicated funding for hiring and training staff, conducting surveys, purchasing equipment, and cultural monitoring. Build relationships and trust beyond the scope of individual projects. Require agency staff training; offer education to the general public and Tribes as well. Support best practices and incentivize innovation.

4. **Improve geospatial data and mapping practices.** Accurate mapping is essential to meaningful consultation. The Department of Cannabis Control (DCC) should develop and maintain an integrated, geo-referenced statewide database, and provide Tribes with the necessary technology and training to use it; and require applicants to provide GIS data.

5. **Develop an integrated statewide database.** Tribal respondents consistently requested access to detailed GIS data and maps to visualize the locations and status of cannabis grows. To ensure Tribes have both the tools and the skills to fully participate in mapping-based consultations, the DCC should fund GIS software access and training for Tribal offices. Systems should allow Tribes to provide guidance on sensitive areas without disclosing specific TCR locations and ensure Tribes retain control over how and when cultural information is shared.

CANNABIS-SPECIFIC RECOMMENDATIONS FOR THE DCC

Cannabis-specific recommendations for the DCC fall into three main areas: promoting meaningful consultation, protecting Tribal cultural resources, and strengthening enforcement and monitoring.

1. **Promote meaningful consultation with Tribes.** Maintain local agency authority for CEQA review, since local knowledge and relationships are essential in the consultation process; the DCC should continue to backstop CEQA compliance and accountability; foster inter-agency coordination; champion legislative reforms to strengthen the legal framework for consultation; offer resources to local jurisdictions to help facilitate co-learning; conduct outreach and education for Tribes regarding the permitting process and projects that fall outside AB 52; establish a Tribal consultation fund.

2. **Protect Tribal cultural resources.** Prevent CEQA exemptions that threaten TCRs; incentivize illegal or damaging grow removal and cleanup in consultation with Tribes; maintain a regularly updated publicly available spatial database of cannabis cultivation permits and abatement actions to promote transparency and streamline accountability and enforcement action; evaluate local agencies to ensure thorough environmental and cultural resource surveys.

3. **Strengthen enforcement and monitoring.** Establish Tribal consultation and environmental mitigation expectations with local agencies; strengthen protections for water, fisheries, and native plants; support Tribal-led cultural surveys with funding so Tribal expertise guides project review; establish and disseminate a clear consultation process for illegal grow removal.

LIST OF COMPLETED PROJECT DELIVERABLES

Below is a comprehensive list of the deliverables completed under DCC Grant Award #65304, demonstrating fulfillment of all contractual obligations.

Deliverable Description	Notes / Link to Product
GIS Parcel Layers Project	Shapefiles are hosted on IGIS, as per agreement. Data visualization is published on the Cannabis Research Center website.
"Building Agency-Tribal Partnerships" Webinar	A one-hour recorded webinar was held. The recording is hosted on the UC ANR YouTube channel and website for public access.
Tribal Resources Webpage	A dedicated resources page for Tribes, agency staff, and the public has been created and is hosted on UC Berkeley's Cannabis Research Center website.
Peer-Reviewed Article 1: "Unchecking the Box"	Published in *Environmental Science and Policy*, 2025.
Peer-Reviewed Article 2: "Tribal Sovereignty in Land Use"	Published in *EPE: Nature and Space*, 2025.
Peer-Reviewed Article 3: "Cannabis Impacts on Native Lands"	Published in *The Journal of Extension*, 2025.
Peer-Reviewed Article 4: "Mapping Tribal Ancestral Territory"	In review at a peer-reviewed academic journal.
Peer-Reviewed Article 5: "Quantifying Territory"	In preparation for peer-review at an academic journal.
Peer-Reviewed Article 6: "From resources to relatives"	In preparation for peer-review at an academic journal.
"By Tribes, For Tribes Consultation Policy Template" Workshop	A workshop with 22 THPOs, cultural resource specialists, and legal advisors was held to develop a customizable Consultation Policy Template for Tribes.
Consultation Policy Template	Customizable resources for California Tribes will be hosted on the dedicated Resources for Tribes page.
Final Report and Recommendations to DCC	This document serves as the final, comprehensive report with full research findings and recommendations.

A. BACKGROUND ON TRIBAL CONSULTATION

California is home to 110 federally recognized Native American Tribes with sovereign claims over their ancestral territories. Due to genocide and land theft in the late 19th century, including failure of the California government to ratify treaties with California tribes, only 0.6% of Native ancestral lands are currently governed by Tribes. However, Tribal nations continue to care for and protect their ancestral lands and territories – whether or not they own or reside on them – as a means of sustaining kinship obligations and cultural continuity. Where these territories are beyond reservation boundaries, Tribes conduct this care through government-to-government relationships, whether through consultation or co-management with land managing agencies.

Supporting consultation is a growing number of natural and cultural resource laws, which typically afford Tribes political standing in land use decision making. *Meaningful* consultation, however, is routinely undercut by weaknesses in consultation policies and practices. A common complaint is that cultural resource laws "lack teeth," which is to say they lack adequate language and enforcement mechanisms. At root, Tribal consultation suffers from power imbalances between Tribes and public agencies, which are then exacerbated by weak or non-existent relationships, poor resources and capacity within Tribal and agency offices, and the exclusion of Tribal knowledge and expertise. In general, Tribal experiences within consultation have been one of constant frustration, which has led some critics to reject consultation in favor of other processes and mechanisms of accountability.

Frustrations with this poor track record notwithstanding, California is widely viewed as a leader in cultural resource law and consultation practice. Senate Bill 18 (SB 18, 2004) was the first law in the U.S. to mandate Tribal consultation at the local level, and Assembly Bill 52 was the first law to mandate local-level consultation on a per-project basis. State and local-level consultation holds out initial promise to build long-term relationships. California thus becomes a case study of what happens when Tribal consultation is institutionalized at the local level.

B. CANNABIS AS A CASE STUDY

The legalization of commercial cannabis in California in 2016 established a complex new regulatory landscape. This new environment intersects with a much older and equally complex set of relationships between the State of California and the sovereign Tribal Nations whose ancestral lands comprise the state. The permitting of thousands of new cannabis cultivation sites, manufacturing facilities, and dispensaries represents a significant new category of land use decisions with the potential to impact Tribal cultural resources, sacred sites, and the environment.

We found that the experience of consultation between Tribes and county agencies (the lead agency for CEQA review of cannabis projects) varies under AB 52. While the statute increases the frequency of consultation at the county level, some counties and the majority of cities are not notifying Tribes or engaging in consultation. Public agencies may be circumventing CEQA entirely or applying CEQA but violating AB 52. This highlights how agency discretion and a lack of enforcement mechanisms prevent the ability of cultural resource laws to create conditions for

meaningful consultation. These challenges are compounded by cross-cultural differences in institutional norms and practices. AB 52 consultation reproduces common weaknesses in Tribal cultural resource policy and practice, and it also points the way toward promising solutions at the subnational level.

