

4.5 Cultural Resources

4.5.1 Introduction

This section describes the potential impacts of the Proposed Project, reasonably foreseeable distribution components, and alternatives related to cultural resources. Section 15064.5(a)(3) of the CEQA Guidelines defines cultural resources as objects, buildings, structures, sites, areas, places, records or manuscripts that are determined historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Relative to the Proposed Project, these resources can be further described as prehistoric archaeological sites, historic-era archaeological sites, historic buildings and structures, landscapes, districts, and linear features. Prehistoric archaeological sites are places where Native Americans lived or carried out activities during the prehistoric period, which is generally prior to the late 1700s for the region. Historic-era archaeological sites reflect the activities of people after initial exploration and settlement in the region by the Spanish during the late 1700s, and later by others. Native American sites can also reflect the historic era. Prehistoric and historic-era sites contain artifacts, cultural features, subsistence remains, and human burials.

Although this section generally discusses cultural resources, it is primarily focused on archaeological and built environment resources. Tribal cultural resources (TCRs), which can include archaeology and built environment, are discussed in Section 4.18.

4.5.2 Regulatory Setting

Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies are applicable to cultural resources and the Proposed Project, reasonably foreseeable distribution components, and alternatives.

State Laws, Regulations, and Policies

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is established in Public Resources Code (PRC) Section 5024.1. PRC Section 5024.1 also presents the California properties considered to be significant historical resources, including all properties listed in, or determined to be eligible for listing, the National Register of Historic Places (NRHP). Resources listed in, or eligible for listing in, the CRHR are referred to as *historical resources*. The criteria for listing in the CRHR include resources that:

1. Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Are associated with the lives of persons important in our past;

3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or
4. Have yielded, or may be likely to yield, information important in prehistory or history.

California Code of Regulations (CCR) Title 14 Section 4852 also sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations. This CCR defines a historical resource as “a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1...”

Under PRC Section 21084.1: “A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” PRC Section 21084.1 defines a historical resource.

Unique Archaeological Resources California Environmental Quality Act

In addition to the protection of Historical Resources, Section 21083.2 of CEQA (PRC Section 21000 et seq.) requires that the lead agency determine whether a project may have a significant effect on unique archaeological resources. A unique archaeological resource is defined in CEQA as an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it:

- Contains information needed to answer important scientific research questions, and there is demonstrable public interest in that information;
- Has a special or particular quality, such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Measures to conserve, preserve, or mitigate and avoid significant effects on these resources are also provided under CEQA Section 21083.2. CEQA Guidelines Section 15064.5 also provides criteria and processes/procedures for identifying and minimizing harm to historical resources.

California Health and Safety Code Section 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If the remains are determined to be a Native American, the Coroner must then contact the Native American Heritage Commission (NAHC). Under PRC Section 5097.98, the NAHC will determine the most likely descendants and notify them of the discovery. As per Section 5097.98 (a-b), the landowner will confer with the most likely descendant to determine appropriate treatment of the human remains.

California Register of Historical Resources

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1. Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Are associated with the lives of persons important in our past;
3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or
4. Have yielded, or may be likely to yield, information important in prehistory or history.

CCR Section 4852 sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations.

4.5.3 Environmental Setting

The following Prehistory, Ethnography, and History environmental setting subsections are taken from the cultural resources chapter of the PEA (NEET West and PG&E 2017a).

Prehistory

California prehistory is divided into three broad temporal periods that reflect similar cultural characteristics throughout the state: Paleoindian Period (ca. 9000–6000 B.C.), Archaic Period (6000 B.C.–A.D. 500), and Emergent Period (A.D. 500–Historic Contact) (Fredrickson 1973, 1974, 1994). The Archaic is further divided into Lower (6000–3000 B.C.), Middle (3000–1000 B.C.), and Upper (1000 B.C.–A.D. 500) Periods. These divisions are generally governed by climatic and environmental variables, such as the drying of pluvial lakes at the transition from the Paleoindian to the Lower Archaic period (NEET West and PG&E 2017a).

The Proposed Project, reasonably foreseeable distribution components, and alternatives areas lie in the Central Coast Archaeological Region, which is one of eight arbitrary organizational divisions of the state (Moratto 2004: Figure 1). This region extends southward from Monterey Bay through Big Sur to Morro Bay, and includes southern Santa Cruz and Santa Clara Counties, all of San Benito and Monterey Counties, and most of San Luis Obispo County. Jones and Ferneau (2002:213) recently refined existing chronological sequences developed for the Central Coast Region, further subdividing the last 3,000 years into the Early–Middle Transition (1000–600 B.C.), Middle (600 B.C.–A.D. 1000), Middle–Late Transition (A.D. 1000–1250), and Late Periods (A.D. 1250–1769). This EIR relies on the regional chronological sequence as adapted by Jones and Ferneau (2002). Prehistoric sites found in the vicinity of the Proposed Project, reasonably foreseeable distribution components, and alternatives are typically near creeks and may consist of isolated chert lithics or lithic scatters, ground stone (portable mortars, pestles,

bedrock mortars and/or cupules), and/or sparse pockets of midden soils. Habitation sites are seasonally occupied camps and small villages (Glover et al. 1999; NEET West and PG&E 2017a).

Ethnography

The Proposed Project, reasonably foreseeable distribution components, and alternatives are in a region traditionally considered to have been prehistorically and ethnohistorically occupied by the Salinan (Hester 1978; Kroeber 1925). Milliken and Johnson's research (2003:128), based on ethnographic and linguistic data and relied upon here, suggests that the Proposed Project, reasonably foreseeable distribution components, and alternatives lie within the Salinan language zone, just east of the lands associated with the ethnographic Chumash. The Salinan sub-group known as the Migueleño occupied a portion of Salinan territory that includes the Proposed Project, reasonably foreseeable distribution components, and alternatives areas. Through a detailed analysis of mission records, Milliken and Johnson (2003:122-123) identified a number of rancherias, or villages, within the area of the Proposed Project, reasonably foreseeable distribution components, and alternatives. These include *Lehuege* on Summit Creek; *Sataoyo* at Templeton; *Sososquiquia*, *Scsotce*, and *Sopsich* in the vicinity of Atascadero; *Chmonimo* at Creston; and *Llecmoni* at Paso Robles.

The semi-sedentary Salinan occupied a rugged, mountainous area on the south-central California coast (Kroeber 1925; Hester 1978). Heavily wooded hills and mountains of the South Coast Ranges dominated the interior, with sheer cliffs and rocky beaches along the Pacific coast. Salinan villages were recorded near the missions and along internal drainages, with some habitation areas along the coast (Hester 1978:501). No permanent sites were recorded in the Coast Range, although temporary camps were likely. Their subsistence economy was one of hunting and gathering. The surrounding environment was varied and rich, and they exploited the mountains, foothills, valleys, and coast. As with most native Californians, acorns were a staple food, supplemented by wild oats, sage seeds, berries, mescal, and wild fruits. Additional resources exploited by coastal and interior groups included large and small mammals such as deer, bear, and rabbits, as well as fish. The full extent of their villages is unknown, but Hester (1978:501) locates 21 from earlier records (NEET West and PG&E 2017a).

A variety of tools and implements, some of which are inferred from the archaeological record in the area, were employed by Salinan groups (Hester 1978:501). These included stone projectile point and scrapers, ground stone bowl and basket mortars, pestles, net sinkers, and arrowshaft straighteners, as well as bone and shell fish hooks, awls, and wedges. Ornaments included items made of steatite, serpentine, and abalone shell. Clothing included basket hats, rabbitskin or otterskin cloaks, and tule aprons. The Salinan also used beads made from mussel and abalone shell for currency and had musical instruments, such as cocoon rattles, wooden flutes, and bone whistles (Hester 1978; NEET West and PG&E 2017a).

Like other indigenous Californians living near the coastal missions, the Salinan population decreased rapidly after the arrival of the Spanish. A relatively small population to begin with, the Salinan were decimated by diseases introduced by the missions and later settlers. By 1831, their number was fewer than 700, and their population continued to decrease even more rapidly after secularization of the missions (Hester 1978:503). Beginning in the late 1980s, a cultural revitalization began, and Salinan descendants contacted the Mission San Antonio de Padua to learn about family records (NEET West and PG&E 2017a).

History

Post-contact history for the state of California generally is divided into three specific periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848–present). Although there were brief visits by Spanish, Russian, and British explorers from 1529–1769, the Spanish first settled California in 1769 with the first of 21 missions established from 1769–1823. The Mexican Period is marked by an extensive era of land grants, most of which were in the interior of the state, and by exploration by American fur trappers west of the Sierra Nevada Mountains (NEET West and PG&E 2017a).

