Michael McGuirt - Request for Clarifications on Resource Evaluations and Impact Assessments

From: "Apple, Rebecca" <Rebecca.Apple@edaw.com>
To: "Michael McGuirt" <MMcguirt@energy.state.ca.us>
Date: 4/7/2009 12:19 PM
Subject: Request for Clarifications on Resource Evaluations and Impact Assessments
CC: "Guigliano, Jennifer" <Jennifer.Guigliano@edaw.com>
Attachments: CEC REQUEST FOR CLAIRIFICATION.doc

Hi Mike,

Here are the responses to your questions. Beacon does not have any concerns that Site BSPL-H-02 will be impacted because it is so far from the road and shoulder. However, if it is a major concern, there is no objection to saying the resource is eligible as long as no additional work is required – i.e., only avoidance will be required. Let me know if you need any further clarifications.

Are you planning on going to the Beacon Workshop on the 14th?

DOCKET
08-AFC-2
DATE APR 07 2009
RECD. AUG 24 2009

Rebecca Apple
Senior Archaeologist/Principal

EDAW, Inc.
1420 Kettner Boulevard, Suite 500
San Diego, California 92101
(619) 233-1454 (office)
Rebecca.Apple@edaw.com
www.edaw.com

CEC REQUEST FOR CLAIRIFICATION
RESPONSE TO E-MAIL FROM M MCGUIRT DATED 3/26/09

Clarifications on Resource Evaluations

BSPL-H-02. EDAW indicates that this historical archaeological site has the potential to yield information important to the late nineteenth to early twentieth century history of the western Mojave desert. Staff is open to the idea, but we need to articulate in our staff analysis what the particular historic themes are that the potential data sets from the site would inform. Would you please provide a more explicit argument for the historical significance of the site and indicate what you feel are the pertinent historic themes and questions that data from the site has the potential to address? In support of your argument, would you also please provide whatever greater degree of detail may be in your field notes about the types, the forms, the character, and the dimensions of the foundations on the site, and on the range of artifact types, and the absolute or relative numbers of artifact types in the site refuse deposit?

Response: The site is comprised of concrete foundations with metal bolts and a concrete cistern, along with a scatter of domestic debris. Although the function is not currently known, it appears likely that it was a small residence. With additional research it should be possible to establish the history of property ownership. Based on this, the foundations and debris scatter would be associated with a particular individual or individuals and therefore have the potential to yield information regarding settlement of the Fremont Valley area as well as refuse disposal if buried deposits are present. The main foundation is approximately 10 feet by 30 feet. The cellar-like foundation is approximately 9 feet by 12 feet, with a series of four steps leading into it. The feature that appears to be a cistern measures approximately 7 feet by 8 feet. The debris scatter was sparse and consisted of modern and historic material: five pieces of sun-purpled bottle glass, three hole-in-top cans, two pieces of polychrome ceramic, one white ceramic with a floral pattern, and 20 plus fragments of clear window glass.

Site 6. EDAW indicates that this prehistoric lithic scatter has the potential to yield information important to prehistoric settlement and lithic technology in the western Mojave Desert. The firm cites the diversity of the lithic assemblage as evidence that the use of the site may not have been only for lithic reduction. Given that the lithic assemblage for the site only includes one projectile point base fragment in addition to several cores and flakes, what does EDAW envision as the potentially significant information that the site may yield. Would you please provide a more explicit argument for the historical significance of the site and indicate what you feel are the pertinent historic themes and questions that data from the site has the potential to address, keeping in mind that the preliminary results of the geoarchaeology study appear to indicate a low likelihood of a subsurface component for the site.

Response: Given that, based on the geoarchaeological study, there is a low likelihood of a subsurface component, the site does not appear to contain sufficient information potential to meet the criteria for inclusion in the California Register of Historical Resources.