By focusing on cannabis permitting, this research provides timely and relevant insights directly applicable to the DCC's mission. While the findings are specific to the cannabis context, the systemic issues they reveal—inadequate communication, resource disparities, flawed mapping—have implications for government-to-government consultation processes across all sectors of government in California.

C. METHODOLOGY

To assess the impact of cannabis legalization on Tribes, we adopted four main objectives: 1. Conduct a statewide survey of Tribes and agencies to assess cannabis permitting engagement, challenges and successes; 2. Generate guidelines and recommendations for the DCC to consider in future funding allocation, regulation and programming; 3. Develop a mapping tool for Tribes to understand environmental risks and impacts in their consultation and resource protection work; and 4. Work with Tribes to develop written guidelines for cannabis permitting on ancestral lands (from which came our Consultation Policy Template).

Key questions we explored included:

- How are California Tribes experiencing the cannabis permitting process?
- Do current consultation requirements, particularly under CEQA and AB 52, effectively protect Tribal cultural resources (TCRs) and respect Tribal sovereignty?
- What are the primary barriers—procedural, institutional, financial, and political—to meaningful consultation?
- How can the DCC enhance its own regulations and provide better guidance to local jurisdictions to ensure consultation is more than a perfunctory exercise?

To gain a holistic understanding of the complexities of Tribal consultation in cannabis permitting, this research employed a mixed-methods approach. This strategy integrated the nuanced perspectives gathered through qualitative interviews with the empirical rigor of quantitative geospatial analysis. Questions were designed with attention to creating a context of respect and collaboration that prioritized the perspectives and knowledge of Tribal partners. Our design and research was conducted in close collaboration with our Tribal Advisors, who provided guidance and feedback throughout the project.

For an expanded description of our methodology and in-depth exploration of the barriers, see article "Unchecking the box," 2025.

Qualitative Data: Interviews and Surveys

The core of the qualitative data is derived from 83 semi-structured interviews and a series of short-answer questions conducted between 2021 and 2023. This extensive dataset provides a detailed perspective on how consultation is experienced by those most directly involved.

Participant Breakdown:

- **Tribal Representatives (33):** Participants included Tribal Historic Preservation Officers (THPOs), Tribal Chairpersons, cultural resource specialists, and Tribal environmental directors.
- **Agency Officials (39):** Interviews were conducted with staff from local (city and county) planning departments, as well as state agencies including the DCC, the Department of Fish and Wildlife, and the State Water Resources Control Board.
- **Stakeholders (11):** This group included cannabis industry consultants, environmental consultants, and legal experts.

The interviews were designed to elicit detailed narratives about participants' experiences with the consultation process. The short-answer responses, collected from Tribal representatives, provided concise, targeted feedback on policy priorities. This qualitative data forms the evidentiary basis for much of our analysis, particularly in the articles "Unchecking the box" and "Tribal sovereignty in land use decision making."

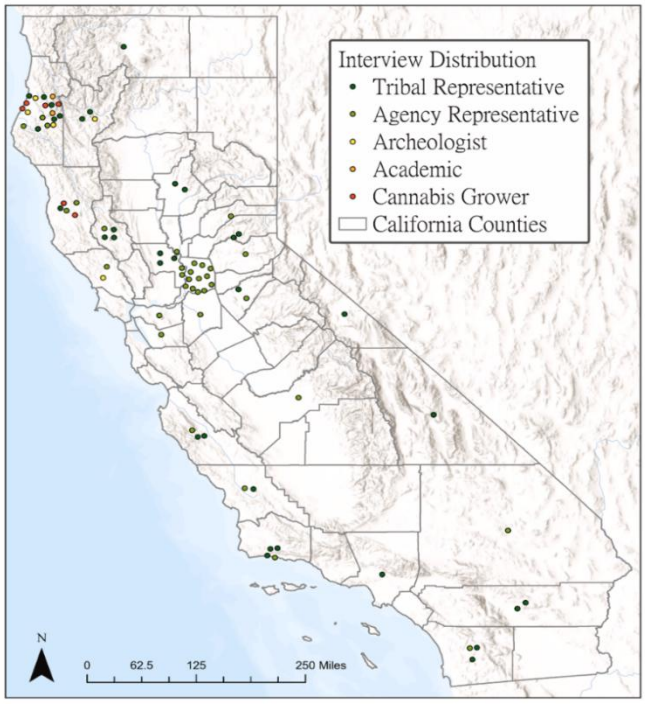

Figure 1. Map of interview distribution. Sorgen et al, "Unchecking the Box" 2025, p.3.

Quantitative Data: Geospatial Analysis of Tribal Territories

A central challenge in the consultation process is the initial step of identifying which Tribes to contact for a given project. This is typically accomplished using geospatial (GIS) maps of Tribal territories. However, the accuracy and reliability of these maps have long been a source of concern for Tribes. To investigate this issue empirically, the research team undertook a novel quantitative analysis comparing the different mapping sources used by state and local agencies.

As detailed in the working papers, "Quantifying Territory: How Mapping Choices Drive Consultation Outcomes in California" and "Mapping Tribal Ancestral Territory: Tribal and Agency Perspectives in California," the methodology involved:

1. **Data Acquisition:** GIS data was compiled from the two primary sources used by agencies: cultural area polygons from the *Handbook of North American Indians* and tribe-specific boundaries from Native Land Digital, a tribally managed mapping project.
2. **Spatial Analysis:** A comparative spatial analysis of these datasets was conducted, examining discrepancies in boundaries, territorial area, and attribution.
3. **Impact Assessment:** The different territorial maps were overlaid with data on cannabis permit locations to model how the choice of map affects which Tribes would be notified for consultation on a given project.

This quantitative analysis revealed statistically significant differences between the datasets, confirming that the choice of maps has profound real-world consequences, often leading to the exclusion of the very Tribes whose cultural resources are at risk.

D. FINDINGS

Major project findings include surprising co-location of cannabis cultivation in areas with Tribal cultural resources (TCRs), systemic barriers to meaningful consultation, weakness of cultural resource law and Tribal cultural resource protection, and the inherent challenges of mapping Tribal ancestral territories. These findings are presented in detail across our published articles (see References below) and are summarized herein.

1. Geospatial coincidence of cannabis cultivation and Tribal cultural resources.

Cannabis proved to be an excellent lens for examining broader issues of Tribal sovereignty and government to government consultation. Not only did AB 52 (2014) and Proposition 64 (2016) pass around the same time, but there is a direct coincidence between cannabis and TCR siting. As several interviewees note, land areas that are southward-facing, low-lying, near a water source, and relatively flat are not only ideal for growing cannabis but also ideal for a village or ceremony site. This means that cannabis cultivators, both historically and today, are selecting for sites that have a high probability of being considered TCRs. Hence, not only did AB 52 lead to an unprecedented number of project notifications for Tribal offices, but a high percentage of those projects were likely to pose a threat to TCRs. This finding underscores the gravity of poor capacity in land management and cultural preservation offices with tragic outcomes for TCRs.