With the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, California became a territory of the United States. The discovery of gold in 1848 at Sutter’s Mill and the resulting Gold Rush era influenced the history of the state and the nation. The rush of tens of thousands of people to the gold fields also had a devastating impact on the lives of indigenous Californians, with the introduction and concentration of diseases, the loss of land and territory (including traditional hunting and gathering locales), violence, malnutrition, and starvation. Thousands of settlers and immigrants continued to pour into the state, particularly after the completion of the transcontinental railroad in 1869 (NEET West and PG&E 2017a).

City of Paso Robles

The City of El Paso de Robles (Spanish for “the pass of oaks,” referred to in this EIR simply as Paso Robles or City of Paso Robles) has historically served as an economic and transportation hub for the rural agricultural area that encompasses the Proposed Project, reasonably foreseeable distribution components, and alternatives areas. The City of Paso Robles is situated on the former lands of the Rancho Paso de Robles. Once an outpost of the Mission San Miguel, the 25,993-acre rancho was granted to Pedro Navarez in 1844. In 1857, Rios sold the rancho to a partnership consisting of Daniel and James Blackburn and Lazare Godchaux (Kyle et al. 2002). The rancho lands were subsequently divided up, with the present-day city boundaries falling under the holdings of the Blackburn brothers and brother-in-law, Drury James, who purchased Godchaux’s interest in the rancho (City of Paso Robles 2020). In 1886, Blackburn and James laid out a plan to subdivide lots surrounding the hotel and establish the town of Paso Robles. It was the goal of Blackburn and James to establish a town site that would be the most important stop between San Francisco and Los Angeles (NEET West and PG&E 2017a).

The Southern Pacific Railroad arrived in October 1886, marking an important turning point in the development of Paso Robles. Rail transportation gave the town the opportunity to expand significantly, and the opening of Paso Robles Inn provided respite to people previously unable to endure long stagecoach rides. Additionally, the arrival of the railroad allowed the town to expand its farming operations for long-distance shipping of crops, livestock, and byproducts. The region was particularly suited for growing almonds, walnuts, and grapes. In the late nineteenth and early twentieth centuries, European settlers planted vineyards and established the wine industry as a major component of the regional economy (Historic Resources Group 2010:17–18). By the 1940s, the population of Paso Robles had soared to over 3,000 residents and it was recognized as a resort community, attracting tourists from all over the world. Since the 1950s, the city has continued to expand and grow its population, while maintaining a diverse economy that includes agriculture and industry (NEET West and PG&E 2017a).

East of Paso Robles: Rancho Santa Ysabel, Huer Huero Creek, Dry Creek, and the Estrella River

The Proposed Project, reasonably foreseeable distribution components, and alternatives are in an area east of Salinas River that has been used for ranching and agriculture since the Mission period. Small settlements along Huer Huero/Dry Creek and Estrella River developed slowly throughout the nineteenth century and expanded more rapidly in the twentieth century along with mechanized agriculture. Trails and roads in the area have historically served to convey people and commodities between the Central Valley, Salinas River, and maritime towns on the Pacific coast (NEET West and PG&E 2017a).

In 1844, the former mission land of Rancho Santa Ysabel was granted to Lieutenant Francisco Casimiro Arce by Governor Manuel Micheltorena. This land grant encompassed a 4-square-league tract of land on the eastern bank of the Salinas River, opposite Rancho Paso de Robles (Gudde and Bright 1998:350; Hoffman 1862:A49). On June 10, 1846, Arce's contingent of the Mexican army was defeated by Ezekiel Merritt and other American settlers near Elk Grove, which emboldened the American insurgents to take Sonoma in the Bear Flag Revolt on June 14, 1846 (Kyle et al. 2002:306). Arce filed a claim to Rancho Santa Ysabel following the Mexican–American War, and was granted a patent in 1866 (State-Surveyor General 1886:17; NEET West and PG&E 2017a). Rancho Santa Ysabel was purchased in 1886 by Chauncey Hatch Phillips' West Coast Land Company along with parts of Rancho Paso Robles and Rancho Huer-Huero to the south (Storke 1891:157). This purchase was later developed into present-day parts of Paso Robles and Templeton (NEET West and PG&E 2017a).

By the 1860s, General Land Office survey plats show a sparse network of roads and trails connecting El Camino Real at Paso Robles and Mission San Miguel with Rancho Santa Ysabel and settlements to the east in the vicinity of present-day Shimmin's Canyon Road and Cholame, and which continue over the Temblor Range to Tulare Lake and the Central Valley. This early system of trails and wagon roads likely followed previous paths and fords established by the Migueleño as they travelled between villages and hot springs at the Salinas River and Cholame, and on seasonal resource-gathering migrations to the oak woodland uplands. Indeed, mission records document kinship ties between the village at Cholame and the rancheria of assii, near present-day Lockwood (Gibson 1983:182; NEET West and PG&E 2017a).

Segments of the present Union Road are plotted on 1869 General Land Office survey plats. This road appears to have originated at Rancho Santa Ysabel to the southwest, and possibly connected to the "camina" (road) roughly depicted on the Rancho Santa Ysabel Diseño as connecting with El Camino Real in the vicinity of Rancho Paso de Robles on the western bank of the Salinas River (University of California, Berkeley 2020). The historical alignment of Union Road plotted on the survey plat parallels another east–west road to the south which is labeled "Trail from San Luis Obispo to Cholame Ranch," and both roads appear to have connected with San Miguel Road (approximate alignment of SR 46) to the east. An 1858 survey plat notes a spring, wheat field, "Indian cabins," and "Indian hut" at the intersection of SR 46 and Shimmin's Canyon Road. SR 46 continues east to the town and ethnographic village site of Cholame, and over the Temblor Range to Tulare Lake and the Central Valley (NEET West and PG&E 2017a).

The 1919 Paso Robles U.S. Geological Survey (USGS) 15-minute Quadrangle shows further development of this network of roads, which by then connected the well-developed city of Paso

Robles, El Camino Real, the Southern Pacific Railroad, and the Salinas River to the west with the small settlements of Estrella, Bern, Union, Shandon, and Geneseo. At this time, rural residences were sparsely distributed along the roadways, leaving the landscape for ranching and agricultural uses. Several schools were in operation, including Dry Creek School, Estrella School, Phillips School, and Pleasant Valley School (NEET West and PG&E 2017a). The Paso Robles Municipal Airport was originally built in 1942 for military use during World War II. It was taken over by San Luis Obispo County in 1949 and was transferred to the City of Paso Robles in 1973 (City of Paso Robles 2016).

By 1948, the USGS 7.5-minute Quadrangle shows much of the early road network incorporated into the modern county and state highway system, including the present alignments of SR 46, Union Road (former SR 41), Mill Road, and Estrella Road. Orchard and field croplands were present along Union Road at this time, while most of the surrounding lands were open space likely used for livestock grazing. While almonds, fruit, and field crops remain important agricultural products of the region, wine grapes were increasingly planted in the mid- and late-twentieth century. Hunter Ranch Golf Course was built in the early 1990s (NEET West and PG&E 2017a).

Native American Coordination

Based on coordination with Native American tribes, it was determined that the Santa Ysabel Ranch area (which is southwest of the Proposed Project but includes the Alternative SE-PLR-2 route) is sensitive for cultural resources. The Xolon-Salinan Tribe indicated that their ancestors had used Dry Creek as a transportation corridor and that the areas surrounding the Estrella and Salinas Rivers are sensitive for cultural resources. Native American consultation through the Assembly Bill 52 process is discussed in Section 4.18, "Tribal Cultural Resources".

Buried Site Sensitivity

The geomorphology of the Proposed Project area (and, by inference, the reasonably foreseeable distribution components and alternatives areas) can be classified into three distinct groups on the basis of landform sediment assemblages (NEET West and PG&E 2017a; Dibblee and Minch 2004; SoilWeb 2016):

1. Pliocene/Pleistocene-aged hillslopes composed of residual silty clay, sandy loam, clay loam, and loam sediments underlain by weathered shale and sandstone bedrock;
2. Late Pleistocene terraces composed of loam and fine sandy loam alluvium; and
3. Holocene-aged valley floors and stream channels composed of gravelly sandy loam and fine sandy loam alluvium.

Pliocene/Pleistocene-aged landforms belonging to the Paso Robles formation pre-date human occupation in the region and therefore have very low potential to contain deeply buried, intact, subsurface cultural materials. Similarly, Pleistocene-aged alluvial terraces in the Proposed Project area have low potential to contain buried archaeological sites, as Pleistocene terrace surfaces pre-date the majority of human occupation in the region. There is some potential for shallow burial of artifacts within thinly veneered sheetwash deposits that have accumulated on low-lying terrace surfaces over the course of the Holocene; however, if present, these deposits

are expected to be shallow and discontinuous. The vast majority of the Proposed Project is underlain by these deposits, which have a very low to low potential to contain buried archaeological sites (NEET West and PG&E 2017a).