Site 16. EDAW indicates that this historic refuse deposit is not eligible for listing in the California Register of Historical Resources (CRHR). The level of detail reported for the artifact assemblage for the site makes it very difficult to assign a date range to the deposit or to associate the deposit with any potential historic themes. Would you please provide whatever greater degree of detail may be in your field notes about the range of artifact types, and the absolute or relative numbers of artifact types that are present in the refuse deposit? For instance, it would be useful to know the particular types and quantities of ceramics and automobile parts that are present in the deposit, whether the metal pieces are identifiable, and the approximate quantities of the different types of glass sherds.

Response: Scatter of modern and historic materials including modern cans, seven hole-in- top cans, two tobacco tins, two possible sardine cans ,three sun-purpled glass fragments, one white ceramic fragment with a maker's mark, one green and white ceramic fragment, a clear glass fragment with embossed mark, window pane glass, and a four-hole milk glass button. The auto mobile parts were three spark plugs. Most of the metal consisted of can fragments.

Site 54. EDAW indicates that this prehistoric lithic scatter has the potential to yield information important to lithic technology in the western Mojave Desert. The firm does not appear to cite any support for this assertion. Given that the lithic assemblage for the site only includes one core, one modified flake and 10 unmodified flakes, what does EDAW envision as the potentially significant information that the site may yield. Would you please provide a more explicit argument for the historical significance of the site and indicate what you feel are the pertinent historic themes and questions that data from the site has the potential to address, keeping in mind that the preliminary results of the geoarchaeology study appear to indicate a low likelihood of a subsurface component for the site.

Response: Given that, based on the geoarchaeological study, there is a low likelihood of a subsurface component, the site does not appear to contain sufficient information potential to meet the criteria for inclusion in the California Register of Historical Resources.

Site 59. EDAW indicates that these two prehistoric trail segments are not eligible for listing in the CRHR. Given that the trail segments may represent parts of an extensive prehistoric trail system that winds along the southern bases of the Tehachapi and Sierra Nevada Mountains through prehistoric archaeological sites similar to the prehistoric component of CA-KER-2142/H (Site 40), which includes assemblages of ground and

chipped stone artifacts and partially buried fire features among two areas of apparently discolored anthropogenic sediments, how has EDAW come to the conclusion that the resource segments have no potential historical significance? Would you please provide a more explicit argument for your evaluation of these trail segments?

Response: Although Site 59 crosses CA-KER-2142/H, there is no clear association between the site and the trail. Most of the cultural materials at CA-KER-2142/H are located to the east, down slope of the trail. No associated cultural material was identified along Site 59 within the rest of the project area. While the route of the trail as a whole may be a potentially eligible resource, the segments within the project area have been heavily impacted by off-road vehicle activity and do not significantly contribute to the resource, beyond locational information.

Clarifications on Impact Assessments

BSPL-H-02. This site appears to be approximately 20 meters east of Neuralia Road. The AFC indicates that the natural gas pipeline would be built in the ROW for that road. Is the site far enough away from the road ROW to make site avoidance feasible during pipeline construction? If FPL can commit to avoiding the site during pipeline construction, one option for the regulatory disposition of the resource would be to assume it eligible for listing in the CRHR, rather than completing the formal evaluation of the resource, and conditioning pipeline construction with explicit avoidance measures. How would FPL like to proceed here?

Response: FPL plans to confine all disturbance associated with the pipeline to Neuralia Road and the road shoulder based on cultural resource and biological concerns. Site BSPL-H-02 is several meters east of the road shoulder and the road (see below – Neuralia Road is visible in the upper right portion of the photograph). FPL will commit to avoiding the site BSPL-H-02.