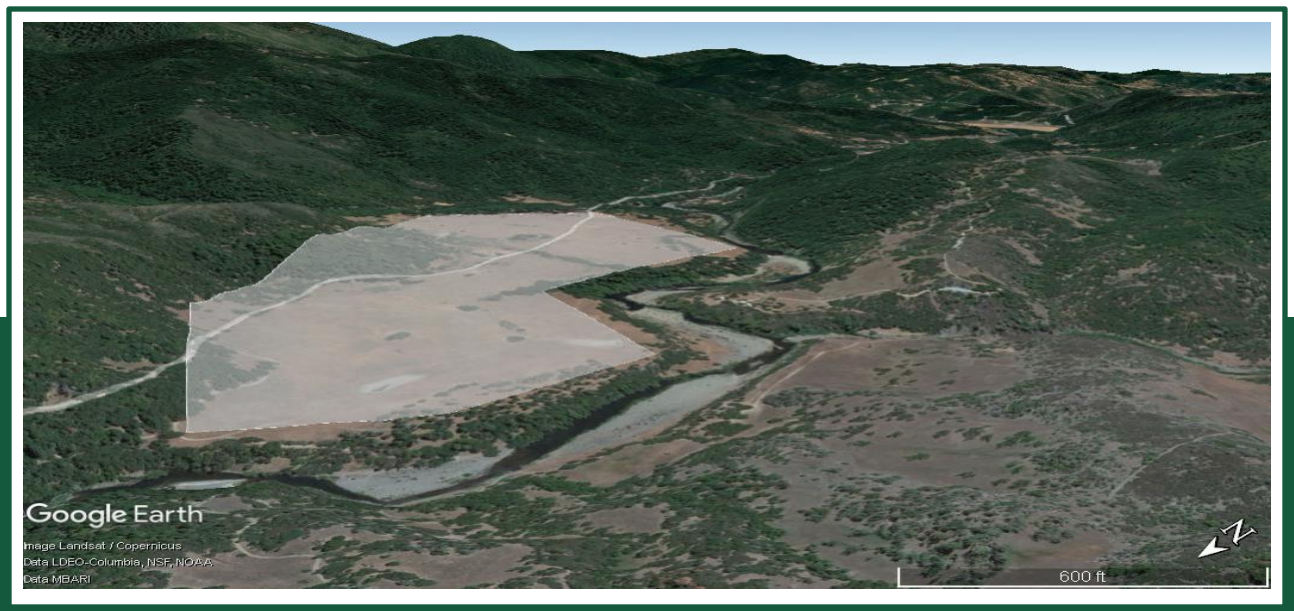

Figure 2. Outdoor cannabis sites have a high probability of being considered TCRs. See Sorgen et al, "Cannabis Impacts" 2025.

2. The "environment" is part of Tribal cultural resources.

A common misconception among agency personnel is that Tribal cultural resources are strictly defined as sites and landscape features that have archaeological significance. By definition, however, TCRs are much broader than that. In our study, Tribal interlocutors often referred to "environmental" features, such as ecosystems and wildlife, waterways, and landscapes, as part of their cultural resources. Often, there is no visible human structure to distinguish a site or landscape as "cultural." This finding has several major implications. First, agency staff must be educated to expand the scope of TCRs beyond cultural items to include natural landscapes and phenomena. Second, archaeological knowledge may be insufficient for TCR identification since there may be no "human signature" to observe. This means that consultation with Tribal experts is indispensable. In the case of cannabis, concerns about impacts may extend beyond archaeological sites to water diversion and contamination, destruction of native plants and landscapes, and impacts to traditional use areas, including gathering sites, viewsheds, and trails. Impacts may also pertain to increased traffic, trespass on Tribal lands, and other social disruptions. Figures 3 and 4 reveal that Tribal survey respondents had strong concerns about cannabis activities on and off reservation lands.

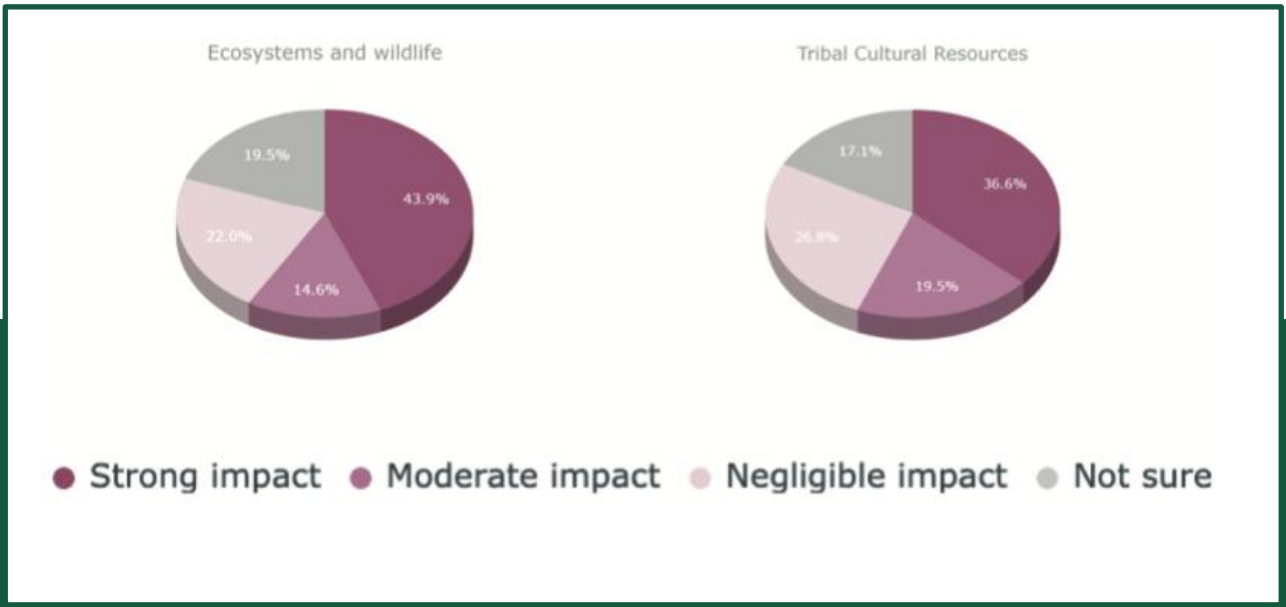

Figure 3. Tribally reported impacts to ecosystems, wildlife, and Tribal cultural resources. "Cannabis Impacts," p. 8.

