

**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 7, 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 #7: SDG&E proposes to relocate the existing temporary retention basin (as approved in MPR request #1) due to the larger than expected concentration of alluvium present adjacent to and extending under the pond. The proposed relocation of the existing temporary retention basin is needed to allow SDG&E's contractors to drain and remove the retention basin structure, remove the alluvium underneath it, and replace it with the properly engineered fill. Once constructed and filled to capacity, the existing basin will be removed. The relocated temporary retention basin will remain in place throughout the development of the ECO Substation site.

In support of MPR #7, 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 #7 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 19, 2013.

Utilizing the information generated from the previously conducted investigations, ASM provided recommendations to the BLM in their confidential letter report dated August 19, 2013 of the potential effects of MPR#7. Mr. Brian Williams, Senior Archaeologist of ASM makes the following recommendations:

“No new archaeological sites were identified in the refinement areas covered by MPR request #7. Based on this analysis, it is my recommendation that MPR request #7 will not result in any new impacts to significant cultural resources and that no additional Environmentally Sensitive Areas would be required by the proposed changes.”

Pursuant to the Project's MOA, BLM professional cultural resources staff has reviewed MPR #7. 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 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

8/22/13  
Date

Accepted by the Agency Official:

  
Field Manager, El Centro Field Office

8/22/2013  
Date