

**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 13, 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 #13: The minor refinements described in this MPR request are required to accommodate the equipment needed to construct the 138 kV Overhead Transmission Line, to prevent potential safety hazards and erosion control problems from existing site conditions, and to protect cultural resources. The refinements will result in a total increase of the Project's temporary impacts by approximately 0.187 acre and permanent impacts by approximately 0.076 acre. The specific shifts at each refinement site are described in the following paragraphs.

Temporary workspace will be increased by approximately 0.003 acre at Steel Pole (SP-) 49 to join the adjacent work areas. Approximately 0.024 acre of temporary workspace and approximately 0.001 acre of permanent grading will be added at Access Road 6.2 (AR-) and AR-10, respectively, to mow the brush along the side of the road in order to provide adequate space for construction equipment. In addition, temporary impacts will be increased by approximately 0.009 acre at AR-7.2 to mow the brush in order to provide an adequate turning radius for construction equipment.

Additional temporary workspace along AR-21/22 is required to smooth the surface of the existing dirt road. This refinement will result in an increase of approximately 0.191 acre of temporary impacts due to the access road modifications. Also, an additional temporary workspace of approximately 0.004 acre at Gate 10E (G-) is required to remove two existing steel posts in order to allow sufficient access by construction equipment.

The refinement at SP-42 will result in an increase of approximately 0.016 acre of permanent impacts to remove or secure a boulder located outside of the work limits that has the potential to roll into the work site and cause damage to the existing Southwest Powerlink tower, construction equipment, and/or cause injury to construction personnel.

The refinement at SP-62 is required to raise the ground elevation in order to promote drainage in the area between the graded pad slope and existing slope. The required work to raise the ground elevation of the area will convert approximately 0.011 acre of approved temporary impacts to permanent impacts.

In addition to a conversion in approximately 0.055 acre of approved temporary impacts to permanent impacts, approximately 0.015 acre of permanent impacts and 0.01 acre of temporary impacts will be added at SP-91. These changes in the SP-91 workspace are required to remove an undocumented stockpile of non-native sand and/or fill that has been left at the location and to grade the area to pre-existing condition.

At SP-90, the temporary workspace was slightly increased by converting approximately 0.006 acre of approved permanent grading to temporary impacts. In addition, the maintenance pad at SP-90 was slightly increased by converting approximately 0.011 acre of approved temporary workspace to permanent impacts.

An overall addition in approximately 0.015 acre of temporary impacts and reduction of approximately 0.026 acre of permanent impacts at SP-55 are required to re-route the access road to avoid an environmentally sensitive area (ESA).

In support of this analysis, 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 #13 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 April 8, 2014. Mr. Brian Williams, Senior Archaeologist of ASM, makes the following recommendations:

“It is my determination that MPR request #13 will not result in any additional impacts to known significant cultural resources. 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 #13. 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 initial 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

4/16/14

Date

Reviewed by:

Carrie Summers

Reviewing Agency Official, El Centro Field Office

4/16/14

Date

Acceptance by the Agency Official:

Thomas J. [Signature]

Field Manager, El Centro Field Office

4/16/2014

Date