



San Diego County Archaeological Society, Inc.

Environmental Review Committee

21 August 2008

To: CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104

Subject: Recirculated Draft Environmental Impact Report/Environmental Impact Statement
Sunrise Powerlink Project

Gentlemen:

I have reviewed the cultural resources aspects of the recirculated DEIR/DEIS for the Sunrise Powerlink Project on behalf of this committee of the San Diego County Archaeological Society (SDCAS).

We appreciate the additional information and alternatives included in the recirculated DEIR/DEIS. Ultimately, however, the comments made in our letter of 8 April 2008 on the original document are not changed. For convenience, they are indented and repeated below, with additional comments appearing in square brackets, [like these]:

Normally, when SDCAS participates in the public review for projects in San Diego County, significantly greater detail is available to us than is the case on the Sunrise Powerlink (SRPL) project. Having very brief summaries of sites, with no real attempt to characterize the difficulty of mitigation other than mention of how many sites are known to contain human remains or rock art, substantially limits our ability to provide a real review.

Mention of the number of sites "potentially eligible" for the National or California Registers is really just a count of sites that are more than isolates and that have not previously been evaluated for eligibility. It would have been helpful to have distinguished between sites with a low, medium or high likelihood of being eligible. For example, sites with just bedrock milling and not associated with a large habitation site might be considered to have a low likelihood of being eligible. Tabulating those results by route segment would have helped assess the various alternatives' acceptability from a cultural resources standpoint. Of course, simple site counts, even with the help of this additional screening, in and of themselves, don't necessarily provide a clear distinction between the desirability of the various routes.

Further making a real comparison of the relative desirability of the routes and segments difficult is the fact that various portions of each segment were not archaeologically

surveyed, and sites in the unsurveyed are apparently just educated guesses. This, plus the numerous sites that have not been tested and actually evaluated for significance, appears to be inconsistent with the *Sundstrom v. County of Mendocino* decision, in that the full impacts of the project are not being disclosed to either the public or the decision-makers prior to project approval.

Page D.7-15 [of the original DEIR/DEIS] notes that “This EIS/EIR is not intended to address all of the requirements of Section 106.” It goes on to cite plans for a “phased identification and evaluation.” Please describe and advise how the public (specifically SDCAS) can be involved in the subsequent phases of environmental review for the project.

While potential routes of various widths were surveyed to varying degrees, it is not clear to what degree access routes and staging areas were surveyed. Clarification, and potentially additional surveying, is required.

Aerial photographs of the western two-thirds or so of San Diego County were taken by the County Tax Assessor in 1928-29, and are available at the County’s Department of Planning and Land Use. Were these and/or other aerial photographs reviewed to help identify locations that might contain historic resources? If not, why not? And will the omission be corrected prior to project approval?

Have all sites located during the extensive fieldwork by the various consultants been recorded, or site records updated? If not, when will that be done?

Have cultural landscapes been part of the studies conducted for the project? If not, why not?

Table D.7-1 [of the original DEIR/DEIS] indicates some cultural resources impacts as being temporary. Please clarify the rationale for this. While the activities themselves may be temporary, wouldn’t any resulting impacts (other than things like noise or visual impacts) be permanent?

Regarding the mitigation measures in Table D.7-3 [of the original DEIR/DEIS], we have the following comments:

- The third bullet for CR-APM-4 states that “curation may be appropriate.” In fact, with the BLM involvement, curation in accordance with 36CFR79 is **required**. Curation is also a requirement Section V of the Register of Professional Archaeologists’ Code of Conduct, as well as of the City of San Diego and County of San Diego. The text of this measure needs to be revised to require curation in accordance with the requirements of 36CFR79 and the State Historic Resource Commission’s *Guidelines for the Curation of Archaeological Collections*, dated May 7, 1993.
- Mitigation Measure CR-APM-11 states that “SDG&E would implement its standard practices for cultural and paleontological resources on private lands.” As those “standard practices” are being cited as a mitigation measure for the SRPL, they must be publicly disclosed and an opportunity for public review and comment must be provided. How else are we to judge their adequacy? We request being provided a copy, and an opportunity to comment as part of the public review of this

DEIR/DEIS. This is a clear deficiency in the DEIR/DEIS, and may also exist in other subject areas, where SDG&E has its own standard practices. While we know what practices (in all subject areas) the City of San Diego and the County of San Diego expect and require, SDG&E's are not nearly as well known.

- All material recovered during all of the fieldwork conducted to date for the project must also be curated, regardless of whether the project ultimately goes forward. Please confirm that this has been or will be done.


Regarding selection of project alternatives, the order of environmental preference described in the DEIR/DEIS appears to also be consistent with the order of desirability from the perspective of potential impacts to cultural resources. Clearly, the local generation alternatives, by virtue of avoiding over 100 miles of corridors, will inevitably impact fewer sites of all types than either the applicant's preferred route or the southern routes. Likewise, the southern routes, being appreciably shorter than the northern route, would likely to impact fewer sites of all types. Furthermore, the sites impacted along the northern route, particularly the segments through the Anza-Borrego Desert State Park (ABDSP), hold an unusually high degree of integrity in both the settings and the sites themselves. Consequently, from the perspective of cultural resources, [either] the applicant's preferred route [or SDG&E's "Enhanced Northern Route"] is very apparently the least desirable of all the alternatives studied.

The La Rumarosa area of Baja California harbors a large number of important prehistoric rock art sites. If it has not already done so, it would be wise for SDG&E to have its cultural resources consultants visit the area in the company of Ken Hedges (San Diego Museum of Man) and Julia Bendimez (INAH) before plans for the La Rumarosa Wind Project and its associated transmission lines proceeds too far.

The recirculated DEIR/DEIS has done nothing to address the concerns or answer the questions raised in our April letter. We urge adoption of one of the in-area alternatives listed in Section 5 (Environmentally Superior Alternatives) on page 5-1 of the recirculated DEIR/DEIS.

We appreciate the opportunity to review this project's environmental documents and request being included in subsequent environmental reviews related to the project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File