Areas containing Holocene-aged valley floor and stream channel alluvium (which are largely confined to the vicinity of Huer Huero Creek and Salinas River in the Proposed Project area) have moderate sensitivity for buried archaeological resources. This is due to the fact that these landforms date to, or post-date, the period of human occupation in the region, and due to the active nature of sedimentary deposition in these settings. As these Holocene soils are up to 5 feet deep (NRCS 2020), there is potential for preservation of buried cultural deposits within the channel banks and adjacent floodplains of these water courses (NEET West and PG&E 2017a).

Archaeological Resources

A records search by the Central Coast Information Center (CCIC) of the California Historical Resources Information System at University of California, Santa Barbara indicated that, while no previous studies had been conducted within or adjacent to the Estrella Substation site, 21 studies overlapped the new and reconductored 70kV power line segment routes (NEET West and PG&E 2017a). The records search identified only two previously recorded cultural isolates (fragments of a Chinese ceramic dish and a Native American flaked tool of chert) within the Proposed Project study area (NEET West and PG&E 2017a), both of which were within 50 feet of the Proposed Project's 70 kV reconductoring segment. Due to their isolation and lack of context in a larger archaeological site, these artifacts lack the potential to yield information important in prehistory and therefore would not be eligible for listing in the CRHR.

As part of the PEA analysis, SWCA Environmental Consultants performed an archaeological field survey of the Proposed Project area, resulting in the identification and recordation of three previously unrecorded archaeological sites (one prehistoric, two from the historic era) and seven isolated artifacts (all are prehistoric, and include flakes or tool fragments, and one projectile point), all of which occurred along the Proposed Project's new 70kV power line segment (see Table 4.5-1). No archaeological resources were identified at the Estrella Substation site or along the reconductoring segment. The two isolated artifacts previously recorded adjacent to the reconductoring segment could not be relocated during the field survey (NEET West and PG&E 2017a).

Table 4.5-1. Archaeological Sites and Artifacts in the Proposed Project Area

ID Number	Resource Type/Time Period	Description	NRHP/CRHR Eligibility ¹
36052-S-001	Historic era; early 20 th century	Well and utility pole	Potentially Eligible
36052-S-002	Historic era; early 20 th century	Trash dump	Potentially Eligible
36052-S-003	Prehistoric	Low-density lithic scatter with sparse shell fragments	Potentially Eligible

ID Number	Resource Type/Time Period	Description	NRHP/CRHR Eligibility ¹
36052-ISO-02	Prehistoric	Chert biface fragment	Not Eligible
36052-ISO-03	Prehistoric	Chert core	Not Eligible
36052-ISO-04	Prehistoric	Chert biface fragment	Not Eligible
36052-ISO-05	Prehistoric	Chert contracting stem projectile point	Not Eligible
36052-ISO-06	Prehistoric	Chert flake	Not Eligible
36052-ISO-07	Prehistoric	Chert core	Not Eligible
36052-ISO-08	Prehistoric	Chert flake	Not Eligible

Notes: NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources

1. Potentially eligible sites may also qualify as a unique archaeological site pursuant to PRC 21084.1, even if they are not determined eligible for NRHP/CRHR listing.

Source: NEET West and PG&E 2017a, 2017b, 2017c

The archaeological sites listed in Table 4.5-1 are described further below. Due to the limited information value of the isolated artifacts (i.e., ID #36052-ISO-02 to -08), they are not eligible for CRHR listing and are not considered further.

- **Site 36052-S-001** is located along the Proposed Project's 70kV power line route between Union Road and Huer Heuro Creek. The site consists of a well and associated utility pole. The well is comprised of two metal pipes encased in a concrete slab. The pipes are 12.75 inches and 6 inches in diameter; the concrete slab is measures 40 by 34.5 inches and is 1 foot thick. The cedar utility pole is located 9 feet southwest of the well and is about 256 feet tall. It is tied into a modern utility pole on Union Road. The entire site area is about 10 feet by 4 feet.
- **Site 36052-S-002** is situated near the western end of the new 70kV power line segment, on an open slope above a shallow, very ephemeral drainage. Although the site area is not cultivated, an orchard and cultivated fields are in close proximity. This historic era site is marked by a variety of modern and early twentieth century refuse. Materials from around the 1930s include car and stove parts; more modern (ca. 1980s) items include, but are not limited to, bottle glass, galvanized sheet metal, clothing, tires, and chicken wire. Most of these items have been pushed together into a 10-foot-high pile. Also present are five pieces of farm machinery that range in age from the 1930s to the 1960s. Overall, the historic era materials cover an area measuring 20 feet by 50 feet.
- **Site 36052-S-003** is a prehistoric site that sits on a bluff overlooking the Salinas River at the west end of the Proposed Project's new 70kV power line segment. Cultural materials at the site include a sparse scatter of debris from the manufacture of stone tools, and shell remains.

CCIC records searches were conducted for each of the alternatives carried forward for full consideration in the EIR to identify any known recorded archaeological resources in these areas.

Additionally, pedestrian archeological surveys were conducted for portions of alternatives where access was permitted by local landowners (NEET West 2019; NEET West and PG&E 2017a, 2017b, 2017c; PG&E 2019). Surveys focused on areas where environmental (e.g., proximity to water, landform) and cultural (e.g., presence of known resources in similar settings) factors indicated elevated cultural resources sensitivity. Access was not granted to the Alternative SS-1 site, so this site was not subject to pedestrian survey. The eastern-most portion of Alternative PLR-1C (including MRVs 1 and 2) and the example FTM sites (except FTM Site 6) under Alternative BS-2 also were not surveyed due to access restrictions. Table 4.5-2 lists archeological sites and artifacts in proximity to alternatives that were identified through the record searches and/or pedestrian surveys.

Table 4.5-2. Archaeological Sites and Artifacts in Proximity to Alternatives

ID Number	Proximity to Alternative	Resource Type	Description	NRHP/CRHR Eligibility ¹
36052-ISO-011	PLR-1A/PLR-1C	Prehistoric	Isolated chert flake	Not Eligible
P-40-038109	SE-PLR-2	Historic era isolate	Mortared rock wall segment	Not Eligible
EST-SR-001	SE-PLR-2	Historic era	Metal artesian well	Potentially Eligible

Notes: NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources

1. Potentially eligible sites may also qualify as a unique archaeological site pursuant to PRC 21084.1, even if they are not determined eligible for NRHP/CRHR listing.

Source: NEET West and PG&E 2017a; PG&E 2019; NEET West 2019

Due to the limited information value of the isolated artifact (i.e., ID #36052-ISO-11), it is not eligible for CRHR listing and is not considered further. The historic era mortared rock wall segment (ID #P-40-038109) was identified through the records search but was not relocated during the pedestrian survey. Further review of the archaeological site forms provided by the CCIC revealed that the site is likely located just outside the Alternative SE-PLR-2 alignment and appears to have been destroyed during development of the area (PG&E 2019). The historic era resource listed in Table 4.5-2 as ID #EST-SR-001 consists of a single metal artesian well that is located on the east side of South River Road. No artifacts or other features were observed around the well and the feature's integrity may have been impacted by agricultural activity (PG&E 2019).

Built Environment Resources

A survey of the built environment within and adjacent to the Proposed Project footprint was conducted by SWCA Environmental Consultants, as documented in the PEA. The survey resulted in the recordation and evaluation of eleven resources in the vicinity of the Proposed Project, as listed in Table 4.5-3 and described further below.

Table 4.5-3. Built Environment Resources in the Proposed Project Vicinity

Identification Name	Resource Description	Build Date	NRHP/CRHR Eligibility
Steinbeck Vineyards and Winery	Vineyard property	Early 20 th century	Not Eligible
Falcon Nest Vineyard and Winery	Vineyard property	Early 20 th century	Not Eligible
Johnson House (2965 Union Road)	Masonry residential building	Circa 1890	Eligible
3310 Union Road	Property containing various residential and agricultural buildings	1940	Not Eligible
3510/3530 Union Road	Property containing various residential and agricultural buildings	1948/1964	Not Eligible
3570 Union Road	Property containing two single-family residences and various outbuildings	1962	Not Eligible
4374 Union Road	Property containing three residences and various outbuildings	1920	Not Eligible
5715 Union Road	Vineyard property	Early 20 th century	Not Eligible
Existing PG&E 230 kV Transmission Line	Transmission Line	1962	Not Eligible
Existing Diablo-Gates 500 kV Transmission Line	Transmission Line	1971	Not Eligible
Existing San Miguel-Paso Robles 70 kV Power Line	Wood Pole Transmission Line	Circa 1954	Not Eligible

Notes: NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources
Source: NEET West and PG&E 2017a, 2017b, 2017c

As shown in Table 4.5-3, of the 11 built environment resources identified during the survey, only one (the Johnson House at 2965 Union Road) was determined to be eligible for listing in the CRHR. The CPUC concurs with the eligibility determinations of SWCA Environmental Consultants described in the PEA; refer to the PEA for detailed descriptions of the eligibility determinations. The Johnson House is discussed further below.

