3.8 Cultural Resources

This section of the Final Environmental Impact Report describes the existing cultural resources setting within the Eagle Mountain Pumped Storage Project (Project) site and surrounding vicinity, and evaluates potential impacts to cultural resources that could occur from Project implementation. The Project site does not contain any structures, buildings, or other features that could constitute historic or prehistoric resources. The impact analysis is based upon field reconnaissance, consultation with the U.S. Bureau of Land Management (BLM), State Historic Preservation Office (SHPO), and Native American Heritage Commission, and review of pertinent documents as discussed within this section.

3.8.1 Regulatory Setting

The following federal, state, and local laws and policies apply to the protection of cultural resources. The proposed Project will be constructed and operated in conformance with all applicable federal, state, and local laws, ordinances, regulations, and standards (LORS).

Section 106 of the National Historic Preservation Act (NHPA) requires that every federal agency "take into account" how each of its undertakings could affect historic properties. *See* 16 U.S.C. § 470 (2000) *et.seq.* Historic properties are districts, sites, buildings, structures, traditional cultural properties, and objects significant in American history, architecture, engineering, and culture that are eligible for inclusion in the National Register of Historic Places (NRHP).

The Federal Energy Regulatory Commission (FERC) designated Eagle Crest Energy Company (ECE) as a non-federal representative for the purposes of conducting section 106 Consultation under the NHPA on September 18, 2008. Pursuant to Section 106, and as the FERC's designated non-federal representative, ECE consulted with the SHPO and affected Indian Tribes to locate, determine National Register eligibility, and assess potential adverse effects to historic properties associated with the Project.

The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 Federal Register 44738-39) specifies the qualifications for archeologists tasked with assessing the impacts to cultural resources. ECE has contracted with Dr. Jerry Schaefer, Ph.D., RPA of ASM Affiliates, Inc. (ASM), who has the required qualifications, to prepare the cultural resources analysis of the proposed Project.

A Historic Properties Management Plan (HPMP) was prepared, informed by the *Guidelines for the Development of Historic Properties Management Plans for FERC Hydroelectric Projects* (FERC May 20, 2002). ECE's Plan and Procedures for Addressing Unanticipated Discoveries of Cultural Resources and Human Remains (HPMP Appendix A) is consistent with the Advisory Council on Historic Preservation's Policy Statement Regarding Treatment of Human Remains and Grave Goods (September 27, 1988, Gallup, N.M.), California laws regarding the discovery of human remains (Health and Safety Code Section 7050.5: Disturbance of Human Remains;

8010-8011: California Native American Graves and Protection Act 8010-8011; Public Resources Code Sections 5097.94, 5097.98 and 5097.99), and the National Native American Graves and Protection Act of 1990 (25 U.S.C. 3001 et seq; 43 CFR 10). This HPMP is also consistent with federal procedures for obtaining required permits for archaeological excavation (Archaeological Resources Protection Act of 1979) (16 U.S.C. 470aa-470mm; Public Law 96-95).

3.8.2 Existing Conditions

The Project traverses the north-central margin of the Colorado Desert, centering on the Chuckwalla Valley and north-eastern Eagle Mountains. This region has a long cultural history extending back more than 10,000 years. The affiliation of a particular Native American group with the Chuckwalla Valley is somewhat uncertain (Heizer, 1978); ethnographic and historic evidence suggests possible links with three distinct groups: the Halchidhoma, Desert Cahuilla, and Chemehuevi. Since the Euro-American occupation of the region, the cultural landscape has been altered by a variety of land uses relating to travel, settlement, mining, water reclamation, and military preparedness. A thorough description of the environmental and cultural context is presented in Section 12.11.

3.8.2.1 Results of Inventories

A search of cultural resource records at the Eastern Information Center (EIC) was performed on March 9, 2009, supplemented by previous similar reports available at ASM Affiliates. The search identified 26 previous reports that had addressed portions of the study corridor, of which nine are mapped as including a portion of the Project area proper and therefore within the Project Area of Potential Effects (APE) boundary. A total of 31 cultural resources had been recorded within the study corridor; of these only two in part fall within the Project APE boundary: an underground portion of site P-33-011265, the Colorado River Aqueduct (CRA), will be crossed by both the transmission line and water pipeline. The transmission line also crosses the Eagle Mountain Railroad. The Central Project Area, where the major elements of the Project (reservoirs, powerhouse, switchyard, etc.) occur, is within the Eagle Mountain Mine area, recorded as P-33-006913.

3.8.2.1.1 *Previous Reports*

As noted, 26 reports addressing portions of the study corridor have been identified (Table 3.8-1). Of these, just 35 percent addressed the Project APE proper. The study corridor (including the 1 mile buffer around the Project area proper) amounts to approximately 49,833 acres. Because many of the previous reports have addressed small linear corridors or irregularly shaped areas, it is not possible to estimate precisely how much of either the Project area proper or the larger study corridor has previously been systematically inventoried for cultural resources. Based upon inspection of the coverage maps, it appears that the portion of the actual Project area that has been systematically inventoried previous to this project-specific Class I and III investigation is unlikely to have exceeded 10 percent, with the smallest portions being the linear elements of the transmission line and water line. Larger contiguous areas within and around the Eagle Mountain Mine (4,656 acres) and townsite (404 acres) near the northern terminus of the transmission line

and the reservoir sites (central and eastern mine pits) have been surveyed (Bull et al., 1991; Schmidt, 1995). A much smaller portion of the larger study corridor has been investigated.

