

## Appendix I: Native American Consultation Materials

The following consultation materials, in chronological order, are included in this appendix:

### 2005

- NAHC Sacred Lands File Search and Native American Contact List for the Valley–Ivyglen Project (August 12, 2005)

### 2008

- Soboba Band of Luiseño Indians Comments on the Notice of Preparation for the Valley–Ivyglen Project (January 28, 2008)
- Pala Band of Mission Indians Comments on the Notice of Preparation for the Valley–Ivyglen Project (February 1, 2008)
- Pechanga Band of Luiseño Indians Comments on the Notice of Preparation for the Valley–Ivyglen Project (February 22, 2008)
- NAHC Sacred Lands File Search and Native American Contact List for the Alberhill Project (May 22, 2008)

### 2009

- SCE Native American Tribe Consultation Letters for Alberhill System Project (February 17, 2009)
- Pechanga Band of Luiseño Indians Comments to SCE on Alberhill Substation Project (April 29, 2009)
- SCE Native American Tribe Consultation Letters for Alberhill System Project (August 12, 2009)
- Soboba Band of Luiseño Indians Comments to SCE on Alberhill Substation Project (August 20, 2009)

### 2010

- Meeting Notes: Alberhill Substation—Native American Consultation with the Soboba Band of Luiseno Indians and Southern California Edison Archaeologists (February 17, 2010)
- Pechanga Band of Luiseño Indians Comments on the Notice of Preparation for the Alberhill System Project (May 14, 2010)

### 2011

- Pechanga Band of Luiseño Indians Comments on the Notice of Preparation for the Alberhill System Project (August 24, 2011)

### 2015

- Pechanga Band of Luiseño Indians Comments on the Notice of Preparation for the Alberhill Project (June 9, 2015)

- Pechanga Band of Luiseño Indians Comments on the Notice of Preparation for the Valley–Ivyglen Project (June 9, 2015)
- SCE Sacred Lands File Search and Native American Contact List Request to NAHC for Valley–Ivyglen and Alberhill Projects (June 19, 2015)
- NAHC Sacred Lands File Search and Native American Contact List for the Valley–Ivyglen and Alberhill Projects (July 15, 2015)

08/12/2005 10:15 FAX 916 657 5390

NAHC

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STATE OF CALIFORNIA

Arnold Schwarzenegger Governor

## NATIVE AMERICAN HERITAGE COMMISSION

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SACRAMENTO, CA 95814  
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Web Site www.nahc.ca.gov



August 12, 2005

Brett Rushing  
Enrix  
590 Ygnacio Valley Road, Suite 200  
Walnut Creek, CA 94596

Sent by Fax: 925-935-6368  
Number of Pages: 6

Re: Proposed Ivyglen Transmission Project, Riverside County

Dear Mr. Rushing:

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 653-6251.

Sincerely,

*Carol Gaubatz*  
For: Carol Gaubatz  
Program Analyst

08/12/2005 16:15 FAX 916 657 5390

NAHC

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**Native American Contacts  
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August 12, 2005**

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Cahuilla

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Luiseno

Gabrielino/Tongva Council / Gabrielino Tongva Nation  
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This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed Hygien Transmission Project, Riverside County.



08/12/2005 10:15 FAX 916 657 5390

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August 12, 2005**

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This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed Irrigation Transmission Project, Riverside County.

08/12/2005 16:15 FAX 916 857 5380

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August 12, 2005**

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08/12/2005 10:15 FAX 916 657 5300

NAHC

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August 12, 2005

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San Luis Rey Band of Mission Indians  
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**Mission:**

Educate and communicate the rich heritage of Soboba peoples; Lead and assist individuals, organizations and communities in understanding the needs and concerns of Native American monitoring of traditional sites; Advocate Native American participation in state agencies and boards; Advocate legislation and enforcement of laws affecting Native American peoples and protecting historical and archaeological resources.

January 28, 2008

Attn: Public Scoping Comments  
RE: Ivyglen Project  
130 Battery Street, Suite #400  
San Francisco, CA 94111

Re: Ivyglen Project

The Soboba Band of Luiseno Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided on said project(s) has been assessed through our Cultural Resource Department, where it was concluded that although this site is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas.

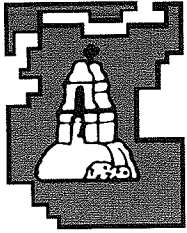
At this time the Soboba Band does see a direct need for Native American **Monitoring** and **Consultation**. The Tribe requests a Native American Monitor be present during any and all ground disturbing activities. Soboba requests this, until deemed unnecessary by both Archaeological and Native American Monitors. Also the Tribe requests to be involved in any and all consultation throughout the project. If you have any questions or concerns, please do not hesitate to contact the Cultural Resource Department.

[SPECIAL NOTE (for projects other than cell towers): *If this project is associated with a city or county specific plan or general plan action it is subject to the provisions of SB18-Traditional Tribal Cultural Places (law became effective January 1, 2005) and will require the city or county to participate in **formal, government-to-government** consultation with the Tribe. If the city or county are your client, you may wish to make them aware of this requirement. By law, they are required to contact the Tribe.*]

Sincerely,

A handwritten signature in dark ink, appearing to read "Darren Hill", is written over a horizontal line.

Darren Hill  
Soboba Cultural Resource Department  
Cell (951) 663-5279  
Phone (951) 487-8268  
dhill@soboba-nsn.gov



## **PALA BAND OF MISSION INDIANS**

Tribal Historic Preservation Office  
35008 Pala Temecula Rd. PMB 445  
Pala, CA 92059

Ph: (760) 891-3591  
Fax: (760) 742-4543

February 1, 2008

Jensen Uchida  
Public Scoping Comments, Ivyglen Project  
130 Battery Street, Suite #400  
San Francisco, California 94111

**Re: Consultation, Application Nos. A. 07-01-031 and A. 07-04-028, Ivyglen  
Telecommunications Project, Lake Elsinore, California**

Mr. Uchida,

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project as above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the recognized Pala Indian Reservation. It also is beyond the boundaries of territory that the Tribe considers its Traditional Use Area. Therefore, we have no objection to project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area. However, if the project boundaries are modified to extend beyond the currently proposed limits, we do request updated information and the opportunity to respond to your changes.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact Joseph M. Nixon at 1 (760) 891 3592 or at e.mail [jnixon@palatribe.com](mailto:jnixon@palatribe.com).

Cordially,

Joseph M. Nixon, Ph. D., RPA  
Tribal Historic Preservation Office  
Pala Band of Mission Indians

Cc: Leroy Miranda

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**PECHANGA INDIAN RESERVATION**  
*Temecula Band of Luiseño Mission Indians*

**OFFICE OF THE GENERAL COUNSEL**  
Post Office Box 1477 • Temecula, CA 92593  
Telephone (951) 676-2768 Ext. 2138 Fax (951) 587-8162

**General Counsel**  
John L. Macarro

**Deputy General Counsel**  
James E. Cohen  
Laura Y. Miranda

February 22, 2008

**VIA FAX and USPS**  
**(415) 981-0801**

Public Scoping Comments  
Re: Ivyglen Project  
130 Battery Street, Suite 400  
San Francisco, CA 94111

**Re: Pechanga Tribe Comments on the Notice of Preparation for the Draft EIR for the Ivyglen Project as Proposed by Southern California Edison Company, Application No.'s A. 07-01-031 and A. 07-04-028**

Dear Mr. Uchida:

The Pechanga Band of Luiseño Indians, a federally recognized Indian tribe and sovereign government, (hereinafter, "the Tribe") is in receipt of the above referenced NOP and submits this comment letter on the above listed Project. The Tribe is officially requesting involvement in this Project pursuant to Public Resources Code §21092.2, including notification and involvement in the entire CEQA environmental review process for the duration of the above referenced Project. If you haven't already done so, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project and requests that these comments be made part of the record of approval for this Project.

**THE CALIFORNIA PUBLIC UTILITIES COMMISSION MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS**

It has been the intent of the Federal Government<sup>1</sup> and the State of California<sup>2</sup> that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as

<sup>1</sup> See Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments; Executive Order 13175 of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments; and Executive Memorandum of September 23, 2004 on Government-to-Government Relationship with Tribal Governments.

<sup>2</sup> See California Public Resource Code §5097.9 et seq., California Government Code §§ 65351, 65352, 65352.3 and 65352.4

other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments such as approval of Specific Plans and EIRs. In this case, it is undisputed that the project lies within the Luiseño tribe's traditional territory as noted in the Cultural Resource Study. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the PUC and applicant consult with the Tribe in order to guarantee an adequate basis of knowledge for an appropriate evaluation of the project effects, as well as generating adequate mitigation measures.

The Federal government has long had an obligation to consult with Tribes on issues which may impact tribal interests. Thus, where federal energy laws are implicated or if the EIR indicates that the Project requires a 401 and 404 permit, the Project would entail a Federal undertaking under Section 106. The National Historic Preservation Act (16 U.S.C. §§ 470 *et. seq*) requires that a Section 106 review be performed for all Federal undertakings. (16 U.S.C. 470w(7); 36 CFR §800.16(y)) The issuance of permits such as a Section 401 or 404 permit are considered undertakings under Section 106. *Id.* As such, the Army Corps and the PUC, as lead agency, must initiate the Section 106 review process, which includes consultation with, among others, federally-recognized Indian tribes. (*Id.* at §800.16(f) and (m)). Consultation is required whether the property in question is on or off tribal lands (*Id.* at §800.2(c)(2)(ii)).

Further, in recent years the State of California has acknowledged the need to consult with and communicate with tribes on a government-to-government basis. (See e.g., SB18 (California Government Code §§ 65351, 65352, 65352.3 and 65352.4)). The CPUC itself has recently implemented regulations that require notification of and consultation with tribes when designating electric transmission corridors. (20 Cal. Reg. §§ 2405, 2406, 2408, etc.). Thus, in order for the staff to prepare an adequate environmental assessment, the PUC must allow the Pechanga Tribe adequate participation in the entire process (both under State and Federal law) so that it might provide the necessary input.

### **PECHANGA CULTURAL AFFILIATION TO THE PROJECT AREA**

The Pechanga Tribe asserts that the Project area is part of the Pechanga Tribe's aboriginal territory, as evidenced by the existence of Luiseño place names, rock art, pictographs, petroglyphs, and an extensive Luiseño artifact record in the vicinity of the Project. The Tribe further asserts that this culturally sensitive area is affiliated specifically with the Pechanga Band of Luiseño Indians because of the Tribe's specific cultural ties to this area. Pechanga considers any resources located on this Project property to be Pechanga cultural resources.

The Pechanga Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of

anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians who have presented boundaries of the Luiseño traditional territory have included all or portions of the Project area in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Oxendine 1983; Smith and Freers 1994), and such territory descriptions correspond almost identically with what was communicated to the Pechanga people by our elders.

While historic accounts, anthropological and linguistic theories are important in determining traditional Luiseño territory; the Tribe asserts that the most critical sources of information used to define our traditional territories are our songs, creation accounts and oral traditions. Luiseño history originates with the creation of all things at *éxva Teméeku*, known today as the City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the Luiseño god *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore after visiting many of the hot springs located within Luiseño and Cahuilla territory. From Elsinore, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

One of the Luiseño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Monívol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, several of which are located near to the Project. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). Another song recounts the travels of eagle, as he searches for a place where there was no death. His travels begin at Temecula, flying north to San Bernardino, to the east, south, and west through Julian, Cuyamaca, and Palomar, and returning to Temecula (DuBois 1908). Further, the story of Táakwish and Tukupar, which is situated around the Temecula Valley, includes placenames for events from the Idyllwild area to the Glen Ivy area near Corona and the western-most portion of the alignment (Kroeber 1906). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights, what anthropologists include in their definition of a "village territory", to an area extending from Rawson Canyon near Lake Skinner on the east, over to Lake Mathews on the northwest, through the Corona area and down Temescal Canyon, and back to the Temecula area.

Rock art is also an important element in the determination of Luiseño territorial boundaries. Throughout Luiseño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small indentations, or cupules.

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock



with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (DuBois 1908:158).

Numerous ethnographers make mention of the fact that the Luiseño were highly territorial, and that territories were marked and jealously guarded. Trespassing was cause for conflict and at times outright warfare between groups. The young were taught never to trespass on the land of others in pursuit of game or the gathering of food without permission (Sparkman 1908:190). Other types of rock art, pictographs and petroglyphs have been documented in Luiseño territory. Typically, it would appear that there is at least one pictograph location per village site. Further, according to the Proponent's Environmental Assessment (PEA), the Project is undisputedly within Luiseño territory.

Thus, our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the Project area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area, and is the culturally affiliated tribe for this Project area. As such, Pechanga must be consulted with concerning Project impacts to cultural resources and other pertinent tribal issues.

The Tribe would welcome to opportunity to meet with the PUC and SCE to further explain and provide documentation concerning our specific cultural affiliation to lands within the Project area.

### **PROJECT IMPACTS TO CULTURAL RESOURCES**

As stated above, the Tribe is in receipt of the NOP and the PEA; however, the Tribe has not received supporting documentation for the NOP and the PEA, including archeological reports and site records. It is imperative that the Tribe receive such supporting documentation as soon as possible as we cannot effectively comment on the Project impacts to cultural resources or engage in meaningful consultation as legally required for this Project.

The PEA indicates that a total of 50 archeological sites were identified within the Project area (both alternatives and the proposed route), but then goes on to conclude that the proposed Project could impact twenty-three (23) cultural resource sites, two (2) of which are identified as eligible for listing on the California Register of Historic Resources (CRHR) (PEA; p 4.6-7). Because we do not have the above listed documents the Tribe cannot evaluate whether we are in agreement with the PEA's conclusion that 48 sites are not entitled to any further evaluation, mitigation or protections under the law. Because this geographic area is rich in significant

cultural resources, the Tribe may very well disagree that only 2 sites are Register eligible and/or entitled to protections under state or federal law.

As explained above, the Lake Elsinore area holds significant cultural importance for the Tribe. This area is rich in cultural resources and sacred sites. Even if there are no significant or CRHR eligible sites within the Project area (alternatives and preferred route) this Project must account for inadvertent discoveries of cultural resources, sacred sites and Native American human remains. The Tribe agrees with the PEA's conclusions that the proposed route will impact significant cultural resources, and that inadvertent discoveries of cultural resources, possibly including Native American human remains, may be uncovered during development of this Project. As such we are requesting that specific mitigation measures be adopted to address the issue of inadvertent discoveries.

Further, the PEA indicates that the CRHR eligible sites can be avoided by shifting the proposed transmission lines or constructing the Project to avoid the sites. The Tribe is in agreement with such proposals and asserts that avoidance should be the preferred mitigation for significant and CRHR eligible sites.

The Tribe will be engaging in further assessment of the Project area, in consultation with tribal elders, to identify more specific concerns and will submit additional specific proposed mitigation measures and further comments once it receives the archeological reports and site records and is able to complete its own evaluation and assessment.

### **REQUESTED TRIBAL INVOLVEMENT AND MITIGATION**

At this time, the Tribe is not opposed to this development Project. The Tribe's primary concerns stem from the Project's likely impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items that may be discovered in the course of the work.

Given that Pechanga cultural resources will likely be affected by the Project, the Tribe must be allowed to be involved and participate with the PUC and SCE in developing all monitoring and mitigation plans for the duration of the Project (California Public Resources code §21081). Such mitigation may include avoidance and preservation of significant cultural resources properties, as avoidance is listed in the CEQA as a recommended method of mitigation, and it is the preferred mitigation of significant resources by the Tribe. Further, because cultural and archaeological resources exist within the Project area, it is the position of the Tribe that Pechanga tribal monitors, in addition to archeological monitors, should be required to be present during all ground-disturbing activities conducted in connection with the project, including any

archeological testing. If an archaeological Phase II Significance Evaluation Program is to be implemented, a Pechanga Tribal monitor should be present for the excavations.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). As such, it is the position of the Tribe that an agreement specifying appropriate treatment of inadvertent discoveries of cultural resources be executed between SCE and the Pechanga Tribe.

Further, the Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project. In addition, the proposed mitigation for Native American human remains has not been updated to coincide with the California Public Resources Code §5097.98 that was recently amended over a year ago. We've proposed changes below to bring this mitigation measure in compliance with current law concerning Native American human remains

Also, the Tribe requests that the PUC and SCE take steps for the protection of any uncovered resources in the process of survey assessments or earthmoving activities which may reveal significant archaeological resources and sites which may be eligible for inclusion in the historic site register or Native American human remains or sacred Luiseño sites and cultural items which require specific protections. Therefore, we request that the PUC and SCE commit to evaluating Project environmental impacts both to the known sites and to any cultural sites which are discovered during grading, to allow the Tribe to participate in all archeological testing, and to adopt appropriate mitigation for such sites, in consultation with the Tribe.

At this time the Tribe has the following requested changes to the mitigation measures that are proposed in the PEA on page 4.6-8 (deletions indicated by strikethroughs and additions indicated by underlines):

**CULT-SCE-1:** If previously unidentified cultural resources are unearthed during construction activities, construction shall be halted in the immediate area and directed away from the discovery until a qualified archaeologist assesses the significance of the resource in consultation with the Pechanga Tribe. The archaeologist and the Pechanga Tribe would recommend appropriate mitigation measures, which may include processes to record, determine eligibility for the NRHP, avoid (preserve), or recover the resources such that the information value of eligible resources is preserved.

**CULT-SCE-2:** If human remains are encountered during the construction or any other phase of development, work in the area of the discovery shall be halted in that area and directed away from the discovery. No further disturbance would occur until the county coroner makes the necessary findings as to the origin pursuant to Public Resources Code 5097.98-99, and Health and Safety Code 7050.5, and until a final decision as to the treatment and disposition has been made. If the remains are determined to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours ~~as required by Public Resources Code 5097 a reasonable timeframe.~~ The NAHC would notify the designated Most Likely Descendant who would provide recommendations for the treatment of remains within 24 hours. The NAHC mediates any disputes regarding treatment of remains. SCE would implement recommendations as required. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The most likely descendant shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98. SCE would implement the results of the consultations as required.

**CULT-SCE-3:** SCE shall avoid and/or minimize impacts to cultural resources, as included as part of the Proposed project design and are included in SCE standard construction and operation protocols. Such avoidance and/or minimization of impact will include, but is not limited to, moving the Subtransmission Lines Route to avoid significant sites and spanning the distance of significant sites between two poles. SCE shall avoid and/or minimize impacts to CA-RIV 714/H and SRI-22.

**CULT-SCE-4:** Prior to the issuance of grading permits, SCE is required to enter into a Cultural Resources Treatment and Monitoring Agreement with the Pechanga Band of Luiseño Indians. This Agreement will address the treatment and disposition of cultural resources and human remains that may be uncovered during construction as well as provisions for tribal monitors.

**CULT-SCE-5:** Tribal monitors from the Pechanga Band of Luiseño Indians shall be allowed to monitor all grading, excavation and ground-breaking activities within native soils, including further archeological surveys, to be compensated by SCE. Pechanga Tribal monitors will have the authority to temporarily stop and redirect grading activities, in consultation with the Project archeologist, to evaluate the significance of any archaeological resources discovered on the property in accordance with CULT-SCE-1.

**CULT-SCE-6:** SCE agrees to relinquish ownership of all cultural resources, including all Luiseño sacred items, burial goods and all archeological artifacts, that are found on the Project area to the Pechanga Band of Luiseño Indians for proper treatment and disposition.

Pechanga Comment Letter to the California Public Utilities Commission  
Re: Pechanga Tribe Comments on the Notice of Preparation for the Draft EIR for the Ivyglen Project as  
Proposed by Southern California Edison Company, Application No.'s A. 07-01-031 and A. 07-04-028  
February 14, 2008  
Page 8

As stated above, the Tribe will be requesting that the PUC and SCE adopt additional specific mitigation measures concerning the protection and preservation of sacred places, and all cultural resources pertaining to this Project once we have had the opportunity to review the archeological reports and site records.

The Tribe looks forward to working together with the California Public Utilities Commission and Southern California Edison in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact us as soon as possible once you have had a chance to review these comments so that we might address the issues raised in this comment letter.

If you have any questions, please do not hesitate to contact me at 951-676-2768, Ext. 2137. Thank you for the opportunity to submit these comments.

Sincerely,



Laura Miranda  
Deputy General Counsel

Cc: Jensen Uchida, Project Manager  
David E. Van Iderstine, Southern California Edison  
Anna Hoover, Pechanga Tribe Cultural Analyst



May 21, 2008  
(6136)

Mr. Dave Singleton  
Program Analyst  
Native American Heritage Commission  
915 Capitol Mall, Room 364  
Sacramento, CA 95814

VIA FACSIMILE (916) 657-5390

**Subject: Lands File Search Request for the Proposed Alberhill Substation Project,  
Riverside County, California**

Dear Mr. Singleton:

Southern California Edison requests a review of the Sacred Lands File for the siting of the proposed Alberhill Substation in Riverside County, California.

The project area, as shown on the attached map, is located in:

Section 6 of Township 5 South and Range 6 West, and Sections 7, 8 and 16 of Township 5 South and Range 5 West of the San Bernardino Base Meridian on the U.S. Geological Survey 7.5' *Alberhill*, California topographic quadrangle sheet.

Please fax the results of this search to my attention at (626) 302-9130. For correspondence, please reference the project number of **6136**. If you have any questions regarding this request, please do not hesitate to contact me at (626) 302-7098. I can also be reached via email at [koral.ahmet@sce.com](mailto:koral.ahmet@sce.com). Thank you for your assistance with this project!

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Ahmet".