- **The Johnson House (2965 Union Road)** is a two-story brick masonry residence that is situated on a flat lot just north of Union Road. Square in plan, it sits on a concrete foundation and is capped by a corrugated metal hipped roof with a centrally located

brick chimney. The property was constructed by Peter Johnson around 1890 with bricks that he made himself. Johnson simultaneously recognized a market for building materials in rapidly developing Paso Robles and began to manufacture bricks for sale. These bricks were used to construct a number of extant residences along Park Street in the 1890s and early 1900s. The Johnson House represents a rare example of a brick masonry single-family residence in this rural area of the city (Historic Resources Group 2010:45).

In considering the integrity of the property, the replacement of original windows and doors and the removal of an original porch and cistern have affected some aspects of the building's design and materials. The sale and subdivision of the original Johnson land holdings and development of the immediate surrounding area has also affected aspects of the property's association and setting; however, extant late 19th century residences in Paso Robles are increasingly rare and because of this, a greater degree of alterations is permissible (Historic Resources Group 2010:65). The Johnson House still retains those essential features that enable it to convey its significance, including its square plan, masonry construction, original window and door openings, and central brick chimney (NEET West and PG&E 2017a).

The Johnson House continues to reflect special elements of the historical and architectural development of Paso Robles and, as a late 19th century brick masonry residence, embodies the distinctive characteristics of a property type and method of construction that is increasingly rare in Paso Robles. As such, the property appears eligible for listing in the CRHR under Criterion 1 and 3. Although Peter Johnson manufactured bricks that were used in the construction of a number of extant buildings in Paso Robles, he does not appear to be demonstrably important within the historic context of early development of Paso Robles. As a result, the property does not appear eligible for CRHR listing under Criterion 2. Research also does not suggest that the property has the potential to yield information important in history (Criterion 4) (NEET West and PG&E 2017a).

Built environment resources within proximity to the alternatives were surveyed by SWCA Environmental Consultants and are listed below in Table 4.5-4. Alternatives SS-1, the eastern-most portion of Alternative PLR-1C (including MRVs 1 and 2), and example FTM sites under Alternative BS-2 were not surveyed due to access restrictions or other limitations.

Table 4.5-4. Built Environment Resources in the Alternatives Vicinity

Identification Name	Proximity to Alternative	Resource Description	Build Date	NRHP/CRHR Eligibility
Diablo-Gates 500kV Transmission Line	PLR-1A	Transmission line	1970s	Not Eligible
Steinbeck Vineyards and Winery	PLR-1A	Vineyard property	Early 20 th century	Not Eligible
4060 Branch Road	PLR-1A/PLR-1C	Vineyard property	Early- to mid-20 th century	Potentially Eligible

Identification Name	Proximity to Alternative	Resource Description	Build Date	NRHP/CRHR Eligibility
4750 Tower Road	PLR-1A/PLR-1C	Agricultural property	Early 20 th century	Potentially Eligible
1997 Wellsona Road	PLR-1A/PLR-1C	Agricultural property	Early 20 th century	Potentially Eligible
1880 Wellsona Road	PLR-1A/PLR-1C	Agricultural property	Mid-20 th century	Potentially Eligible
San Miguel-Paso Robles 70kV Power Line	PLR-1A/PLR-1C	Transmission line	Mid-20 th century	Not Eligible
1050 Via Paloma	SE PLR-2	Residential property	Historic-era	Not Eligible
841 South River Road	SE PLR-2	Residential property	Historic-era	Not Eligible
715 South River Road	SE PLR-2	Residential property	Historic-era	Not Eligible
735 South River Road	SE PLR-2	Residential property	Historic-era	Not Eligible
3995 Concho Way	SE PLR-2	Residential property	Historic-era	Not Eligible

Notes: kV = kilovolt; NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources

Source: NEET West and PG&E 2017c; PG&E 2019; NEET West 2019

As shown in Table 4.5-4, several of the built environment resources in proximity to the alternatives had been evaluated as part of the Proposed Project survey and determined not to be eligible for listing in the CRHR. A number of other built environment resources were evaluated and determined to be not eligible for listing in the CRHR, as described in the technical reports for these alternatives (NEET West and PG&E 2017c; PG&E 2019; NEET West 2019). The CPUC concurs with the eligibility determinations by SWCA Environmental Consultants. Several other resources (4060 Branch Road, 4750 Tower Road, 1997 Wellsona Road, and 1880 Wellsona Road) have not been evaluated and are considered potentially eligible.

4.5.4 Impact Analysis

Methodology

The analysis considered the potential for the Proposed Project, reasonably foreseeable distribution components, and alternatives to impact known and unknown cultural resources during construction or operation pursuant to the significance criteria listed below. The impact analysis considered the existing laws and regulations presented in Section 4.5.2 and relied on environmental setting information presented in Section 4.5.3.

Criteria for Determining Significance

Section 15064.3(b) of the CEQA Guidelines notes that “A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” It further states that “[a] substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (Section 15064.3(b)(1)). To be materially impaired is defined as an action that demolishes or materially alters the physical characteristics of an historical resource in an adverse manner such that it no longer conveys those characteristics the contribute to its historical significance and that justify its inclusion in listed registers (Section 15064.3(b)(2)). It is the responsibility of the CEQA lead agency to identify potentially feasible, enforceable measures to mitigate significant changes in the significance of an historical resource (Section 15064.3(b)(3)).

If an archaeological site does not meet the criteria as a historical resource, but has been determined to be a unique archaeological resource pursuant to PRC 21083.2(g), the lead CEQA agency must similarly address potential impacts.

For the purposes of this analysis, the Proposed Project, reasonably foreseeable distribution components, and alternatives would result in a significant impact to cultural resources if they would:

- A. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5;
- B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;
- C. Disturb any human remains, including those interred outside of dedicated cemeteries.

Environmental Impacts

Proposed Project

Impact CR-1: Cause a substantial adverse change in the significance of a historical and/or archaeological resource as defined in Section 15064.5 – *Less than Significant with Mitigation*

As described in Section 4.5.3, cultural resources surveys conducted for the Proposed Project identified three archaeological sites, seven archaeological isolates, and 11 resources of the built environment. For purposes of this analysis, the three archaeological sites are considered potentially eligible for listing in the CRHR eligibility and are considered historical resources under CEQA. The seven archaeological isolates were not indicative of larger sites and thus are not considered eligible for listing in the CRHR or unique archaeological resources; however, their presence attests to the widespread general use of the region by the indigenous population during the pre-historic and historic past. As described earlier in the chapter, previous activities near the rivers and a tendency for people to settle near perennial water sources increase the

likelihood of archaeological sites in the vicinity of rivers and creeks. As noted above, coordination with Native American tribes in the area indicated that the areas of the Proposed Project region near surface waterbodies, in particular (e.g., Dry Creek, and Estrella and Salinas rivers), are sensitive for ~~cultural resources~~ TCRs. Of the 11 built environment resources, only the Johnson House appears to be eligible for listing on the CRHR. This house is situated off Union Road along the Proposed Project's 70 kV power line route near the point where the power line would cross SR 46.

The Proposed Project may have a significant impact on the environment if the Project were to cause a substantial adverse change in the significance of the known potentially eligible cultural resources described above, such as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings that would render the resources ineligible for listing in the CRHR, any local register of historical resources, or identifiable in an historical resources survey meeting the requirements of PRC Section 5024.1(g). Likewise, if Proposed Project ground-disturbing construction activities were to uncover buried unknown archaeological resources and these resources were not properly treated, this would result in a significant impact. Given the sensitivity of areas near the Salinas River and past use of the river and immediate surroundings by Native Americans, there is potential for resources to be encountered during excavation and grading activities associated with construction of the Proposed Project's 70 kV reconductoring segment, which would be installed largely along the Salinas River corridor. Based on the buried site sensitivity analysis described in Section 4.5.3, construction of new 70 kV power line poles across Huer Huero Creek near Union Road would also have potential to encounter preserved buried cultural deposits in the Holocene-aged valley floor and stream channel alluvium. In particular, installation of concrete pier foundations for poles, which will reach depths of up to 20 feet, would have the greatest potential to pass through Holocene deposit and encounter/impact buried resources. Minor grading for structure locations, pull and tension sites, and access roads could also reveal buried archaeological materials.

