**WEST OF DEVERS UPGRADE PROJECT**

**REVIEW MEMORANDUM**

**CULTURAL RESOURCES**

**Document:** Proponent’s Environmental Assessment – Valley South 115 kV Subtransmission Project, Section 4.5 Cultural Resources, December 2014

**Reviewer:** Joan George / Susan Goldberg, M.A., RPA, Applied EarthWorks, Inc.

**Date:** 19 December 2014

**Issue/Comment:**

1. The records search information in the Proponent’s Environmental Assessment (PEA) is inconsistent with the records search information in the cultural resources survey report for the Project. In addition, the records search information in the cultural resources survey report for the Project (Wilson et. al 2014) lists studies performed outside of the Project area (i.e., Coachella Valley).  We recommend a QA/QC review of the records search information.
2. The records searches were conducted in 2011, 2012, and 2013; however, much work has been done in the area since then. It is not clear if the entire Project (Segment 1 and Segment 2) was updated in 2013, or if only portions of the Project were updated.  We recommend updating the entire Project (Segment 1 and Segment 2) records search with a half-mile radius.
3. The pedestrian surveys of the Project (Segment 1 and Segment 2) failed to identify one known prehistoric resource.  This resource consists of a large bedrock outcrop containing many bedrock milling features.  This resource type is very common to the study area and the cultural resources survey report notes that previously documented prehistoric resources “overwhelmingly consist of bedrock milling features” (pg. 54 of VSSP cultural resources report).  Therefore, it is very disconcerting that this site was missed during the field surveys and casts suspicion on the completeness and adequacy of all the cultural surveys.  We recommend culturally sensitive areas within the Project be resurveyed by qualified archaeologists who are familiar with the site types commonly found in the area.

Wilson, Stacie, Jill Gibson, and Theodore G. Cooley

2014 *Cultural Resources Survey Report for the Proposed Southern California Edison Valley South 115 kV Subtransmission Project, Riverside County, California.* AECOM, San Diego, California. Submitted to Southern California Edison.