

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

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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 9, 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 #9: SDG&E proposes an additional 0.45 acre of temporary workspace to allow for the relocation of approximately 540 feet of fence including eight ornamental trees and the associated irrigation system located on privately owned land. Per the landowner's request, the existing fence will be removed and replaced with an identical new fence approximately 20 feet east, outside of the SDG&E right-of-way (ROW), and the eight new trees and irrigation line will be installed on the east side of the new fence line within the landowner's property.

The refinement area was surveyed for archaeological materials during pre-construction and cultural resources inventory work for the Project (Williams 2011) as well as during a supplemental survey done by ASM Affiliates (ASM) on November 11, 2013 to include a small portion of the expansion area that was not previously surveyed. No cultural resources were identified within the proposed refinement area nor were any identified within 100 feet.

In support of this analysis, 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), a supplemental pre-construction survey of the expansion, *Cultural Resources Survey of 138kv Realignment along the Boulevard to the Border corridor for the East County Substation Project, San Diego County, California* (Williams 2011), and the *Old Highway 80 National Register of Historic Places Nomination Form* (Krintz 2012). 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. The area covered by MPR #9 has been surveyed during both 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 November 26, 2013.

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 December 3, 2013 of the potential effects of MPR#9. Mr. Brian Williams, Senior Archaeologist of ASM, makes the following recommendations:

“Based on this analysis, it is my determination that MPR request #9 will not result in any impacts to significant cultural resources and that no additional Environmentally Sensitive Areas (ESAs) would be required by the proposed changes [as long as the recommended mitigation measures are implemented].”

Pursuant to the Project's MOA, BLM professional cultural resources staff has reviewed MPR #9. The BLM concurs with the contractor's recommendations and based on their letter report, this BLM Determination and Findings, 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

12/4/13

Date

Reviewed by:

[Signature]

Reviewing Agency Official, El Centro Field Office

12/5/13

Date

Acceptance by the Agency Official:

[Signature]

Field Manager, El Centro Field Office

12/5/2013

Date