

Appendix E

Letter from California State Historic Preservation Officer

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION

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February 19, 2015

Reply in Reference To: BIA_2015_0120_001
 (BIA# 2014-316)

Catherine Wilson
 Acting Deputy Regional Director
 Bureau of Indian Affairs, Western Regional Office
 2600 North Central Avenue
 Phoenix, Arizona 85004-3008

RE: Fort Yuma Quechan Indian Reservation Fiber-Optic Line Project; Imperial County, California.

Dear Ms. Wilson:

Thank you for seeking my consultation regarding the above noted undertaking. Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act (NHPA), the Bureau of Indian Affairs (BIA) is seeking my comments regarding the effects that the above named project will have on historic properties.

TDS Telecommunication Corporation (TDS) proposes to install new fiber-optic cable and ten nodes to provide internet service to the communities of Winterhaven, Bard, and the Fort Yuma-Quechan Indian Reservation (Reservation) requiring an easement across Reservation land. This will involve the installation of 8.68 miles of fiber-optic line on Reservation land and 7.75 miles of line within unincorporated Imperial County.

The Area of Potential Effects (APE) consists of a 98-foot wide corridor incorporating all segments of the fiber-optic installation. Trenching to install the fiber optic line will be approximately one to two feet in width to a depth of approximately four feet; therefore the vertical APE for the project will extend to four feet.

In addition to your letter received January 20, 2015, you have submitted *A Class III Cultural Resources Survey for a Proposed Buried Telecommunications Fiber-Optic Line near Winterhaven, in Imperial County, California* (Howell, December 22, 2014) as evidence of your efforts to identify and evaluate historic properties in the project APE.

Archival research included a record search at the South Coastal Information Center in May and June 2014, and the Arizona State Museum's AZSITE online database on April 15, 2014. Five previously recorded sites were determined to lie within the APE for the project:

	Resource Designation	Resource Description	NRHP Eligibility	Project Effect
1	CA-IMP-3424	Southern Pacific Railroad	Eligible; Criteria A	No Adverse Effect
2	CA-IMP-6824	Reservation Main Drain Canal	Eligible; Criteria A	No Adverse Effect
3	CA-IMP-6830	Yuma Main Canal	Eligible; Criteria A	No Adverse Effect
4	CA-IMP-6832	Cocopah Canal	Eligible; Criteria A	No Adverse Effect
5	CA-IMP-7158	Pilot Knob Tap Drop 4 16 kV Line	Eligible; Criteria A	No Adverse Effect

Native American consultation included contact with the Tribal Historic Preservation Officer, Arlene Kingery, on May 16, 2014 regarding knowledge of sites of religious or cultural significance to the tribe in the project area. No such properties were identified through consultation efforts.

A pedestrian surface survey was conducted of the APE utilizing transects spaced fifteen meters apart on July 15 and 16, 2014. One built resource was identified and recorded:

	Resource Designation	Resource Description	NRHP Eligibility	Project Effect
6	P-13-014813	Walapai Canal	Eligible;	No Adverse Effect

Ten isolated finds were also observed within the APE. Six of these isolates are lithic fragments that could only be tentatively identified as flaked stone. All were found in disturbed contexts. Three isolates were possible historic glass; one of which was associated with a fragment of white earthenware. One isolated occurrence was a roadside memorial shrine recorded with the intent to document its location for avoidance.

The BIA has recommended the six resources listed in the tables above as eligible to the NRHP. The ten isolated finds do not qualify as historic properties under Section 106 of the NHPA. Pursuant to 36 CFR §800.5(b) the BIA has determined a *Finding of No Adverse Effect* to historical properties by the proposed project.

I agree the ten isolated finds described do not meet the qualifications as historic properties. Because formal evaluations were not provided for the above listed built environment resources, I cannot make a determination of eligibility to the NRHP. I suggest the resources be assumed eligible to the NRHP for purposes of this project only. Because the project will have no adverse effect to these resources I then concur with the *Finding of No Adverse Effect* for the project. After clarification of information obtained through phone contact, I also concur identification efforts are sufficient and I also have no objections to the delineation of the APE, as depicted in the supporting documentation. For future reference I wish to clarify that canals are considered built resources and not archaeological resources.

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, the BIA may have additional future responsibilities for this undertaking under 36 CFR Part 800. Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Associate State Archaeologist, Kim Tanksley at (916) 445-7035 or by email at kim.tanksley@parks.ca.gov. Any questions concerning the built environment should be directed to State Historian, Kathleen Forrest at (916)445-7022 or by email at kathleen.forest@parks.ca.gov.

Sincerely,



Carol Roland-Nawi, PhD
State Historic Preservation Officer