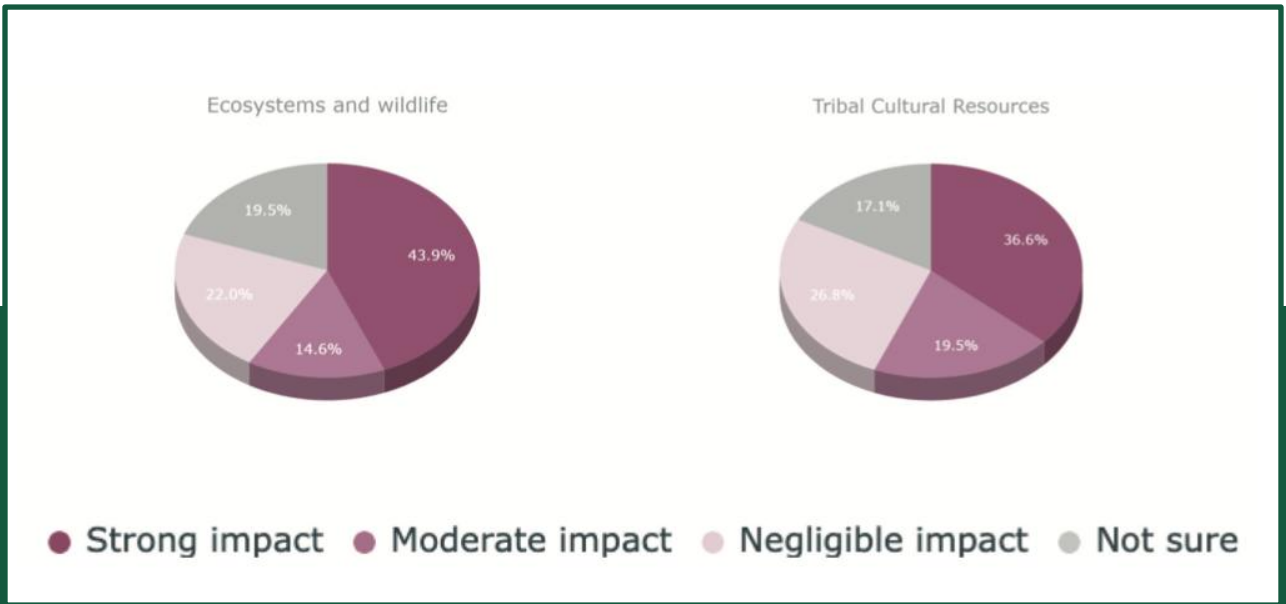

Figure 4. Tribally reported impacts to water quality, access, and availability. "Cannabis Impacts," p. 7.

3. Inaccurate mapping of Tribal ancestral territories undermines consultation.

The entire consultation process is predicated on accurately identifying which Tribes have a cultural affiliation with a project area. However, there is no single, authoritative map of Tribal ancestral lands in California. The maps used by state agencies frequently rely on outdated ethnographic data that group distinct Tribes together and impose arbitrary historical boundaries that do not accurately reflect cultural history or current understanding.

Our analysis revealed substantial boundary disagreements between two primary mapping sources used to determine Tribal ancestral territory (cultural area polygons from the Handbook of North American Indians and tribe-specific boundaries from Native Land Digital). We found frequent attribution errors where the wrong Tribe was linked to a territory, and widespread grouping of multiple distinct Tribes under single labels (see Figure 6). Statistical tests confirmed a low level of spatial agreement across datasets, meaning that the choice of map can produce vastly different consultation outcomes.

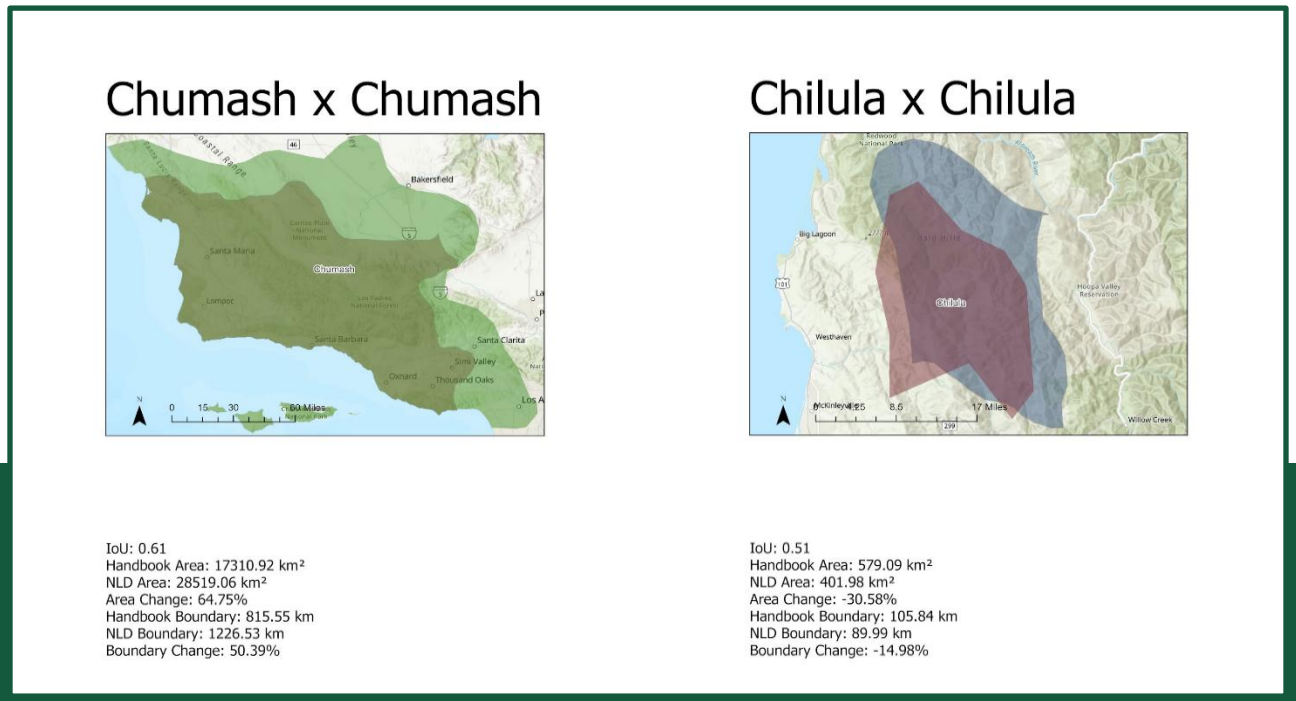

Figure 5. Overlays of cultural area polygons from the Handbook of North American Indians and Native Land Digital reveal significant discrepancies. LaRosa et al, "Quantifying Territory" (in preparation).

These mapping discrepancies cause errors in consultation. In many cases, they lead to systematic under-consultation, where the wrong Tribes are notified and culturally affiliated Tribes are excluded from the process. Exclusion impacts Tribes' ability to make land use decisions, erodes trust, and reinforces a history of unilateral state decision making. Flawed consultation practices also create inefficiency for agencies, who may spend time consulting with the wrong parties or later face legal or political conflict when overlooked Tribes learn about a project after approval. Accurate, Tribally vetted mapping resources (specifically, maps of ancestral territories created and maintained by Tribes themselves, not by state agencies) are essential for ensuring that consultation is legally compliant, culturally respectful, and substantively meaningful.