As described in Chapter 2, *Project Description*, the Applicants have proposed APMs (see Table 2-12) that would avoid or minimize potential impacts on cultural resources. Specifically, APM CUL-1 would require that a cultural resources principal investigator (meeting the Secretary of the Interior's standards for professional archaeology) be retained to ensure all APMs related to archaeological and historical resources are properly implemented. Per APM CUL-2, the Proposed Project is specifically designed to avoid impacts to the potentially CRHR-eligible resources identified in the area (i.e., the three archaeological sites [36052-S-001, 36052-S-002, and 36052-S-003] and the Johnson House). During construction, a 50-foot buffer would be established around the boundary of each respective resource and these areas would be designated as environmentally sensitive areas. If work within the 50-foot buffer cannot be avoided, then monitoring would be required. Additionally, construction activities would avoid impacts to the Johnson House entirely.

APM CUL-3 would require that, in the event of a discovery of unanticipated cultural materials during construction, all construction work within 50 feet of the discovery would cease and the principal investigator would be consulted to assess the find. While avoidance of resources is preferred, if avoidance of the resource is not feasible and the resource is found to be significant, a detailed archaeological treatment plan, including Phase III data recovery, would be developed and implemented by a qualified archaeologist. APMs CUL-5 and CUL-6 would provide for

construction monitoring of initial ground-disturbing activities (i.e., initial excavation and grading) by a tribal monitor and an archaeological monitor. Under both of these APMs, the monitoring would be required for initial ground-disturbing activities that may occur within 50 feet of Dry Creek, Huer Huero Creek, and the Salinas River or known prehistoric archaeological sites. The archaeological monitor would also be required to monitor construction activities within 50 feet of any known historic sites.

Finally, APM GEN-1 would require that the Applicants prepare and implement a worker environmental awareness program for construction personnel, which would include training on, among other things: (1) how to identify cultural resources; (2) avoidance requirements and procedures to be followed if unanticipated cultural resources are discovered during construction (see APM CUL-3), and (3) disciplinary actions that may occur when historic preservation laws are violated.

Implementation of the APMs described above would avoid or reduce many of the potential cultural resource impacts associated with Proposed Project construction. Avoidance and marking of the archaeological sites identified through the field surveys would minimize the potential for encountering buried resources associated with these sites. With respect to the Johnson House, implementation of APM CUL-2 would ensure that the house is not directly impacted by Proposed Project construction. While installation of the new 70 kV power line along Union Road could adversely affect the viewshed from the house, this would not demolish or materially alter the Johnson House's physical characteristics that justify its eligibility for inclusion in the CRHR. The house itself would not be impacted by construction or operation of the Proposed Project. APMs CUL-3, CUL-5, and CUL-6 likewise would increase the likelihood that any uncovered buried resources during initial ground-disturbing activities in sensitive areas could be accurately identified (by having tribal and archaeological monitors present). The procedures outlined in APM CUL-3 would help to ensure that significant impacts to any identified archaeological resources would not occur, and APM GEN-1 would ensure that construction workers are aware of how to identify cultural resources and the protocols to follow in the event of an unanticipated discovery.

Overall, implementation of APMs CUL-1, CUL-2, CUL-3, CUL-5, CUL-6, and GEN-1 would reduce potential impacts to historical and archaeological resources during Proposed Project construction activities. However, due to a lack of specificity in some of the APMs, and some contradictory language in others, the APMs would not completely reduce potential impacts to a level that is less than significant; thus leaving the opportunity for construction to cause a substantial adverse change in the significance of known eligible and potentially eligible cultural resources. **Mitigation Measure CR-1** provides enhancements, as identified by the CPUC, to the APMs listed above to provide the specificity required to reduce potential impacts to cultural resources to a less than significant level. During operation, the Proposed Project would not involve substantial ground-disturbing activities and thus, would not result in impacts to historical or archaeological resources during this phase. As a result, this impact would be **less than significant with mitigation**.

Mitigation Measure CR-1: CPUC Enhancements to APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6.

The following actions ~~by the CPUC~~ are designed to augment the APMs provided by the Project proponents to ensure that construction impacts to cultural resources are mitigated to a level of less than significant:

- ~~a.~~ The CPUC shall appoint a qualified archaeologist to represent the interests of the CPUC and oversee the implementation of the APMs with regard to archaeological resources on their behalf. The archaeologist shall meet the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology.
- ~~b.a.~~ The Project proponents shall make every effort to design the project to avoid known eligible or potentially eligible cultural resources for the Proposed Project, reasonably foreseeable distribution components, and alternatives. A 50-foot buffer, using flagging, rope, tape, or fencing, shall be established around the boundary of each respective resource, which shall be designated an environmentally sensitive area. If the proponent engineers determine that the project cannot be designed to avoid known cultural resources and construction will encroach upon the resource buffer, construction monitoring by an archaeologist shall be required. A Native American representative from a consulting tribe identified by the CPUC shall be retained to monitor the construction activities if the resource is a Native American archaeological site that will be encroached upon. The Project proponent will be responsible for communicating project schedules and needs to the Native American monitor and/or tribe, but it is the responsibility of the tribe to ensure that the monitor is on site when called for, and work may proceed if the Project proponent has provided adequate notice of work. If an archaeological resource will be directly impacted, a detailed archaeological treatment plan shall be developed and implemented by the Project proponent's cultural resources principal investigator, as defined in APM CUL-1. The treatment plan shall be developed using the mitigation options provided under Section 15126.4(b) of the CEQA Guidelines. The CPUC ~~and the CPUC professional archaeologist~~ shall have opportunity to review and comment on approve the proposed treatment plan. If the resource is a Native American archaeological site, tribes that have entered into AB 52 consultation with the CPUC shall have the opportunity to review and comment on the treatment plan. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System.
- ~~e.b.~~ If prehistoric or historic-era archaeological resources are encountered during Project implementation, the Project proponents shall immediately cease all construction activity within 50 feet of the find and create a 50-foot buffer area for avoidance. The archaeological monitor shall notify the Project's cultural resources principal investigator immediately, and the principal investigator shall, in turn, notify the CPUC ~~and their appointed professional archaeologist~~. If an archaeological monitor is not present at the time of the find, Project proponent's environmental inspector or construction supervisor shall make the

notifications. The Project's cultural resources principal investigator shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.

If the CPUC determines, based on recommendations from the cultural resources principal investigator, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a ~~tribal cultural resource~~ TCR (as defined in PRC Section 21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.

If the assessment of significance can be made by the cultural resources principal investigator based on a small sample of discovered material, then the CPUC will review and approve the findings. In the absence of CPUC approval due to a short opportunity for CPUC review due to construction schedules, the applicants shall assume the discovery is a historical resource for the purpose of avoidance, development of an evaluation study, or development of a treatment plan (as described below).

If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes if the resource is Native American-related, and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC, in consultation with and the appropriate tribe(s), if applicable. Treatment for most archaeological resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource, consistent with the Secretary of Interior's Standards and Guidelines, Archaeology and Historic Preservation (48 CFR 190). The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System. Work in the area may commence, at the direction of the CPUC following concurrence from the CPUC that the fieldwork performed was sufficient, upon completion of treatment and under the direction of the qualified archaeologist. Should the resource also be identified as a TCR, then measures outlined in Section 4.18 will also apply if

resource-specific measures identified during the resource-specific consultation do not supersede them.

~~e.c.~~ Construction monitoring shall be conducted by an archaeologist for initial ground-disturbing activities that may occur within 100 feet of Dry Creek, Huer Huero Creek, the Salinas River, and the Estrella River, or within 50 feet of all known archaeological sites. Ground-disturbing activities are defined as activities that may include, but are not limited to boring, grading, grubbing, excavation, drilling, and trenching, within the project areas. Monitoring of ground disturbance would also occur in the vicinity of Santa Ysabel Ranch, which was identified as culturally sensitive by AB 52 consulting tribes. The archaeological monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, and any cultural materials identified. The logs will be compiled and submitted to the CPUC on a regular basis to be determined prior to beginning construction ~~during preparation of the Mitigation Monitoring and Reporting Plan~~. Should any archaeological materials be unearthed, the monitor shall follow the directives of Mitigation Measure CR-1 ~~(e)~~. If human remains are discovered during project construction the archaeological monitor shall comply with Mitigation Measure CR-2. The archaeological monitor will work in tandem with the Native American monitor. The involvement of Native American monitors is described in Mitigation Measure TCR-1.

Impact CR-2: Disturb human remains, including those interred outside of dedicated cemeteries – *Less than Significant with Mitigation*

Ground-disturbing activities during construction of the Proposed Project would have potential to encounter buried human remains. For the reasons discussed in Impact CR-1, the potential for encountering such remains would be highest in areas that are sensitive for cultural resources, such as within stream corridors and adjacent to known Native American archaeological sites. This is based on the assumption that human remains are most likely to be encountered in areas of heaviest past habitation/use by indigenous peoples. However, there would be potential to encounter buried human remains in any area the Proposed Project plans disturbance, especially where there would be ~~deep~~ excavations through Holocene deposits for pole and tower foundations. If human remains were discovered during these activities and the remains were not treated with respect and/or proper protocols were not followed, this would result in a significant impact.