Previous studies likely to have addressed significant portions of the area within the Project boundary include Cowan and Wallof (1977; RI-00220), Wallof and Cowan (1977; RI-00222), Carrico et al. (1982; RI-00221), Bull et al. (1991; RI-03321), Love (1994; RI-03949), and Schaefer (2003):

- Cowan and Wallof (1977) and Wallof and Cowan (1977) reported a 1976 archaeological survey of 200 linear miles for the earliest alternative routes of the Southern California Edison Devers-Palo Verde No. 1 (DPV1) 500 kilovolt (kV) Transmission Line, both north and south of Interstate 10 (I-10). The northern route bisects both the transmission and water line routes although no sites were recorded at the EIC within the Project area proper. The 1976 survey corridor was 400-feet-wide and was surveyed intensively, in 12-meter (m) interval transects. However, standards for recording sites were relatively restrictive: resources classified as isolates included lithic scatters with less than 15 items per 10 m^2; ceramic scatters with less than five items per 10 m^2; prehistoric trails, rock rings, and other isolated features; and historic remains except for pre-1950 scatters with more than 10 items per 10 m^2, structures, military encampments, and mine buildings. Most of these would be classified as sites under today's standards. These "isolates" were not recorded by Cowan and Wallof at the EIC and only appear as tabular listings in their report. Some may have been recorded during subsequent surveys along the same corridor.
- Carrico et al. (1982) reported a 1980 survey of the same alignment as the 1976 DPV1 500 kV Transmission Line survey. The 1980 survey also included a corridor that was 400 feet wide and was surveyed at 12-meter intervals. Criteria for distinguishing sites from isolates were less restrictive than in the 1976 study: isolates were defined as five or fewer prehistoric or historic artifacts within a distance of 25 meters. Most of the recorded sites were south of I-10 and outside the Project area. This route was ultimately built but the sites were evaluated in the field prior to construction and as a result, these sites no longer exist.
- Schaefer (2003) reported a Class I and II study for 527 linear miles of alternative routes for the Desert-Southwest transmission line, including 16.5 miles of new surveys. The alignments addressed were generally the same as those previously addressed in the reports by Cowan and Wallof (1977), Wallof and Cowan (1977), and Carrico et al. (1982). Additional fieldwork in 2002 consisted of surveying 16.5 miles of generally 1-mile long, 150-meter (500-foot) wide sample units with transects at 20-meters (65-feet) intervals. The survey corroborated the Carrico et al. survey results and identified the Alligator Rock NRHP site complex as the only known sensitive zone near the current Project area.

- Bull, et al. (1991) reported a 1990 survey of 4,659 acres for the previously proposed solid waste landfill project. This survey overlaps much of the northern extent of the proposed transmission line and portions of the site plan at the former Eagle Mountain Mine, including the Eagle Mountain Railroad route. This area is generally characterized by relatively rugged terrain, and the 1990 survey coverage in this area was not systematic, but was focused on ridgelines, saddles, and drainages. Scatters of more than three items within a 25-meter radius were classified as sites although none were recorded in the current Project area. Their conclusion was that the area possessed low sensitivity for archaeological sites. The Bull et al. investigations included ethnographic interviews by subconsultant Cultural Systems Research, Inc. (CSRI), under the direction of Lowell J. Bean, Sylvia Brakke Vane, and Jackson Young. These ethnographic investigations included field visits and interviews with one Cahuilla, one Chemehuevi, and two Mohave consultants, as well as phone interviews with other groups and an ethnohistoric literature review. Both the Chemehuevi and Cahuilla Elders recounted knowledge of hunting activities in the Eagle Mountains but no groups attributed sacred sites or special spiritual or cultural significance to the area. Opposition to the solid waste landfill project was noted, however, for environmental reasons. CSRI's conclusion was that the Project posed no impacts to traditional cultural or sacred values.
- Love conducted Class I literature reviews and reconnaissance level surveys for a similar (in part) transmission line route (1993) and water pipeline (1994) as the present project for the previous proposal for the Eagle Mountain Pumped Storage Project. The study area was visually inspected by driving on existing roads and doing on-foot spot checks. Unlike the present proposed transmission line corridor, the earlier proposed route paralleled the eastern side of Eagle Mountain Road and veered northeast at the Metropolitan Water District of Southern California (MWD), Eagle Mountain Pumping Plant holding pond. The literature reviews included inspection of 1850s Government Land Office (GLO) maps and surveyor notes and Riverside County Historical Division archives that informed the present study. The only identifiable resource on the 1857 GLO maps within the current Project is "Brown's (Wagon) Road" which crosses the southern portion of Eagle Mountain Road. Love also conducted in-field visits with Cahuilla elder and former tribal historian, Anthony Andreas, Jr. He specifically identified the east-west trail segments as particularly important evidence of the cultural interaction between the Cahuilla and the Mohave (Love, 1993:11). Otherwise, Love predicted that both the general areas of the current transmission line and water line routes would possess low sensitivity for cultural resources.

The field portion of a Class III Inventory of all Project elements outside the privately owned Kaiser property has recently been completed under a BLM Fieldwork Authorization.

Table 3.8-1. Previous Cultural Resource Studies in or near the Eagle Mountain Pumped Storage Project Transmission Line Project Area

Note: Asterisks indicate reports that are mapped as specifically addressing portions of the present Project area proper.