Koral Ahmet, MA, RPA  
Archaeologist  
Southern California Edison  
Corporate Environment Health & Safety

Attachment: As stated







STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-6390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
e-mail: [ds\\_nahc@pacbell.net](mailto:ds_nahc@pacbell.net)



May 22, 2008

Koral Ahmet  
Southern California Edison  
2244 Walnut Grove Ave.  
Rosemead, CA 91700

Sent by FAX to: 626-302-9130  
Number of pages: 3

Re: Proposed Alberhill Substation Project, Riverside County

Dear Mr. Ahmet:

The Native American Heritage Commission was able to perform a record search of its Sacred Lands File (SLF) for the affected project area. The SLF failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the Sacred Lands File does not guarantee the absence of cultural resources in any 'area of potential effect (APE).'

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the nearest tribes that may have knowledge of cultural resources in the project area. A List of Native American contacts are attached to assist you. The Commission makes no recommendation of a single individual or group over another. It is advisable to contact the person listed; if they cannot supply you with specific information about the impact on cultural resources, they may be able to refer you to another tribe or person knowledgeable of the cultural resources in or near the affected project area (APE).

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton  
Program Analyst

Attachment: Native American Contact List



**Native American Contacts**  
**Riverside County**  
**May 22, 2008**

**Cahuilla Band of Indians**  
**Anthony Madrigal, Jr., Chairperson**  
P.O. Box 391760                      Cahuilla  
Anza                      , CA 92539  
tribalcouncil@cahuilla.net  
(951) 763-2631  
  
(951) 763-2632 Fax

**Pechanga Band of Mission Indians**  
**Paul Macarro, Cultural Resource Center**  
P.O. Box 1477                      Luiseno  
Temecula                      , CA 92593  
(951) 308-9295 Ext 8106  
(951) 676-2768  
(951) 506-9491 Fax

**Ramona Band of Cahuilla Mission Indians**  
**Joseph Hamilton, vice chairman**  
P.O. Box 391670                      Cahuilla  
Anza                      , CA 92539  
admin@ramonatribe.com  
(951) 763-4105  
(951) 763-4325 Fax

**Soboba Band of Mission Indians**  
**Chairperson**  
P.O. Box 487                      Luiseno  
San Jacinto                      , CA 92581  
dhill@soboba-nsn.gov  
(951) 654-2765  
(951) 654-4198 - Fax

**Santa Rosa Band of Mission Indians**  
**John Marcus, Chairman**  
P.O. Box 609                      Cahuilla  
Hemet                      , CA 92546  
srtribaloffice@aol.com  
(951) 658-5311  
(951) 658-6733 Fax

**Morongo Band of Mission Indians**  
**Michael Contreras, Cultural Resources-Project**  
49750 Seminole Drive                      Cahuilla  
Cabazon                      , CA 92230                      Serrano  
(951) 755-5206  
  
(951) 922-8146 Fax

**Cupa Cultural Center (Pala Band)**  
**Shasta Gaughen, Assistant Director**  
35008 Pala-Temecula Rd. PMB Box 445                      Luiseno  
Pala                      , CA 92059  
cupa@palatribe.com  
(760) 742-1590  
(760) 742-4543 - FAX

**Pechanga Band of Mission Indians**  
**Mark Macarro, Chairperson**  
P.O. Box 1477                      Luiseno  
Temecula                      , CA 92593  
tbrown@pechanga-nsn.gov  
(951) 676-2768  
(951) 695-1778 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Alberhill Substation Project located in Temescal Canyon, a Southern California Edison Project (#6136); Riverside County, California for which a Sacred Lands File search and Native American Contacts list were requested.

**Native American Contacts**  
**Riverside County**  
**May 22, 2008**

Willie Pink  
48310 Pechanga Road Luiseno  
Temecula , CA 92592  
wjpink@hotmail.com  
(909) 936-1216  
Prefers e-mail contact

Soboba Band of Luiseno Indians  
Erica Helms, Cultural Resources Manager  
P.O. Box 487 Luiseno  
San Jacinto , CA 92581  
dhill@soboba-nsn.gov  
(951) 654-2765  
FAX: (951) 654-4198

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Alberhill Substation Project located in Temescal Canyon, a Southern California Edison Project (#6136); Riverside County, California for which a Sacred Lands File search and Native American Contacts list were requested.

Michael Contreras  
Morongo Band of Mission Indians  
49750 Seminole Drive  
Cabazon, CA 92230

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Contreras:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Shasta Gaughen, Assistant Director  
Cupa Cultural Center (Pala Band)  
35008 Pala-Temecula Road  
PMB Box 445  
Pala, CA 92059

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Ms. Gaughen:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

route will be constructed along existing 115kV circuits, and will not require new construction. However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated





Joseph Hamilton, Vice Chairman  
Ramona Band of Cahuilla Mission Indians  
P.O. Box 391670  
Anza, CA 92539

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Hamilton:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Paul Macarro  
Cultural Resource Center  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Macarro:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed

route will be constructed along existing 115kV circuits, and will not require new construction. However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Anthony Madrigal, Jr., Chairperson  
Cahuilla Band of Indians  
P.O. Box 391760  
Anza, CA 92539

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Madrigal:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



John Marcus, Chairman  
Santa Rosa Band of Mission Indians  
P.O. Box 609  
Hemet, CA 92546

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Marcus:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Mark Macarro, Chairperson  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Macarro:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Willie Pink  
48310 Pechanga Road  
Temecula, CA 92592

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr. Pink:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction. However, new construction for the 115kV line may be necessary along Meniffee Road between

Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,



Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Chairperson  
Soboba Band of Mission Indians  
P.O. Box 487  
San Jacinto, CA 92581

February 17, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, including Sub-Transmission, and Transmission Feeder Lines, Riverside County, California**

Dear Mr./Ms. Chairperson:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the project area.

The proposed substation is located north of Interstate 15 and Temescal Canyon Road near the community of Alberhill. The project is situated in Section 15, Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (Figure 1. Project area Overview and Figure 2.), and will consist of approximately 140 acres. The proposed substation site has been previously surveyed for cultural resources. This cultural resources study identified historic foundations and an historic-age house. These resources were subsequently evaluated and recommended as not eligible for listing on the California Register of Historic Resources (CRHR). A records search conducted with the Eastern Information Center, University of California Riverside did not yield any previously recorded prehistoric archaeological sites within the proposed substation property.

The proposed 500kV source line is located north of the proposed substation, and will connect to the existing Serrano-Valley 500kV circuit. A one-quarter mile buffer around the proposed 500kV source line is depicted as Conceptual Routes 500kV on the attached map. The proposed route is located in Sections 9, 10, 15, and 16 of Township 5 South, Range 5 West, as depicted on the USGS 7.5" Alberhill quadrangle (see Figures 1 and 2). No previously recorded prehistoric or historic sites have been identified within this buffer for the proposed transmission line corridor.

The proposed 115kV source line is proposed to the east of the substation site, and will be constructed within a one-quarter mile buffer around the proposed route in an area defined as the Northern Corridor shown on the attached map. The proposed corridor for the 115kV line is situated in various sections of Townships 5 & 6 South and Ranges 3, 4 & 5 West, on the USGS 7.5" Alberhill, Elsinore and Romoland quadrangles (see Figures 1-6). Much of the proposed route will be constructed along existing 115kV circuits, and will not require new construction.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

However, new construction for the 115kV line may be necessary along Meniffee Road between Newport Road and Scott Road (Figures 5 and 6). A cultural resources records search identified a number of previously recorded archaeological sites within the buffer area. SCE plans to avoid these resources to minimize any impacts that could result from the proposed construction of the 115kV source line.

Project location maps are enclosed as an attachment for your reference.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the proposed project location that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

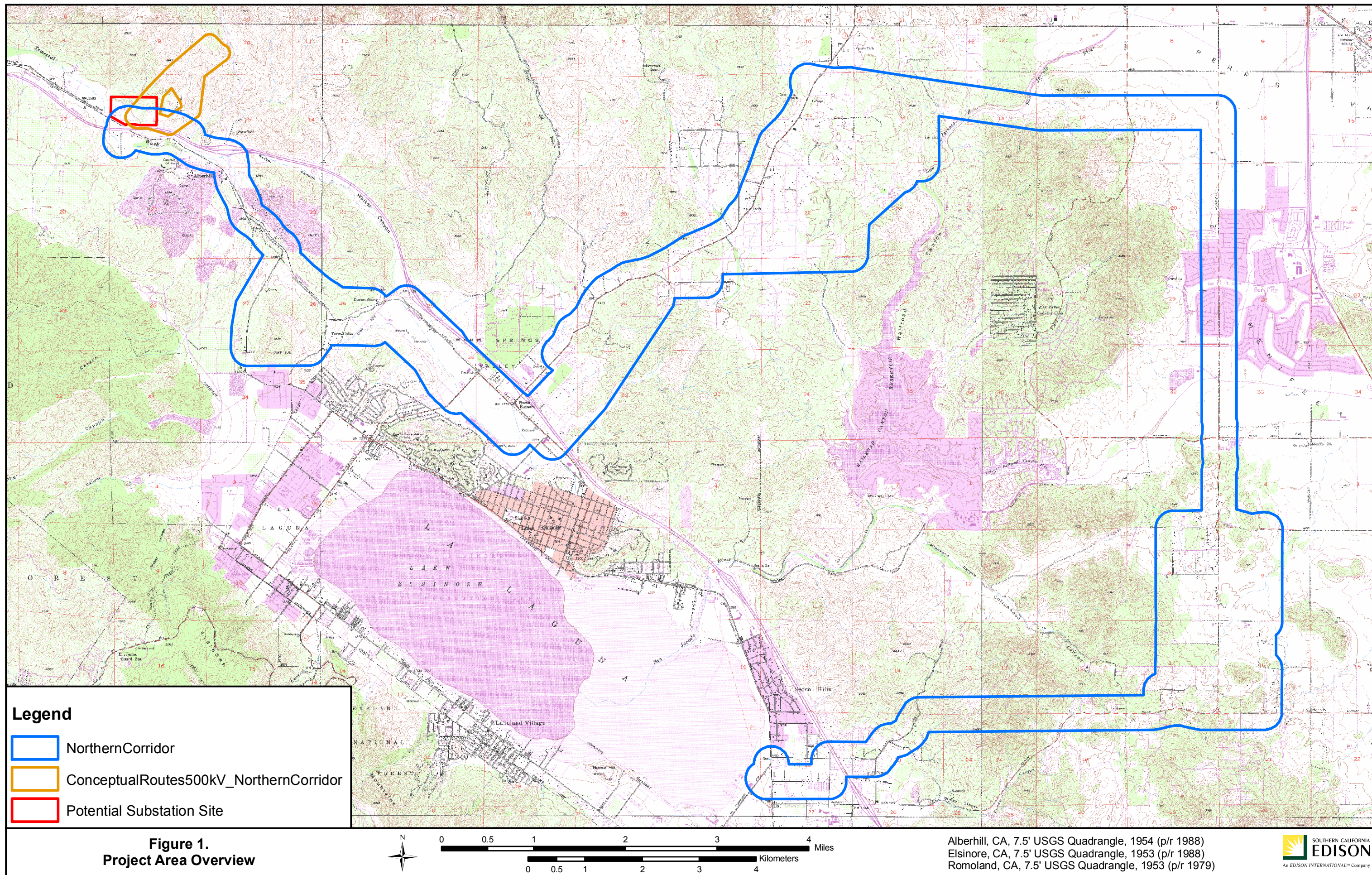
Sincerely,






Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

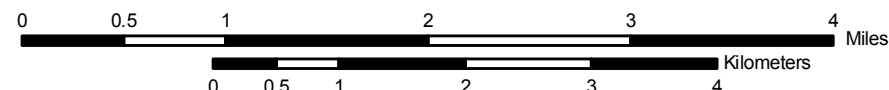




**Legend**

-  NorthernCorridor
-  ConceptualRoutes500kV\_NorthernCorridor
-  Potential Substation Site

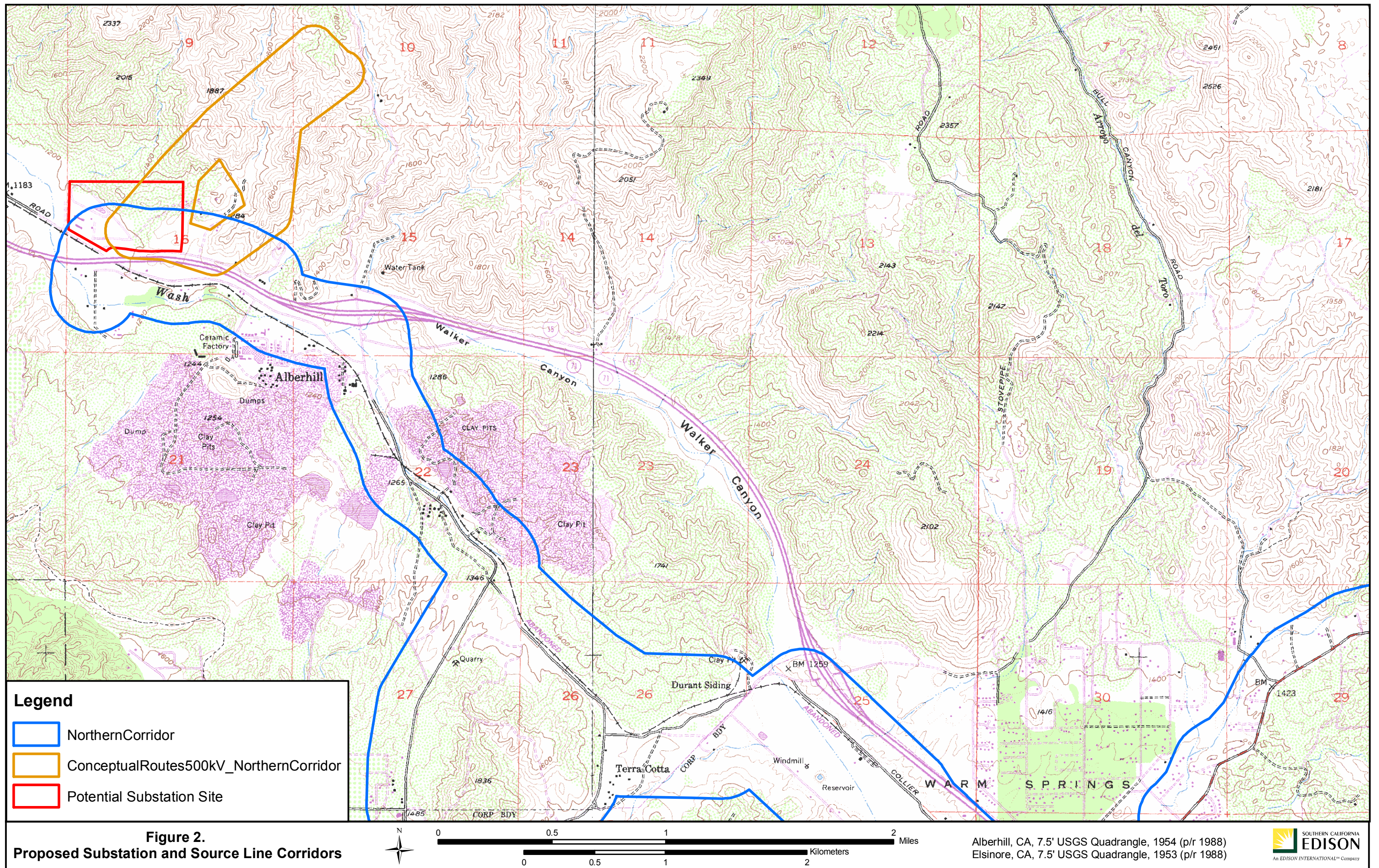
**Figure 1.**  
**Project Area Overview**



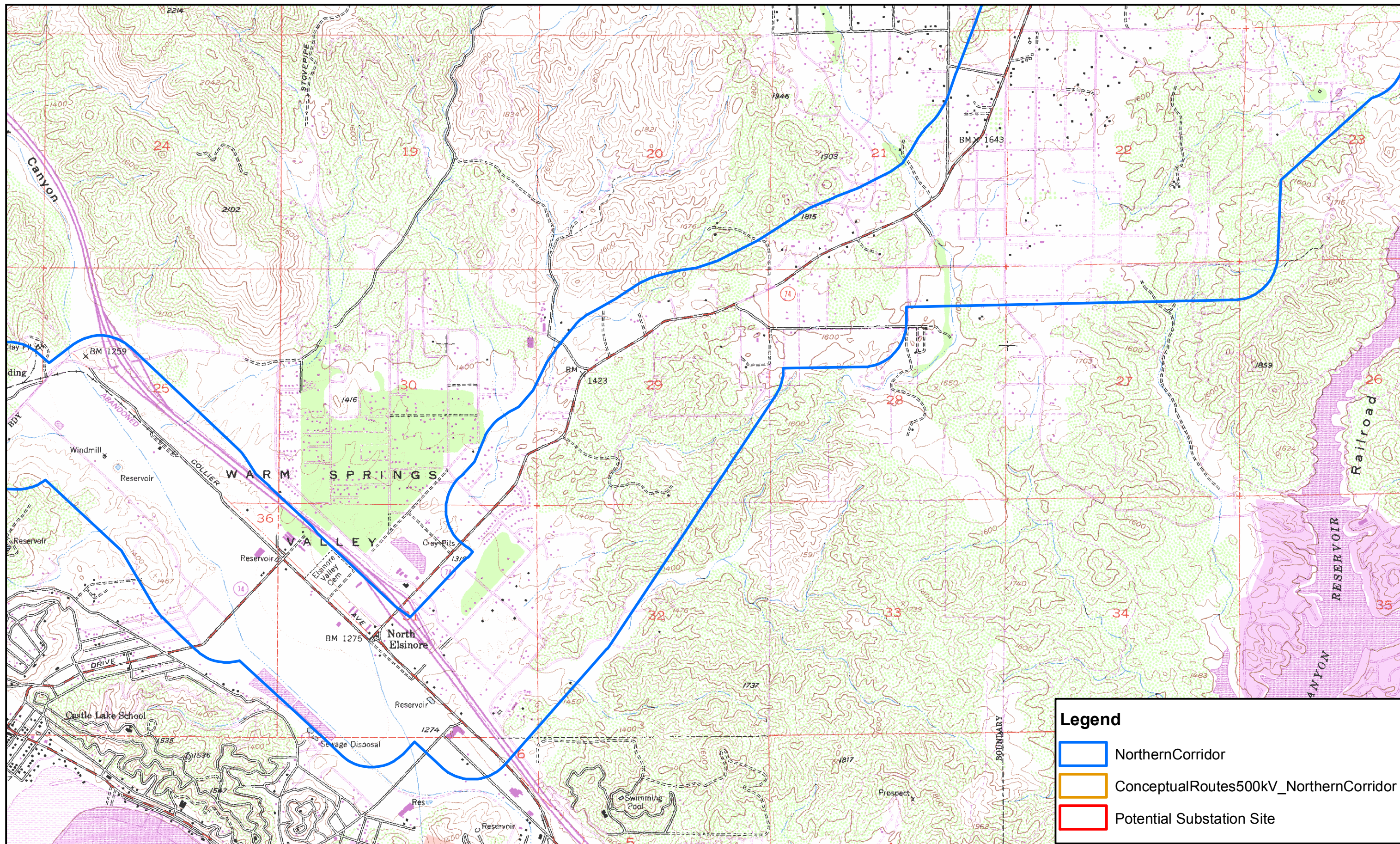
Alberhill, CA, 7.5' USGS Quadrangle, 1954 (p/r 1988)  
Elsinore, CA, 7.5' USGS Quadrangle, 1953 (p/r 1988)  
Romoland, CA, 7.5' USGS Quadrangle, 1953 (p/r 1979)











**Figure 3.**  
**Proposed Substation and Source Line Corridors**

0 0.5 1 2 Miles  
 0 0.5 1 2 Kilometers

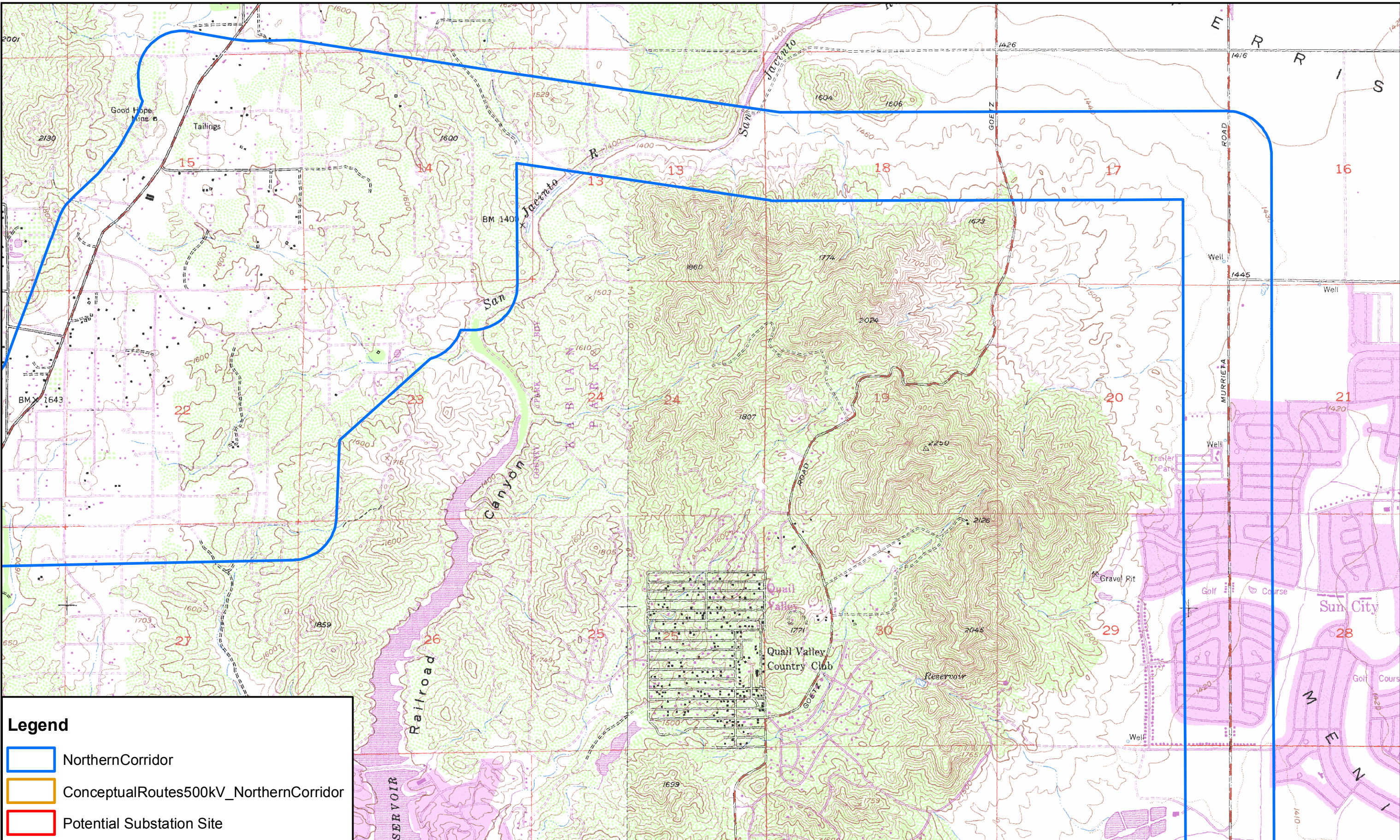
Elsinore, CA, 7.5' USGS Quadrangle, 1953 (p/r 1988)