As described in Chapter 2, *Project Description*, APM CUL-4 would require that protocols be followed consistent with California Health and Safety Code Section 7050.5 in the event that human remains are discovered. If human remains are discovered, all work within 50 feet of the discovery would cease and the environmental inspector or construction supervisor would notify the County Coroner immediately. If the human remains are determined to be Native American, the County Coroner would notify the NAHC, which would determine and notify a most likely descendant. The most likely descendant would then inspect the site within 48 hours of notification and may recommend measures that they feel are appropriate, potentially including scientific removal and nondestructive analysis of the human remains and any items associated with Native American burials. Implementation of this APM would reduce any potential impacts

on human remains during Proposed Project construction but, given the APM's time limitations for the most likely descendant to respond to the request, this impact could be significant.

Mitigation Measure CR-2 would follow the legal requirements of PRC Section 5097.98, which allows the most likely descendant 48 hours from the time they are *granted access* to the property, rather than 48 hours of notification per APM CUL-4, to make recommendations about the disposition of the human remains. Implementation of this mitigation measure would reduce this impact to a level that is less than significant.

The Proposed Project is not expected to require excavation during the operation phase. Thus, there would be no potential to encounter or adversely impact human remains during operation. As such, this impact would be **less than significant with mitigation**.

Mitigation Measure CR-2: Comply with the Legal Requirements of PRC 5097.98.

California Health and Safety Code Section 7050.5 shall be followed, as described in APM CUL-4, if human remains are discovered during construction of the Proposed Project or reasonably foreseeable distribution components or alternative. If human remains are discovered, all work within 50 feet of the discovery shall cease and the archaeological monitor shall immediately notify the Project's cultural resources principal investigator. In turn, the principal investigator shall immediately notify the County coroner, as well as the CPUC and their appointed professional archaeologist. If an archaeological monitor is not present at the time of the find, Project proponent's environmental inspector or construction supervisor shall make the notifications. State of California Health and Safety Code Section 7050.5 stipulates that no further disturbance will occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Project proponent's lead cultural resource manager, the CPUC, and the qualified archaeologist representing the CPUC shall be immediately notified. The County Coroner who evaluated the finds will notify the NAHC by telephone within 24 hours. In turn, the NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The most likely descendant will complete inspection of the site and make recommendations or preferences for treatment within 48 hours of being granted access to the site. As per Section 5097.98 of the PRC, the landowner shall discuss and confer with the most likely descendant(s) to determine appropriate treatment of remains. Construction will not continue in the protected area until treatment of the remains has been resolved, in compliance with PRC 5097 et seq. and notice is provided by to the CPUC documenting the resolution and respectful disposition of the Native American human remains ~~archaeologist to resume work in the area.~~

Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout

Like the Proposed Project, construction of the reasonably foreseeable distribution components would involve excavation and other ground-disturbing activities (albeit on a much smaller scale) that could potentially encounter buried cultural resources. The portions of the reasonably foreseeable new distribution line segments that come close to, or cross, Dry Creek would have the most potential for encountering cultural resources. The distribution work within the Estrella Substation (e.g., installing the 70/21 kV transformer and related equipment) would not impact

cultural resources since site preparation and grading of this area would already have been conducted as part of the Proposed Project. Likewise, foundations for new equipment related to ultimate substation buildout (e.g., transformer, breakers, switches, etc.) would occur within the fence line of the already constructed Estrella Substation and, therefore, would not impact cultural resources. However, other activities involving new ground disturbance outside the Estrella Substation footprint could cause a substantial adverse change in the significance of a historical or archaeological resource. Note that the routes of any additional future distribution feeders and/or 70 kV power lines that could be established through ultimate substation buildout are not known; thus, the potential impacts associated with these facilities are speculative and not evaluated in this EIR.

To minimize potential impacts, **Mitigation Measure CR-3** would be implemented, which would require that a pedestrian archaeological survey be conducted for the reasonably foreseeable distribution components prior to construction and that avoidance and minimization measures be implemented for any identified resources. APMs CUL-1, CUL-2, CUL-3, CUL-5, CUL-6, and GEN-1 would also be implemented, as well as **Mitigation Measure CR-1**, which, together with Mitigation Measure CR-3, would reduce potential impacts to historical and/or archaeological resources during construction to a level that is less than significant. Since the reasonably foreseeable distribution and ultimate substation buildout components would be operated remotely, and no excavation or ground-disturbance is anticipated during the operation phase, the facilities would not impact historical or archaeological resources following construction. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of the reasonably foreseeable distribution components would involve ground-disturbing activities, such as excavation necessary for pole installations, that may uncover buried human remains. Construction of the additional 230 kV interconnection for ultimate substation buildout would occur outside the existing Estrella Substation footprint, and thus would have potential to encounter buried human remains. As described in Impact CR-2, if discovered human remains were discovered and the remains were not treated with respect and proper protocols were not followed, this would result in a significant impact. However, implementation of **Mitigation Measure CR-2** would reduce potential impacts through the requirement that PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5 and would ensure that human remains are not disturbed during construction of the reasonably foreseeable distribution components and ultimate substation buildout. Because operation of the reasonably foreseeable distribution and ultimate substation buildout components would not require excavation or ground-disturbing activities, it would not impact human remains during this project phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Mitigation Measure CR-3: Complete Cultural Resources Studies, Evaluate Resources for Significance, and Implement Avoidance and Minimization Measures.

- (a) HWT, PG&E, and/or their contractors shall conduct a pedestrian archaeological survey and built environment resources survey for any alternative substation sites, 70 kV power line alignments (or portions of alignments), reasonably foreseeable distribution components, and/or ultimate substation buildout sites that have not yet been investigated and shall prepare a Cultural Resources Technical Report

documenting the results of the surveys. The archaeological and built environment resources surveys shall be completed prior to construction of the respective components and prior to final design. If the CPUC will not complete their review within 30 days, they will notify the project proponent and provide a status of the review. Lack of response within 30 days may not be considered concurrence.

The pedestrian survey shall include systematic surface inspection with transects spaced at 15-meter (approximately 50-foot) intervals, or less, where feasible and safe (owing to the extant hardscape, such as paving, and landform). Where such transects are not feasible or safe, survey shall provide the most complete coverage possible either through wider transects (ex. on steep slopes near rivers) or opportunistic survey (ex.: locations where private property fences or buildings/pavement don't obscure the ground). The technical report shall explain the conditions requiring less intensive survey.

The survey ~~and~~ shall cover the entire site or alignment and a 100-foot buffer around the site or alignment. Archaeologists shall examine the ground surface for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historical artifacts (e.g., metal, glass, ceramics), sediment discoloration that might indicate the presence of a cultural midden, roads and trails, and depressions and other features that might indicate the former presence of structures or buildings (e.g., post holes, foundations). When cultural resources are encountered, archaeologists shall collect all data necessary to complete the appropriate California Department of Parks and Recreation (DPR) 523 series forms from the Office of Historic Preservation. The resources shall be mapped with handheld mapping-grade global positioning system (GPS) units with sub-meter accuracy and differential correction. All GPS data shall be exported into Geographic Information Systems geodatabases and plotted onto the associated geo-referenced USGS 7.5-minute quadrangle to ensure accuracy and to produce location maps of all resources. Each site shall also be photo-documented. No artifacts will be collected during the pedestrian survey.

The built environment resources survey shall be conducted for alternatives that have not previously been surveyed by a qualified architectural historian, and shall include all structures, properties, and other built resources within the footprint or alignment and within a 100-foot buffer of the site footprint or alignment. Resources identified through the built environment resources survey will be recorded on the appropriate DPR 523 forms.

- (b) Avoidance and delineation of a buffer around any potentially CRHR-eligible archaeological resources in the study area identified through the field surveys or evaluations under this mitigation measure shall follow the procedures outlined in APM CUL-2. If the resource(s) cannot be avoided, the qualified archaeologist shall develop an evaluation plan to ascertain the site's eligibility for listing in the CRHR. The evaluation plan must be submitted to and approved by the CPUC prior to any excavation. The CPUC shall ensure consulting tribes have the opportunity to review and comment on evaluation plans for Native American archaeological sites. Archaeological sites found to contain human remains must be treated in accordance

with the provisions of Section 7050.5 of the California Health and Safety Code (see APM CUL-4 and Mitigation Measure CR-2). The CPUC will provide the project proponent with an update on the status of the review within 60 days of submittal. Lack of response within 60 days may not be considered concurrence.

