



February 26, 2007

Beverly Bastion  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Wilson-Gregg Reconductoring Corridor for the Panoche Substation – Fresno County, California**

Dear Ms. Bastion:

This letter has been produced to satisfy the requirement stated in Data Request 65 of the Panoche AFC for a letter report detailing the cultural resources survey conducted in support of the Wilson-Gregg reconductoring corridor. This letter is prepared in supplement to information presented in the existing Panoche AFC.

**Summary**

In February, 2007, records searches and on-site survey were performed in support of the Wilson-Gregg line reconductoring of the Panoche AFC. The records search “study area” and survey methods complied with current CEC regulatory standards.

One cultural resource, the Wilson-Gregg line itself, was identified during survey. However, the line is not eligible for the National Register of Historic Places (NRHP) and does not qualify as a Historic Resource for the purposes of CEQA. Therefore, the proposed reconductoring will not impact the existing cultural resource base.

**Records Search**

A records search was conducted at the South San Joaquin Valley Information Center of the California Historical Resources Information System (CHRIS). The records search found one previous survey performed within the reconductoring corridor, and five performed within ¼ mile of the project corridor. No surveys had previously been outside of a ¼ mile radius but within a ½ mile radius of the proposed reconductoring corridor. No previously recorded resources were located within ½ mile of the reconductoring corridor.

A search of the Native American Heritage Commission’s Sacred Lands file has been requested, and results, at the time of this letter, are pending.

In addition to the CHRIS search, JRP Historical consultants consulted historic maps and air photos to determine the age of the Gregg Substation, the power line to be reconducted, and surrounding buildings.



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**Methods**

Pedestrian survey was performed on February 14, 2007 by Matthew Armstrong of URS. The power line route and a 50-foot buffer zone on either side (for a total 100-foot wide corridor) were surveyed in 5-meter transects. Ground visibility ranged between 35% and 100% for most of the route, but was as low as 20% in some locations. Where ground visibility was less than 35% due to vegetation, patches of ground-covering vegetation were scraped away at regular intervals to examine the ground surface.

JRP Historical Consultants performed on-site survey and examination of historic structures in the reconductoring corridor.

**Results**

No archaeological resources were located within the study area. The ground surface in the study area has been heavily disturbed by decades of agricultural activity. It is unlikely that the presence of vehicles used in reconductoring will have any impact upon the regional cultural resource base.

The Gregg Substation is less than 45 years old and therefore excluded from further consideration. The powerline itself was constructed some time between 1923 and 1946. However, it was not built during the pioneering days of electrical transmission in California; it was constructed using common methods and materials for its time (and still in use today) and does not reflect the work of a master; it is not associated with important people or events in local, state, or federal history; the transmission line and towers are not likely to provide information about history or engineering.

**Conclusions**

Though the Wilson-Gregg line is over 45 years old, it lacks any characteristics necessary to qualify it for the NRHP or to make it a historic resource for the purposes of CEQA. There are no other cultural resources in the study area. Therefore, modifications of the existing line for reconductoring is not anticipated to negatively impact the existing cultural resource base.

**Personnel Qualifications**

Matthew Armstrong holds an MA in Anthropology from the University of California, Santa Barbara, and a BA in Anthropology from the University of California, Santa Cruz. He has five years experience in cultural resource management, including one year with URS, two years as a cultural resources specialist at Vandenberg Air Force Base, and two years working with many environmental and cultural resource consulting firms. See attached Resume for further details.

Sincerely,  
**URS Corporation**

Matthew Armstrong, MA, RPA  
Archaeologist

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**Photographs**



Wilson-Gregg line as seen over existing orchard

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Wilson-Gregg Line passing through recently planted orchard