**Legend**

- NorthernCorridor
- ConceptualRoutes500kV\_NorthernCorridor
- Potential Substation Site

**SOUTHERN CALIFORNIA EDISON**  
 An EDISON INTERNATIONAL Company





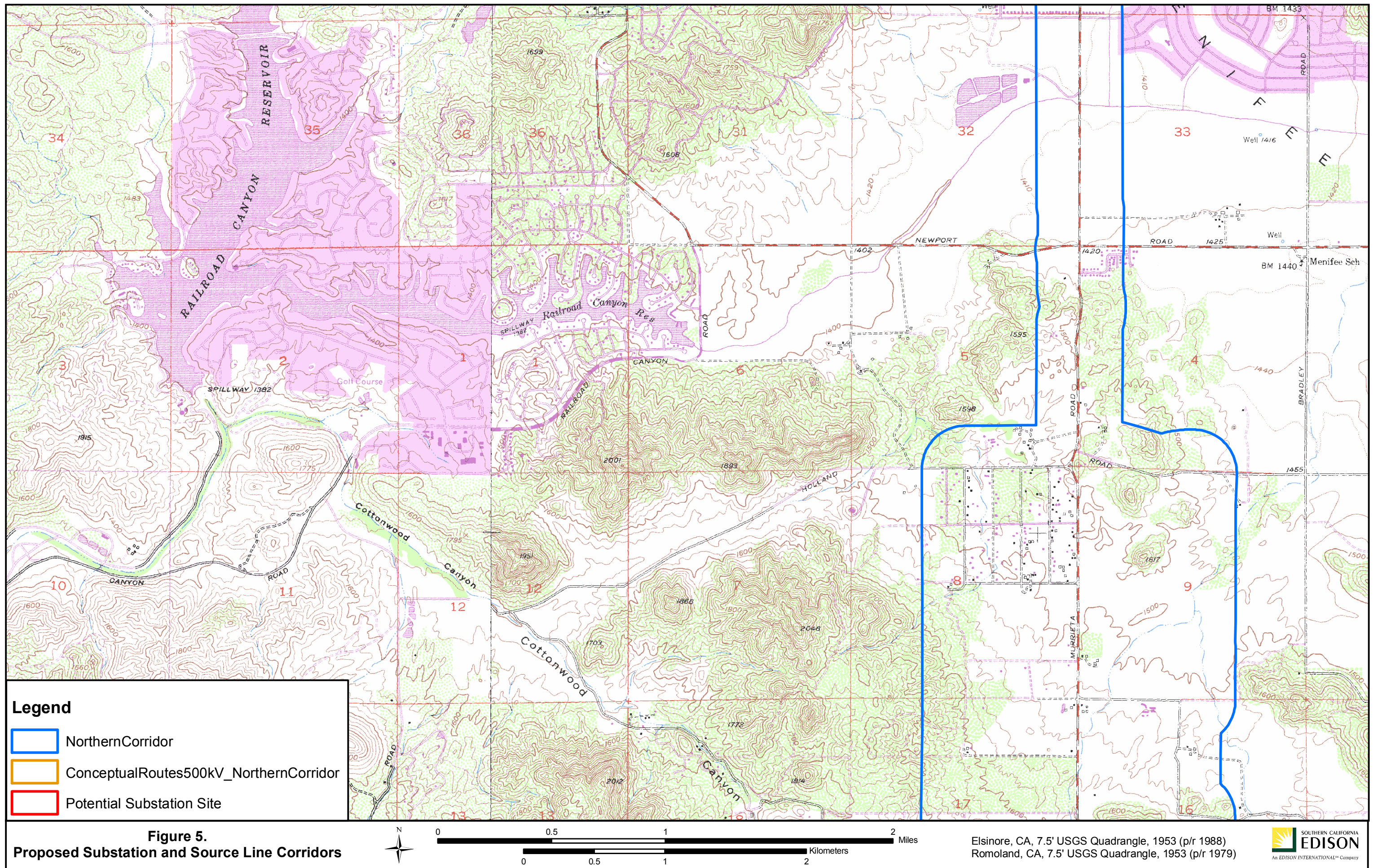
**Figure 4.**  
**Proposed Substation and Source Line Corridors**



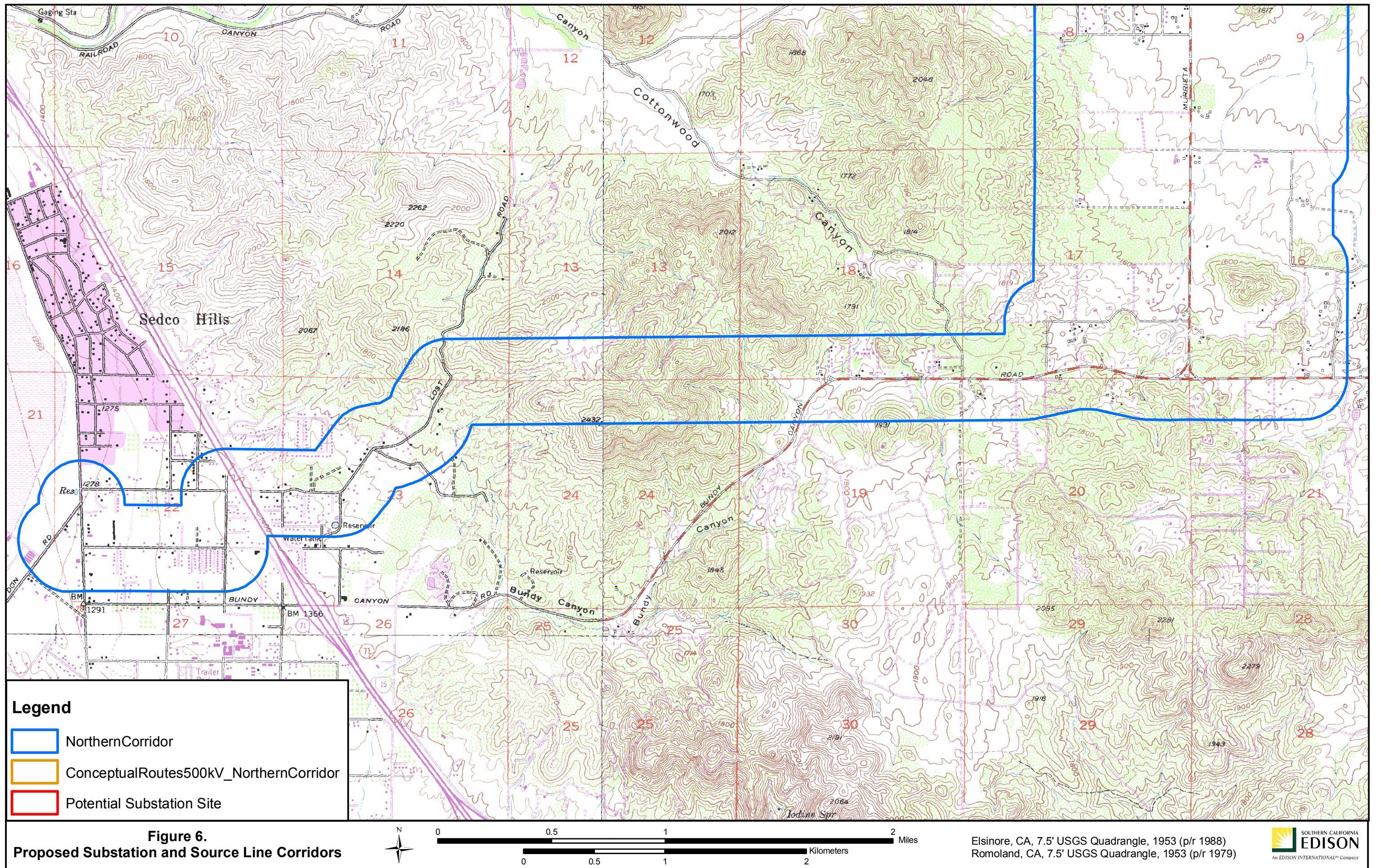
Elsinore, CA, 7.5' USGS Quadrangle, 1953 (p/r 1988)  
Romoland, CA, 7.5' USGS Quadrangle, 1953 (p/r 1979)















## PECHANGA CULTURAL RESOURCES

*Temecula Band of Luiseño Mission Indians*

Post Office, Box 2183 • Temecula, CA 92593  
Telephone (951) 308-9295 • Fax (951) 506-9491

Chairperson:  
Germaine Arenas

Vice Chairperson:  
Mary Bear Magee

Committee Members:  
Evie Gerber  
Darlene Miranda  
Bridgett Barcello Maxwell

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Anna Hoover

Monitor Supervisor:  
Aurelia Marruffo

April 29, 2009

### VIA E-Mail and USPS

#### **RE: Request for Information for the Alberhill Substation Project, including Sub-Transmission and Transmission Feeder Lines (SCE)**

Dear Ms. Bholat:

The Pechanga Band of Luiseño Indians ("the Tribe") appreciates your request for information regarding the above referenced project. After reviewing the provided maps and internal documents, we have determined that the project area is not within reservation lands, although it is within our ancestral territory.

Currently, we are interested in commenting and participating in this project based upon traditional knowledge of the area and extensive recorded sites and sensitive cultural resources within the region and the provided buffer zone. The entire proposed Project area is located within a highly culturally sensitive area that contains two (2) known village sites with associated smaller domestic activity areas.

At this time, the Tribe requests the following:

- 1) Notification once the Project begins the entitlement process, if it has not already;
- 2) Copies of all applicable archaeological reports, site records, proposed grading plans and environmental documents (PEA/EIR, etc);
- 3) Participation in all survey and excavation activities including but not limited to archaeological surveys, excavations and geological testing studies.
- 4) Government to government consultation with the Lead Agency; and
- 5) The Tribe believes that monitoring by the Pechanga Tribe and a qualified archaeologist may be required during earthmoving activities. The Tribe reserves its right to make additional comments and recommendations once the environmental documents have been received and fully reviewed. In the event that subsurface cultural resources are identified, the Tribe requests consultation with the project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed project. The Tribe does not consider initial inquiry letters from project consultants or applicants to constitute appropriate

government-to-government consultation, but rather tools to obtain further information about the project area. Therefore, the Tribe reserves its rights to fully participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, as well as providing further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. We request to be included in all correspondence regarding this project. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

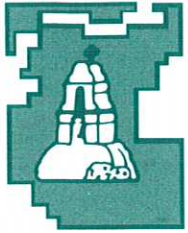
If you have any additional questions or comments, please contact me at ahoover@pechanga-nsn.gov or 951-308-9252 X8104.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anna M. Hoover', with a long horizontal flourish extending to the right.

Anna M. Hoover  
Cultural Analyst

Cc: Pechanga Office of the General Counsel  
Brenda Tomaras, Tomaras & Ogas, LLP



**PALA BAND OF MISSION INDIANS**

Tribal Historic Preservation Office

35008 Pala Temecula Rd. PMB 445

Pala, CA 92059

Ph: (760) 891-3591  
Fax: (760) 742-4543

March 23, 2009

Sarah Bholat, MPH  
Archaeologist  
Southern California Edison  
PO Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

Re: Proposed Alberhill Substation Project

Dear Ms. Bholat:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3591 or by e-mail at [sgaughen@palatribe.com](mailto:sgaughen@palatribe.com).

Sincerely,

Shasta C. Gaughen, MA  
Tribal Historic Preservation Officer  
Pala Band of Mission Indians





environmentalofficer@cahuilla.net

08/24/2009 02:59 PM

To sara.bholat@sce.com

cc

bcc

Subject Proposed Alberhill Substation Project

Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
2244 Walnut Grove Ave.  
Rosemead, CA 9170

Re: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115k V Source Line Route, Riverside County, California

Dear Ms. Bholat:

Thank you for contacting the Cahuilla Band of Indians concerning the above referenced project. The Cahuilla Environmental Protection Office has assessed the information you provided concerning:

We have determined that even though this project is outside the Cahuilla Indian Reservation territory, it is not outside the Traditional Use Area for the Cahuilla Band of Indians. We request copies of cultural resource documents and reports. We appreciate your observance of Tribal resources as it relates to cultural heritage and preservation.

Respectfully,

Yvonne L. Markle  
Environmental Office Manager  
Cahuilla Tribal Environmental Protection Office  
P.O. Box 391741  
Anza, CA 92539  
[environmentalofficer@cahuilla.net](mailto:environmentalofficer@cahuilla.net)



Michael Contreras  
Morongo Band of Mission Indians  
49750 Seminole Drive  
Cabazon, CA 92230

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Contreras:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the revised project area.

The additional 115kV subtransmission line is located south of Interstate 15 from the intersection of Third Street and Collier Avenue, and will terminate in Skylark Substation (an existing substation) at the intersection of Mission Trail and Waite Street (Figure 1.). This additional new line is an existing 115kV circuit which will be rebuilt with larger poles to support a double-circuit subtransmission line for the Alberhill system.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,

A handwritten signature in blue ink, reading "Sara Bholat". The signature is stylized with a large, flowing "S" and "B".

Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

Shasta Gaughen, Assistant Director  
Cupa Cultural Center (Pala Band)  
35008 Pala-Temecula Road  
PMB Box 445  
Pala, CA 92059

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Ms. Gaughen:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the revised project area.

The additional 115kV subtransmission line is located south of Interstate 15 from the intersection of Third Street and Collier Avenue, and will terminate in Skylark Substation (an existing substation) at the intersection of Mission Trail and Waite Street (Figure 1.). This additional new line is an existing 115kV circuit which will be rebuilt with larger poles to support a double-circuit subtransmission line for the Alberhill system.

SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,

A handwritten signature in blue ink, reading "Sara Bholat". The signature is stylized with a large "S" and "B".

Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

Joseph Hamilton, Vice Chairman  
Ramona Band of Cahuilla Mission Indians  
P.O. Box 391670  
Anza, CA 92539

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Hamilton:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the revised project area.

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SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

Paul Macarro  
Cultural Resource Center  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Macarro:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the revised project area.

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SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.



If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Anthony Madrigal, Jr., Chairperson  
Cahuilla Band of Indians  
P.O. Box 391760  
Anza, CA 92539

August 13, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Madrigal:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

At the recommendation of the Native American Heritage Commission (NAHC), SCE requests your input regarding the identification of potential effects to cultural resources, sacred lands or other heritage sites within the revised project area.

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SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

John Marcus, Chairman  
Santa Rosa Band of Mission Indians  
P.O. Box 609  
Hemet, CA 92546

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Marcus:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

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SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

We encourage you to participate in this process. The potential impacts that this project may have on cultural resources important to the Native American community cannot be evaluated unless we are aware the resource(s) exist. If possible, for project planning purposes we would like to receive any questions or concerns regarding this project within the next two weeks. If we have not heard from you within 30 days of the receipt of this letter, we will assume that you do not wish to participate in further consultation.

If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated

Mark Macarro, Chairperson  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Mr. Macarro:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

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SCE would appreciate any information you may have regarding Native American cultural resources located in or near the new additional route that could be affected by the proposed project. Any information concerning the identity, location, character, and traditional use of cultural places identified during consultation will be considered confidential.

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If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

Sincerely,

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



Chairperson  
Soboba Band of Mission Indians  
P.O. Box 487  
San Jacinto, CA 92581

August 12, 2009

**SUBJECT: Native American Consultation Regarding the Proposed Alberhill Substation Project, Revised 115kV Source Line Route, Riverside County, California**

Dear Chairperson:

Southern California Edison (SCE) proposes to construct a new 500/115kV Alberhill electric power substation and source lines near the Cities of Lake Elsinore, Sun City and the community of Alberhill in Riverside County, California. SCE initially sent consultation letters to the tribe in February 17, 2009. Since then the scope for the 115kV subtransmission lines of the project has changed, and a new route was added. The location of the substation and the proposed 500kV transmission source lines for the project remains as proposed. SCE feels obliged to inform you of the recent changes to the project.

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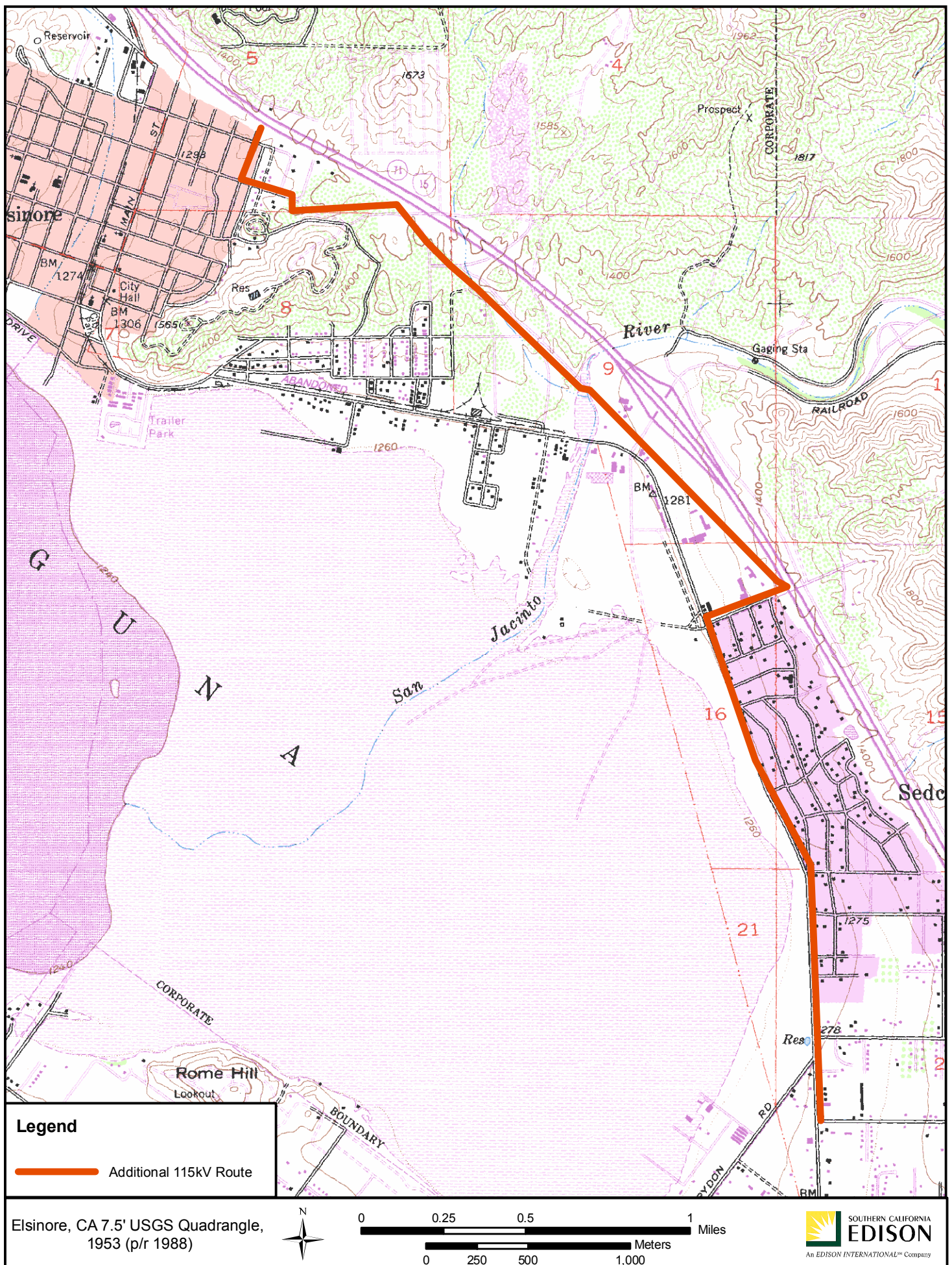
If you have any questions, please feel free to call me at (626) 302-1154 or via e-mail at [sara.bholat@sce.com](mailto:sara.bholat@sce.com). Thank you for your assistance and participation in this project.