Should any archaeological site be determined eligible for listing in the CRHR, and if Project proponent design engineers determine that any portion of the site that contributes to its eligibility cannot be avoided by construction, a data recovery program shall be necessary and a detailed data recovery plan shall be prepared by a qualified archaeologist per Mitigation Measure CR-1(b)(2). The data recovery plan must be submitted and approved by the CPUC prior to implementation of the plan. The CPUC shall ensure that consulting tribes will have the opportunity to review and comment on the data recovery plan for any CRHR-eligible Native American site. The CPUC will provide the project proponent with an update on the status of the review within 60-days of submittal. Lack of response within 60 days may not be considered concurrence.

For any artifacts removed during project evaluation or data recovery excavations, the Project proponent's qualified archaeologist must provide for the curation of such artifact(s). If the archaeological resource is determined to be a TCR, the CPUC shall work with the relevant tribe(s), consistent with Mitigation Measure TCR-1, to determine the disposition of any TCRs artifacts discovered during construction or artifacts resulting from execution of a treatment plan, such as, but not limited to, reburying in close proximity of the finds without scientific study, conducting scientific study before reburying the materials either near the origin of the find or in another protected place, or curation at a facility that meets the U.S. Secretary of the Interior's criteria for curation (36 CFR 79).

~~(b)(c)~~ For buildings, structure(s), or objects evaluated as a historical resource(s) that cannot be avoided, the applicant(s) qualified architectural historian shall prepare a treatment plan for the affected resource(s) building(s), which may include, but not be limited to will be preparation of documentation by a qualified architectural historian according to the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation and/or other actions to address the criteria for which the historical resource is eligible for the CRHR.

Alternatives

No Project Alternative

Under the No Project Alternative, no new substation or 70 kV power line would be constructed or operated. Therefore, there would be no potential for ground-disturbing activities to encounter historical or archaeological resources or human remains. None of the built environment resources in the area would be affected. As a result, **no impact** would occur under any of the significance criteria.

Alternative SS-1: Bonel Ranch Substation Site

The records search for Alternative SS-1 did not reveal the presence of any known previously recorded archaeological sites or built environment resources within the proposed substation footprint. However, this alternative site has not been subject to a pedestrian survey for archaeological resources and its location near the Estrella River indicates that there is sensitivity for buried archaeological remains. Thus, construction of Alternative SS-1 could result in significant impacts to cultural resources. As a result, **Mitigation Measure CR-3** would be implemented, which would require that a pedestrian archaeological site survey be conducted prior to construction. Archaeologists conducting the pedestrian surveys would document any cultural resources discovered in DPR 523 series forms and identified cultural resources would be avoided during construction. If Project proponent design engineers determine that avoidance is not possible, the resources would be evaluated and treated appropriately by a qualified archaeologist, as described in Mitigation Measure CR-1(b).

APMs CUL-1, CUL-2, CUL-3, CUL-5, CUL-6, and GEN-1 would also be implemented. Implementation of these measures would reduce the potential for Alternative SS-1 to impact historical and/or archaeological resources (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts); however, significant impacts could still occur due to a lack of specificity in some of the APMs and contradictory language in others. Implementation of **Mitigation Measure CR-1** would ensure that impacts to cultural resources would be less than significant. As it would be operated remotely and would not require substantial excavation or ground-disturbance during operation, the substation under Alternative SS-1 would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative SS-1 would have similar (or slightly elevated) potential to encounter buried human remains compared to the proposed Estrella Substation. The potential would be slightly elevated under Alternative SS-1 due to the site's location close to the Estrella River, which both general archaeological practice and the advice of Native American tribes in the area have indicated is sensitive for cultural resources. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5 and would ensure that human remains are not disturbed during construction of Alternative SS-1. The limitations of APM CUL-4 could ultimately result in significant change to burial sites; however, implementation of **Mitigation Measure CR-2** would reduce such impacts to less than significant. Because Alternative SS-1 is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative PLR-1A: Estrella Route to Estrella Substation

As described in Section 4.5.3, no CRHR-eligible archaeological resources were identified within or along the Alternative PLR-1A alignment. Several built environment resources were identified along the alignment, which were either determined to not be eligible for listing in the CRHR or were not evaluated and are potentially eligible. As a result, Alternative PLR-1A could cause an adverse change in the significance of these resources by demolishing or materially altering their physical characteristics in an adverse manner such that it no longer conveys those characteristics that qualify the resource as a historical resource. This would be a significant

impact. **Mitigation Measure CR-3** would be applied to ensure that avoidance and minimization measures are implemented for these resources. ~~Because the Alternative PLR-1A route has already been subject to a pedestrian archaeological survey, this would not be required under Mitigation Measure CR-3.~~ Even while archaeological resources were not identified during the field survey, such resources could still be encountered during Alternative PLR-1A construction activities (in particular, deep excavations for pole installation). Areas where the Alternative PLR-1A alignment crosses Dry Creek, Huer Huero Creek, and other smaller drainages, and parallels the Salinas River would be most sensitive for buried cultural resources.

APMs CUL-1, CUL-3, CUL-5, CUL-6, and GEN-1 would be implemented for Alternative PLR-1A (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts), but due to a lack of specificity in some of the APMs and contradictory language in others, these APMs would not fully reduce the potential for Alternative PLR-1A to impact historical and/or archaeological resources to a level that is less than significant. Implementation of **Mitigation Measure CR-1** would ensure that impacts would be reduced to a less than significant level through mitigation. As it would be operated remotely and would not require substantial excavation or ground-disturbance during operation, the power line under Alternative PLR-1A would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative PLR-1A would have similar (or slightly elevated) potential to encounter buried human remains compared to the Proposed Project's 70 kV power line. The potential would be slightly elevated under Alternative PLR-1A due to the longer length of this alignment, and due to the additional length along or near surface waterbodies. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5 and would ensure that human remains are not disturbed during construction of Alternative PLR-1A. Although APM CUL-4 would be applied, Alternative PLR-1A could potentially have significant impacts to human remains. Implementation of **Mitigation Measure CR-2** would reduce these impacts to a less than significant level by ensuring that the legal requirements of PRC Section 5097.98 are followed. Because Alternative PLR-1A is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1

As described in Section 4.5.3, no CRHR-eligible archaeological resources were identified within or along the Alternative PLR-1C alignment; however, the eastern-most portion of the alignment was not subject to pedestrian survey. Additionally, only a portion of the alignment was surveyed for built environment resources and several of the built environment resources that were identified along the alignment were not evaluated for significance. Thus, Alternative PLR-1C ~~would~~ **may** result in significant impacts absent implementation of mitigation measures. As such, **Mitigation Measure CR-3** would be applied, which would require that the portions of the Alternative PLR-1C alignment not previously surveyed are subjected to a pedestrian archaeological survey and that avoidance and minimization measures are implemented. Even if the archaeological field survey does not identify eligible resources, the potential to encounter buried resources during Alternative PLR-1C construction activities remains, especially during deep excavations for pole installation. Areas most sensitive for buried cultural resources are

where the Alternative PLR-1C alignment crosses Huer Huero Creek and other smaller drainages, and parallels the Estrella (MRV 1, in particular) and Salinas rivers.

APMs CUL-1, CUL-2, CUL-3, CUL-5, CUL-6, and GEN-1 would be implemented for Alternative PLR-1C, and would reduce impacts to archaeological sites (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts), but not to a less significant level. Implementation of **Mitigation Measure CR-1** would reduce the potential for Alternative PLR-1C to impact historical and/or archaeological resources to a level that is less than significant. As it would be operated remotely and would not require substantial excavation or ground-disturbance during operation, the power line under Alternative PLR-1C would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative PLR-1C would have similar (or slightly elevated) potential to encounter buried human remains as the Proposed Project's 70 kV power line. The potential would be slightly elevated under Alternative PLR-1C due to the longer length of this alignment and the additional length along or near surface waterbodies. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5 and would ensure that human remains are not disturbed during construction of Alternative PLR-1C, but not to a less than significant level. Application of **Mitigation Measure CR-2** would ensure reduction of impacts to less than significant level. Because Alternative PLR-1C is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative PLR-3: Strategic Undergrounding (Both Options)

The Alternative PLR-3 alignments (Option 1 & 2) are generally covered by the Proposed Project cultural resources studies, which found no CRHR-eligible archaeological or built environment resources along this section of the Proposed Project's overhead 70 kV power line route. Alternative PLR-3, Option 2 is the exact same alignment as the Proposed Project overhead alignment, while the portion of Alternative PLR-3, Option 1 that diverges from the Proposed Project alignment follows existing roads (i.e., Wisteria Lane and Golden Hill Road). Given that the underground 70 kV power line would be installed within the roadway (i.e., underneath pavement) in this location, a pedestrian archaeological survey would not be informative. Overall, while significant archaeological resources are not known to be present within the Alternative PLR-3 alignments, there remains potential to encounter such resources during construction activities, such as trenching for underground power line installation.

