

FEB 15 2011



San Diego County Archaeological Society, Inc.

Environmental Review Committee

14 February 2011

To: Mr. Iain Fisher, CPUC/Greg Thomsen, BLM
c/o Dudek
605 Third Street
Encinitas, California 92024

Subject: Draft Environmental Impact Report/Draft Environmental Impact Statement
East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects

Dear Messrs. Fisher and Thomsen:

I have reviewed the cultural resources aspects of the subject DEIR/DEIS on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in DEIR/DEIS, we have the following comments:

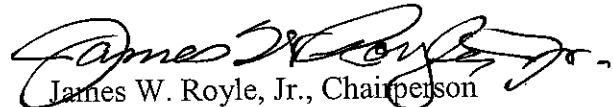
1. The cultural resources research performed for the several projects covered by this DEIR/DEIS utilized several different archaeological consulting firms. The tables in Section D.7 summarize the results of their work, but Tables D.7-5, D.7-6 and D.7-7 utilize a format that is much more effective in summarizing the results than the other tables presented in the section. While it ultimately does not affect the impact analysis or mitigation measures, the DEIR/DEIS would have been improved had the other tables been converted to the more comprehensive format. For example, it clearly would have been desirable to have included in the table whether each site is or is not NHRP-eligible rather than leaving it to the reader to find that information in the text and then refer back to the table for the description of the site.
2. The bottom paragraph on page D.7-15 mentions two sites, SDI-7073 and SDI-7083, which were not relocated. What were these sites? Section D.7 does not provide a description of those two sites. Failure to relocate these sites could, depending on the site types, be a concern. Please revise Section D.7 to correct this omission.
3. Table D.7-3 lists 31 previously-recorded sites along the 138 kV transmission line corridor, and the text on page D.7-17 states that "15 sites were relocated during the 2008 field surveys." However, the DEIR/DEIS does not clearly indicate which 16 sites were not relocated. Obviously, the segments of Highway 80 and the SD&AE Railroad would have been among the 15 relocated sites, and a few sites are discussed later in Section D.7. But there would clearly be greater concerns with not relocating a sparse flaked lithic scatter than some of the other 31 sites. Absent identification of which 16 sites were not relocated, the

evaluation of sites along this corridor is potentially inadequate. Please provide the missing information.

4. For the Tule Wind Project, the text on page D.7-21 states that 39 previously-recorded sites were identified by Tetra Tech in 2008 and 7 more by ASM in 2009. However, Table D.7-5 lists 47 sites. Then, on page D.7-31, it refers to 38 previously-recorded sites. Please explain the different numbers. Isn't the correct number 40?
5. That same paragraph on page D.7-31 states that: "A total of 152 new sites were identified: 108 in the APE survey, while 43 were identified in the ROW sample." First off, 108 plus 43 does not equal 152. It appears that the DEIR/DEIS authors have simply counted the sites listed in Table D.7-6, which total 108 in the APE and 44 (not 43) in the ROW. But Table D.7-6 includes both previously-recorded and newly-discovered sites, so there are not "152 new sites", but (as stated back on page D.7-25) 102. While this does not affect the assessment of the 152 sites listed in the table, it does indicate poor editing.
6. The paragraph below Table D.7-8, on page D.7-33, refers to "Excavations at CA-SDI-6119..." But that site is not listed in Table D.7-8 as being within the ESJ Gen-Tie Project APE, though the text on page D.7-61 states that it is and would be impacted. Please explain and revise the text and/or table as necessary.
7. Regarding mitigation measures, the wording provided includes curation of collections from future archaeological fieldwork at sites, but makes no mention of curation for any material recovered as part of the field research for the various projects. In order to mitigate cumulative impacts to cultural resources, County of San Diego practice requires that they also be curated, regardless of whether the sites are evaluated as significant or not. The same standard should be applied to these projects.
8. Was the isolated lead ball within the ESJ Gen-Tie APE, mentioned on page D.7-69, collected? If so, it will need to be curated.

Thank you for affording SDCAS this opportunity to participate in the public review period for this DEIR/DEIS.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
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