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Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
Corporate Environment, Health and Safety

Enclosure: as stated



**Figure 1. Additional 115kV Route for Alberhill Substation System**



August 20, 2009

Attn: Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, Ca 91770

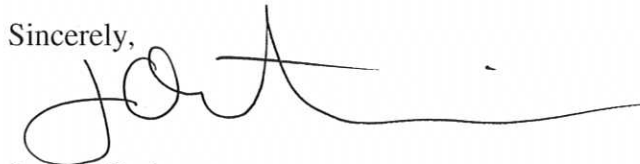
**Re: Native American Consultation Regarding the Proposed  
Alberhill Substation Project, Revised 115k Source Line Route,  
Riverside County, California**

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. This project location is in close proximity to known village sites and is a shared use area that was used in ongoing trade between the Luiseno and Cahuilla tribes. Therefore it is regarded as highly sensitive to the people of Soboba.

Soboba Band of Luiseño Indians is requesting the following:

1. **Government to Government** consultation in accordance to SB18. Including the transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur.
2. Soboba Band of Luiseño Indians continue to be a lead consulting tribal entity for this project.
3. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseño Indians requests that Native American Monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department to be present during any ground disturbing proceedings. Including surveys and archaeological testing.
4. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

Sincerely,



Joseph Ontiveros  
Soboba Cultural Resource Department  
P.O. Box 487



San Jacinto, CA 92581  
Phone (951) 654-5544 ext. 4137  
Cell (951) 663-5279  
[jontiveros@soboba-nsn.gov](mailto:jontiveros@soboba-nsn.gov)

**Cultural Items (Artifacts).** Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

**Treatment and Disposition of Remains.** Given that Native American human remains have been found during development of the Project and the Soboba Band has been designated the MLD, the following provisions shall apply to the Parties:

- A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.
- B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.
- C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.



D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.

E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes are to be treated in the same manner as human bone fragments or bones that remain intact

**Coordination with County Coroner's Office.** The Lead Agencies and the Developer should immediately contact both the Coroner and the Soboba Band in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

**Non-Disclosure of Location Reburials.** It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer agrees to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

# *Soboba Cultural Resource Department*



February 11, 2009

Attn: Sara Bholat, MPH  
Archaeologist  
Southern California Edison  
P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemeand, Ca 91770

## **Re: PROPOSED ALBERHILL SUBSTATION PROJECT, INCLUDING SUB-TRANSMISSION, AND TRANSMISSION FEEDER LINES, RIVERSIDE COUNTY, CALIFORNIA**

The Soboba Band of Luiseno Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Luiseno Tribal Traditional Use Areas. It is in close proximity to other known sites and is a shared use area that was used in ongoing trade between the Luiseno bands, not considered as a location occupied by one existing band, but rather the Luiseno Tribe. For these reasons the site is regarded as sensitive to the people of Soboba for the possibility of unanticipated finds.

Soboba Band of Luiseno Indians is requesting the following:

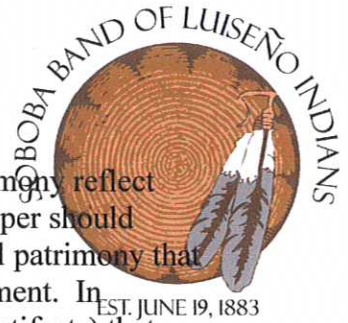
1. **Government to government** consultation. Meaning the transfer of information to the Soboba Band of Luiseno Indians regarding the progress of this project should be done as soon as new developments occur.
2. Soboba Band of Luiseno Indians be regarded as the lead consulting tribal entity for this project.
3. Working in and around traditional use areas intensifies the possibility of encountering cultural resources during the construction/excavation phase. For this reason the Soboba Band of Luiseno Indians requests that Native American Monitor(s) from the Soboba Band of Luiseno Indians Cultural Resource Department to be present during any ground disturbing proceedings. Including surveys and archaeological testing.
4. Request that proper procedures be taken and requests of the tribe be honored (Please see the attachment)

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Ontiveros", written over a horizontal line.

Joseph Ontiveros  
Soboba Cultural Resource Department  
P.O. Box 487  
San Jacinto, CA 92581  
Phone (951) 654-5544 ext. 4137  
Cell (951) 663-5279





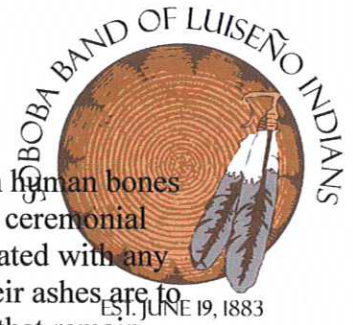
**Cultural Items (Artifacts).** Ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices of the Soboba Band. The Developer should agree to return all Native American ceremonial items and items of cultural patrimony that may be found on the project site to the Soboba Band for appropriate treatment. In addition, the Soboba Band requests the return of all other cultural items (artifacts) that are recovered during the course of archaeological investigations. Where appropriate and agreed upon in advance, Developer's archeologist may conduct analyses of certain artifact classes if required by CEQA, Section 106 of NHPA, the mitigation measures or conditions of approval for the Project. This may include but is not limited or restricted to include shell, bone, ceramic, stone or other artifacts.

The Developer should waive any and all claims to ownership of Native American ceremonial and cultural artifacts that may be found on the Project site. Upon completion of authorized and mandatory archeological analysis, the Developer should return said artifacts to the Soboba Band within a reasonable time period agreed to by the Parties and not to exceed (30) days from the initial recovery of the items.

**Treatment and Disposition of Remains.** Given that Native American human remains have been found during development of the Project and the Soboba Band has been designated the MLD, the following provisions shall apply to the Parties:

- A. The Soboba Band shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and grave goods shall be treated and disposed of with appropriate dignity.
- B. The Soboba Band, as MLD, shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98 (a). The Parties agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.
- C. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The Soboba Band, as the MLD in consultation with the Developer, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains.
- D. All parties are aware that the Soboba Band may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Developer should accommodate on-site reburial in a location mutually agreed upon by the Parties.





E. The term "human remains" encompasses more than human bones because the Soboba Band's traditions periodically necessitated the ceremonial burning of human remains. Grave goods are those artifacts associated with any human remains. These items, and other funerary remnants and their ashes, are to be treated in the same manner as human bone fragments or bones that remain intact

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**Memo:** To File

**Date:** February 17, 2010

**Subject:** *Alberhill Substation - Native American Consultation with the Soboba Band of Luiseno Indian and Southern California Edison Archaeologists*

**Attendees:** Joseph Ontiveros (Soboba Cultural Resources Department)  
Sara Bholat (SCE Archaeologist)  
Thomas T. Taylor (SCE Biological and Archaeological Resources Group Manager)

SCE Archaeologist, Sara Bholat, received a call from Mr. Joseph Ontiveros from the Soboba Band of Luiseno Indians on February 4, 2010. The call was regarding a request for Native American consultation with Southern California Edison (SCE) for the proposed Alberhill Substation Project. Mr. Ontiveros requested this meeting after receiving the cultural resources survey reports for the proposed Alberhill Substation Project submitted by SCE.

A meeting was schedule with Mr. Ontiveros for 2:00 pm on February 17, 2010 at the SCE General Office in Rosemead, California. The parties present at the meeting were Mr. Ontiveros from the Soboba Band of Luiseno Indians, Ms. Bholat (SCE archaeologist assigned to the Alberhill Substation project), and Mr. Thomas Taylor (SCE Biological and Archaeological Resources Group Manager).

Mr. Ontiveros expressed concerns regarding the Native American resources that are present within the general area surrounding the proposed project. SCE explained that the proposed project is not expected to have significant impacts to cultural resources along the proposed project. The reasoning behind this justification is that during the cultural resources survey, no prehistoric or historic resources were identified within the project area of impact which includes the proposed substation parcel, the proposed 500kV transmission source line and the 115kV subtransmission line routes. Any resources that were identified during the records search and survey are well outside of the area of impact and can be easily avoided during construction.

The tribe requests that ground disturbing activities be monitored by a qualified archaeologist, however due to the absence of archaeological resources within the project area, the tribe requests that monitoring can be a random "spot check-type" activity. The tribe also requests that tribal representatives be allowed to visit the project area as necessary during construction. The tribe also would like to be notified if any resources are uncovered during ground disturbing activities.



SCE will consider their recommendations, and will inform the tribal representatives with any changes to the project.

Sara Bholat  
Archaeologist  
Southern California Edison  
Corporate Environment Health & Safety  
Biological and Archaeological Resources Group

P.O. Box 800  
2244 Walnut Grove Ave.  
Rosemead, CA 91770

**From:** [Anna Hoover](#)  
**Date:** Friday, May 14, 2010 4:53:03 PM  
**Posted At:** Inbox  
**Conversation:** Pechanga Tribe Comments on the Alberhill Circuit Project  
**Subject:** Pechanga Tribe Comments on the Alberhill Circuit Project  
**Attachments:** [Pechanga Cmnts NOP Alberhill Substation final 5.14.10.pdf](#)

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Ms. Ladd;

Electronically attached are the Pechanga Tribe's comments regarding the above named project. Please respond to this e-mail for confirmation of receipt. A hard copy will also follow via USPS.

Please do not hesitate to contact me should the attachment not open or if you have any questions or comments.

Thank you!

Anna M. Hoover  
Cultural Analyst  
Pechanga Band of Luiseno Mission Indians  
P.O. Box 2183  
Temecula, CA 92593

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**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luiseño Mission Indians*

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Aurelia Marruffo  
Richard B. Searce, III

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Anna Hoover

Monitor Supervisor:  
Jim McPherson

May 14, 2010

**VIA E-MAIL and USPS**

Karen Ladd, Project Manager  
Alberhill System Project  
c/o Ecology and Environment, Inc  
130 Battery Street, 4<sup>th</sup> Floor  
San Francisco, CA 94111

**Re: Pechanga Tribe Comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR), Southern California Edison's Alberhill System Project (Application A.09-09-022)**

Dear Ms. Ladd:

Thank you for inviting us to submit comments on the above named Project. This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government.

The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire environmental review process for the duration of the above referenced Project (the "Project"). The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please incorporate these comments into the record of approval for this Project as well.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe reserves the right to fully participate in the environmental review process, as well as to provide additional comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.



**CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC) MUST INCLUDE  
INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS  
ENVIRONMENTAL REVIEW PROCESS**

It has been the intent of the Federal Government<sup>1</sup> and the State of California<sup>2</sup> that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the Project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with the CEQA and other applicable Federal and California law, it is imperative that CPUC consult with the Tribe in order to guarantee an adequate basis of knowledge for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures.

**PECHANGA CULTURAL AFFILIATION TO PROJECT AREA**

The Pechanga Tribe asserts that the Project area is part of Luiseño, and therefore the Tribe's, aboriginal territory as evidenced by the existence of Luiseño place names, *tóota yixélval* (rock art, pictographs, petroglyphs), and an extensive Luiseño artifact record in the vicinity of the five sub-areas of the Project. These culturally sensitive areas are affiliated with the Pechanga Band of Luiseño Indians because of the Tribe's cultural ties and traditional knowledge of these areas as well as extensive history in these areas.

D. L. True, C. W. Meighan, and Harvey Crew<sup>3</sup> stated that the California archaeologist is blessed "with the fact that the nineteenth-century Indians of the state were direct descendents of many of the Indians recovered archaeologically, living lives not unlike those of their ancestors." Similarly, the Tribe knows that their ancestors lived on this land and that the Luiseño peoples still live in their traditional lands. The Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. The Pechanga Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians include the Project in their descriptions (Bean 1974; Sparkman 1908; Kroeber 1925; Oxendine 1989; White 1963; Harvey 1974; Smith and Freers 1994), and such territory descriptions correspond with that communicated to the Pechanga

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<sup>1</sup> See Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments and Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments.

<sup>2</sup> See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352, 65352.3 and 65352.4

<sup>3</sup> D. L. True, C. W. Meighan, and Harvey Crew. Archaeological Investigations at Molpa, San Diego County, California, University of California Press 1974 Vol. 11, 1-176

people by our elders. While historic accounts and anthropological and linguistic theories are important in determining traditional Luiseño territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts, and oral traditions.

Luiseño history originates with the creation of all things at '*éxva Teméeku*, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the first human *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs at Elsinore, where he died (DuBois 1908). He was cremated at '*éxva Teméeku*. It is the Luiseño creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation, and now known as the Pechanga Band of Luiseño Mission Indians (the Pechanga Tribe). From Temecula, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. Lake Elsinore and its surrounding environs is one the location for noteworthy events in Luiseño culture. For example, it is the place where two of the *Káamalam* (first people), *Qáwqaw* and *Chixéemal*, had their first menses, which is the subject of one of the girls' coming-of-age songs (DuBois 1908). Another song recounts the travels of the people to the Elsinore area after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Moníivol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. All areas of the Project are located within this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

The proposed Project is located near four major Village Complexes - the Audie Murphy village complex-located immediately to the west of the Murrieta Road alignment area; Meadowbrook Complex - located to the northeast of Lake Elsinore and potentially within the 500kV area; *Páayaxchi* - the large village that was situated to the north of Lake Elsinore, west of the Project and *Táawila* - also known as the Ringing Rock Complex and Christianson-Webb. All villages contain domestic activity areas as well as sacred and ceremonial components.

*Tóota yixelval* (rock art) is also an important element in the determination of Luiseño territorial boundaries. *Tóota yixelval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiseño ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in Luiseño basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixelval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiseño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. One such example of this style of *tóota yixelval* was identified during the archaeological survey (P-33-001027). Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

Our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the Project area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area.

In addition, the Pechanga Tribe has a long modern day history of involvement with Projects in the Alberhill, Canyon Lake, Lake Elsinore, Menifee, Temescal Valley and Wildomar areas. Not only has the Pechanga Tribe been involved, but it has been given the designation of the consulting tribe or affiliated tribe on many projects located in the Cities of Lake Elsinore, Wildomar and Menifee, and their spheres of influence. In addition, Pechanga was the consulting tribe on the Audie Murphy Project and are currently the caretakers of the Meadowbrook and Ringing Rock (*Táawila*) Village Complexes. Moreover, the Pechanga Tribe has been the only



tribe to assume the role of MLD in the Lake Elsinore area which is confirmed by Native American Heritage Commission records.

The Tribe has additional information regarding specific place names and sensitive cultural areas that the Project may impact which are not included in this letter to protect their confidentiality. We welcome the opportunity to meet with CPUC and SCE to further explain and provide documentation and information concerning our specific cultural affiliation to and knowledge of these lands and the Project area.

### **PROJECT IMPACTS TO CULTURAL RESOURCES**

The proposed Project is located in a highly sensitive region of Luiseño territory which is directly related to the creation stories and the Tribe believes that the possibility for recovering cultural resources during ground-disturbing activities is high. The Tribe has over thirty-five (35) years of experience in working with various types of construction projects throughout its territory and is highly qualified to make determinations regarding its ancestors. The combination of this knowledge and experience, along with the knowledge of the culturally-sensitive areas and oral tradition, is what the Tribe relies on to make fairly accurate predictions regarding the likelihood of subsurface resources in a particular location.

To date, the Tribe has received the Programmatic Environmental Assessment (PEA) and the archaeological studies<sup>4</sup>. The 2009 archaeological study indicates that there are over 100 previously recorded cultural sites within a ½ mile radius of the 115kV project line and two within a ½ mile radius of the proposed 500kV lines.

The Tribe is aware of significant sites that will be impacted by the proposed project, either directly or indirectly. For example, the archaeological report briefly reviews sites P-33-001027 and P-33-015724 however no mention is made that both of these sites are connected to a larger network of sites that form two of the Village Complexes described below. The Tribe has specific information about these two sites that a records search will not reveal. Further, the studies make a very broad assumption that most of the sites that were within the record search radius consisted of milling sites or lithic scatters. No discussion is provided of how these sites might be interrelated and no discussion is provided of the region and how the landscape was utilized, either prehistorically or historically. The Tribe is very concerned that the report does not address these sites more thoroughly, especially since one of the new prehistoric sites is located in direct connection with the Audie Murphy Village Complex. As stated above, the proposed Project is located near four major Village Complexes - the Audie Murphy village

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<sup>4</sup> Cultural Resources Inventory of the Proposed Southern California Edison 115kV/500kV Alberhill Circuits, Riverside County, California. Prepared by ECORP Consulting, September 2009  
and

Cultural Resources Investigation of the Proposed Southern California Edison 500/115kV Alberhill Substation Project, Riverside County, California. Prepared by ECORP Consulting, December 2008

complex; the Meadowbrook Complex, *Páayaxchi* and *Táawila*. These four areas can be designated as Village Complexes because they contain not only domestic activity areas such as milling features and lithic scatters but they contain sacred and ceremonial features, *tóota yixélval* and human remains. Additionally, it has been clearly documented ethnographically as well as through oral traditions, that this geographic region was used for seasonal resource collecting and as a transportation route between additional villages located to the north near Glen Ivy and Lake Mathews; to the northeast near Cajalco Creek and the Motte Reserve area; to the east near Newport Road and the I215, and to the south in Temecula. The archaeological and cultural records verify that this area was well traveled and the natural resources were attractive and utilized by the Luiseño people.

The Tribe additionally has records maintained through oral tradition regarding the Alberhill area. Alberhill (as well as Lake Elsinore) features prominently in the Luiseño creation account, specifically regarding *Wuyóot*. In fact, there are three Luiseño place names that have been identified within a few hundred feet of the Project's boundaries in the Alberhill region that would be visually impacted by this Project. The Tribe has recently also located a new place name that is in the vicinity of the southwest portion of the 115kV line, near the Skylark Airport. *Píi'iv* is a known habitation location and was most likely associated with *Páayaxchi*.

Given the discrepancy between what the prior archaeological reports found within the APE and what the Tribe's records show are within the APE for the project, the Tribe requests that the CPUC assure that additional investigation and evaluation of the Project area be performed in conjunction with the Environmental Impact Report process. We further request that the regional cultural resources, including the Village Complexes within the region, be addressed in the Environmental Impact Report and that the proposed mitigation appropriately reflects the high sensitivity of this region.

The Tribe requests to be involved and participate with CPUC and SCE in assuring that an adequate environmental assessment is completed for the entire Project, including analysis of off-site impacts and in developing all monitoring and mitigation plans and measures for the duration of the Project. It is further the position of the Pechanga Tribe that Pechanga tribal monitor professionals be required to be present during all cultural resource surveys, and archaeological and ground-disturbing activities conducted in connection with the Project, including any additional archaeological excavations performed. The Tribe also requests that all analysis of impacts to cultural resources for this Project area must necessarily include all cultural resources in the vicinity, even if such complexes exist adjacent to or nearby each sub-area of the Project.

Given the sensitivity of the area, inadvertent discoveries are foreseeable impacts and thus need to be appropriately mitigated for within the confines of the Project. It is imperative that adequate cultural resources assessments be performed in conjunction with the Pechanga Tribe and the Project approval and environmental review process. The identification of surface resources during an archaeological survey should not be the sole determining factor in deciding

whether mitigation measures for inadvertent discoveries are required. The cultural significance of the area, provided in consultation with the Pechanga Tribe, should play a large part in determining whether specifications concerning unanticipated discoveries should be included.

### **REQUESTED TRIBAL INVOLVEMENT AND MITIGATION**

The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luiseño Indians. The Pechanga Band is not opposed to this Project. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). As such, it is the position of the Pechanga Tribe that an agreement specifying appropriate treatment of inadvertent discoveries of cultural resources be executed between SCE and the Pechanga Tribe.

The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §1506a.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5-10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. It is important to note that all resources are important to the Tribe and the determination is not based upon scientific importance. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures and conditions of approval for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right



pursuant to California law with regard to any remains or items discovered in the course of this Project.

### **PROJECT MITIGATION MEASURES**

The Pechanga Tribe will itself be engaging in further assessment of the Project area, in consultation with tribal elders, to identify more specific information about this culturally sensitive area. The Tribe requests that the CPUC, SCE and the Project Archaeologist work directly with the Tribe to thoroughly evaluate and assess potential impacts to the Project Area, including any proposed off-site impacts. The Tribe further requests copies of the four studies referenced in the archaeological study as Chmiel and Cooley 2008; Cooley and Craft 2008; Craft and Cooley 2008; Lerch and Gray 2006 so that we may make a more thorough evaluation of the impacts to cultural resources. The Tribe also requests that sites P-33-001027 and P-33-015724 be avoided and preserved *in situ*.

Moreover, the Tribe possesses necessary information about the cultural sensitivity of this area that an archaeological survey alone can not reveal, and should be consulted to assist in identifying and mitigating the cultural resources impacts for this Project as soon as possible. The Tribe had previously requested to have a tribal monitor professional participate in the site survey already conducted, however we were not informed of the fieldwork. Therefore, we also request to be included in any future site visits, surveys and excavations to assist the Project Archaeologist in assessing impacts to cultural resources in the Project area. The Tribe further requests detailed copies of the Project maps that define the exact boundaries of the Project components so that we may continue to refine the identification of sites that may be impacted.

As an initial matter, the Tribe requests the following mitigation measures be included in the DEIR in order to address the recommendations as proposed in the archaeological study and to address inadvertent discoveries as well as Native American participation during earthmoving activities. The Tribe may submit additional suggested mitigation to specifically address proposed impacts to any sites or resources within the Project area:

- MM 1** Prior to beginning Project construction, SCE shall retain a Secretary of the Interior/Riverside County qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to a cultural resources evaluation.
- MM 2** At least 30 days prior to beginning Project construction, SCE shall contact the Pechanga Tribe to notify the Tribe of grading, excavation and the monitoring program, and to develop a Cultural Resources Treatment and Monitoring Agreement. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground

disturbing activities; Project grading and development scheduling; terms of compensation for tribal monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site.

