

United States Department of the Interior
BUREAU OF LAND MANAGEMENT

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Memorandum

To: Field Manager, El Centro Field Office

From: Archaeologist, El Centro Field Office

Subject: Agency Findings and Determinations under Section 106 of the National Historic Preservation Act

Project: ECO Substation Project Minor Project Refinement 10, San Diego County, California

San Diego Gas and Electric (SDG&E) has proposed a minor project refinement (MPR) on private land to the approved ECO Substation (Project) as analyzed in the Final Environmental Impact Statement/Environmental Impact Report (EIR/EIS).

MPR #10: SDG&E proposes to improve the access road at SP-63 and to modify the maintenance pad and access road for SP-64. The SP-63 access road improvements will result in an increase in permanent impacts of approximately 0.02 acre. The changes at SP-64 will result in a reduction in temporary impacts by approximately 0.03 acre and a reduction in permanent impacts by approximately 0.02 acre. Therefore, the proposed refinements will have no net change in the overall permanent impacts of the Project and will decrease the overall temporary impacts of the Project. The activities associated with the construction and utilization of the refinement areas will occur in the same manner as described in the Final EIR/EIS for construction, operation, and maintenance of the Project.

The refinements are a direct cause of lithic materials identified during monitoring of preconstruction work area delineation on October 08, 2013. Avoidable New Discovery SP64-S-1 consists of six pieces of debitage and the redesign directly avoids impacts to the surface materials recorded at the site.

In support of this analysis, ASM personnel reviewed archival documentation including the Class III inventory report prepared in support of this Project, *Prehistoric Artifact Scatters, Bedrock Milling Stations and Tin Can Dumps: Results of a Cultural Resources Study for the SDG&E East County Substation Project, San Diego County, California* (Berryman and Whittaker 2010), a supplemental pre-construction survey of the expansion, *Cultural Resources Survey of 138kv Realignment along the Boulevard to the Border corridor for the East County Substation Project*,

San Diego County, California (Williams 2011), and the *Old Highway 80 National Register of Historic Places Nomination Form* (Krintz 2012). Additionally, ASM reviewed the *Memorandum of Agreement among the Bureau of Land Management-California, The United States Army Corps of Engineers, San Diego Gas & Electric Company, and the California State Historic Preservation Officer Regarding the East County Substation Project, San Diego County, California*, August 2012 (MOA). The area covered by MPR #10 has been surveyed during both Class III inventory survey and by ASM personnel in accordance with the final *Management Plan for Archaeological Monitoring, Post-Review Discovery, and Unanticipated Effects for the San Diego Gas & Electric Company (SDG&E) East County (ECO) Substation Project, Jacumba, San Diego County, California*, January 2013. This is documented in ASM's confidential letter report to Mr. Jeff Sahagun dated January 3, 2014.

Utilizing the information generated from the previously conducted investigations, ASM provided recommendations to the BLM in their confidential letter report dated January 3, 2014 of the potential effects of MPR#10. Mr. Brian Williams, Senior Archaeologist of ASM, makes the following recommendations:

“It is my determination that MPR request #10 will not result in any impacts to significant cultural resources. Erection of an Environmentally Sensitive Area (ESA) fence will be required by the proposed changes and all initial ground disturbances within 100 feet of the ESA should be monitored by a professional archaeologist and Native American monitor.”

Pursuant to the Project's MOA, BLM professional cultural resources staff has reviewed MPR #10. The BLM concurs with the contractor's recommendations and based on their letter report, the MOA, and the BLM's Record of Decision (ROD) for this Project, compliance with the following actions are required as part of SDG&E's implementation of these changes:

- **CUL-1A – Develop and Implement a Historic Properties Treatment Plan-Cultural Resources Management Plan.**
- **CUL-1D – Construction Monitoring.**
- **CUL-1E – Discovery of Unknown Resources.**
- **CUL-2 – Human Remains.**
- **SDG&E will also continue to comply with all other relevant cultural resources protection and treatment measures as outlined in the MOA and the ROD as appropriate.**

All archaeological sites and all potentially culturally sensitive areas that are within 100 feet of construction activities shall be demarked as ESAs and protected as exclusionary zones. Additionally, archaeological and Native American monitors are to be on-site during the ground disturbing.

Prior Section 106 review and consultation for the Project's MOA provide that the required conditions and mitigation measures listed above are adequate to identify and protect historic

properties that might be affected by the aforementioned MPR. Therefore, the BLM staff archaeologist has recommended that there would be no adverse effect on historic properties if the above measures are implemented.

The BLM makes the following findings for this undertaking.

1. **The activities covered by the MPR will take place within the originally defined APE for the Project.**
2. **The BLM finds that there will be *no adverse effects to historic properties* provided the above mitigation measures are implemented as required by the MOA and the ROD.**
3. **Accordingly, the MPR is covered by the prior consultations for the Project. No additional consultation is required pursuant to the National Historic Preservation Act.**

This memorandum documents the recommendations of the cultural resources staff, the acceptance of these recommendations by the Agency Official (as defined in 36 CFR §800.2(a), Protection of Historic Properties), and constitutes the formal statement of Agency findings and determinations for Section 106 of the National Historic Preservation Act with respect to the aforementioned minor project refinement.

Recommended by:

JEFF SAMAGUN

Archaeologist, El Centro Field Office

1/8/14

Date

Reviewed by:

Carmen Sanchez

Reviewing Agency Official, El Centro Field Office

1/8/14

Date

Acceptance by the Agency Official:

Thomas F. Pale

Field Manager, El Centro Field Office

1/8/2014

Date