

**United States Department of the Interior**  
**BUREAU OF LAND MANAGEMENT**

**El Centro Field Office**  
1661 South 4<sup>th</sup> Street  
El Centro, CA 92243  
[www.blm.gov/ca/elcentro/](http://www.blm.gov/ca/elcentro/)

CA-670-08-088/CR-CA-670-13-123/CACA-51204/(8100)P

**Memorandum**

To: Field Manager, El Centro Field Office

From: Archaeologist, El Centro Field Office

Subject: Agency Findings and Determinations under Section 106 of the National Historic Preservation Act

Project: ECO Substation Project Minor Project Refinement 6, San Diego County, California

San Diego Gas and Electric (SDG&E) has proposed minor project refinements (MPR) on private land to the approved ECO Substation (Project) as analyzed in the Final Environmental Impact Statement/Environmental Impact Report (EIR/EIS).

MPR #6: The refinements described in this MPR request are a result of the final transmission line design that was developed based on the preliminary alignment presented in the Final EIR/EIS. SDG&E submitted the Proponent's Environmental Assessment (PEA) and the application for a Permit to Construct once the preliminary design contained sufficient detail as advised by the Working Draft PEA Checklist for Transmission Line and Substation Projects (California Public Utilities Commission, San Francisco Energy Division Director's Office, October 2008) document. SDG&E continued to refine the engineering design to incorporate field verification of terrain, including the locations of boulders and other features that could impact constructability, results of geotechnical investigations. They also include specific input regarding construction methodology (including equipment requirements that SDG&E's contractor will implement during construction), requests and requirements from resources agencies, and continued right-of-way (ROW) acquisitions and landowner coordination. As a result, minor refinements to the pole locations and workspace requirements as estimated in the Final EIR/EIS are necessary. A complete list of proposed refinements is summarized in Appendix A.

In support of MPR #6, ASM Affiliates (ASM) personnel reviewed archival documentation, including the Class III inventory report prepared in support of this Project: *Prehistoric Artifact Scatters, Bedrock Milling Stations and Tin Can Dumps: Results of a Cultural Resources Study for the SDG&E East County Substation Project, San Diego County, California* (Berryman and Whittaker 2010), as well as previous archaeological investigations in the area: *Prehistoric*

*Lifeways in the Jacumba Valley* (Townsend 1986), *Eligibility Recommendations for 28 Archaeological Sites along San Diego Gas & Electric's Sunrise Powerlink Project, San Diego and Imperial Counties, California* (Williams and Whitley 2011), and *Data Recovery Study of Three Archaeological Resources (SDI-7030, SDI-7060 and SDI-19303) along San Diego Gas & Electric's Sunrise Powerlink Project, San Diego County, California* (Williams, In Progress). Additionally, ASM reviewed the *Memorandum of Agreement among the Bureau of Land Management-California, The United States Army Corps of Engineers, San Diego Gas & Electric Company, and the California State Historic Preservation Officer Regarding the East County Substation Project, San Diego County, California, August 2012 (MOA)*. The area covered by MPR #6 has been surveyed during both the Class III inventory survey and by ASM personnel in accordance with the final *Management Plan for Archaeological Monitoring, Post-Review Discovery, and Unanticipated Effects for the San Diego Gas & Electric Company (SDG&E) East County (ECO) Substation Project, Jacumba, San Diego County, California, January 2013*. This is documented in ASM's confidential letter report to Mr. Jeff Sahagun dated August 12, 2013.

Seven new sites and five new isolates were recorded during this supplemental survey. None of the new sites are within the area of direct impact (ADI) for the proposed refinements however any within 100 feet of proposed work areas will require Environmentally Sensitive Area (ESA) fencing as well as archaeological and Native American monitoring in accordance with the MOA Stipulation 3(a)(i) (page 5). Each refinement area was micro-sited to avoid both new sites as well as the previously recorded archaeological site artifacts and features; permanent work space was substantially reduced or eliminated at some locations along the 138 kV Transmission Line.

