OFFICE OF HISTORIC PRESERVATION DEPARTMENT OF PARKS AND RECREATION

1725 23rd Street, Suite 100 SACRAMENTO, CA 95816-7100 (916) 445-7000 Fax: (916) 445-7053 calshpo@parks.ca.gov www.ohp.parks.ca.gov

January 27, 2015

Reply in Reference To: USMC_2015_0112_004

Danielle Page
Cultural Resource Management Branch
Assistant Chief of Staff, Environmental Security
United States Marine Corps
Box 555010
Camp Pendleton, CA 92055-5010

Re: Annual SDG&E Transmission Road Grading, CPEN (20130061A), (your 5090, ENV/CRS, January 6, 2015)

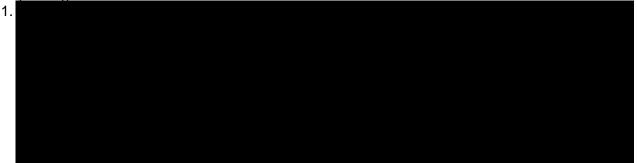
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Dear Ms. Page:

Thank you for initiating consultation regarding the United States Marine Corps' efforts to comply with Section 106 of the *National Historic Preservation Act of 1966* (54 U.S.C. § 306108), as amended, and its implementing regulation found at 36 CFR Part 800. Camp Pendleton is proposing to allow San Diego Gas and Electric Company (SDG&E) to conduct their annual transmission road grading to maintain and improve dirt access roads within existing SDG&E easements for associated tielines. Conducting annual transmission road grading allows its crews to access transmission line structures to conduct operational and maintenance activities. SDG&E is required to conduct annual operational and maintenance activities to ensure reliability in energy transmission in compliance with applicable Federal and State laws and regulations.

Under SDG&E's annual transmission road grading program, grading is restricted to existing transmission access roads and no new roads are established. The graders will remain within the boundaries of the established windrows/berms of the roads, which are generally 12 feet in width. The area of potential effects (APE) will include the width of roads and 15 meters on either side of the roads. The collective length of the transmission roads is approximately 139 miles. Generally the grading program starts in late March to early April and extends for approximately 12 weeks.

Based on the results of both previous and current cultural resources surveys, Camp Pendleton has identified 88 documented archaeological sites that are located with the APE of the proposed undertaking. The eligibility status of these sites is discussed below and the actions that you are requesting me to do are also discussed below:



Camp Pendleton is not requesting any action from me in regards to the above described sites.



Camp Pendleton is requesting me to review and concur with the above described eligibility determinations.

3.

Camp Pendleton is not requesting any action from me in regards to the above described sites.

4.

Camp Pendleton is requesting me to review and concur with the above described eligibility determinations.

5.

Camp Pendleton is requesting me to review and concur with the above described eligibility determinations.



Camp Pendleton is requesting me to review and concur with the above described eligibility determinations.

In your letter, you stated that you consulted with six federally and one non-federally recognized tribal governments, and have notified the public through contacts with the San Diego Archaeological Society in regards to the proposed undertaking.

After applying the criteria of adverse effects, Camp Pendleton has determined that none of the listed or eligible sites described above will be affected adversely by the proposed undertaking if the following conditions are implemented:

- 1. Avoidance of all archaeological sites in the APE;
- 2. Development and implementation of a monitoring program to ensure avoidance of direct impacts to the sites from the grading activities;
- 3. Monitoring of all grading activities by qualified archaeological and Native American monitors;
- 4. Development and implementation of a discovery plan; and
- 5. A monitoring report will be submitted to my office upon completion of the proposed undertaking.

Based on your identification efforts, Native American consultation, and after applying the criteria of adverse effects, Camp Pendleton has determined that a finding of no adverse effect with conditions is appropriate for the proposed undertaking. You requested my review and comment on your identification of the APE, your eligibility determinations and your finding of no adverse effect with conditions.

After reviewing your letter of January 6, 2015, I have the following comments:

- 1) I have no objections to your identification and delineation of the APE pursuant to 36 CFR Parts 800.4(a)(1) and 800.16(d);
- 2) I concur with your determinations of eligibility as described above in Paragraph nos. 2, 4, 5, and 6; and
- 3) I concur with your finding of No Adverse Effects with the conditions described above for the proposed undertaking.

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have additional future responsibilities for this proposed undertaking under 36 CFR Part 800. Should you encounter cultural artifacts during ground disturbing activities, please halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions, please contact either of the following members of my staff: Ed Carroll at (916) 445-7006 or Ed.Carroll@parks.ca.gov or Duane Marti at (916) 445-7030 or at email at Duane.Marti@parks.ca.gov.

Sincerely,

Jenan Saunders

(for) Carol Roland-Nawi, PhD State Historic Preservation Officer