**MM 3** Prior to beginning Project construction, the Project Archaeologist shall file a pre-grading report with SCE (if required) to document the proposed methodology for grading activity observation. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in MM 2, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Pechanga Tribe in order to evaluate the significance of any archaeological resources discovered on the property. Tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities, and shall also have the authority to stop and redirect grading activities in consultation with the Project archaeologist.

**MM 4** The landowner shall relinquish ownership of all cultural resources, including sacred items, burial goods and all archaeological artifacts that are found on the Project area to the Pechanga Tribe for proper treatment and disposition.

**MM 5** All sacred sites, should they be encountered within the Project area, shall be avoided and preserved as the preferred mitigation, if feasible.

**MM 6** If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then identify the "most likely descendant(s)" within 48 hours of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98 and the Treatment Agreement described in MM 2.

**MM 7** If inadvertent discoveries of subsurface archaeological resources are discovered during grading, SCE, the Project Archaeologist, and the Tribe shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. SCE shall make the determination of significance if the Tribe and project Archaeologist cannot agree on the significance or the mitigation for such resources, based on the provisions of the California Environmental Quality

Pechanga Tribe Comment Letter

Re: Comments on the NOP for a DEIR on the Alberhill System Project

May 14, 2010

Page 10

Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Pechanga Tribe.

The Pechanga Tribe looks forward to working together with the CPUC and SCE in protecting the invaluable Luiseño cultural resources found in the Project area. Please contact me at 951-308-9295 X8104 once you have had a chance to review these comments so that we might address any outstanding issues concerning the Project. Thank you.

Sincerely,



Anna Hoover  
Cultural Analyst

Cc Pechanga Office of the General Counsel  
Brenda Tomaras, Tomaras & Ogas, LLP





**PECHANGA CULTURAL RESOURCES**  
*Temecula Band of Luisecio Mission Indians*

Post Office, Box 2183 • Temecula, CA 92593  
Telephone (951) 308-9295 • Fax (951) 506-9491

August 24, 2011

**VIA E-MAIL and USPS**

Karen Ladd, Project Manager  
Alberhill System Project  
do Ecology and Environment, Inc  
130 Battery Street, 4<sup>th</sup> Floor  
San Francisco, CA 94111

**Re:Pechanga Tribe Comments on the Notice of Amended Proponent's Environmental Assessment and Preparation of an Environmental Impact Report, Southern California Edison's Alberhill System Project (Application A.09-09-022)**

Dear Ms. Ladd:

This comment letter is written on behalf of the Pechanga Band of Luisecio Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project") as well as the regulatory process. Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please incorporate these comments into the record of approval for this Project as well.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental and regulatory review of the Project and to assist the California Public Utilities Commission (CPUC) in preparing appropriate mitigation for the cultural resources that may be discovered during development of this Project.

Comments were submitted by the Tribe for the original Notice of Preparation (NOP) in May 2010 on this Project. At that time, the Tribe requested to begin consultation with the CPUC as we have additional information that the archaeological studies did not reflect. To date, the Tribe has still not been contacted to begin consultation with the CPUC or Southern California Edison (SCE) and we are very concerned that we were not contacted during the revisions to the Proponent's Environmental Assessment (PEA) in which the preferred Alignments will impact significant tribal and cultural resources. Further, we have not been provided the opportunity to

Chairperson:  
Germaine Arenas

Vice Chairperson:  
Mary Bear Magee

Committee Members:  
Erie Gerber  
Darlene Miranda  
Bridgett Barcello Maxwell  
Aurelia Marruffo  
Richard B. Searce, III

Director:  
Gary DuBois

Coordinator:  
Paul Macarro

Cultural Analyst:  
Anna Hoover

participate during the archaeological survey(s) and physically view the proposed Project Alternatives which will further assist in our determination of impacts to these cultural resources.

Finally, the Amended PEA states that there will be biological and cultural studies that will be conducted prior to construction activities on the Project in order to "...modify the project design in order to avoid sensitive resources, or to implement Applicant Proposed Measures (APMs) to minimize the impact to sensitive resources..." The Tribe believes that this is an ineffective determination and is deferred mitigation. Under CEQA, deferred mitigation is generally prohibited, and further the deferral of conducting studies which would identify potential impacts to a later date could be a violation of CEQA. (See, e.g., *Sandstrom v. County of Mendocino* (1<sup>st</sup> Dist. 1988) 202 Cal. App. 3d 296).

#### THE CPUC MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS

It has been the intent of the Federal Government<sup>1</sup> and the State of California<sup>2</sup> that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the CPUC consult with the Tribe in order to guarantee an adequate basis of knowledge for an appropriate evaluation of the Project effects, as well as generating adequate mitigation measures.

#### PECHANGA CULTURAL AFFILIATION TO PROJECT AREA

The Pechanga Tribe has previously submitted cultural affiliation details on the Project area in prior comments however; the following is being provided again as a basis for beginning consultation with the CPUC and SCE.

The Tribe, as well as the archaeological report, asserts that the Project area is part of Luisefio, and therefore the Tribe's, aboriginal territory as evidenced by the existence of Luisefio place names, *toota yixelval* (rock art, pictographs, petroglyphs), and an extensive Luisefio artifact record in the vicinity of the Project. This culturally sensitive area is affiliated with the Pechanga Band of Luisefio Indians because of the Tribe's cultural ties to this area as well as extensive history with Lead Agencies in this area and monitoring other projects within the area.

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See e.g., Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments, Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments, Executive Memorandum of September 23, 2004 on Government-to-Government Relationships with Tribal Governments, and Executive Memorandum of November 5, 2009 on Tribal Consultation.

<sup>2</sup>See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352.3 and 65352.4

D. L. True, C. W. Meighan, and Harvey Crew<sup>3</sup> stated that the California archaeologist is blessed "with the fact that the nineteenth-century Indians of the state were direct descendents of many of the Indians recovered archaeologically, living lives not unlike those of their ancestors." Similarly, the Tribe knows that their ancestors lived on this land and that the Luisefio peoples still live in their traditional lands. The Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. The Pechanga Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians include the Project in their descriptions (Bean 1974; Sparkman 1908; Kroeber 1925; Oxendine 1989; White 1963; Harvey 1974; Smith and Freers 1994), and such territory descriptions correspond with that communicated to the Pechanga people by our elders. While historic accounts and anthropological and linguistic theories are important in determining traditional Liaise() territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts, and oral traditions.

Luisefio history originates with the creation of all things at *'exva Temeeeku*, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luisefio territory). It was at Temecula that the first human *Wuyoot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyoot* to the many hot springs at Elsinore, where he died (DuBois 1908). He was cremated at *'exvct Temeeeku*. It is the Luisefio creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation, and now known as the Pechanga Band of Luisello Mission Indians (the Pechanga Tribe). From Temecula, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. Lake Elsinore and its surrounding environs is one the location for noteworthy events in Luisefio culture. For example, it is the place where two of the *Kciamatani* (first people), *Ocrwqaw* and *Chixeemal*, had their first menses, which is the subject of one of the girls' coming-of-age songs (DuBois 1908). Another song recounts the travels of the people to the Elsinore area after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Monlivol*, are songs of the places and landmarks that were destinations of the Luisefio ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the

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<sup>3</sup>D. L. True, C. W. Meighan, and Harvey Crew. Archaeological Investigations at Molpa. San Diego County. California, University of California Press 1974 Vol. 11, 1-176



Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescat Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. All areas of the Project are located within this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

The proposed Project is located near four major Village Complexes - the Audie Murphy village complex-located immediately to the west of the Murrieta Road alignment area; Meadowbrook Complex - located to the northeast of Lake Elsinore and potentially within the 5001(V area; *Pciayaxchi* — the large village that was situated to the north of Lake Elsinore, west of the Project and *Taawila* — also known as the Ringing Rock Complex and Christianson-Webb. All villages contain domestic activity areas as well as sacred and ceremonial components.

*Thom yixelval* (rock art) is also an important element in the determination of Luiseflo territorial boundaries. *Thom yixelval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiseflo ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in Luiseflo basket designs and can be observed in remaining baskets and textiles today.

An additional type of *loofa yixelval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiseflo territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. One such example of this style of *toota yixelval* was identified during the archaeological survey (P-33-001027). Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albanas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell

how they traveled from "Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

Our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the Project area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area.

In addition, the Pechanga Tribe has a long modern day history of involvement with Projects in the Alberhill, Canyon Lake, Lake Elsinore, Menifee, Temescal Valley and Wildomar areas. Not only has the Pechanga Tribe been involved, but it has been given the designation of the consulting tribe or affiliated tribe on many projects located in the Cities of Lake Elsinore, Wildomar and Menifee, and their spheres of influence. In addition, Pechanga was the consulting tribe on the Audie Murphy Project and are currently the caretakers of the Meadowbrook and Ringing Rock (*Tciawlla*) Village Complexes. Moreover, the Pechanga Tribe has been the only tribe to assume the role of MLD in the Lake Elsinore area which is confirmed by Native American Heritage Commission records.

The Tribe has additional information regarding specific place names and sensitive cultural areas that the Project may impact which are not included in this letter to protect their confidentiality. We request an opportunity to meet with CPUC and SCE to further explain and provide documentation and information concerning our specific cultural affiliation to and knowledge of these lands and the Project area.

#### CULTURAL RESOURCES SHOULD BE EVALUATED IN THE DEIR

The proposed Project is on land that is within the traditional territory of the Luiseño and therefore, the Pechanga Band of Luiseño Indians. The Tribe's primary concerns stem from the Project's likely impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

After review of the 2011 Notice of Preparation (NOP), the Tribe has specific concerns regarding the Project. As in May 2010, we request consultation with the CPUC and SCE representatives regarding the important and significant cultural resources that will be impacted by the Project. The Tribe has information that, due to sensitivity and specific tribal policies, cannot necessarily be made public and to which archaeologists are not privy. Early consultation with us ensures that concerns about potential impacts to significant and important cultural resources are addressed in a sensitive and meaningful manner. Relying solely on the archaeological consultant for information without contacting a professional tribal consultant regarding *their* ancestors and *their* history does not fulfill the spirit of consultation nor does it

acknowledge that tribes themselves know specific information about the land, its past history and uses and, more importantly, its ancestors that is vital in the planning process.

*The Tribe was not Notified by the PEA Revisions' and has yet to Begin Consultation*

It is imperative that the DEIR presents an adequate and thorough study of cultural resources within the Project area and within the region. The Tribe would like to emphasize that portions of the proposed Project are located within multiple habitation sites and a large village complex, portions of which have been preserved and protected by the County of Riverside and the City of Menifee. Habitation sites and village complexes are of utmost importance to the Tribe because they are the last physical remains of where the ancestors lived. They contain information and data that are reflective of every aspect of tribal culture. It is well known that native village and habitation complexes enveloped large areas of land, sometimes several square miles. The Tribe understands that, for various reasons, Cultural Resource Management (CRM) work is often limited to the proposed project with no resources expended for a regional analysis. However, in order to understand the full impacts of the Project on cultural resources, not only those resources within the Project area, but also the adjacent resources must be taken into account from not only a scientific archaeological perspective but from a cultural one as well. The Tribe asserts that in the DEIR, any analysis of impacts to cultural resources for this Project area must necessarily include all village complexes, even if such complexes exist adjacent to or nearby the Project area.

Based upon the information presented in the revised PEA, the majority of the Alternatives will be places within existing Right-of-Ways (ROWs). However, without the Tribe's input regarding the identification of significant cultural resources in these areas, any impacts and/or destruction to this area are a great irreparable loss to tribal culture and scientific knowledge and cannot possibly be mitigated to a 'less than significant' level. As we noted in May 2010, the archaeological study noted several sites that we know to be related to the village complexes in the area. Further, because many of these ROWs were never monitored — either archaeologically or tribally, the potential for previously undiscovered subsurface resources is always high.

Additionally, the Tribe understands that, for management purposes, cultural sites are often recorded as separate entities. However, this has caused a narrow interpretation of cultural areas; each individual 'site' is often viewed as a single, isolated event and little to no research is conducted on the surrounding areas that may indicate a larger habitation area or Village Complex, as has been done on this Project to date. If indiscriminate destruction of individual "sites" (i.e., individual features) is allowed to continue with little to no effort put forth by the Lead Agency or Archaeologists to attempt to accommodate both the goal of preservation alongside the goal of development, the only remaining features of our villages will be small portions that have been chosen by archaeologists to be "saved" based only on a scientific assessment and valuation of the site rather than the cultural significance attributed to it by the Tribe. This sort of methodology completely ignores the value of an individual feature/site's



contribution to the entire habitation area and the cultural importance of these villages and larger areas of habitation. The Tribe would like to encourage archaeologists to look at how these features relate to each other and to the larger environment or landscape instead of separating them into discrete and isolated sites and thus diminishing their importance.

*Cultural Studies Should be Completed Prior to  
Approval and Certification of the DEIR*

The Tribe is concerned that not all the Project alternatives, especially any new locations determined in the PEA, have been appropriately surveyed for cultural resources. Although two archaeological studies were conducted in 2005 and 2009, it is not clear in the revised PEA if all the alternatives have been surveyed; the Tribe believes that the Project should be fully surveyed for evaluation in the DEIR with a complete assessment of the activity areas/cultural sites located within the Project boundaries and within a reasonable vicinity of the Project. Further, the Tribe requests to be involved in all assessment and evaluation done by the CPUC and SCE, including participating in all archaeological surveys and excavation programs, and to participate as a partner in interpreting the results and devising appropriate mitigation based upon those results.

The Pechanga Tribe requests that the CPUC take steps for the protection of any uncovered resources in the process of these assessments. The additional surveys may reveal significant cultural resources and sites which may be eligible for inclusion in the historic site registers, may contain human remains and/or may be sacred Luisefio sites. The Pechanga Tribe believes that only after the completion of more extensive surveys by both the Project Archaeologist and the Pechanga Tribe, will a complete assessment of impacts be accurate.

Additionally, the revised PEA indicates that there will be biological and cultural studies that will be conducted prior to construction activities however only biological and paleontological studies are recommended. We do not understand what cultural studies would need to be conducted this late in the Project. The Tribe believes that this is deferred mitigation which is generally disfavored under CEQA and creates an uncertainty in the mitigation measures, as it defers mitigation to a later time yet lacks performance standards to ensure that impacts to significant cultural resources will be addressed and mitigated.

**REQUESTED TRIBAL INVOLVEMENT AND MITIGATION**

The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luiseno Indians. The Pechanga Band is not opposed to this Project. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseno village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of

cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

Given the sensitivity of the area, inadvertent discoveries are foreseeable impacts and thus need to be appropriately mitigated for within the confines of the Project. The identification of surface resources during an archaeological survey should not be the sole determining factor in deciding whether mitigation measures for inadvertent discoveries are required. The cultural significance of the area should play a large part in determining whether specifications concerning unanticipated discoveries should be included.

The Tribe requests to be involved and to participate with the CPUC and SCE in assuring that an adequate EIR is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that Pechanga tribal monitors be required to be present during all ground-disturbing activities conducted in connection with the Project, including any additional archeological excavations performed.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). As such, it is the position of the Pechanga Tribe that an agreement specifying appropriate treatment of inadvertent discoveries of cultural resources be executed between the Project Applicant/Developer and the Pechanga Tribe.

The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §1506a.5(t)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(1) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5-10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project.

### PROJECT MITIGATION MEASURES

The Pechanga Tribe will itself be engaging in further assessment of the Project area, in consultation with tribal elders, to identify more specific information about this culturally sensitive area. The Tribe requests that the CPUC, SCE and the Project Archaeologist work directly with the Tribe to thoroughly evaluate and assess potential impacts to the Project Area, any new Alternatives and any proposed off-site impacts. The Tribe further requests copies of the four studies referenced in the archaeological study as Chmiel and Cooley 2008; Cooley and Craft 2008; Craft and Cooley 2008; Lerch and Gray 2006 so that we may make a more thorough evaluation of the impacts to cultural resources. The Tribe also requests that, if they will be impacted in any way by the new Alternatives, sites P-33-001027 and P-33-015724 be avoided and preserved *in situ*.

Moreover, the Tribe possesses necessary information about the cultural sensitivity of this area that an archaeological survey alone cannot reveal, and should be consulted to assist in identifying and mitigating the cultural resources impacts for this Project as soon as possible. The Tribe had previously requested to have a professional tribal monitor participate in the site survey already conducted, however we were not informed of the fieldwork. Therefore, we also request to be included in any future site visits, surveys and excavations to assist the Project Archaeologist in assessing impacts to any new Alternatives in the Project area. The Tribe further requests detailed copies of the Project maps that define the exact boundaries of the Project components so that we may continue to refine the identification of sites that may be impacted.

As an initial matter, the Tribe requests the following mitigation measures be included in the DEIR in order to address the recommendations as proposed in the archaeological study and to address inadvertent discoveries as well as Native American participation during earthmoving activities. The Tribe may submit additional suggested mitigation to specifically address proposed impacts to any sites or resources within the Project area:

- MM 1      Prior to beginning Project construction, SCE shall retain a Secretary of the Interior/Riverside County qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to a cultural resources evaluation.
- MM 2      At least 30 days prior to beginning Project construction, SCE shall contact the Pechanga Tribe to notify the Tribe of grading, excavation and the monitoring program, and to develop a Cultural Resources Treatment and Monitoring Agreement. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; Project grading and development scheduling; terms of compensation for tribal monitors; and treatment and final disposition of any



cultural resources, sacred sites, and human remains discovered on the site.

- MM 3 Prior to beginning Project construction, the Project Archaeologist shall file a pre-grading report with SCE (if required) to document the proposed methodology for grading activity observation. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in MM 2, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Pechanga Tribe in order to evaluate the significance of any archaeological resources discovered on the property. Tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities, and shall also have the authority to stop and redirect grading activities in consultation with the Project archaeologist.
- MM 4 The landowner shall relinquish ownership of all cultural resources, including sacred items, burial goods and all archaeological artifacts that are found on the Project area to the Pechanga Tribe for proper treatment and disposition.
- MM 5 All sacred sites, should they be encountered within the Project area, shall be avoided and preserved as the preferred mitigation, if feasible.
- MM 6 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then identify the "most likely descendant(s)" within 48 hours of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98 and the Treatment Agreement described in MM 2.
- MM 7 If inadvertent discoveries of subsurface archaeological resources are discovered during grading, SCE, the Project Archaeologist, and the Tribe shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. SCE shall make the determination of significance if the Tribe and project Archaeologist cannot agree on the significance or the mitigation for such resources, based on the provisions of the California Environmental Quality Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Pechanga Tribe.

.....  
*Pechanga Cultural Resources • Temecula Band of Luiseilo Mission Indians  
Post Office Box 2183 • Temecula, CA 92592*

*Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need*

Pechanga Comment Letter to the CPUC  
Re: Pechanga Tribe Comments on the Alberhill System Project  
August 24, 2011  
Page 11

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

The Pechanga Tribe looks forward to working together with the CPUC in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 once you have had a chance to review these comments so that we can begin consultation and analysis of impacts to cultural resources. Thank you.

Sincerely,



Anna Hoover  
Cultural Analyst

Cc Pechanga Office of the General Counsel  
Brenda Tomaras, Tomaras & Ogas, LLP

## Black, Kristi

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**From:** Anna Hoover <ahoover@pechanga-nsn.gov>  
**Sent:** Tuesday, June 09, 2015 1:58 PM  
**To:** alberhill  
**Cc:** Ebru Ozdil; Brenda L. Tomaras; Andrea Fernandez  
**Subject:** Notice of Preparation - SCE Alberhill System Project  
**Attachments:** Alberhill System Project NOP.pdf

To Whom it May Concern;

These comments are written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the “Project”). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

Although these comments are being submitted past the requested NOP deadline of June 5, 2015, we request that you please accept our comments and incorporate them in to the Project file and documents. The Pechanga Tribe has worked jointly with the CPUC and SCE on this Project since 2009. We are very concerned that the Notice of Preparation (NOP) does not address the potential significant impacts that the Project will have to tribal cultural resources. The Alberhill System line traverses through a Traditional Cultural Property (TCP), may impact over 15 cultural sites and will visually impacts several more sites that are located within close vicinity. Further, this Project is located less than four miles from the Tribe’s Trust Lands located in Meadowbrook. These are formal, non-contiguous reservation lands, making the Pechanga Tribe the closest Indian Tribe to the Project.

In order to comply with CEQA and other applicable Federal and California law, it is imperative that the CPUC consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as to generate adequate mitigation measures. Thus, the Tribe requests to be involved and participate with the CPUC in assuring that an adequate environmental assessment is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be required to be present during all archaeological surveys and studies, as well as to be present during all ground-disturbing activities conducted in connection with the Project, including any archeological excavations performed.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

The Pechanga Tribe looks forward to working together with the CPUC in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at [ahoover@pechanga-nsn.gov](mailto:ahoover@pechanga-nsn.gov) once you have had a chance to review these comments so that we might continue our consultation. Thank you.

***Anna M. Hoover***  
**Cultural Analyst**  
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**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**  
**Southern California Edison's Alberhill System Project (Application A.09-09-022) and**  
**Valley–**  
**Ivyglen Subtransmission Line Project (Application A.07-01-031)**

The California Public Utilities Commission (CPUC) will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Alberhill System Project (Alberhill Project or ASP) and the Valley–Ivyglen Subtransmission Line Project (Valley–Ivyglen Project or VIG). The purpose of this Notice of Preparation (NOP) is to open a 30-day public comment period on the scope of the EIR for the Alberhill Project and Valley–Ivyglen Project. Below is background information on each project and a summary of the status of each project's application. The comment period will extend from May 6, 2015, to June 5, 2015.