Report No. RI-	Title	Author(s)	Year	Survey (acres)
RI-00099	Archaeological Survey of Proposed County Dump 4 1/2 Miles North of Desert Center.	McWilliams, S.R.	1973	160
RI-00220*	Interim Report-Fieldwork and Data Analysis: Cultural Resource Survey of the Proposed Southern California Edison Palo Verde-Devers 500 Kv Power Transmission Line	Cowan, Richard; Kurt Wallof	1977	0
RI-00221	Cultural Resource Inventory and National Register Assessment of the Southern California Edison Palo Verde to Devers Transmission Line Corridor (California Portion)	Carrico, R.; D. Quillen, D. Gallegos	1982	6120
RI-00222	Final Report: Cultural Resource Survey of the Proposed Southern California Edison Palo Verde-Devers 500kv Power Transmission Line	Wallof, Kurt; Richard Cowan	1977	0
RI-00498*	An Archaeological Assessment of a Portion of the Se 1/4 of Section 36, T3s, R14e, SBBM, Near Eagle Mountain, Riverside County, California	Swenson, James	1978	150
RI-00672	Addendum Phase I Archaeological Survey Report for Proposed Berm and Channel West of Desert Center, Riverside County, California, 11-RIV-10, PM 104.7	McManus, James	1980	0.4
RI-00673	Historic Property Survey Report: 11-RIV-10, 104.7, 11209-192511 (Construct Berm and Channel)	Salazar, Lucian	1980	0.4
RI-00674	Archaeology Phase I Survey Report: Proposed Berm and Channel at 11-RIV-10, PM 104.7, Desert Center, 11209-192511	Oxendine, Joan	1979	3.7
RI-00813	Eastern Riverside County Geothermal Temperature Gradient Holes	Bureau of Land Management	1980	0
RI-00982	An Archaeological Survey of Geothermal Drilling Sites In Riverside County	Crew, Harvey	1980	0
RI-01654	An Archaeological Assessment for TPM 18983, Parcel No. 808-083-004	Bowles, Larry	1983	915
RI-01855	Cultural Resources Literature Search, Records Check and Sample Field Survey for the California Portion of the Celeron/ All American Pipeline Project	Weil, Edward; Jill Weisbord; E.Blakeley	1984	172.97
RI-02210	Preliminary Cultural Resources Survey Report for the US Telecom Fiber Optic Cable Project, from San Timoteo Canyon to Socorro, Texas: The California Segment	Underwood, J.; J. Cleland; C Woods; R. Apple	1986	0
RI-02285*	Letter Report: Proposed Land Exchange with the Nature Conservancy	Mitchell, Mike	1988	110

Report No. RI-	Title	Author(s)	Year	Survey (acres)
RI-03151	Letter Report: CA066-9NO-1, Hindley Mining Test Units, CAMC238008	Broeker, Gale	1991	14
RI-03321*	Cultural Resource Survey of the Eagle Mountain Mine and the Kaiser Railroad, Cultural Resource Permit #CA881916	Bull, C.; S. Wade; M. Davis	1991	4659
RI-03648	Negative Archaeological Survey Report, Desert Center Maintenance Station	Laylander, Don	1993	2
RI-03914*	Cultural Resource Investigation of Eagle Mountain townsite	Schmidt, James	1995	404
RI-03948*	Cultural Resources Reconnaissance: Eagle Mountain Pumped Storage Transmission Corridor, Riverside County, California	Love, Bruce	1993	0
RI-03949*	Addendum Cultural Resources Reconnaissance: Eagle Mountain Pumped Storage Transmission Corridor, Riverside County	Love, Bruce	1994	0
RI-04152	Letter Report: Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility CM 826-02, 1083 Washington Street, City and County of Riverside, California	McLean, Deborah	1998	0.25
RI-04452*	Cultural Resources Reconnaissance, Eagle Mountain Pumped Storage Transmission Corridor, Riverside County, California	Love, Bruce	1993	0
RI-04570	Cultural Resources Survey and Assessment of a Cellular Phone Tower Site and Associated Access Road and the Results of Test Excavations at Historic Archaeology Site CA-RIV-6513H In Desert Center, Riverside County, California	DeBarros, Philip	2000	0.25
RI-05245	Negative Archaeological Survey Report: Southern California Edison Company, Blythe-Eagle Mountain 161 kV Deteriorated Pole Replacement Project	Schmidt, James	2005	0
RI-05272*	Cultural Resources Survey and Assessment of Approximately 40 Acres: Fraternal Order of Eagles# 4455 Kaiser Road Project, North of Desert Center, Riverside County, California	Robinson, Mark	2003	40
RI-06707	Cultural Resources Surveys of Alternative Routes Within California for the Proposed Devers-Palo Verde 2 Transmission Project	McDougall, D; J. George; S. Goldberg	2006	1243
RI-07790	A Class II Cultural Resources Assessment for the Desert-Southwest Transmission Line, Colorado Desert, Riverside and Imperial Counties, California	Schaefer, Jerry	2003	600

3.8.2.1.2 *Previously Recorded Cultural Resources*

Records from EIC document the presence of 31 previously recorded cultural resources within the study corridor (Table 3.8-2). About 50 percent (n = 15) of the recorded resources in the study

area are prehistoric, and 50 percent (*n* = 16) are historic in age. The majority of the recorded resources are comparatively minor. Some 18 percent (*n* = 5) are isolated finds, including three prehistoric lithics, one milling stone, and one historic ceramic mug. Many other sites consist of small prehistoric lithic scatters, a pot drop, possible rock rings and cleared circles, and bedrock milling. However, potentially more significant resources are also present in the surrounding study corridor, consisting of several portions of a major east-west trail network with associated features. Significant historic sites in the study region include two stick figure petroglyphs associated with an early wagon road; a possible cenotaph (a monument erected in honor of a person whose remains are interred elsewhere) associated with "Desert Steve" Ragsdale; three historic sites associated with Camp Young/Desert Center and the World War II-era Desert Training Center/California-Arizona Maneuver Area (DTC/CAMA); a historic well; and the Eagle Mountain Mine and townsite, including the Eagle Mountain Mine Radio Control Tower; the CRA; and the Metropolitan Water District's Eagle Mountain Pumping Plant. Less significant historic sites include remains of a blacktopped road and various historic post-World War II trash scatters. The vast majority of the sites is located either north or south of the I-10 corridor and outside the proposed Project boundary, and therefore will not be affected by the proposed Project.