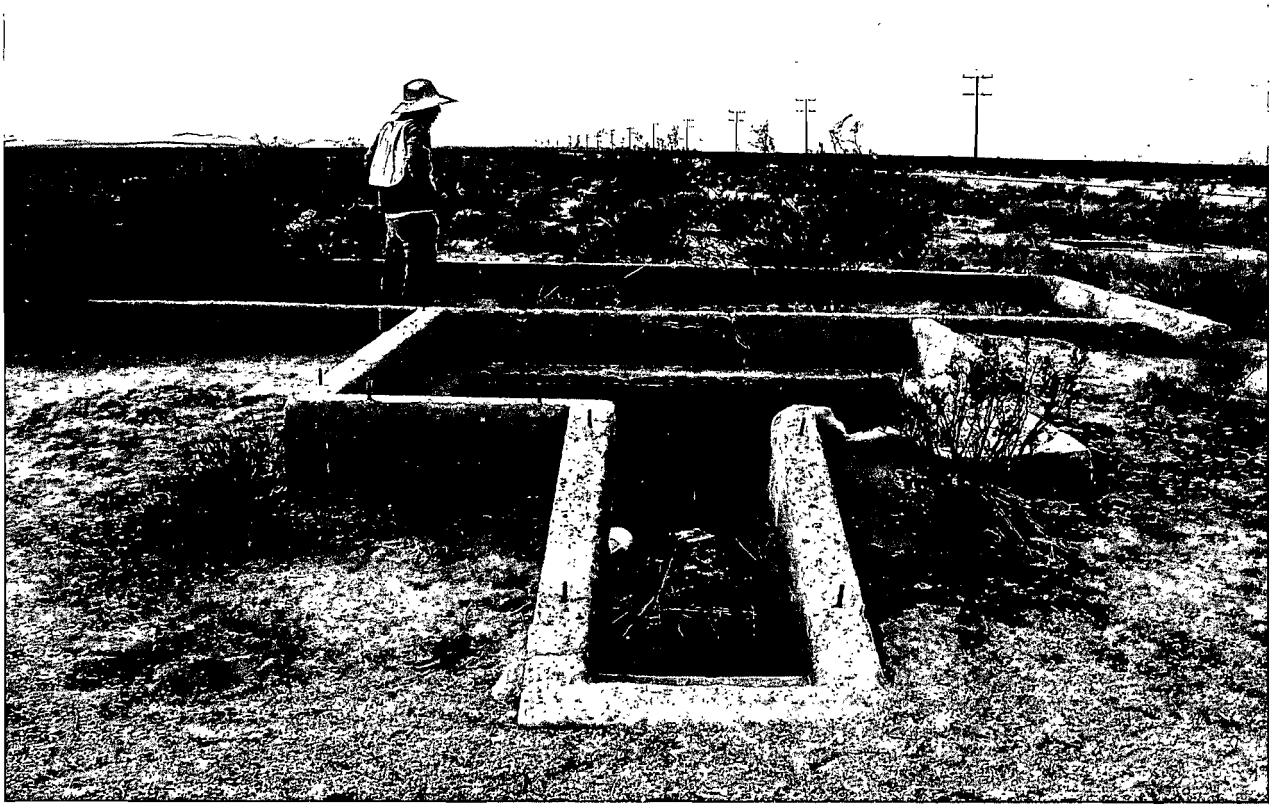
Site 6. This site appears to be roughly 100 meters to the west and north of electric transmission line option 1. Why does EDAW appear to envision the proposed project having a direct physical impact on it?

Response: EDAW does not have concerns that the project will affect the site. Based on concerns previously raised by CEC staff that the site was in the vicinity of a turn in the transmission line, the Site 6 was included in the impacts discussion.

Site 56. This site appears to be on the proposed alignment for electric transmission line option 1. Why does EDAW not envision the proposed project having a direct physical impact on it?

Response: You are correct that this site should be included in the impact discussion. Site 56 is a very low density lithic scatter that was recommended not eligible. FPL had

committed to avoiding the site prior to it being identified as not eligible. This apparently led to the error of it being omitted from the impact assessment. For the record, the Site 56 is recommended not eligible and although it may be directly impacted by the project there is no significant impact.



Site BSPL-H-02. View to the south.