**A. Introduction**

*Alberhill System Project*

Southern California Edison Company (SCE) filed an application and Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity on September 30, 2009, (Application A.09-09-022) with the CPUC to construct the Alberhill Project. The CPUC circulated an NOP on April 15, 2010, that opened a 30-day scoping comment period. SCE filed amended sections of the PEA on April 11, 2011, that modified the two proposed 500-kV transmission lines for the project. The CPUC circulated a second NOP on July 28, 2011, which opened another 30-day scoping comment period. The CPUC has not yet circulated an environmental document for the Alberhill Project.

*Valley–Ivyglen Project*

On April 2, 2013, SCE filed a Petition for Modification (PFM) for Decision 10-08-009, which granted SCE a Permit to Construct the Valley–Ivyglen Subtransmission Line and Fogarty Substation Project. On March 26, 2014, SCE filed a Motion to Bifurcate the Fogarty Substation Project from the Valley–Ivyglen Project, which was approved by the CPUC on August 28, 2014, thereby separating the Valley–Ivyglen Project from the Fogarty Substation Project.[1] On May 23, 2014, SCE filed a revised PFM for Decision 10-08-009 for the Valley–Ivyglen Project.

*Environmental Review*

In August 2013, the CPUC determined that it would be in the public's best interest to consolidate the California Environmental Quality Act (CEQA) analyses for the proposed Alberhill Project Certificate of Public Convenience and Necessity and the Valley–Ivyglen Project PFM applications into a single CEQA document. As the lead agency, the CPUC has determined that an EIR should be prepared in accordance with the criteria, standards, and procedures of the CEQA (Public Resources Code sections 21000 et. seq. and California Code of Regulations Title 14, sections 15000 et seq.).

**B. Alberhill System Project Location, Description, and Purpose**

The Alberhill Project would include construction of the following:

- One 1,120-megavolt-ampere (MVA) 500/115-kilovolt (kV) substation (Alberhill Substation), expandable to a maximum of 1,680 MVA.
- Two 500-kV transmission lines to connect the proposed substation to the existing Serrano–Valley 500-kV transmission line.
- One new and four modified 115-kV subtransmission lines to transfer five substations that are currently served by the Valley South 500/115-kV Substation to the new Alberhill Substation.
- Telecommunications lines on the new and replaced transmission and subtransmission lines.
- A 120-foot microwave antenna tower at the proposed Alberhill Substation site; microwave telecommunications antennas at the existing Santiago Peak communications site and Serrano Substation; and other telecommunications equipment installations at existing and proposed substations.

The Alberhill Substation is proposed to be built on approximately 34 acres of a 124-acre property located on the northwest corner of the intersection of Temescal Canyon Road and Concordia Ranch Road in unincorporated western Riverside County. The two 500-kV transmission lines would each extend approximately 1 mile northeast to connect to the existing Serrano–Valley 500-kV transmission line. The 115-kV subtransmission line modifications and construction would occur southeast from the Alberhill Substation to Skylark Substation (approximately 11.5 miles) and from Skylark Substation to Newcomb Substation (approximately 9 miles). See Figure 1 attached to this NOP. ***\*A GIS-based webviewer will be available on the project website (see address below) in a few days.*** A portion of the proposed Alberhill Project 115-kV subtransmission line would be placed on structures built as part of the proposed Valley–Ivyglen Project.

Telecommunications lines would be installed primarily on the overhead structures modified or constructed as part of the proposed Alberhill Project. In addition, a 120-foot microwave antenna tower would be installed at the proposed Alberhill Substation site that would direct signals to a new dish antenna located approximately 7 miles to the southwest at the existing Santiago Peak Communications site in Cleveland National Forest. From there, another new dish antenna would direct signals to a new dish antenna installed at the Serrano Substation in the City of Orange in Orange County.

The Alberhill Project would serve the cities of Lake Elsinore, Canyon Lake, Perris, Menifee, Murrieta, Hot Springs, Temecula, and Wildomar, as well as the surrounding unincorporated areas of Riverside County. SCE designed the proposed Alberhill Project to meet long-term forecasted electrical demand in the Alberhill Project area and increase electrical system reliability. SCE estimates that construction would take approximately 28 months.

### **C. Valley–Ivyglen Project Location, Description, and Purpose**

The Valley–Ivyglen Project would involve the construction of a new, single-circuit 115-kV subtransmission line and a fiber optic line. The alignment of the proposed Valley–Ivyglen 115-kV line would generally follow the route approved in 2010 by CPUC Decision 10-08-009, with modifications to address erosion and landslide activity that occurred in the area. The modified

route would be approximately 27 miles long and constructed within approximately 23 miles of new right-of-way. The line would traverse unincorporated Riverside County and the cities of Menifee, Perris, and Lake Elsinore. The proposed route would cross Interstate 15, Interstate 215 and State Route 74. See Figure 2 attached to this NOP. ***\*A GIS-based webviewer will be available on the project website (see address below) in a few days.*** Fiber optic lines would be installed overhead on the proposed structures and underground in new and existing conduit.

In addition to route realignment, the proposed Valley–Ivyglen Project would include the following modifications compared to the project approved in 2010 by CPUC Decision 10-08-009:

- Additional disturbance areas and access road changes;
- Alternate construction methods, including helicopter use, blasting, temporary transmission poles, and retaining walls;
- Additional underground installations;
- Additional transmission structures and types of transmission structures;
- Increased span lengths and depths of borings.
- Additional construction methods, including shoofly poles, blasting, guard structures, and helicopter use;
- Modifications to work areas, staging areas, and helicopter operation yards; and
- Modifications to the telecommunications system, including overhead and underground installation.

SCE anticipates that construction of the Valley–Ivyglen Project would take approximately 27 months.

#### **D. Scope of EIR and Discussion of Potential Impacts**

CEQA requires agencies to consider environmental impacts that may result from a project, inform the public of potential impacts and alternatives, and facilitate public involvement in the assessment process. The EIR for the proposed Alberhill Project and Valley–Ivyglen Project will discuss the purpose and need for the proposed projects, describe alternatives, describe the environmental setting, evaluate the environmental impacts of the proposed projects and alternatives, and evaluate cumulative impacts.

Preliminary analysis suggests that significant impacts could result from the Alberhill and Valley–Ivyglen Projects. Tables 1 and 2 summarize the potentially significant effects of the proposed projects. More detailed analyses will be included in the EIR.

#### **E. Public Review**

This NOP has been sent to the State Clearinghouse, responsible and trustee agencies, and other interested parties. Comments should identify the issues to be considered in the EIR with respect to proposed projects. The public comment period on the scope of the EIR will extend from May 6, 2015 to June 5, 2015.

The CPUC will host two meetings on the Alberhill Project and the Valley–Ivyglen Project as detailed below:

**Date:** May 18, 2015

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**Time:** 1:00 to 2:30 p.m.

**Time:** 6:00 to 7:30 p.m.

**Location:** Cesar E. Chavez Library  
163 E. San Jacinto  
Perris, CA 92570

**Location:** Lake Elsinore Cultural Arts Center  
183 North Main Street  
Lake Elsinore, CA 92530

Each meeting will begin with a brief presentation, followed by an open house format to answer specific questions about the proposed projects. You are invited to submit written comments, which must be postmarked or received by fax or email no later than June 5, 2015. Please be sure to include your name, address, and telephone number in correspondence.

Please send comments to:

**Alberhill Project and Valley-Ivyglen Project**

c/o Ecology and Environment, Inc.

505 Sansome Street, Suite 300

San Francisco, CA 94111

**Fax:** (415) 398-5326

**Email:** [alberhill@ene.com](mailto:alberhill@ene.com) or [ivyglen@ene.com](mailto:ivyglen@ene.com)

Following this public scoping period, the CPUC will prepare a Draft EIR that will address scoping comments received during this public scoping period as well as the two previous public scoping periods for the Alberhill Project

Information about the Alberhill Project is available at the following public website:

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<http://www.cpuc.ca.gov/Environment/info/ene/ivyglen/ivyglen.html>

Copies of applicant-submitted documents, meeting dates, and other information about the Alberhill Project and Valley-Ivyglen Project are available on the websites. As completed, the Draft and Final EIR and other documentation will be posted to the website. The Draft and Final EIR will also be available for review at the following public libraries:

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**Wildomar Library**  
34303 Mission Trail  
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(951)471-3855

**Table 1 Summary of Potentially Significant Effects of the Alberhill Project**

<b>Resource Area</b>	<b>Potential Effects</b>
<b>Aesthetics</b>	<p>A permanent effect on aesthetics along Interstate 15 (I-15), an eligible State Scenic Highway, could result from operation of the proposed Alberhill Project because the proposed Alberhill Substation, new 500-kV transmission lines, and new and upgraded 115-kV subtransmission lines (115-kV Segments ASP1, ASP3, ASP4, and ASP5) would be visible to motorists. Permanent effects may result because of visual contrast, alterations to existing scenic integrity, blocked or partially blocked views, and the introduction of industrial-like facilities to a relatively undeveloped rural area. The following components, among others, would be viewable from I-15:</p> <ul style="list-style-type: none"><li>• Two 37-foot-tall transformers</li><li>• 49-foot-tall steel-enclosed 500-kV gas-insulated switchrack</li><li>• Control building (7,000 square feet)</li><li>• Parking area (7,600 square feet) and driveways (156,000 square feet)</li><li>• 8-foot-tall concrete or decorative-block substation perimeter wall</li><li>• 500-kV transmission lines and lattice steel towers (95 to 190 feet tall)</li><li>• 115-kV subtransmission lines (upgraded from 65–90 feet tall to 70–100 feet tall)</li></ul>
	<p>Permanent effects on the visual character or quality of a site or its surrounding area could result from operation of the proposed Alberhill Project at the proposed Alberhill Substation site, along the 500-kV transmission line routes, along 115-kV Segments ASP1 and ASP6, and along the northern section of the proposed 115-kV Segment ASP2 route near the proposed Alberhill Substation site that may reduce the intactness, unity, or vividness of existing views.</p>
<b>Air Quality</b>	<p>Temporary violations of maximum daily on-site emission levels of fugitive dust (particulate matter of 10 micrometers or less [PM10] and 2.5 micrometers or less [PM2.5]) would occur during construction of the proposed Alberhill Substation due to grading, excavation, and asphaltting.</p>

	<p>Temporary violations for maximum daily on-site emission levels of PM10 would occur during construction of the proposed 115-kV subtransmission lines from roadwork, site preparation, structure installation, and wire stringing.</p>
	<p>The temporary exposure of sensitive receptors to substantial concentrations of volatile organic compounds (VOC) and fugitive dust (PM10 and PM2.5) would occur during construction of the proposed Alberhill Substation, 500-kV transmission lines, and 115-kV subtransmission lines.</p>
<b>Biological Resources</b>	<p>Temporary, permanent, direct, and indirect effects on Stephens' kangaroo rat would likely result from the construction and operation of the proposed Alberhill Substation, 500-kV lines, and several of the 115-kV segments.</p>
	<p>Temporary, permanent, direct, and indirect effects on riparian areas and federally protected wetlands (e.g., Temescal Wash or its tributaries) as defined by Clean Water Act Section 404 could result from construction and operation activities along the proposed 500-kV and 115-kV routes and at proposed Alberhill Substation site.</p>
<b>Hazards and Hazardous Materials</b>	<p>Each of the 560-MVA 500/115-kV transformers would contain approximately 33,550 gallons of transformer oil. In California, all used oil is managed as hazardous waste until tested to show it is not hazardous (Section 25250.4 of the California Health and Safety Code). Direct and indirect effects from the accidental release of hazardous materials could result during construction and operation of the proposed Alberhill Substation.</p>
	<p>Temporary and permanent effects from fire could result from construction and operation of the proposed Alberhill Project along the proposed 500-kV and 115-kV lines and at the proposed Alberhill Substation site, which would be located within or adjacent to Very High Fire Hazard Severity Zones.</p>
<b>Hydrology and Water Quality</b>	<p>Temporary, direct, and indirect effects on water quality and existing drainage patterns could result from construction of the proposed Alberhill Substation, access road to 500-kV Tower SA-5, and along sections of the proposed 115-kV segments due to project-related activities such as the placement of fill, earth moving activities, and the potential for spill of hazardous materials near jurisdictional (e.g., Temescal Wash ) and potentially jurisdictional waterways/drainages.</p>
<b>Cumulative Effects</b>	<p><i>Aesthetics.</i> A permanent effect on aesthetics along an eligible State Scenic Highway (I-15) could result from operation of the proposed Alberhill Project in addition to the proposed Talega–Escondido/Valley–Serrano (TE/VS) Project, and proposed Valley–Ivyglen Project. The proposed Alberhill Substation, 500-kV transmission lines, and 115-kV Segments</p>

	ASP1 through ASP5, as well as the proposed Valley–Ivyglen Project 115-kV Segments VIG3 through VIG7 and proposed TE/VS switchyard and associated 500-kV transmission lines, would be visible from I-15.
	<i>Air Quality.</i> A temporary violation of maximum daily on-site emission levels of PM10 and PM2.5 (fugitive dust) would occur during the construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project. Construction activities that overlap (e.g., earth-moving activities) may result in cumulative effects on air quality.
	<i>Air Quality.</i> Construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project could result in a temporary, cumulatively considerable net increase of VOC, nitrogen oxide, particulate matter of PM10, and PM2.5 due to diesel- and gasoline-fueled engine exhaust from vehicles and equipment.
	<i>Biological Resources.</i> Construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project could result in cumulatively considerable effects on riparian areas and federally protected wetlands.

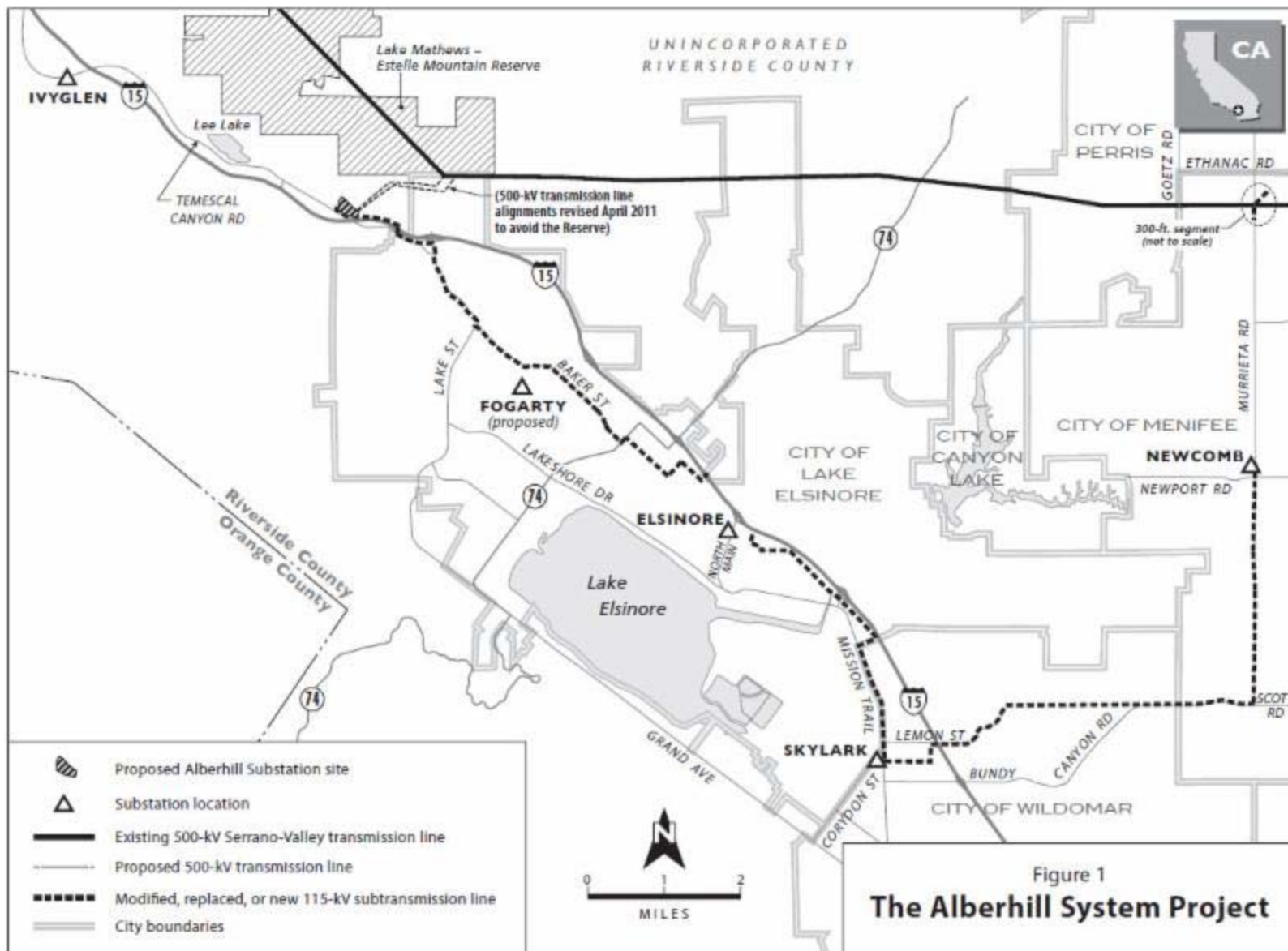
**Table 2 Summary of Potentially Significant Effects of the Valley–Ivyglen Project**

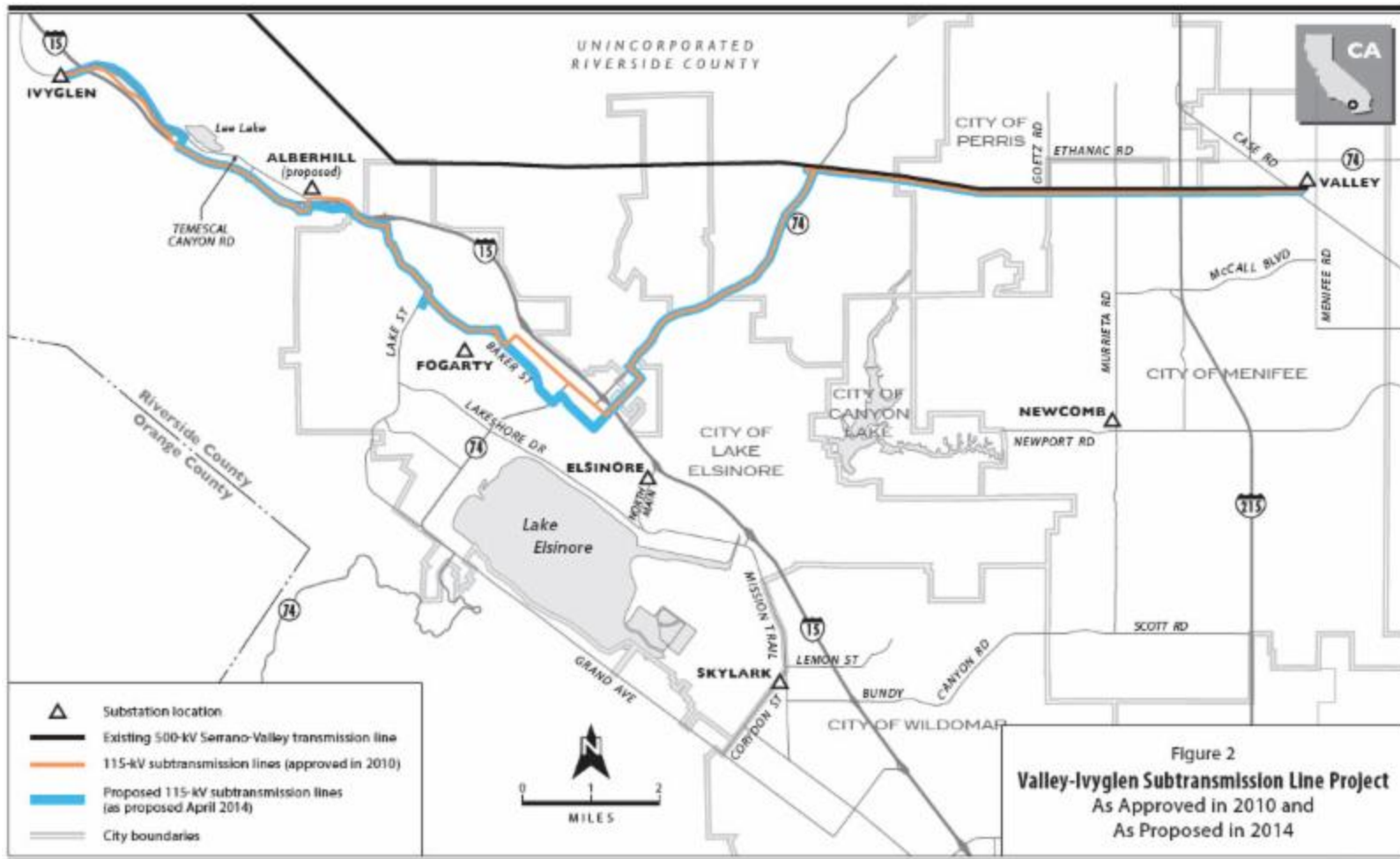
Resource Area	Potential Effects
<b>Aesthetics</b>	<p>Temporary and permanent effects on aesthetic resources along Interstate 15 (I-15) and State Route 74 (SR-74), both eligible State Scenic Highways, could result from construction and operation of the proposed Valley–Ivyglen Project. Construction would occur over a 24-month period, and construction activities along 115-kV Segments VIG1 through 115-kV VIG8 would be noticeable to area residents and motorists along I-15 and SR-74. Construction activities that would temporarily affect scenic resources include:</p> <ul style="list-style-type: none"> <li>• Use of vehicles and equipment for excavation and grading activities, transporting and lifting, watering to control dust, transporting workers, and other construction activities;</li> <li>• Soil and vegetation removal;</li> <li>• Removal of existing power poles;</li> <li>• Temporary construction site fencing and signage;</li> <li>• Spraying of embankment slopes with an erosion control mixture, which may be vivid in color; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Temporary outdoor storage of materials, stockpiling of spoils from excavation.</li> </ul> <p>A permanent effect on aesthetics along I-15 and SR-74 could result from the replacement of existing wood distribution line poles (30 to 80 feet tall) with new steel poles (up to 115 feet tall) and the introduction of new steel poles. The new poles would result in permanent visual contrast, alterations to existing scenic integrity, blocked or partially blocked views, and the introduction of industrial-like facilities to a relatively undeveloped rural area. The new and upgraded 115-kV subtransmission structures along 115-kV Segments VIG1 through 115-kV VIG8 would be intermittently noticeable to area residents and motorists along I-15 and SR-74.</p>
<b>Air Quality</b>	Temporary violations for maximum daily on-site emission levels of PM10 would occur during construction of the proposed 115-kV subtransmission lines from roadwork, site preparation, structure installation, and wire stringing.
	The temporary exposure of sensitive receptors to substantial concentrations of volatile organic compounds (VOC) and fugitive dust (particulate matter of 10 micrometers or less and particulate matter of 2.5 micrometers or less) would occur during construction of the proposed 115-kV subtransmission lines.
<b>Biological Resources</b>	Temporary, permanent, direct, and indirect effects on Stephens' kangaroo rat would likely result from construction of several of the proposed 115-kV segments.
	Temporary, permanent, direct, and indirect effects on riparian areas and federally protected wetlands (e.g., Temescal Wash or its tributaries or the San Jacinto River) as defined by Clean Water Act Section 404 could result from construction and operation of a number of the proposed 115-kV segments. Among the areas likely to be affected are the proposed access roads and new structures along 115-kV Segment VIG6, trenched areas to install 115-kV Segment VIG8 underground, and the area where two tubular steel poles (4765121E and 4765120E) would be installed along 115-kV Segment VIG1 adjacent to the San Jacinto River.
<b>Hazards and Hazardous Materials</b>	Temporary effects from the use of hazardous materials and petroleum products could result in upset or accident conditions involving the release of hazardous materials and petroleum products during construction.
	Temporary and permanent effects from wildfire could result during construction and operation of the proposed Valley-Ivyglen Project along proposed 115-kV segments that would be located within or adjacent to Very High Fire Hazard Severity Zones.