Table 3.8-2. Previously Recorded Cultural Resources in or near the Eagle Mountain Pumped Storage Project Transmission Line Project Area

Site		Within APE	Description
P-33-	CA-RIV-		
000072	72	No	Prehistoric trail, 13 rock cairns, ceramics at one cairn, part of major e-w trail network recorded by Johnston and Johnston 1957
000187	187	No	Historic Gruendike Well, Cram Brothers cattle trough, scant residence, school, gas station remains, unconfirmed (prehistoric) camp site related to Johnston's e-w trail
001173	1173	No	Historic petroglyphs of two anthropomorphs on north tip of Alligator Rock, associated with e-w trail, San Pasqual Well, and historic Frink's Cutoff alternative to the Bradshaw Trail
002735	2735	No	Prehistoric rock circle, flake and milling stone scatter (temporary camp)
002736	2736	No	Prehistoric trail, bedrock milling
002737	2737	No	Prehistoric chipping station associated with Alligator Rock quarry
002738	2738	No	Prehistoric lithic core fragments associated with Alligator Rock quarry
003108	3108	No	Prehistoric chipping station associated with Alligator Rock quarry
003109	3109	No	Prehistoric flake scatter associated with Alligator Rock quarry
006836		No	Historic Desert Center Army Air Field
006418		No	Prehistoric isolated milling stone
006913		Yes	Historic Eagle Mountain Mine and townsite
006914		No	Historic Eagle Mountain Pumping Station of the Colorado River Aqueduct
008392	6123H	No	Historic 1920s surveyors camp from the Colorado River Aqueduct surveys including hearth and artifacts; later 1969 claim marker

Site		Within APE	Description
P-33-	CA-RIV-		
011265	6726H	Yes	Historic Colorado River Aqueduct
012295	7019H	No	Historic mid-twentieth century trash pit, most removed during mechanical trenching
014207		No	Historic trash scatter, concrete cistern or well, dirt road, mid-nineteenth century
014181		No	Five (5) historic mine claim cairns and trash scatter
014182		No	Prehistoric isolated basalt flake
014194		No	Prehistoric isolated quartz flake
014195		No	Prehistoric isolated quartz flake
015097		No	Historic WWII-era DTC/CAMA tent pads, rock alignments, and trash
015098		No	Prehistoric cleared circle or rock ring (problematic)
015100		No	Prehistoric cleared circle or rock ring (problematic)
015106		No	Prehistoric ceramic “pot drop” of 12 buff ware sherds
015970		No	Prehistoric rock ring
015971		No	Historic WWII-era DTC/CAMA mortared rock alignment and clearings (hospital?)
015972		No	Historic blacktopped paved road
015973		No	Historic refuse dump associated with old gas station location
016946		No	Historic Eagle Mountain Mine radio control tower and storage structure
017343		No	Historic isolated ceramic mug

3.8.2.1.3 *Prehistoric Cultural Resources*

Prehistoric resource types represented in the sample include two (2) different segments of the same east-west trail; one (1) temporary camp; four (4) lithic scatters or chipping stations; one (1) rock ring; two (2) cleared circle features; one (1) ceramic pot drop; and four (4) isolated finds (Table 3.8-3).

Table 3.8-3. Previously Recorded Prehistoric Sites,[1] by Generalized Types (Primary Number P-33-)

Trail	Temporary Camp	Lithic Scatter/Chipping Station	Cleared Circle/Rock Ring	Ceramic Pot Drop	Isolates
000072	002735	002737	015098	015106	006418
002736		002738	015100		014182
		003108	015970		014194
		003108			014195

[1] None of these resources are located within the APE.

- Temporary camps are informally distinguished from artifact scatters by the greater diversity of artifact types, often with features. The one site of this type, P-33-002735, included a rock ring, lithics, and two portable milling slabs. Because temporary camps contain more complex patterns of prehistoric remains, they are more likely than simple scatters to be determined to constitute significant resources. This site is located in relative isolation to the south of I-10, but in the same general vicinity of the majority of prehistoric lithic scatters and isolates of materials derived from Alligator Rock. This southern location would also make it associated with the general east-west travel route through the Chuckwalla Valley.
- The two trails, P-33-000072 and P-33-002736, are the previously recorded segments of the major east-west transit route through the Chuckwalla Valley. Much of this route has been traced by Johnston and Johnston (1957), extending west through the San Gorgonio Pass and east to the Colorado River. Numerous pot drops were recorded along the route. A separate branch that goes south through the Coachella Valley and east through Salt Creek Pass is better known as the Cocomaricopa Trail but McCarthy (1982) identifies the route through the Chuckwalla Valley by the same name. Both routes, it seems, were major prehistoric and ethnohistoric transportation corridors, recognized by archaeologists and Native American consultants alike as a significant element in the regional cultural history. Depending on their integrity and further research, they are likely to be eligible for the NRHP. The trail network appears to be south of the Project area and thus the Project poses no impact to any preserved remains.
- Four lithic scatter sites are located south of I-10 and contain the types of plutonic aplite associated with the North Chuckwalla Mountain Quarry National Register of Historic Places District around Alligator Rock. They are outside of the district boundaries and represent peripheral sites to the main lithic procurement area. They are not likely to be NRHP-eligible but in any event are not within the Project area.
- One rock ring and two cleared circles are located in the study corridor but not within the Project area. The two cleared circles are problematic and may result from deflation of natural ground rodent mounds rather than from cultural factors. If cultural, these type of features bear witness to temporary encampment.
- Prehistoric isolates consist of single artifacts in these cases. Three of the four isolates are stone flakes and one is a milling stone. None are located in the Project area but only within the study corridor. Normally, isolates are treated as categorically ineligible for the NRHP due to limited research values and do not require any further treatment or consideration.
- One ceramic pot drop, P-33-015106, is of the site type often associated with routes of travel. Although pot drops are generally considered not NRHP-eligible, recent advances in thermoluminescence dating and materials analysis suggest they have greater research value than previously thought. It is located near I-10 and therefore outside the Project area.