4. Sensitive data creates inherent mapping challenges.

Cultural resource protection faces a Catch-22 in that knowledge of the whereabouts of sensitive areas both protects and imperils them. Due to histories of looting and vandalism, Tribes prefer to keep the geospatial location of sensitive areas confidential. Initially, members of the research team did not grasp the risks involved in sharing TCR locations and had to be educated by the Tribal Advisory Committee, ultimately deciding to alter the project goal from sharing Tribal data with the DCC to sharing DCC cannabis parcel data with Tribes. Agency survey respondents and interviewees also demonstrated inadequate understanding of risks associated with sharing TCR locations, regularly asking for access to this information. We found that Tribes must maintain full control of TCR data, sharing information only as necessary and at their discretion. This means that agency records, such as the CHRIS and SLF information systems, will never be adequate replacements for Tribal consultation. Agencies should advocate for updating these information systems as well as increasing funding and technical support to enable Tribes to develop robust, *internal* information systems.

5. Experience with AB 52 consultations vary across county jurisdictions.

AB 52 mandates local-level consultation on a per-project basis for all projects that are subject to CEQA review (and arguably all projects regardless of CEQA eligibility). We found that AB 52 is increasing the frequency of consultation, in some cases engaging Tribes and public agencies in formal consultation for the first time; however, we also discovered that over one-third of county agencies surveyed report that they still do not work with Tribes (see Figure 6), while the Tribes we surveyed reported even lower levels of consultation, possibly indicating different definitions of what counts as "consultation." With regard to experiences of consultation, reports vary, with some Tribes noting positive relationships with agency partners and others complaining that consultation remains a "box-checking exercise," i.e. a procedural formality with no real interest in Tribal perspectives or opportunities to shape development. We also found that Tribes are sometimes unable to consult on projects in which they would like to have input because projects are exempted from CEQA. While consultation at the city and county level can be preferable for involving local knowledge and relationships in the consultation process, much more education is needed in local planning departments.

For more on variability in consultation experiences, see our article: "Tribal sovereignty," 2025.

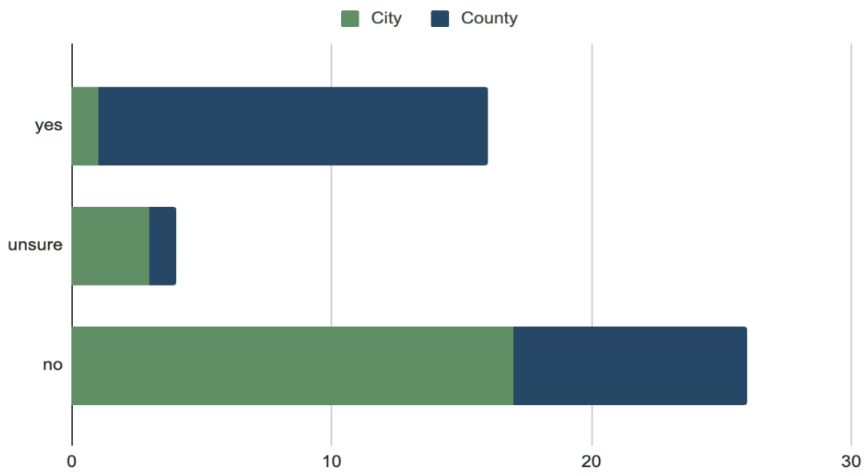

Figure 6. Responses to agency survey question "Do you work with Tribes?" in "Tribal sovereignty," p. 11.

6. Power imbalances undercut meaningful consultation between Tribes and public agencies.

While local- and state-level consultation holds out promises to improve relationships between Tribes and public agencies, meaningful consultation continues to be undermined by systemic challenges, which have a root cause in power differences between Tribes and public agencies. Agency discretion gives agencies the final word as to whether a permit is approved or rejected and sometimes whether a project is CEQA-exempt, whether the site counts as a TCR, whether impacts meet a "threshold of significance," and what counts as an adequate mitigation measure. Deference to agency authority on these matters undercuts Tribal sovereignty and exacerbates other common weaknesses in the consultation process such as:

- Treating consultation as a box-checking exercise
- Beginning consultation late in the permitting process, once resources are committed and projects are partially or completely planned
- Prioritization of agency or archaeological knowledge over Tribal knowledge
- Short response and decision windows
- Information deficits and other knowledge gaps related to data sensitivity
- Poor staffing and funding shortages for project review and cultural monitoring
- Lack of political will to engage in "good faith" consultation
- Weak enforcement mechanisms

Overall, agency discretion in consultation undermines the possibility of meaningful consultation and leads to damaged relationships and poor outcomes for TCRs. Each of these points has a corresponding solution, beginning with shifting discretionary authority to Tribes. For more on this finding and recommendations flowing from it, see our "Unchecking the Box" article.

7. Funding is needed for consultation and TCR management.

Closely related to the point above, Tribes need funding for many consultation and TCR-related activities, including staff review of permit applications (especially in high volume environments such as the post-legalization period), payments to Elders, equipment purchases and training on GIS and other platforms, cultural surveys and continuous cultural monitoring, and staff training. It is also important to recognize that agency offices suffer from many of the same problems due to funding shortages. Information- and resource-poor environments prevent the development of healthy, long-term government to government relations and make consultation less meaningful and effective.

E. RECOMMENDATIONS

Our research found that while there are varying degrees of government-to-government relationships across city, county, and state jurisdictions, meaningful consultation remains mostly aspirational. There is an urgent need for systemic reform of the Tribal consultation process in California. The Department of Cannabis Control, as the state agency regulating a new land use category with significant bearing on Tribal cultural resources, is uniquely positioned to adopt policies and procedures that can set the gold standard for consultation across the State. The following set of recommendations is divided into general recommendations for agencies and specific recommendations to the DCC for cannabis regulation.

GENERAL RECOMMENDATIONS

Many Tribal authorities define "meaningful consultation" as **shared decision-making authority**. Shared authority cannot be guaranteed by legal mandates; it must be enacted in agencies' policies and practices, which should reflect the protocols and priorities of specific Tribal partners and an understanding of their specific historical contexts and challenges. In practice, this shared authority will:

- **Support Tribal authority over the decision-making process.**
    - **Co-design consultation process.** Seek out and incorporate Tribal procedures to ensure consultation is streamlined and effective for both parties. Ideally, the consultation process should be collaboratively designed.
    - **Tribal discretion in final decision making.** Promote policies granting Tribes independent authority to determine what counts as a cultural resource, what counts as a "substantial" or "significant" effect, and what counts as an appropriate mitigation measure.

    - ***Innovation:*** Humboldt County has adopted a "two key" approval process where both Tribes and agencies must approve a project for it to start.

  - **Agency difference to Tribal expertise.** Tribes are the experts on their cultural resources. While information systems and scientific data can supplement Tribal knowledge, Tribes must have the final say about cultural resources.