APMs CUL-1, CUL-3, and GEN-1 would be implemented for Alternative PLR-3 (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts). Because no portion of the Alternative PLR-3 (Option 1 or 2) alignments occur within close proximity to known prehistoric or historic archaeological sites, avoidance of known sites would not be required under APM CUL-2. Tribal and archeological monitors also would not be required under APMs CUL-5 or CUL-6 as the alternative is not in proximity to streams. Implementation of APMs CUL-1, CUL-3, and GEN-1 would reduce the potential for Alternative PLR-3 to impact historical and/or archaeological resources, but not to a level that is less than significant. Implementation of **Mitigation Measure CR-1** would reduce the potential for significant impacts to a less than

significant level. As it would be operated remotely and would not require substantial excavation or ground disturbance during operation, the underground power line under Alternative PLR-3 (both options) would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative PLR-3 would have similar (or slightly elevated) potential to encounter buried human remains as the Proposed Project's 70 kV power line because Alternative PLR-3 requires additional excavation to install an underground power line even though much of the Alternative PLR-3 alignments have been disturbed in the past during road construction (i.e., portions within existing roadways). Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5, but would not reduce this impact to a level of less than significant. Application of **Mitigation Measure CR-2** would ensure that human remains are not significantly disturbed during construction of Alternative PLR-3. Because Alternative PLR-3 is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative SE-1A: Templeton Substation Expansion – 230/70 kV Substation

No CRHR-eligible archaeological or built environment resources were identified within the Alternative SE-1A site or surrounding area. While the location includes several structures (a barn, outbuildings, mobile home, a windmill, electrical panels, a tank, and pumps) that could be impacted by the alternative, these were found ineligible for CRHR listing (NEET West 2019). Specifically, these structures are ineligible for listing because they are all common types found throughout the region, are in a deteriorated condition, and do not have any known association with important farming operations or individuals from the 1920s through the 1970s (NEET West 2019). Even while significant archaeological resources were not identified in the Alternative SE-1A site, buried resources could still be encountered during excavation and other ground-disturbing construction activities, potentially resulting in a significant impact if proper protocols are not followed.

As such, APMs CUL-1, CUL-3, and GEN-1 would be implemented (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts). Because the Alternative SE-1A site does not occur in close proximity to streams or known prehistoric or historic archaeological sites, avoidance of known sites would not be required under APM CUL-2, and tribal and archeological monitors would not be required under APMs CUL-5 or CUL-6. Implementation of the applicable APMs CUL-1, CUL-3, and GEN-1 would reduce the potential for Alternative SE-1A to impact historical and/or archaeological resources, but not to a level that is less than significant. Impacts to historical and/or archaeological resources would, however, be lessened to a less than significant level through the implementation of **Mitigation Measure CR-1**. As it would be operated remotely and would not require substantial excavation or ground-disturbance during operation, the substation under Alternative SE-1A would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative SE-1A would have similar potential to encounter buried human remains as the proposed Estrella Substation. Implementation of APM CUL-4 would require that HWT and/or PG&E follow protocols that are consistent with those outlined in California Health

and Safety Code Section 7050.5, but would not ensure that such impacts would be reduced to a less than significant level. Implementation of **Mitigation Measure CR-2** would ensure that human remains are not significantly disturbed during construction of Alternative SE-1A. Because Alternative SE-1A is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative SE-PLR-2: Templeton-Paso South River Road Route

As described in Section 4.5.3, an isolated historic-era feature (metal artesian well) was identified along the Alternative SE-PLR-2 route, which was not evaluated for significance but is conservatively assumed to be CRHR-eligible. A number of built environment resources were recorded and evaluated along the route, but none of the structures were found to be eligible for listing in the CRHR. Coordination with Native American tribes indicated that the Santa Ysabel Ranch area (through which the Alternative SE-PLR-2 alignment would pass) is sensitive for TCRs cultural resources, including TCRs that are archaeological in nature. While Native American archaeological sites were not discovered through the record search or pedestrian survey, such sites and artifacts could be discovered beneath the ground surface during excavation and grading activities for Alternative SE-PLR-2, potentially resulting in a significant cultural resources impact if proper protocols are not followed.

APMs CUL-1, CUL-2, CUL-3, CUL-6, and GEN-1 would be implemented (see Impact CR-1 for detailed discussion of how these measures would avoid or minimize impacts). Because the Alternative SE-PLR-2 route would not occur in close proximity to streams or known prehistoric archaeological sites, a tribal monitor would not be required to be present during initial ground-disturbing activities. Implementation of the APMs would reduce the potential for Alternative SE-PLR-2 to impact historical and/or archaeological resources, but not to a level that is less than significant. **Mitigation Measure CR-1** would ensure that impacts to historical and/or archaeological resources during construction of Alternative SE-PLR-2 would be reduced to a less than significant level. As it would be operated remotely and would not require substantial excavation or ground-disturbance during operation, the power line under Alternative SE-PLR-2 would not impact cultural resources during the operation phase. Therefore, impacts under significance criteria A and B would be **less than significant with mitigation**.

Construction of Alternative SE-PLR-2 would have similar (or slightly elevated) potential to encounter buried human remains as the Proposed Project's 70 kV power line despite its shorter length because it would pass through the Santa Ysabel Ranch area, which has been identified as sensitive for cultural resources by consulting tribes. Implementation of APM CUL-4 would require that HWT and PG&E follow protocols that are consistent with those outlined in California Health and Safety Code Section 7050.5, but would not ensure that human remains are not significantly disturbed during construction of Alternative SE-PLR-2. Implementation of **Mitigation Measure CR-2** would provide a framework for achieving a less than significant impact to human remains. Because Alternative SE-PLR-2 is not anticipated to require excavation or ground-disturbing activities during operation, it would not impact human remains during the operation phase. Overall, impacts under significance criteria C would be **less than significant with mitigation**.

Alternative BS-2: Battery Storage to Address the Distribution Objective

As described in Chapter 3, *Alternatives Description*, potential FTM battery storage sites are identified under Alternative BS-2 for illustrative purposes for this EIR. FTM battery storage facilities could be constructed at the example FTM sites (1 through 8) or at other sites identified in the future. Effects to cultural resources from FTM BESSs sited at the example sites are discussed here for illustrative purposes.

With the exception of FTM Site 8, no previously recorded resources were identified through CCIC records searches at the illustrative FTM sites examined as part of the EIR analysis under Alternative BS-2. The resource identified at FTM Site 8 was the existing power station, which had previously been evaluated as not eligible for listing in the CRHR. FTM Sites 3 and 5 were covered by previous archaeological surveys, with negative findings at those locations. FTM Site 6 is the same site as the Alternative SE-1A Templeton Substation Expansion Site; thus, it is covered by the field surveys conducted for that alternative, which identified no significant resources on the site. None of the other potential FTM sites (1, 2, 4, 7, and 8) have been field-surveyed for archaeological or built environment resources. Aerial imagery shows the potential FTM sites (with the exception of FTM Sites 7 and 8) to be vacant and largely within existing developed areas of Paso Robles and Atascadero; none of the FTM sites are within 50 feet of Dry Creek, Huer Huero Creek, Salinas River, or Estrella River. Because not all of the FTM sites have been subject to field surveys, Alternative BS-2 could result in adverse impacts to cultural resources. Like the Proposed Project, construction of the FTM BESSs under Alternative BS-2 would have potential to encounter buried human remains. Adherence to California Health and Safety Code Section 7050.5 and PRC Section 5097.98 would ensure that human remains are not significantly disturbed during construction of Alternative BS-2.

Overall, FTM BESS sites were selected for illustrative purposes only, BESS installations have not been designed and technologies have not been selected, and the specifics of Alternative BS-2 are unknown. Thus, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is provided for any of the significance criteria.

Alternative BS-3: Third Party, Behind-the-Meter Solar and Battery Storage

This alternative would involve the installation of BTM solar or battery storage units at properties by individual program participants. The City of Paso Robles has a robust historic preservation program that includes a list of built environment properties that meet NRHP/CRHR eligibility criteria, a Historic Preservation Ordinance, and provisions set forth in the municipal code that require permitting of alterations to historic properties (Historic Resources Group 2010). It is possible that some owners of historic buildings may elect to install solar or battery units as part of the program, which would require permitting by the City. It would be the responsibility of the property owner and City to determine the compatibility and potential effects of the unit installation to the historic resource through the permit evaluation process. This includes any potential ground disturbance that might impact surface or buried archaeological resources.

In general, the installation of individual BTM solar and BESS facilities would have relatively minimal potential to substantially affect significant cultural resources, including human remains, due to their small individual sizes and the fact that they would be installed on or within existing

buildings (generally assumed to involve minimal ground-disturbance) and/or within existing properties.

Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is reached under any of the significance criteria.