Except for the trail segments, the likelihood of special ethnic importance for contemporary Native Americans is not evident at any of the resources previously identified in the study corridor, and as suggested by previous Native American ethnographic work associated with the proposed Eagle Mountain Landfill project (Bull et al., 1991). Ongoing consultation with local Native American groups is required as a part of the Section 106 process that will occur as development of the Project progresses.

3.8.2.1.4 *Historic Cultural Resources*

Historic-period cultural resources that have previously been identified in the study corridor include a well and cattle trough complex, the CRA, and the Metropolitan Water District's Eagle Mountain Pumping Plant, a workers camp associated with the construction of the aqueduct, two sites with rock alignments and other features associated with the World War II DTC/CAMA, the Desert Center Army Air Base (now in part the formerly Riverside County-owned Desert Center Airport), the Eagle Mountain Mine and all facilities, the Eagle Mountain Mine Radio Control Tower, two mining sites associated with claims or prospectors camps, one paved road surface, three post-war trash deposits, and one isolate (Table 3.8-4). In large measure, evaluating the significance of such resources is likely to be based on archival background research used to determine whether the archaeological remains can be linked to interpretable historic contexts and whether they possess either significant research potential or historic preservation values. In some cases, surface collections or test excavations could be required if Project construction of operations activities will disturb or threaten the integrity of such sites.

Table 3.8-4. Previously Recorded Historic Sites, by Generalized Types (Primary Number P 33-)

Rock Art	Well, Cattle Trough, etc.	Colorado River Aqueduct	WWII Military	Mining	Road	Trash Deposit	Isolate
001173	000187	006914	006836	**006913**	015972	012295	017343
		008392	015097	014181		014207	
		011265	016971	016946		015973	

Note: Resources in bold are located at least partially within the APE.

- The Gruendike Well site, P-33-000187, is located on the U.S. Geological Survey (USGS) Corn Springs 7.5-minute map southeast of the Desert Center Airport and was recorded in 1978 based on an interview with the son of Steve Ragsdale who was the original resident in 1915. Remains of an old school, cattle trough, and gas station complex were said to exist but integrity was noted as very poor. These are all located outside the Project APE.
- One of the historic road segments, P-33-015972, is located south of the Project APE, parallel to I-10. The historic Brown's Wagon Road route crosses one transmission line alternative that was considered but rejected, but is not in the Project APE. It is only known from GLO maps and has not been officially recorded. An alternative to the Bradshaw Trail route known as Frink's Cutoff Alternative is associated with a historic petroglyph site at the northern tip of Alligator Ridge, P-33-000173. This is also located outside the Project APE.

- Military features and deposits in the study corridor relate to the World War II DTC/CAMA (P-33-015097 and P-33–016971). Most of the residential or cantonment facilities are concentrated around I-10 but are known to extend over a large area. Bischoff (2000) suggests that the rock-lined walkways on the east side of Eagle Mountain Road near the southern extent along a pipeline road may remain from the evacuation hospital and not Camp Desert Center proper. E Clampus Vitus and the BLM are about to recognize this general area as such. Some alignments and clearings have been previously recorded in 2007 as P-33-016971, extending across Eagle Mountain Road and may be specifically associated. In any case, the transmission line alignment will avoid this area. The Riverside County Historical Commission recognizes the Desert Training Center (DTC) in the vicinity of Desert Center as a Point of Historical Interest (Riv-022). Remains of the DTC Army Air Base were recorded in 1982 by a Riverside Historical Commission staffer as P-33-006836. The current airport utilizes the southern arm of what was a V-shaped landing strip, with the apex pointing east. Remains from World War II include concrete slabs from the link trainer building, headquarters building, flagpole stump, and officers' facilities. All of these are outside the Project APE.
- The proposed transmission line and water line will span a buried portion of the CRA, P-33-011265. This is the only previously recorded cultural resource that occurs directly within the Project APE, except for the mine proper. An aqueduct feature, the Metropolitan Water District's Eagle Mountain Pumping Plant (P-33-006914), is located 1 mile from the Project area proper and will not be subject to any direct impacts from the transmission line Project.
- The entire Eagle Mountain Mine and company town of Eagle Mountain was recorded by a Riverside Historical Commission staffer as P-33-006913 in 1982, shortly before the mine closed. A historical marker commemorates the early claims from the 1880s, L. S. Barnes' sale to the Southern Pacific Railroad in 1909, Kaiser Steel's acquisition in 1944, and the beginning of ore shipments to Fontana in 1948. Specific facilities that are mentioned include the iron ore mine with offices, mining equipment, railroad yard, residential community, stores, school, and playground that was constructed of discarded mining equipment. The site form, however, fails to identify the boundaries of the 57-acre site or specific feature locations, and neither does it constitute a full inventory that may be found in Schmidt (1995), although no site form updates were prepared. More recently, the radio control tower and storage structure was recorded in the central part of the mine (P-33-016946). Other mining-related sites, P-33-014181, are a group of late-dated mine claim cairns and associated trash. The Riverside County Historical Commission recognizes Eagle Mountain Iron Mine and the Desert Center Area as a Point of Historical Interest (Riv-041). The Project will avoid the townsite, and the transmission line will span the railroad.
- Three historic trash deposits have been recorded within the Project area proper (P-33-012295, P-33-014207, and P-33–015973). All of these deposits appear to date from the middle twentieth century and postdate the DTC/CAMA.