    - ***Innovation:*** Humboldt County revised its Cannabis Land Use Ordinance to stipulate that Tribes can designate TCRs at their sole discretion.

  - **Approach each Tribe as an individual, sovereign nation.** Government to government consultation is between two sovereign entities. Even in the context of multi-lateral consultation where more than one Tribe is involved, Tribes do not speak for each other and should be treated as independent authorities.

  - **Establish dispute resolution mechanisms.** Develop and implement guidelines for when consulting parties fail to reach agreement.

    - ***Innovation:*** Humboldt County forms an ad hoc committee within the Board of Supervisors in case of impasse.

- **Establish ongoing and transparent communication.**

  - **Full disclosure and transparency.** Tribes need complete project information to make informed decisions. Prior to consultation, agencies should supply all application details, permitting, and approvals on traditional Tribal lands.

  - **Early and continuous engagement.** Notify Tribes *immediately* when an applicant submits a project for review and update promptly when plans are modified.

  - **Establish a point of contact.** Have your agency designated contact (Tribal liaison) establish a designated point of contact with each partnering Tribe and keep this list updated. Notify all Tribes when the agency liaison changes.

  - **Follow up and use various communication strategies.** If a Tribe does not respond to a notification, it does not mean that they decline consultation. Follow up, use different modes of communication, and ideally establish preferred communication methods.

  - **Streamline communication.** Work with Tribes to eliminate redundant agency notifications and develop agreed-upon standardized consultation protocols.

  - **Institute agency accountability.** Create feedback mechanisms for Tribes and ideally public reporting on consultation compliance rates.

- **Build Tribal and agency capacity for consultation.**
  - **Provide dedicated funding**. Tribes often need funding to hire and train staff, conduct cultural and environmental surveys (including compensation for Elders' reviews), purchase equipment and mapping software, and conduct cultural monitoring.
    - ***Innovation:*** San Diego County assesses permit applicants a "cultural resource fee" that goes to Tribes who consulted for cultural monitoring.
  - **Build relationships**. Agencies should prioritize building familiarity and trust with Tribal authorities beyond the scope of individual projects. This may include regular annual or bi-annual meetings to discuss permitting processes and address concerns proactively. Relationships, especially face-to-face relationships, introduce a measure of agency and flexibility that can help clarify gray areas in cultural resource laws, improve communication and coordination, and ultimately increase trust and accountability between consulting parties. As cultural resource laws and policies are implemented at the state and local levels, robust preexisting relationships lay the groundwork for more respectful, efficient, and mutually beneficial consultation outcomes and policy adherence.
  - **Educate agency staff**. Require agency staff to complete regular training on statutory requirements and cultural awareness. Curricula should address:
    - Principles of government-to-government relationships
    - Historical context of Tribal land dispossession
    - Contemporary Tribal priorities and cultural values
    - AB 52 and related legal requirements
  - **Educate general public**. Helping to increase understanding about histories of land dispossession and the ongoing connection and real interest Tribes sustain in their ancestral territories and Tribal cultural resources may help to ease tensions around Tribal jurisdiction, especially where private property is concerned.
  - **Educate Tribes.** Ensure Tribes understand legal and permitting processes to build their capacity to engage effectively.
  - **Support innovation and best practices.** Evaluate, incentivize, and scale successful consultation and TCR protection strategies.
- **Improve geospatial data and data sharing with Tribes.**
  - **Maintain a cannabis permit database.** Develop and maintain a geo-referenced database of cannabis permit information including active grow locations, permit statuses (pending,

approved, denied), water sources and usage data, and environmental risk indicators. Make this database accessible to Tribes to support their consultation processes.

- **Require GIS data from applicants.** Require all cannabis permit applicants to submit their project footprint in standard GIS format.

CANNABIS-SPECIFIC RECOMMENDATIONS FOR THE DCC

- **Promote meaningful consultation with Tribes.**
  - **Maintain local agency authority over CEQA review**. While centralizing CEQA review at the state level can help streamline the permitting process, local agency authority over CEQA review is imperative for meaningful Tribal consultation. City and county agencies should remain the lead agencies for CEQA review since local agencies have a better understanding of their specific environments and more opportunities to build and maintain relationships with Tribes over land use in shared jurisdictions. The DCC should continue to provide a backstop to local-level CEQA review to ensure compliance and accountability.
  - **Foster inter-agency coordination.** Because of the strong connection between cannabis and TCRs, the DCC should join or convene an inter-agency task force with other key state agencies (e.g., OPR, NAHC, DFW, Water Boards) to standardize and improve consultation practices across the state to ensure protection of TCRs.
  - **Champion legislative reforms.** The DCC should work with the Governor's Office and the Legislature to sponsor legislation that strengthens the legal framework for consultation, addressing the ambiguities and loopholes identified in this research.
  - **Offer resources to local jurisdictions**. The DCC can help facilitate co-learning across local jurisdictions by holding webinars and circulating best practices and examples from counties that have developed successful working relationships with Tribes. See, for example, the UCANR webinar we held with Karuk Tribe and Humboldt County on "Strengthening Tribal-Agency Partnerships."
  - **Outreach and education.** Provide Tribes with full details of the permitting process and a clear explanation of projects that do not fall under standard consultation guidelines (like AB 52). The DCC should create and distribute outreach materials that explain the licensing process to Tribes and highlight opportunities for participation beyond formal consultation.
  - **Establish a Tribal consultation fund.** The DCC should seek legislative authority to use a portion of cannabis tax revenue to establish a dedicated fund for Tribes. This fund should provide grants to Tribal governments to build the capacity of their THPO and environmental offices, including funding for cultural surveys, project review, and monitoring.

- **Protect Tribal cultural resources.**
  - **Prevent CEQA exemptions that threaten TCRs.** One unfortunate outcome of including AB 52 as part of CEQA is the exemption from AB 52 consultation when projects are ruled CEQA-exempt. The DCC should require local agencies to consult with Tribes even when projects are CEQA-exempt and should provide clear guidelines for required environmental review of cannabis projects.
  - **Incentivize illegal grow removal and cleanup in consultation with Tribes.** The DCC should promote programs that incentivize the cleanup of illegal or environmentally damaging cultivation sites and should emphasize that these cleanups should be done in consultation with Tribes, whose TCRs have been damaged from illegal grow removal.
    - ***Innovation:*** Humboldt County's Retirement, Remediation, and Relocation (RRR) program allowed growers to earn development credits for cleaning up inappropriate sites, which could then be applied to new, more suitable cultivation projects.
  - **Maintain a regularly updated spatial database of cannabis cultivation permits and abatement actions** to promote transparency and streamline accountability and enforcement action. The DCC should ensure this information be presented in visual formats that allow for easy review by regulators, the public, and other stakeholders. At the same time, it is critical that the database respect Tribal concerns about the protection of sensitive cultural information. Location data related to Tribal Cultural Resources should not be made publicly available but rather shared securely with Tribal governments through data-sharing agreements that recognize Tribal sovereignty. In this way, Tribes can access the detailed site-level information they need for meaningful consultation while the public-facing portal provides generalized data appropriate for broad access. This approach ensures that the DCC can advance both transparency and cultural resource protection in partnership with Tribes.
  - **Ensure the thoroughness of environmental and cultural resource surveys.** Since many cannabis sites were chosen for proximity to water and flat, south-facing land, which often are also archaeologically and environmentally sensitive areas, rigorous review of the entire project area is imperative. The DCC should ensure that local agencies conduct comprehensive reviews and should encourage counties to hire Tribal experts for programmatic and cultural resource surveys.
    - ***Innovation:*** The Karuk Tribe conducts cultural and environmental resource assessments, streamlining the Tribal review process and saving costs for the applicant. (Note: Not every Tribe has the same capacity.)