<b>Hydrology and Water Quality</b>	Temporary and long-term effects on water quality and existing drainage patterns could result from 1) foundation excavation for 115-kV structure installations; 2) vegetation removal and earthmoving activities at construction sites and for access roads; 3) culvert construction across aquatic features; and 4) blasting. Erosion or siltation on or off site could result from the grading and vegetation clearing along a number of the proposed 115-kV Segments including along 115-kV Segment 8 where trenching would be required to install the proposed 115-kV line underground near Temescal Wash, a jurisdictional waterway.
<b>Land Use</b>	Potential conflict with Riverside County and City of Lake Elsinore land use policies, zoning ordinances, and requirements within specific plan areas could result (e.g., Alberhill Ridge Specific Plan in Lake Elsinore) because of the installation of new structures within 50 feet of eligible State Scenic Highways (Riverside County General Plan Policy 13.4), installation of structures along visually significant ridgelines and hilltops (Riverside County General Plan Policy 11.1(d)), or within an adopted road realignment for Lake Street (City of Lake Elsinore Vesting Tentative Tract No. 35001).
<b>Noise</b>	Temporary effects on nearby sensitive receptors could result from construction equipment and activities, including helicopter use and blasting that would exceed local noise standards, substantially increase temporary ambient noise levels, and generate substantial ground-borne vibrations during construction.
<b>Traffic</b>	Temporary effects on air traffic patterns could result from the use of helicopters during construction that increase safety risks.
<b>Cumulative Effects</b>	Cumulatively considerable effects may occur on aesthetics, air quality, and biological resources, as described in Table 3.





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<http://www.cpuc.ca.gov/Environment/info/ene/alberhill/Alberhill.html> for a pdf copy of the NOP.



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Ecology & Environment, Inc. | 505 Sansome St. | Suite 300 | San Francisco | CA | 94111



## Black, Kristi

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**From:** Anna Hoover <ahoover@pechanga-nsn.gov>  
**Sent:** Tuesday, June 09, 2015 2:05 PM  
**To:** IvyGlen  
**Cc:** Ebru Ozdil; Andrea Fernandez; Brenda L. Tomaras  
**Subject:** Notice of Preparation - SCE Ivyglen Subtransmission (App A.07-01-031)  
**Attachments:** Alberhill System Project NOP.PDF

To Whom it May Concern;

These comments are written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the “Project”). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

Although these comments are being submitted past the requested NOP deadline of June 5, 2015, we request that you please accept our comments and incorporate them in to the Project file and documents. The Pechanga Tribe has worked jointly with the CPUC and SCE on this Project since 2008. We are very concerned that the Notice of Preparation (NOP) does not address the potential significant impacts that the Project will have to tribal cultural resources. The Ivyglen Subtransmission line traverses through a Traditional Cultural Property (TCP), may impact over 15 cultural sites and will visually impacts several more sites that are located within a close vicinity. Further, this Project is located less than 0.75 miles from the Tribe’s Trust Lands located in Meadowbrook. These are formal, non-contiguous reservation lands, making the Pechanga Tribe the closest Indian Tribe to the Project.

In order to comply with CEQA and other applicable Federal and California law, it is imperative that the CPUC consult with the Tribe in order to guarantee an adequate knowledge base for an appropriate evaluation of the Project effects, as well as to generate adequate mitigation measures. Thus, the Tribe requests to be involved and participate with the CPUC in assuring that an adequate environmental assessment is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be required to be present during all archaeological surveys and studies, as well as to be present during all ground-disturbing activities conducted in connection with the Project, including any archeological excavations performed.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

The Pechanga Tribe looks forward to working together with the CPUC in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-770-8104 or at [ahoover@pechanga-nsn.gov](mailto:ahoover@pechanga-nsn.gov) once you have had a chance to review these comments so that we might continue our consultation. Thank you.

***Anna M. Hoover***  
**Cultural Analyst**  
**Pechanga Band of Luiseno Mission Indians**  
**P.O. Box 2183**  
**Temecula, CA 92593**

**951-770-8104 (O)**  
**951-694-0446 (F)**  
**951-757-6139 (C)**  
**ahcoover@pechanga-nsn.gov**

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**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**  
**Southern California Edison's Alberhill System Project (Application A.09-09-022) and**  
**Valley–**  
**Ivyglen Subtransmission Line Project (Application A.07-01-031)**

The California Public Utilities Commission (CPUC) will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the Alberhill System Project (Alberhill Project or ASP) and the Valley–Ivyglen Subtransmission Line Project (Valley–Ivyglen Project or VIG). The purpose of this Notice of Preparation (NOP) is to open a 30-day public comment period on the scope of the EIR for the Alberhill Project and Valley–Ivyglen Project. Below is background information on each project and a summary of the status of each project's application. The comment period will extend from May 6, 2015, to June 5, 2015.

**A. Introduction**

*Alberhill System Project*

Southern California Edison Company (SCE) filed an application and Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity on September 30, 2009, (Application A.09-09-022) with the CPUC to construct the Alberhill Project. The CPUC circulated an NOP on April 15, 2010, that opened a 30-day scoping comment period. SCE filed amended sections of the PEA on April 11, 2011, that modified the two proposed 500-kV transmission lines for the project. The CPUC circulated a second NOP on July 28, 2011, which opened another 30-day scoping comment period. The CPUC has not yet circulated an environmental document for the Alberhill Project.

*Valley–Ivyglen Project*

On April 2, 2013, SCE filed a Petition for Modification (PFM) for Decision 10-08-009, which granted SCE a Permit to Construct the Valley–Ivyglen Subtransmission Line and Fogarty Substation Project. On March 26, 2014, SCE filed a Motion to Bifurcate the Fogarty Substation Project from the Valley–Ivyglen Project, which was approved by the CPUC on August 28, 2014, thereby separating the Valley–Ivyglen Project from the Fogarty Substation Project.[1] On May 23, 2014, SCE filed a revised PFM for Decision 10-08-009 for the Valley–Ivyglen Project.

*Environmental Review*

In August 2013, the CPUC determined that it would be in the public's best interest to consolidate the California Environmental Quality Act (CEQA) analyses for the proposed Alberhill Project Certificate of Public Convenience and Necessity and the Valley–Ivyglen Project PFM applications into a single CEQA document. As the lead agency, the CPUC has determined that an EIR should be prepared in accordance with the criteria, standards, and procedures of the CEQA (Public Resources Code sections 21000 et. seq. and California Code of Regulations Title 14, sections 15000 et seq.).

**B. Alberhill System Project Location, Description, and Purpose**

The Alberhill Project would include construction of the following:

- One 1,120-megavolt-ampere (MVA) 500/115-kilovolt (kV) substation (Alberhill Substation), expandable to a maximum of 1,680 MVA.
- Two 500-kV transmission lines to connect the proposed substation to the existing Serrano–Valley 500-kV transmission line.
- One new and four modified 115-kV subtransmission lines to transfer five substations that are currently served by the Valley South 500/115-kV Substation to the new Alberhill Substation.
- Telecommunications lines on the new and replaced transmission and subtransmission lines.
- A 120-foot microwave antenna tower at the proposed Alberhill Substation site; microwave telecommunications antennas at the existing Santiago Peak communications site and Serrano Substation; and other telecommunications equipment installations at existing and proposed substations.

The Alberhill Substation is proposed to be built on approximately 34 acres of a 124-acre property located on the northwest corner of the intersection of Temescal Canyon Road and Concordia Ranch Road in unincorporated western Riverside County. The two 500-kV transmission lines would each extend approximately 1 mile northeast to connect to the existing Serrano–Valley 500-kV transmission line. The 115-kV subtransmission line modifications and construction would occur southeast from the Alberhill Substation to Skylark Substation (approximately 11.5 miles) and from Skylark Substation to Newcomb Substation (approximately 9 miles). See Figure 1 attached to this NOP. ***\*A GIS-based webviewer will be available on the project website (see address below) in a few days.*** A portion of the proposed Alberhill Project 115-kV subtransmission line would be placed on structures built as part of the proposed Valley–Ivyglen Project.

Telecommunications lines would be installed primarily on the overhead structures modified or constructed as part of the proposed Alberhill Project. In addition, a 120-foot microwave antenna tower would be installed at the proposed Alberhill Substation site that would direct signals to a new dish antenna located approximately 7 miles to the southwest at the existing Santiago Peak Communications site in Cleveland National Forest. From there, another new dish antenna would direct signals to a new dish antenna installed at the Serrano Substation in the City of Orange in Orange County.

The Alberhill Project would serve the cities of Lake Elsinore, Canyon Lake, Perris, Menifee, Murrieta, Hot Springs, Temecula, and Wildomar, as well as the surrounding unincorporated areas of Riverside County. SCE designed the proposed Alberhill Project to meet long-term forecasted electrical demand in the Alberhill Project area and increase electrical system reliability. SCE estimates that construction would take approximately 28 months.

### **C. Valley–Ivyglen Project Location, Description, and Purpose**

The Valley–Ivyglen Project would involve the construction of a new, single-circuit 115-kV subtransmission line and a fiber optic line. The alignment of the proposed Valley–Ivyglen 115-kV line would generally follow the route approved in 2010 by CPUC Decision 10-08-009, with modifications to address erosion and landslide activity that occurred in the area. The modified



route would be approximately 27 miles long and constructed within approximately 23 miles of new right-of-way. The line would traverse unincorporated Riverside County and the cities of Menifee, Perris, and Lake Elsinore. The proposed route would cross Interstate 15, Interstate 215 and State Route 74. See Figure 2 attached to this NOP. ***\*A GIS-based webviewer will be available on the project website (see address below) in a few days.*** Fiber optic lines would be installed overhead on the proposed structures and underground in new and existing conduit.

In addition to route realignment, the proposed Valley–Ivyglen Project would include the following modifications compared to the project approved in 2010 by CPUC Decision 10-08-009:

- Additional disturbance areas and access road changes;
- Alternate construction methods, including helicopter use, blasting, temporary transmission poles, and retaining walls;
- Additional underground installations;
- Additional transmission structures and types of transmission structures;
- Increased span lengths and depths of borings.
- Additional construction methods, including shoo-fly poles, blasting, guard structures, and helicopter use;
- Modifications to work areas, staging areas, and helicopter operation yards; and
- Modifications to the telecommunications system, including overhead and underground installation.

SCE anticipates that construction of the Valley–Ivyglen Project would take approximately 27 months.

#### **D. Scope of EIR and Discussion of Potential Impacts**

CEQA requires agencies to consider environmental impacts that may result from a project, inform the public of potential impacts and alternatives, and facilitate public involvement in the assessment process. The EIR for the proposed Alberhill Project and Valley–Ivyglen Project will discuss the purpose and need for the proposed projects, describe alternatives, describe the environmental setting, evaluate the environmental impacts of the proposed projects and alternatives, and evaluate cumulative impacts.

Preliminary analysis suggests that significant impacts could result from the Alberhill and Valley–Ivyglen Projects. Tables 1 and 2 summarize the potentially significant effects of the proposed projects. More detailed analyses will be included in the EIR.

#### **E. Public Review**

This NOP has been sent to the State Clearinghouse, responsible and trustee agencies, and other interested parties. Comments should identify the issues to be considered in the EIR with respect to proposed projects. The public comment period on the scope of the EIR will extend from May 6, 2015 to June 5, 2015.

The CPUC will host two meetings on the Alberhill Project and the Valley–Ivyglen Project as detailed below:

**Date:** May 18, 2015

**Date:** May 18, 2015

**Time:** 1:00 to 2:30 p.m.

**Time:** 6:00 to 7:30 p.m.

**Location:** Cesar E. Chavez Library  
163 E. San Jacinto  
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Each meeting will begin with a brief presentation, followed by an open house format to answer specific questions about the proposed projects. You are invited to submit written comments, which must be postmarked or received by fax or email no later than June 5, 2015. Please be sure to include your name, address, and telephone number in correspondence.

Please send comments to:

**Alberhill Project and Valley-Ivyglen Project**

c/o Ecology and Environment, Inc.

505 Sansome Street, Suite 300

San Francisco, CA 94111

**Fax:** (415) 398-5326

**Email:** [alberhill@ene.com](mailto:alberhill@ene.com) or [ivyglen@ene.com](mailto:ivyglen@ene.com)

Following this public scoping period, the CPUC will prepare a Draft EIR that will address scoping comments received during this public scoping period as well as the two previous public scoping periods for the Alberhill Project

Information about the Alberhill Project is available at the following public website:

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Information about the Valley–Ivyglen Project is available at the following public website:

<http://www.cpuc.ca.gov/Environment/info/ene/ivyglen/ivyglen.html>

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**Table 1 Summary of Potentially Significant Effects of the Alberhill Project**

Resource Area	Potential Effects
<b>Aesthetics</b>	<p>A permanent effect on aesthetics along Interstate 15 (I-15), an eligible State Scenic Highway, could result from operation of the proposed Alberhill Project because the proposed Alberhill Substation, new 500-kV transmission lines, and new and upgraded 115-kV subtransmission lines (115-kV Segments ASP1, ASP3, ASP4, and ASP5) would be visible to motorists. Permanent effects may result because of visual contrast, alterations to existing scenic integrity, blocked or partially blocked views, and the introduction of industrial-like facilities to a relatively undeveloped rural area. The following components, among others, would be viewable from I-15:</p> <ul style="list-style-type: none"><li>• Two 37-foot-tall transformers</li><li>• 49-foot-tall steel-enclosed 500-kV gas-insulated switchrack</li><li>• Control building (7,000 square feet)</li><li>• Parking area (7,600 square feet) and driveways (156,000 square feet)</li><li>• 8-foot-tall concrete or decorative-block substation perimeter wall</li><li>• 500-kV transmission lines and lattice steel towers (95 to 190 feet tall)</li><li>• 115-kV subtransmission lines (upgraded from 65–90 feet tall to 70–100 feet tall)</li></ul>
	<p>Permanent effects on the visual character or quality of a site or its surrounding area could result from operation of the proposed Alberhill Project at the proposed Alberhill Substation site, along the 500-kV transmission line routes, along 115-kV Segments ASP1 and ASP6, and along the northern section of the proposed 115-kV Segment ASP2 route near the proposed Alberhill Substation site that may reduce the intactness, unity, or vividness of existing views.</p>
<b>Air Quality</b>	<p>Temporary violations of maximum daily on-site emission levels of fugitive dust (particulate matter of 10 micrometers or less [PM10] and 2.5 micrometers or less [PM2.5]) would occur during construction of the proposed Alberhill Substation due to grading, excavation, and asphaltting.</p>

	<p>Temporary violations for maximum daily on-site emission levels of PM10 would occur during construction of the proposed 115-kV subtransmission lines from roadwork, site preparation, structure installation, and wire stringing.</p>
	<p>The temporary exposure of sensitive receptors to substantial concentrations of volatile organic compounds (VOC) and fugitive dust (PM10 and PM2.5) would occur during construction of the proposed Alberhill Substation, 500-kV transmission lines, and 115-kV subtransmission lines.</p>
<b>Biological Resources</b>	<p>Temporary, permanent, direct, and indirect effects on Stephens' kangaroo rat would likely result from the construction and operation of the proposed Alberhill Substation, 500-kV lines, and several of the 115-kV segments.</p>
	<p>Temporary, permanent, direct, and indirect effects on riparian areas and federally protected wetlands (e.g., Temescal Wash or its tributaries) as defined by Clean Water Act Section 404 could result from construction and operation activities along the proposed 500-kV and 115-kV routes and at proposed Alberhill Substation site.</p>
<b>Hazards and Hazardous Materials</b>	<p>Each of the 560-MVA 500/115-kV transformers would contain approximately 33,550 gallons of transformer oil. In California, all used oil is managed as hazardous waste until tested to show it is not hazardous (Section 25250.4 of the California Health and Safety Code). Direct and indirect effects from the accidental release of hazardous materials could result during construction and operation of the proposed Alberhill Substation.</p>
	<p>Temporary and permanent effects from fire could result from construction and operation of the proposed Alberhill Project along the proposed 500-kV and 115-kV lines and at the proposed Alberhill Substation site, which would be located within or adjacent to Very High Fire Hazard Severity Zones.</p>
<b>Hydrology and Water Quality</b>	<p>Temporary, direct, and indirect effects on water quality and existing drainage patterns could result from construction of the proposed Alberhill Substation, access road to 500-kV Tower SA-5, and along sections of the proposed 115-kV segments due to project-related activities such as the placement of fill, earth moving activities, and the potential for spill of hazardous materials near jurisdictional (e.g., Temescal Wash ) and potentially jurisdictional waterways/drainages.</p>
<b>Cumulative Effects</b>	<p><i>Aesthetics.</i> A permanent effect on aesthetics along an eligible State Scenic Highway (I-15) could result from operation of the proposed Alberhill Project in addition to the proposed Talega–Escondido/Valley–Serrano (TE/VS) Project, and proposed Valley–Ivyglen Project. The proposed Alberhill Substation, 500-kV transmission lines, and 115-kV Segments</p>



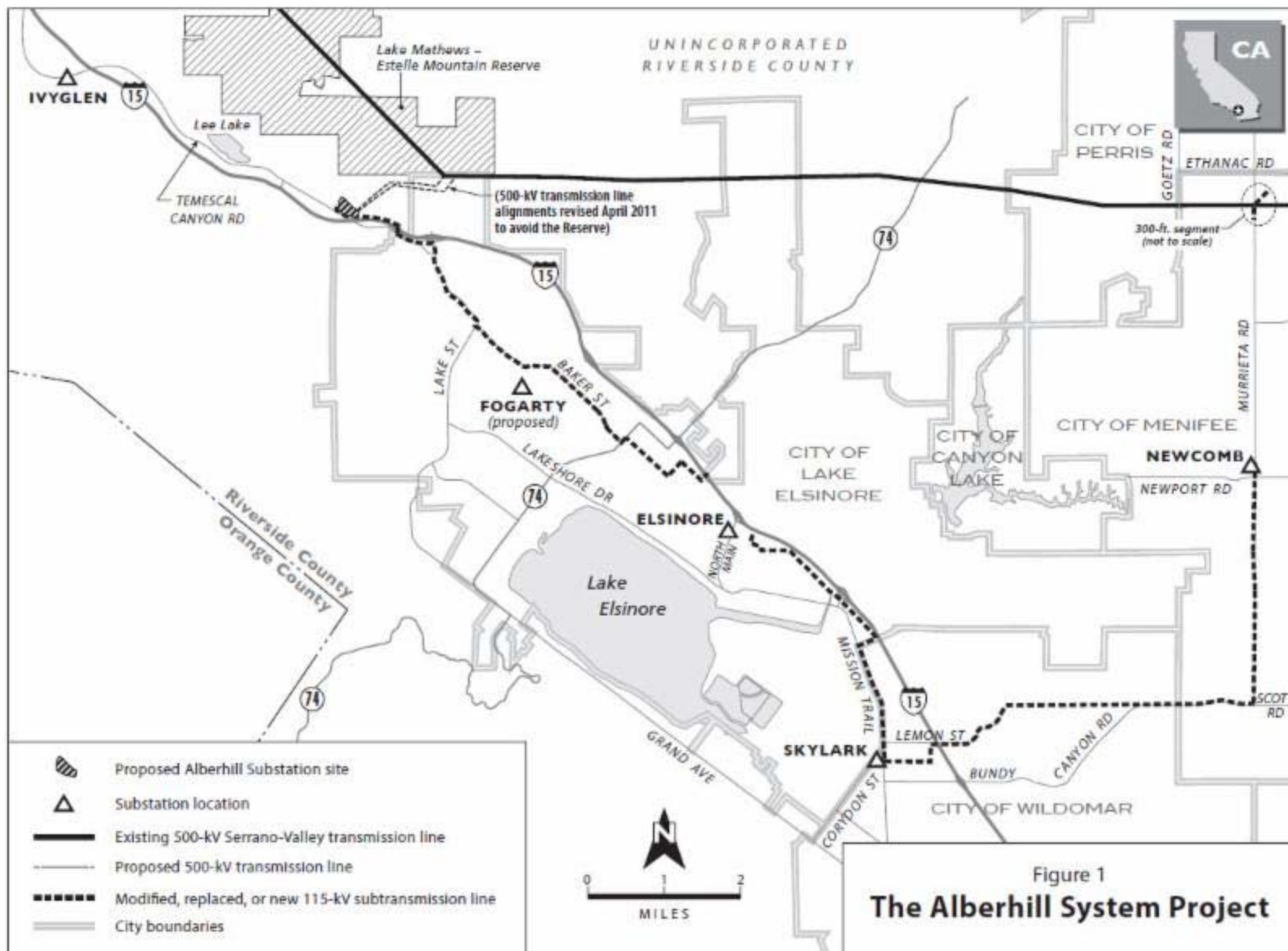
	ASP1 through ASP5, as well as the proposed Valley–Ivyglen Project 115-kV Segments VIG3 through VIG7 and proposed TE/VS switchyard and associated 500-kV transmission lines, would be visible from I-15.
	<i>Air Quality.</i> A temporary violation of maximum daily on-site emission levels of PM10 and PM2.5 (fugitive dust) would occur during the construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project. Construction activities that overlap (e.g., earth-moving activities) may result in cumulative effects on air quality.
	<i>Air Quality.</i> Construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project could result in a temporary, cumulatively considerable net increase of VOC, nitrogen oxide, particulate matter of PM10, and PM2.5 due to diesel- and gasoline-fueled engine exhaust from vehicles and equipment.
	<i>Biological Resources.</i> Construction of the proposed Alberhill System Project, proposed Valley–Ivyglen Project, and proposed TE/VS Project could result in cumulatively considerable effects on riparian areas and federally protected wetlands.