- One historic isolate, a ceramic mug, was recorded (P-33-017343). As is the case with prehistoric isolates, such resources are normally treated as categorically ineligible for the NRHP and do not require any further consideration or treatment.

3.8.2.1.5 *Newly Recorded Cultural Resources.*

The Class III intensive field survey documented only five historic sites (P-33-17643 through P-33-17647) and one historic isolate (P-33-17648) within the Project APE (*see* Section 12.12). All are located within the boundaries of the proposed Interconnection Collection Substation site. All of the historic sites are trash dumps containing, variously, domestic trash, tin cans, and building debris. Diagnostic tin can and other artifact attributes indicate all the sites date to the late 1940s, 1950s, and more recent decades, often with a mix of artifacts from several decades. These sites all appear to represent road-side trash deposition associated with the community of Desert Center. All post-date the World War II DTC/CAMA. The one historic isolate is a concrete post with an embossed "C." This type of monument was used to mark California highway rights-of-way margins during the period between 1914 and 1934. It is likely associated with Ragsdale Road or the precursors of I-10. All of these sites are evaluated as not eligible to the NRHP. Formal determinations of significance will be made by the BLM.

3.8.2.2 Native American Heritage Commission Results

On April 16, 2008, ASM mailed a Sacred Lands File records search request to the California Native American Heritage Commission (NAHC) and received a records search from the NAHC on April 30, 2009 stating search results were negative for sacred lands within the proposed Project area.

Twelve tribal groups or individuals were identified who may have knowledge of cultural resources in the Project area:

1. John A. James, Chairperson, Cabazon Band of Mission Indians (Cahuilla)
2. Joseph Hamilton, Chairman, Ramona Band of Cahuilla Mission Indians
3. Patricia Tuck, Tribal Historic Preservation Officer, Agua Caliente Band of Cahuilla Indians
4. Diana L. Chichuaha, Cultural Resources Coordinator, Torres-Martinez Band of Cahuilla Indians
5. Michael Contreras, Cultural Heritage Program Manager, Morongo Band of Cahuilla Indians (Cahuilla, Serrano)
6. Luther Salgado, Sr., Cahuilla Band of Indians
7. Ann Brierty, Policy/Cultural Resources Department, San Manuel Band of Mission Indians (Serrano)
8. Darrell Mike, Chairperson, Twenty-Nine Palms Band of Mission Indians (Chemehuevi)
9. Charles Wood, Chairperson, Chemehuevi Reservation
10. Joseph (Mike) R. Benitez (Chemehuevi)
11. Michael Tsosie, Cultural Contact, Colorado River Reservation (Mohave, Chemehuevi)

12. Linda Otero, Director, AhaMaKav Cultural Society, Fort Mojave Indian Tribe

3.8.2.3 Cultural Resources Consultation

FERC authorized ASM to conduct government-to-government consultation in order to gather information on any traditional use areas and places of traditional or cultural significance that may be affected by the proposed Project. GEI Consultants, Inc. (GEI) also participated in the initial consultation. This consultation was conducted under 18 CFR 380.12 and 18 CFR 380.14 of the National Environmental Policy Act as well as Executive Orders 13007 and 13175, and the FERC policy on consultation with Indian Tribes (Order No. 635). The following is a summary of the consultation results.

Contact with Native Americans that have traditional ties with the region in which the proposed Project is located began in September 2007 and will continue as needed throughout the duration of the proposed Project permitting and construction. On September 26, 2007, GEI mailed a Project notification letter to eight Tribes requesting input on the proposed Project Pre-Application Document (PAD) to:

1. Agua Caliente Band of Cahuilla Indians
2. Barona Band of Mission Indians
3. Cabazon Tribal Business Committee
4. Cahuilla Band of Mission Indians
5. Chemehuevi Tribal Council
6. Morongo Band of Mission Indians
7. Torres-Martinez Desert Cahuilla Indians
8. Twenty-Nine Palms Band of Mission Indians

Of these Tribes, one Tribe (Agua Caliente Band of Cahuilla Indians) requested a meeting to discuss the proposed Project, and one Tribe (Morongo Band of Mission Indians) confirmed an interest in the proposed Project area. On October 23, 2007, representatives from GEI and Ruettiger, Tonilli, and Associates met with Tribal Historic Preservation Officer (THPO) staff, Sean Milanovich, and tribal representative, Thomas Davis at the Agua Caliente Band tribal headquarters in Palm Springs, California to discuss the proposed Project and cultural resource concerns. At this meeting, Chairman Richard Milanovich requested that GEI hold a joint meeting and field visit with all Tribes contacted for the proposed Project. On March 7, 2008, GEI mailed a meeting and field visit invitation to the eight above-listed Tribes; however none of the Tribes responded to the invitation.