- **Strengthen enforcement and monitoring.**
  - **Establish consultation and mitigation expectations with local agencies.** In consultation with Tribes, the DCC should develop guidance for local agencies on acceptable consultation standards and mitigation measures for impacts to TCRs. This guidance should prioritize avoidance and integrate Tribal protocols for mitigation and resource protection.
  - **Strengthen protections for water and native plants.** The DCC should work with the State Water Resources Control Board and the Department of Fish and Wildlife to ensure that environmental protections in the cannabis regulations specifically account for the cultural importance of water, fisheries, and native plant communities.
  - **Support Tribal-led cultural surveys.** The DCC should require and provide funding for Tribal governments to conduct their own cultural surveys of proposed project areas. This proactive step identifies "areas of concern" early and ensures that Tribal expertise, not just archaeological data, guides project review.
  - **Consultation on illegal grow removal**. Establish a clear process for local governments to notify and consult with Tribes about the removal of illegal facilities and the subsequent impacts on Tribal cultural resources.

F. COMPLETED PROJECT DELIVERABLES

Six Publications

In ***Tribal Sovereignty in land use decision making: Evaluating cultural resource law in California***, we describe the ongoing challenge of upholding Tribal sovereignty in land use decision making, in part because Tribal sacred sites, cultural heritage sites, and other cultural resources exist in areas outside of Tribal jurisdiction. While AB 52 provides a mechanism for Tribal consultation on a per-project basis and has given Tribe's decision making authority where Tribal Cultural Resources (TCRs) are concerned, even when TCRs are located off-reservation, our study shows that AB 52 is not consistently applied in land use decision making and that it faces several barriers to implementation. Our focus on AB 52 in cannabis permitting provides a lens for evaluating Tribal consultation and TCR protection more generally. We discuss these findings and suggest how environmental policies and agency processes can be strengthened in support of Tribal sovereignty.

In ***Unchecking the Box: Overcoming barriers to meaningful consultation***, we focus on intergovernmental consultation between public agencies and Tribal governments. Consultation is a critical component of affirming Indigenous land sovereignty and protecting sacred sites and cultural resources in land use and decision making. We analyze barriers to meaningful consultation through our case study of consultation on cultural resources and cannabis permitting on Tribal ancestral lands in California. We argue that cultural resource laws in general suffer from asymmetrical power relations, which are codified into policy through provisions such as "agency discretion" and unfunded mandates. We differentiate between "structural" barriers to consultation

(those which embody exclusionary mechanisms of settler colonialism) and "soft" barriers (such as cultural differences, knowledge gaps, and relationships) all of which undermine the consultation process. Meaningful consultation requires equitable Tribal-agency relations, which depend on policies that affirm Tribal authority in land use decision making, as well as agency and Tribal capacity building, with equitable funding for Tribal staff time, Tribal-agency trust and relationship building, and agency training in Tribal culture, history, and cultural resource policy. Cultural resource laws and consultation policies that affirm Tribal sovereignty demonstrate awareness of and incorporate measures intended to eliminate these barriers.

In ***Cannabis Impacts on Native Lands: On the Need for Inclusion of Native Perspectives in Extension Work***, we highlight the need for Cooperative Extension to increase awareness of Tribal concerns around activities that impact land, natural resources, and water, based on the research results that surfaced widespread concern among Native communities about the environmental impacts of cannabis cultivation, especially to water quality, access, and availability. These concerns underscore the need to include Native communities in Extension's agricultural and natural resource activities across all regions and sectors.

Mapping Tribal Ancestral Territory: Tribal and Agency Perspectives in California is currently under review. This article explores how mapping failures translate into concrete land use planning problems, including systematic under-consultation with affected tribes, regulatory non-compliance under Assembly Bill 52, and inadequate protection of Tribal Cultural Resources in development projects. The research identifies five critical modes of territorial misrepresentation -- over-simplification of dynamic boundaries, systematic exclusion of non-recognized tribes, reliance on outdated academic sources, technical reductionism in digital systems, and cultural invisibility in mapping systems -- requiring immediate attention from land use planners and environmental governance agencies.

Quantifying Territory: How Mapping Choices Drive Consultation Outcomes in California is in preparation. In this article, we describe the spatial and attribution discrepancies between two primary Native California ancestral territory mapping sources: cultural area polygons from the Handbook of North American Indians, used in conjunction with the Native American Heritage Commission's tribal contact lists, and tribe-specific boundaries from Native Land Digital. Spatial analysis of 72 Handbook polygons and 126 Native Land Digital polygons revealed substantial differences in territorial representation, with only 49% of territories showing one-to-one attribution matches, representing 38% of California's land area. Findings indicate substantial variations in territorial representation between traditional academic and contemporary Indigenous mapping sources, with significant implications for consultation processes, regulatory compliance, and cultural resource protection.

From resources to relatives: Tribal cultural resource protection in California is in preparation. The article explains that the dominant approach to Tribal Cultural Resource Management (TCRM) uses a colonialist framework that interprets cultural resources within the historical purview of archaeology and disregards Native peoples as subject-matter experts. Through a case study of TCRM in the arena of cannabis permitting in California, this article demonstrates that agencies continue to privilege archaeological knowledge over Tribal expertise and that project outcomes do not meet Tribal standards. To adequately protect Tribal cultural resources, agencies should consult with Tribes regarding areas of concern and support Tribal decision making by integrating project

approvals with Tribal protocols, guaranteeing Tribal discretionary authority, and funding Tribes to conduct cultural surveys, project review, and monitoring.

GIS Mapping and Analysis

We conducted a novel quantitative analysis of the GIS data used in consultation, creating new datasets that illustrate the shortcomings of current mapping protocols. These shapefiles and the resulting analysis are a critical component of the project's findings.

Roundtable Webinar

The roundtable webinar **"Building Agency-Tribal Partnerships: Lessons from Humboldt County"** reviewed the recent history of collaborations and formal consultations between Tribes and Humboldt County Planning.