**Table 2 Summary of Potentially Significant Effects of the Valley–Ivyglen Project**

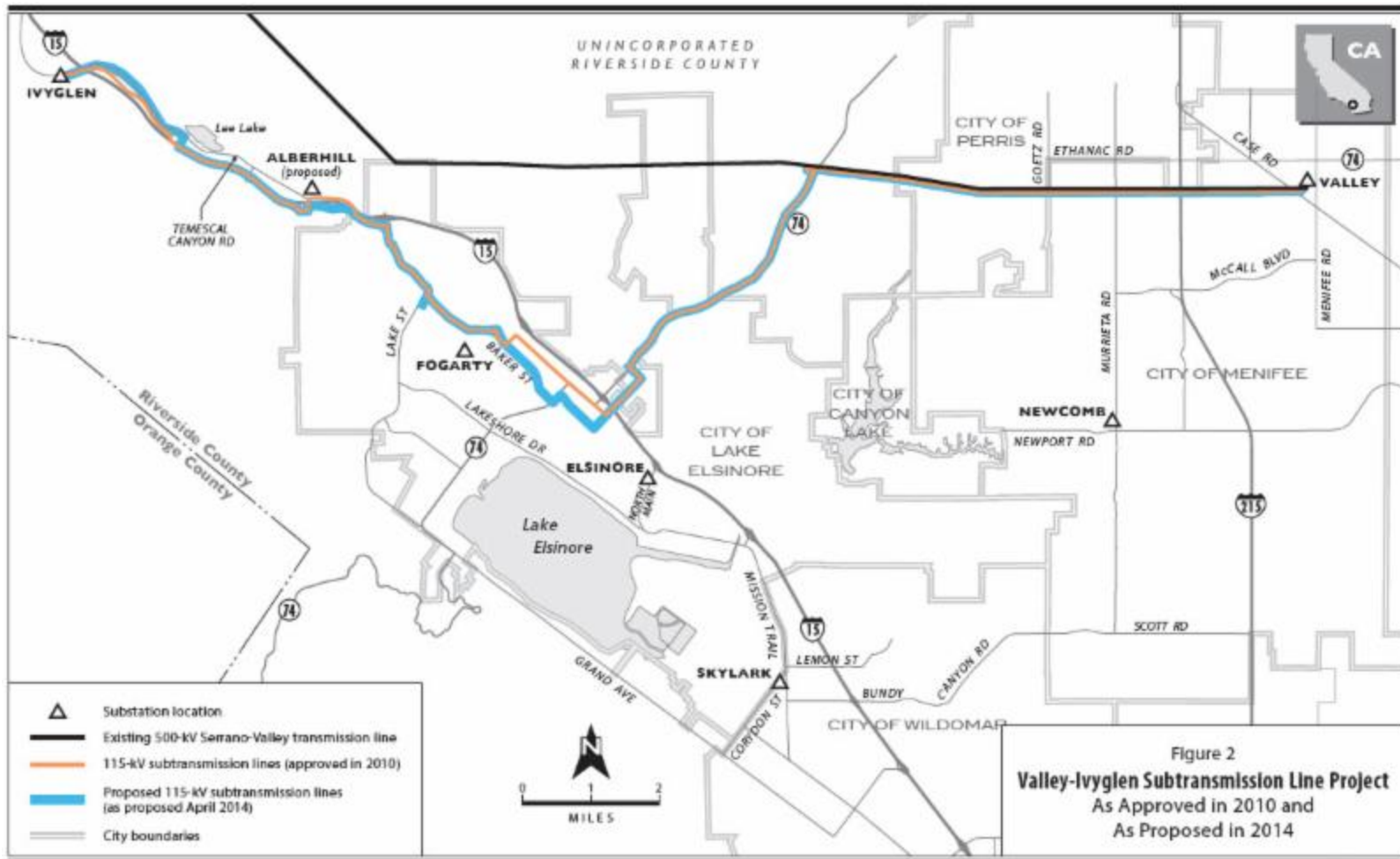
Resource Area	Potential Effects
<b>Aesthetics</b>	<p>Temporary and permanent effects on aesthetic resources along Interstate 15 (I-15) and State Route 74 (SR-74), both eligible State Scenic Highways, could result from construction and operation of the proposed Valley–Ivyglen Project. Construction would occur over a 24-month period, and construction activities along 115-kV Segments VIG1 through 115-kV VIG8 would be noticeable to area residents and motorists along I-15 and SR-74. Construction activities that would temporarily affect scenic resources include:</p> <ul style="list-style-type: none"> <li>• Use of vehicles and equipment for excavation and grading activities, transporting and lifting, watering to control dust, transporting workers, and other construction activities;</li> <li>• Soil and vegetation removal;</li> <li>• Removal of existing power poles;</li> <li>• Temporary construction site fencing and signage;</li> <li>• Spraying of embankment slopes with an erosion control mixture, which may be vivid in color; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Temporary outdoor storage of materials, stockpiling of spoils from excavation.</li> </ul> <p>A permanent effect on aesthetics along I-15 and SR-74 could result from the replacement of existing wood distribution line poles (30 to 80 feet tall) with new steel poles (up to 115 feet tall) and the introduction of new steel poles. The new poles would result in permanent visual contrast, alterations to existing scenic integrity, blocked or partially blocked views, and the introduction of industrial-like facilities to a relatively undeveloped rural area. The new and upgraded 115-kV subtransmission structures along 115-kV Segments VIG1 through 115-kV VIG8 would be intermittently noticeable to area residents and motorists along I-15 and SR-74.</p>
<b>Air Quality</b>	Temporary violations for maximum daily on-site emission levels of PM10 would occur during construction of the proposed 115-kV subtransmission lines from roadwork, site preparation, structure installation, and wire stringing.
	The temporary exposure of sensitive receptors to substantial concentrations of volatile organic compounds (VOC) and fugitive dust (particulate matter of 10 micrometers or less and particulate matter of 2.5 micrometers or less) would occur during construction of the proposed 115-kV subtransmission lines.
<b>Biological Resources</b>	Temporary, permanent, direct, and indirect effects on Stephens' kangaroo rat would likely result from construction of several of the proposed 115-kV segments.
	Temporary, permanent, direct, and indirect effects on riparian areas and federally protected wetlands (e.g., Temescal Wash or its tributaries or the San Jacinto River) as defined by Clean Water Act Section 404 could result from construction and operation of a number of the proposed 115-kV segments. Among the areas likely to be affected are the proposed access roads and new structures along 115-kV Segment VIG6, trenched areas to install 115-kV Segment VIG8 underground, and the area where two tubular steel poles (4765121E and 4765120E) would be installed along 115-kV Segment VIG1 adjacent to the San Jacinto River.
<b>Hazards and Hazardous Materials</b>	Temporary effects from the use of hazardous materials and petroleum products could result in upset or accident conditions involving the release of hazardous materials and petroleum products during construction.
	Temporary and permanent effects from wildfire could result during construction and operation of the proposed Valley-Ivyglen Project along proposed 115-kV segments that would be located within or adjacent to Very High Fire Hazard Severity Zones.

<b>Hydrology and Water Quality</b>	Temporary and long-term effects on water quality and existing drainage patterns could result from 1) foundation excavation for 115-kV structure installations; 2) vegetation removal and earthmoving activities at construction sites and for access roads; 3) culvert construction across aquatic features; and 4) blasting. Erosion or siltation on or off site could result from the grading and vegetation clearing along a number of the proposed 115-kV Segments including along 115-kV Segment 8 where trenching would be required to install the proposed 115-kV line underground near Temescal Wash, a jurisdictional waterway.
<b>Land Use</b>	Potential conflict with Riverside County and City of Lake Elsinore land use policies, zoning ordinances, and requirements within specific plan areas could result (e.g., Alberhill Ridge Specific Plan in Lake Elsinore) because of the installation of new structures within 50 feet of eligible State Scenic Highways (Riverside County General Plan Policy 13.4), installation of structures along visually significant ridgelines and hilltops (Riverside County General Plan Policy 11.1(d)), or within an adopted road realignment for Lake Street (City of Lake Elsinore Vesting Tentative Tract No. 35001).
<b>Noise</b>	Temporary effects on nearby sensitive receptors could result from construction equipment and activities, including helicopter use and blasting that would exceed local noise standards, substantially increase temporary ambient noise levels, and generate substantial ground-borne vibrations during construction.
<b>Traffic</b>	Temporary effects on air traffic patterns could result from the use of helicopters during construction that increase safety risks.
<b>Cumulative Effects</b>	Cumulatively considerable effects may occur on aesthetics, air quality, and biological resources, as described in Table 3.







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ENVIRONMENTAL CONSULTANTS

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June 19, 2015

Katy Sanchez  
Native American Heritage Commission  
1550 Harbor Boulevard, Suite 100  
Sacramento, CA 95691

**RE: Southern California Edison Company Alberhill Substation and 500kV/115kV  
Subtransmission Line Project and Valley-Ivy Glen 115kv Subtransmission Line Project**

Dear Ms. Sanchez,

We are requesting on behalf of our client that a review of the Sacred Lands File be conducted for a cultural resources study. We are also requesting a local government tribal consultation list for the proposed project area. The project is located near Lake Elsinore in Riverside County, as depicted on the topographic quadrangles indicated on the attached maps.

The proposed Alberhill Substation and 500kV/115kV Subtransmission Line Project and Valley-Ivy Glen 115kv Subtransmission Line Project is a new construction of a 500kV/115kV Substation, a new 500kV tie in to the substation, and approximately 50 miles of 115kV subtransmission line construction.

SGS Quadrangle Name: Alberhill, Elsinore, Lake Matthews, Romoland  
Township, Range, Section(s):

T 5S, R 6W, Section 1, 2, 13;  
T 5S, R 5W, Sections 7, 9, 10 11, 14-18, 20, 22, 25-27;  
T 5S, R 4W, Sections 13-15, 21-22, 28-32;  
T 5S, R 3W, Sections 14-18;  
T 6S, R 4W, Sections 5-6, 8-9, 13-16, 22-24;  
T 6S, R 3W, Sections 4-5, 8-9, 16-21;  
Unsectioned, La Laguna – Stearns Grant.

We are dedicated to the protection of Native American cultural resource and will incorporate any comments or concerns you may have into our findings and recommendations. Please email the results of this search, along with the contact information for any Native American tribes or individuals who may have additional knowledge of religious and/or culturally significant locations within or in the vicinity of the project area, to me at [cmillington@swca.com](mailto:cmillington@swca.com). They can also be faxed to my attention at (626) 240-0607. For correspondence, please reference Project Number 900995. If you have any questions regarding this request, please do not hesitate to contact me via email or at (626) 240-0587, ext. 6624. Thank you for your assistance with this project.



Sincerely,

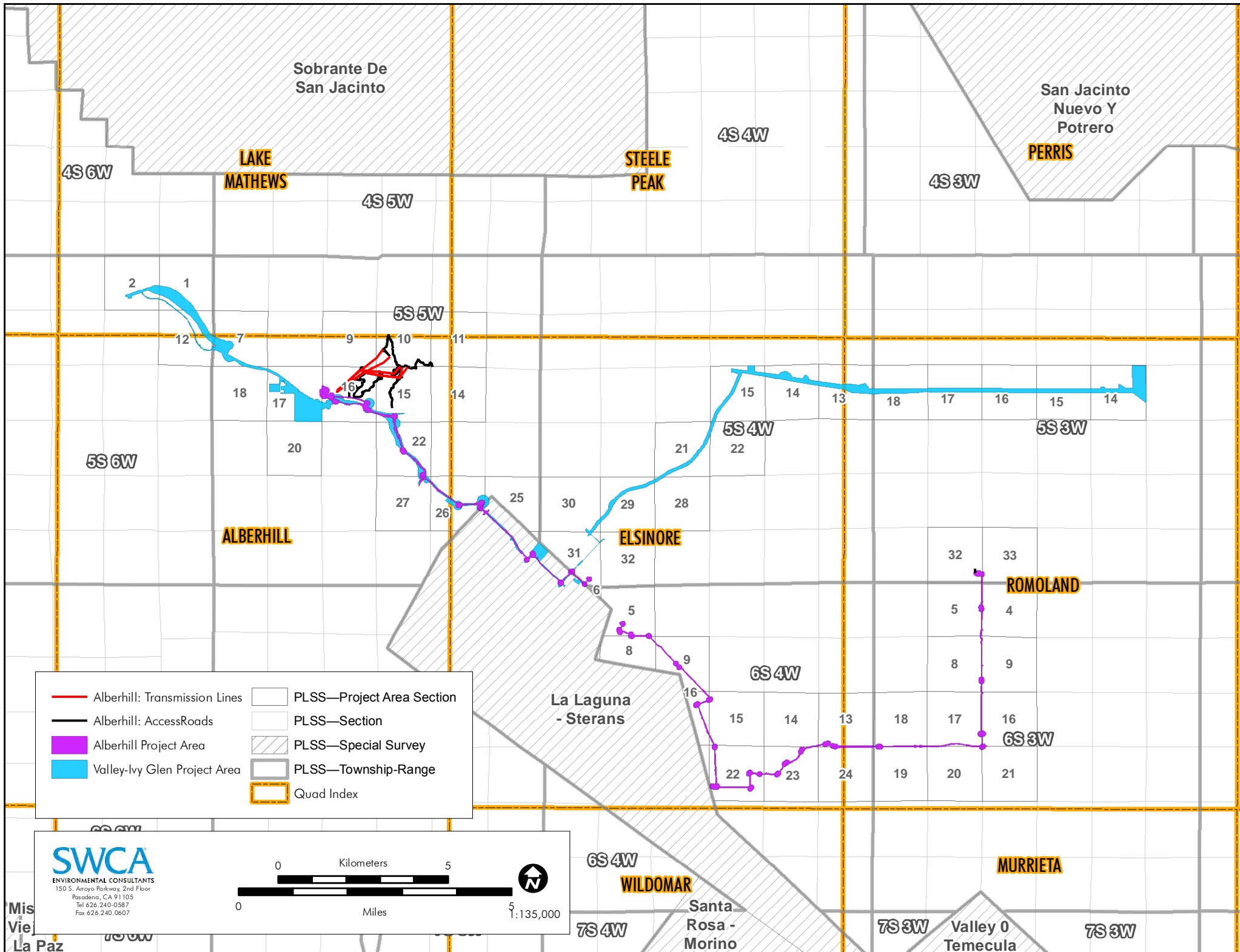
A handwritten signature in black ink, which appears to read "Chris Millington", is positioned below the word "Sincerely,".

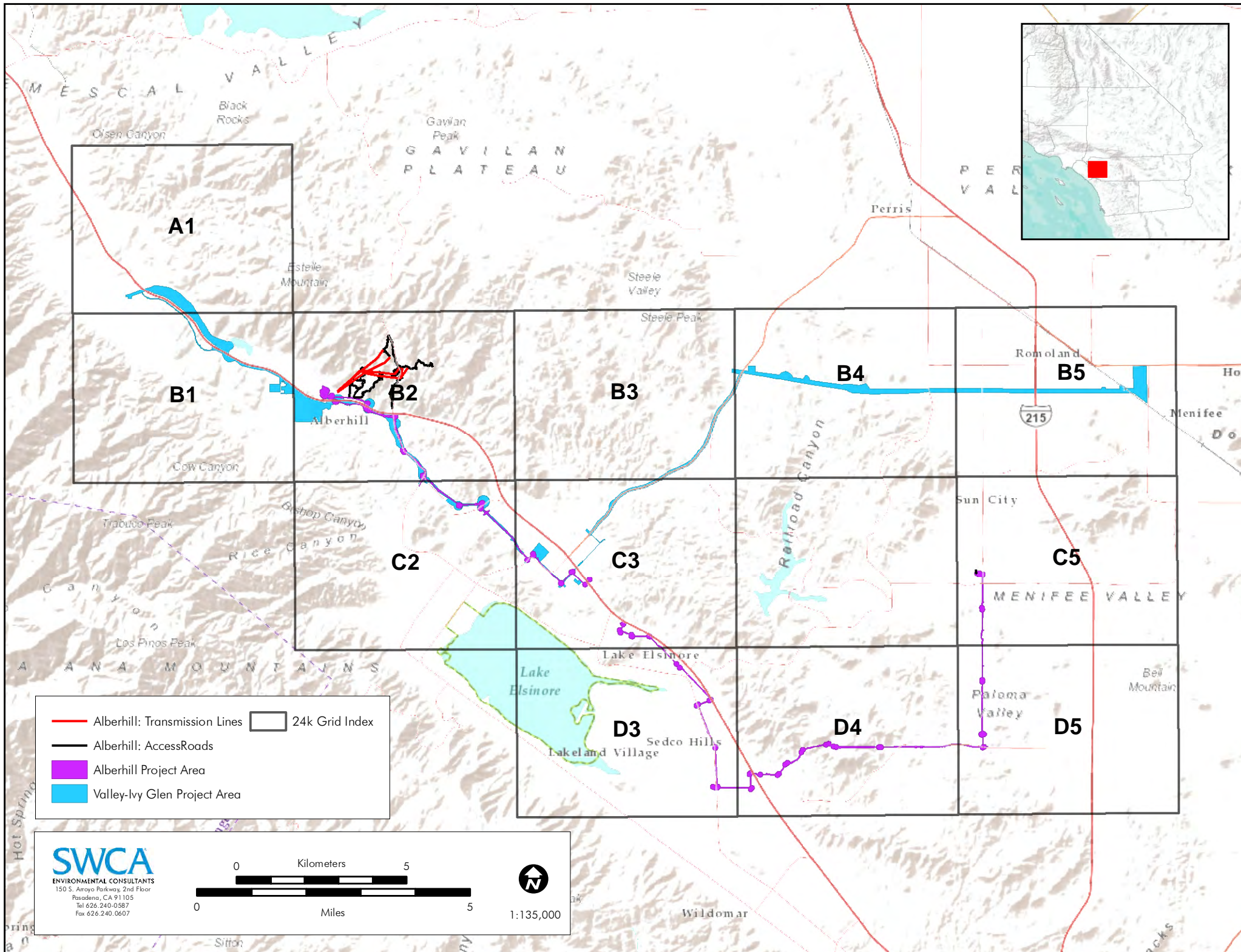
Chris Millington

Project Manager, Cultural Resources

Enclosures: study area overview maps and map book at 1:24,000 scale.







**SWCA**  
ENVIRONMENTAL CONSULTANTS  
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STATE OF CALIFORNIAEdmund G. Brown, Jr., Governor**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Blvd., ROOM 100  
West SACRAMENTO, CA 95691  
(916) 373-3710  
Fax (916) 373-5471



July 15, 2015

Chris Millington  
SWCA Environmental Consultants  
625 Fair Oaks Avenue, Suite 190  
South Pasadena, CA 91030

Sent by Fax: (626) 240-0607  
Number of Pages: 3

Re: Southern California Edison Company Alberhill Substation and 500kV/115kV  
Subtransmission Line Project..., Riverside County.

Dear Mr. Millington,

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 373-3712.

Sincerely,

A handwritten signature in cursive script that reads "Katy Sanchez".

Katy Sanchez  
Associate Government Program Analyst

**Native American Contact List  
Riverside County  
July 14, 2015**

**Pala Band of Mission Indians**  
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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Southern California Edison Company Alberhill Substation and 500kV/115kV Subtransmission Line Project..., Riverside County.



**Native American Contact List  
Riverside County  
July 14, 2015**

**San Luis Rey Band of Mission Indians  
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Lavonne Peck, Chairwoman**

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(951) 654-4198 Fax

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