On June 16, 2008, GEI mailed a Notice of Draft License Application and request for comments to the eight above-listed Tribes. Of these Tribes, one Tribe (Agua Caliente Band of Cahuilla Indians) requested additional Project information. Mr. Sean Milanovich requested and received the Draft License Application Initial Statement Exhibits, A-G (Public Information); Draft License Application Exhibit E, Volume 2 (Privileged Information); and the Eagle Mountain Pumped Storage Project Class I Inventory Report and site records.

On August 29, 2008, Kurt Russo (Native American Land Conservancy) contacted GEI and requested to be placed on the consultation list for the proposed Project. On September 15, 2008, GEI mailed Mr. Russo the Draft License Application Initial Statement Exhibits, A-G (Public Information) and the Eagle Mountain Pumped Storage Project Class I Inventory Report, without the site records.

On July 1, 2009, Ann Miles (FERC) mailed a request for consultation on licensing to the two Tribes that initially indicated an interest in the proposed Project (Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians). ASM, on behalf of FERC, initiated government-to-government consultation with the following 10 Tribes:

1. Agua Caliente Band of Cahuilla Indians (Ms. Patricia Tuck, THPO)
2. Barona Band of Mission Indians
3. Cabazon Tribal Business Committee
4. Cahuilla Band of Mission Indians
5. Chemehuevi Tribal Council Morongo
6. Colorado River Indian Reservation
7. Fort Mojave Indian Tribe
8. Morongo Band of Mission Indians
9. Torres-Martinez Desert Cahuilla Indians
10. Twenty-Nine Palms Band of Mission Indians

All Tribes were mailed an initial consultation letter on September 10, 2009, and a copy of the proposed Project's HPMP on September 17, 2009. ASM contacted tribal representatives from all 10 Tribes by electronic mail and telephone calls to determine the need for further work. As of the date of this report, additional consultation concerning the proposed Eagle Mountain Pumped Storage Project has not been requested by any of the above listed Tribes; however the following requests have been documented, as shown below.

Based on a request for clarification from FERC another consultation letter was mailed on December 4, 2009 to the above listed Tribes with an updated map of the Project Area of Potential Effect (APE), including all elements within the Project boundaries. The letter also included a confidential map and discussion of recorded trail segments and projected trail routes in the Project vicinity, which was a response to one Tribal member about the location of trails in the Project area. The letter demonstrated that the previously recorded trail is located to the south of, and outside of, the APE. The most significant preserved segment, documented as CA-RIV-72, is located 5 miles west of the Project APE. The letter was followed by a telephone call starting on December 13 through 16, 2009 to determine if there were any tribal concerns involving sites or Traditional Cultural Properties (TCPs) in the Project APE.

At present, no TCPs have been identified in the Project APE by any Native American Tribes. The Augustine Band of Cahuilla Mission Indians has recommended Native American monitors during construction activities. The Cabazon Band of Mission Indians has recommended archaeological monitors during construction activities.

3.8.2.4 Historic Properties Management Plan

ECE prepared a draft HPMP in September 2009, which was submitted to the SHPO for comment. The SHPO replied (in a letter dated October 26, 2009) that the determination that the Eagle Mountain Mine and townsite were not eligible for the National Register was primarily based on the fact that in 1996 they were not yet 50 years old and would have had to been exceptional to so qualify. Today, however, they are over 50 years old and would not have to meet this higher level of eligibility. The SHPO concluded that the HPMP, as it presently exists for what is currently known about the cultural resources within the APE, is reasonable for taking effects on historic properties by the undertaking into account.

The HPMP was revised in December 2009 to include plans to address any TCPs should any be identified. The HPMP also includes provision for a new inventory and evaluation after the Project has been approved and prior to any construction, concurrent with final engineering design. The SHPO was consulted regarding the revised HPMP, and in a letter dated December 22, 2009 stated that they did not object to how the APE was defined, that they look forward to having the opportunity to review and comment on the adequacy of ECE's efforts to identify historic properties once that information has been completely gathered and assembled, that they were pleased ECE provided for the National Register reevaluation of the Eagle Mountain Mine and townsite and they concur that such a study should consider whether the mine and townsite constitutes an historic district eligible for the NRHP.

The SHPO also stated that they do not object to ECE assuming eligibility of the CRA for the National Register for the purposes of the undertaking, and that the HPMP appears to be reasonable given what is currently known about the potential for the undertaking to effect historic properties. Once identification and evaluation are complete and effects are fully known, amendment to the HPMP may be warranted. ECE will continue consultation with the SHPO throughout the development of the Project.

The HPMP provides Project background information, identifies previously recorded cultural resources in the APE, outlines Project management and preservation goals and priorities, presents the very limited foreseeable Project effects and mitigation/management measures, and provides a schedule for implementing the stipulated activities. The HPMP should be considered a dynamic and updatable document. The HPMP will be used by ECE staff to ensure that the management goals are achieved with regard to the preservation or appropriate treatment of historic resources. It gives explicit guidance to ECE staff on how to accomplish the goals. ECE's Project Environmental Coordinator is responsible for implementing the HPMP. The focus of the HPMP is on the discovery plan and worker environmental awareness training because no historic properties are identified within the APE except for a buried portion of the CRA that will be easily avoided. A worker environmental awareness program is a standard operating procedure for large projects in California, and will consist of worker training related to both cultural resources and biological resources (described in more detail in Section 3.5 of the Final EIR).