Consultation Policy Template

In Spring 2025, after consulting with our Tribal Advisory Committee, the project shifted from its original plan of creating a best practices guide for government agencies and cannabis-specific guidelines for Tribes. Our advisors noted that California's AB 52 legislation was being rewritten, which would quickly render a policy brief obsolete. More importantly, they advocated for a resource created for Tribes rather than for agencies. They recommended developing a customizable Consultation Policy Template to empower California Tribes, especially those with limited resources, to establish their own consultation protocols. This "By Tribes, For Tribes" approach enables Tribes to proactively guide government agencies through consultation processes based on Tribal priorities, rather than reacting to agency interpretations of laws like AB 52, SB 18, NHPA, and NAGPRA.

By Tribes, for Tribes Consultation Policy Workshop

To develop the new resource, the project team held a workshop with 22 Tribal Heritage Preservation Officers (THPOs) and legal experts, who confirmed the need for the template. With input from the workshop and permission from the National Indian Justice Center (NIJC), the team embarked on a collaborative effort to substantially update and expand an existing NIJC template to create an easy-to-use, customizable Template to share broadly with California Tribes. Following an iterative process of rewriting, review, and revision with Tribal partners, the project produced a fully designed and customizable Consultation Policy Template, a User's Guide, and supplementary materials. These resources, which incorporate a list of agency best practices for Tribes to adapt and present, are now hosted online for broad distribution.

Resources for Tribes webpage

A dedicated **Resources for Tribes webpage** provide easy access to project resources, including those supporting Policy and Land Use, Digital Mapping and GIS, and Consultation, housed on UC Berkeley's Cannabis Research Center website.

Conference presentations and newsletters

We presented our project research findings and recommendations via our academic journal publications and at three different professional conferences during the NCE period: the 2025 Cannabis and Environmental Stewardship Symposium, CALTHPO/SHPO Summit, and the California Native American Tribal GIS Summit. We have accepted invitations to present our research to UC Agriculture and Natural Resources' (UCANR's) Native American Community Partnerships Working Group and the California County Planning Commissioners' Annual Conference in October and the Tribal and Indigenous Planning Division of APA next April and are considering a presentation at the California Indian Conference in 2026.

In addition to downloads from publisher sites (over 400 downloads to date for the *Journal of Extension* article alone) our publications have been shared with the 317 subscribers to the UC Berkeley Cannabis Research Center newsletter. Project accomplishments will be shared statewide in a press release in early October. Our *Resources for Tribes* webpage will host the new Consultation Policy Template and supplementary resources, information on policy and land use ordinances for cannabis cultivation, GIS digital mapping tools recently updated based on our Tribal Advisors' feedback, links to our three publications, and an expanded collection of other agency and Tribal consultation resources for Tribes.

G. AREAS FOR FURTHER STUDY

Our study identified several areas requiring additional investigation:

1. **Tribal Market Participation:** What barriers prevent Tribal participation in the legal cannabis market and what pathways exist for effective Tribal-State partnerships?
2. **Cannabis Remediation:** What concerns do Tribes have about cannabis remediation and what are culturally appropriate remediation strategies?
3. **Cumulative Impact Assessment:** How are cumulative effects of multiple projects affecting TCRs and Tribal communities?
4. **Enforcement Effectiveness:** What enforcement mechanisms prove most effective in ensuring consultation compliance?
5. **Sector Comparison:** How do consultation experiences in cannabis compare to other industries (forestry, water, renewable energy)?
6. **Traditional Ecological Knowledge Integration:** How is TEK incorporated into land use decision making through AB 52 consultation and other areas of Tribal-state interaction?

CONCLUSION

California's cannabis permitting process demonstrates both the promise and limitations of Assembly Bill 52 (AB 52) in protecting Tribal cultural resources. While AB 52 provides Tribes unprecedented standing in local land use planning and decision making, meaningful consultation remains inconsistent across jurisdictions and projects. Our survey findings reveal that this inconsistency stems from several interconnected challenges: CEQA's limited scope, excessive agency discretion, weak enforcement mechanisms, and insufficient capacity and resources in both Tribal and agency offices. These structural barriers, including inadequate funding, staff shortages, and poor information sharing—are compounded by the complexity of land use permitting and inconsistent policies and relationships across jurisdictions.

The DCC can and should implement reform measures at the state level and encourage changes at the local level to support meaningful consultation and protect Tribal cultural resources. Our research identifies four critical areas for action: establishing shared decision-making authority through Tribal discretion, providing high-quality information on land use permits to Tribes, ensuring adequate funding and training to enhance both Tribal and agency capacity, and fostering long-term relationships between agencies and Tribal offices.

While these actions will help improve consultation infrastructure over time, other problems require legislative and structural reform. Currently (fall 2025), Tribes are working with state lawmakers to advance additional CEQA changes that would coordinate and streamline consultation processes, afford Tribes a more prominent role in identifying and protecting TCRs, and enhance guidance for agencies. Whatever reforms are ultimately implemented, effective and meaningful consultation will require clear regulatory guidance, Tribal authority over cultural resources, and funded participation. In the long term, sovereignty in land use decision making requires formal recognition of Indigenous rights to ancestral territories, co-management of culturally significant landscapes, and meaningful consultation with Tribes to ensure Tribal perspectives and priorities are reflected in environmental planning processes and outcomes.

The success stories identified in our research, particularly Humboldt County's reforms supporting Tribal discretionary authority over culturally significant areas, demonstrate that structural change is both possible and beneficial for all parties. When Tribes have authentic decision-making power over cultural resources, consultation becomes genuine negotiation between sovereign entities rather than extractive information gathering.

California's ongoing commitment to repair and reconciliation with Tribes, as evidenced through the state's Tribal Affairs initiatives, requires implementing the structural changes identified in this research. This includes affirming Tribal authority, providing equitable resources, and moving beyond consultation as mere procedural compliance. As California continues evolving its approach to environmental protection and land use planning, the state has an opportunity to model innovative approaches to Indigenous sovereignty and environmental justice. The cannabis industry, despite its challenges, provides a concrete sector where these principles can be tested and refined for broader application.

In an era where the state government is actively seeking to promote truth, healing, and reconciliation with California Tribes, reforming the consultation process is a critical and tangible

way to turn those commitments into action. Recent changes to CEQA and the ongoing work of the Truth and Healing Council signal a growing political will to address these issues. By taking decisive action now, the DCC can align itself with this movement and help to define a new, more respectful, and more collaborative chapter in the history of California's relationship with its first peoples. Effective consultation is not a burden or an obstacle; it is an opportunity to make better, more informed, and more sustainable decisions for the future of California.

REFERENCES

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- Comprehensive statewide surveys of 46 Tribal representatives and 56 agency representatives
- 61 semi-structured interviews with 83 individuals across California
- Extensive collaboration with 7-member Tribal Advisory Committee
- Workshop and consultation inputs from 22 California THPOs

APPENDIX: INTERVIEW AND SURVEY INSTRUMENTS

1. Tribal Survey Guide
2. Tribal Interview Guide
3. Agency Survey Guide
4. Agency Interview Guide