To decrease the potential for impacts within previously recorded site boundaries, which is already considered very low due to the absence of surface artifacts and small potential for buried deposits, all permanent workspace, with the exception of the immediate area around the steel pole foundations, was eliminated by the proposed Project refinements, and only existing access roads and overland travel directly to and from the poles will be utilized with some additional area for equipment staging.

Utilizing the information generated from the previously conducted investigations and the geomorphological studies of this location, ASM provided recommendations to the BLM in their confidential letter report dated August 12, 2013 of the potential effects of MPR#6. Mr. Brian Williams, Senior Archaeologist of ASM, makes the following recommendations:

“Based on this analysis, it is my recommendation that MPR request #6 will not result in any additional adverse effects to historic properties as long as the recommended mitigation measures are implemented.”

Pursuant to the Project's MOA, BLM professional cultural resources staff has reviewed MPR #6. The BLM concurs with the contractor's recommendations and based on their letter report, the BLM Determination and Findings letter dated August 19, 2013 to Consulting Parties, the MOA, and the BLM's Record of Decision (ROD) for this Project, compliance with the following actions are required as part of SDG&E's implementation of these changes:

- **CUL-1A – Develop and Implement a Historic Properties Treatment Plan-Cultural Resources Management Plan.**
- **CUL-1D – Construction Monitoring.**
- **CUL-1E – Discovery of Unknown Resources.**
- **CUL-2 – Human Remains.**
- **SDG&E will also continue to comply with all other relevant cultural resources protection and treatment measures as outlined in the MOA and the ROD as appropriate.**

All archaeological sites and all potentially culturally sensitive areas that are within 100 feet of construction activities shall be demarked as ESAs and protected as exclusionary zones. Additionally, archaeological and Native American monitors are to be on-site during the temporary fencing prior to initiation of ground disturbing activities in the vicinity of the site and will be maintained and monitored for the duration of the work effort in the ESA vicinity.

Prior Section 106 review and consultation for the Project's MOA provide that the required conditions and mitigation measures listed above are adequate to identify and protect historic properties on public lands that might be affected by the aforementioned MPR. Therefore, the BLM staff archaeologist has recommended that there would be no adverse effect on historic properties if the above measures are implemented.

The BLM makes the following findings for this undertaking.

- 1. The activities covered by the MPR will take place within the originally defined APE for the Project.**
- 2. The BLM finds that there will be *no adverse effects to historic properties* provided the above mitigation measures are implemented as required by the MOA and the ROD.**
- 3. Accordingly, the MPR is covered by the prior consultations for the Project. No additional consultation is required pursuant to the National Historic Preservation Act.**

This memorandum documents the recommendations of the cultural resources staff, the acceptance of these recommendations by the Agency Official (as defined in 36 CFR §800.2(a), Protection of Historic Properties), and constitutes the formal statement of Agency findings and determinations for Section 106 of the National Historic Preservation Act with respect to the aforementioned minor project refinement.

Recommended by:

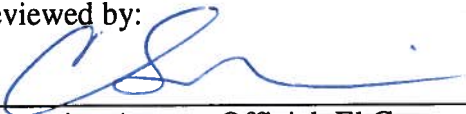
**JEFF SAHAGUN**

Archaeologist, El Centro Field Office

**8/21/13**

Date

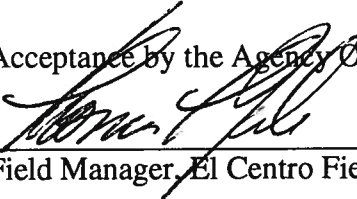
Reviewed by:



\_\_\_\_\_  
Reviewing Agency Official, El Centro Field Office

8/21/13  
\_\_\_\_\_  
Date

Acceptance by the Agency Official:



\_\_\_\_\_  
Field Manager, El Centro Field Office

8/21/2013  
\_\_\_\_\_  
Date

Attachments: Appendix A. MPR #6 Refinement Table