

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

El Centro Field Office
1661 South 4th Street
El Centro, CA 92243
www.blm.gov/ca/elcentro/

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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 12, San Diego County, California

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

MPR Request #12: MPR request #12 includes a reduction and shift in the maintenance pad for three-pole structure SD-6; a reduction in temporary workspace at existing Southwest Powerlink (SWPL) structure 50183; a reduction in temporary workspace at an existing Sunrise Powerlink (SRPL) pull site; a shift in the pull site south of SD-2 and removal of the previously planned temporary access road; a slight expansion of the permanent access road leading to SD-2; and a reduction to the workspaces at structures SD-1, SD-3, SD-4, and SD-5. Finally, the installation of fiber optic cable from the SRPL Transmission Line to the SWPL loop-in is also requested as part of MPR request #12.

Each refinement area was sited to avoid known cultural resources and permanent/temporary work space was substantially reduced or eliminated along the SWPL loop-in. Two of the refinements for this MPR request are a direct cause of avoidance to known cultural resources.

In support of this analysis, ASM Affiliates (ASM) personnel reviewed cultural resources 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), the evaluation report for the Sunrise Powerlink Project, *Eligibility Recommendations for 28 Archaeological Sites Along San Diego Gas & Electric's Sunrise Powerlink Project, San Diego and Imperial Counties, California* (Williams and Whitely 2012), and a study conducted on the potential for buried deposits at these facilities, *Update to*

existing site boundary for CA-SDI-7074, San Diego County, California (Williams 2013). 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, (MOA) August 2012. The area covered by MPR request #12 was 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.

Utilizing the information generated from the previously conducted investigations, ASM provided recommendations to the BLM in their confidential letter report to Mr. Jeff Sahagun, dated February 18, 2014. Mr. Brian Williams, Senior Archaeologist of ASM, makes the following recommendations:

“It is my determination that MPR request #12 will not result in any additional impacts to known significant cultural resources. Erection of Environmentally Sensitive Area (ESA) fencing was already established for this location during use of the Northern Access Road and will be checked and refreshed as necessary prior to any work in the area. A professional Archaeological Monitor and Tribal Cultural Consultant will be required to be present for all initial ground disturbance related to this MPR request.”

Pursuant to the Project’s MOA, BLM professional cultural resources staff has reviewed MPR #12. The BLM concurs with the contractor’s recommendations and based on their letter report, 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 ground disturbing.

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 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

3/4/14
Date

Reviewed by:

[Signature]
Reviewing Agency Official, El Centro Field Office

3/4/14
Date

Acceptance by the Agency Official:

[Signature]
Field Manager, El Centro Field Office

3/5/2014
Date