3.8.3 Potential Environmental Impacts

3.8.3.1 Methodology

A Class I cultural resources inventory was conducted on the entire Project site. The report of this inventory is included in Section 12.11. The Class I study involved requesting information on previously identified cultural resources and studies on record at the EIC at University of California Riverside, and with the California NAHC in Sacramento. Two areas were considered: the provisional "Project area proper" plotted by geographic information system (GIS) mapping as a route extending outward from the Project boundary, varying in width from about 400 to 800 feet; and a broader study corridor extending out 1 mile on each side of the Project area proper. The Project boundary, as defined in ECE's Final License Application Exhibit G, constitutes the APE for the purposes of regulations for compliance with Section 106 of the National Historic Preservation Act (36 CFR 800).

The data were used to assess:

- The extent of previous studies of cultural resources completed within the Project area proper and within the study corridor
- The number and character of previously recorded cultural resources within the Project area proper and within the study corridor
- The likelihood of additional cultural resources being present in portions of the study corridor that have not yet been systematically inventoried, and the probable character of such unidentified resources
- Any additional inventories, evaluation studies, and mitigation measures likely to be needed to treat cultural resources as the development of the Project advances

A comprehensive Class III inventory of the APE, including the transmission line right-of-way route, water pipeline route, three well locations, and interconnection collector substation were also conducted under a BLM Fieldwork Authorization and is included in Section 12.12. No significant cultural resources were identified within the Project boundaries during the surveys. However, it is the responsibility of FERC to make authoritative significance determinations and findings of effect.

In that regard, these reports were prepared to provide FERC, BLM, other regulatory authorities with data for compliance with Section 106 of the National Historic Preservation Act (16 U.S.C.470(f); 16 CFR 4.41; 64 CFR 26618.380.14). The Eagle Mountain Mine lands which are also part of the APE were not surveyed due to access limitations, but are considered to have low probability of containing significant cultural resources because of the magnitude of disturbance from historic mining activities that are well documented. The BLM, Agua Caliente Band of Cahuilla Indians, and the Morongo Band of Mission Indians made comments on cultural resources during the consultation process. These entities requested cultural resource surveys be conducted in the Project area. No special survey procedures were recommended, and survey procedures employed are standard methods for Class I and Class III surveys. The BLM advised

ECE on the status of previous cultural resource surveys that have been done in the general area of the Project.

3.8.3.2 Thresholds of Significance

The State Water Resources Control Board concludes that the Project may have significant impacts on aesthetics and visual resources if it does any of the following:

(a) Cause a substantial adverse change in the significance of a historical resource defined in §15064.5

(b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5

(c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature

(d) Disturb any human remains, including those interred outside of formal cemeteries

3.8.3.3 Environmental Impact Assessment

The small number of cultural resources previously recorded within the study corridor indicates the low general archaeological sensitivity of the area and the unlikely presence of additional resources that may be eligible for the NRHP within the Project boundary. This conclusion has been confirmed by the results of the Class III survey of the Project transmission line, interconnection substation site, water line, and water wells. The reasons include lack of permanent or seasonal water sources or stable food sources to sustain either residential or temporary camps, lack of lithic resources on the spotty desert pavements within the Project area (with Alligator Rock to the south and well outside the Project APE being the main local lithic tool stone source), location of the Project to the north of the documented archaeological remains of the major east-west trail through the Chuckwalla Valley, deliberate efforts in Project planning to avoid known World War II training areas, and previous impacts to the integrity of old land surfaces from alluvial stream channels and historic era activities.

3.8.3.3.1 *Prehistoric Cultural Resources*

The major east-west trail through the Chuckwalla Valley is documented to occur around the southern periphery, but outside of, the Project APE. The trail was first documented by Johnston and Johnston (1957:24) in 1953 and recorded as CA-RIV-72 at the EIC by the Johnstons. It was described as a 1-mile long segment of trail located several miles west of Desert Center and a short distance north of U.S. Highway 60-70 (now I-10). The most notable aspect of the trail was an alignment of 13 large rock cairns, each from 1 to 3 feet in height. Potsherds were also found along the trail, one of which was Tizon Brown Ware, indicating use of the trail by Native Americans whose travels probably brought them through upland mountainous areas. Johnston and Johnston could not trace the trail further east but hypothesized that it probably followed a course towards Gruendike Well (near the Desert Center Airport), and then on to Sidewinder Well further east.

They also surmised that this was a branch of the much larger trail, CA-RIV-53T, that extended for 150 miles all the way from the San Bernardino Valley through the San Gorgonio Pass, over to Thousand Palms, south to La Quinta, and then east to Pinkhan Well, Cottonwood Spring, along the north side of Hayfield Lake, and then past Desert Center through the Chuckwalla Valley to the Colorado River. A southern branch of this same trail system passed along the south side of Hayfield Lake to Aztec Well and Corn Spring and then north to Sidewinder Well. The Johnstons were able to record seven short segments of the entire trail and then projected the remainder. One such segment is CA-RIV-72.

Daniel McCarthy relocated CA-RIV-72 in 1981, establishing the location with greater certainty on a 15-foot USGS quadrangle and mapping the location of not 13 but 14 cairns. He remarked that beyond the portion he could map, the trail appears to be disturbed by tank tracks and active erosion and "seems to be heading toward the north flanks of the Chuckwalla Mountains near the intersection of I-10 and Eagle Mountain Road" (EIC, Department of Parks and Recreation [DPR] Form, 1981). Two other recorded trail segments, CA-RIV-1173 and -2736, although historic, appear to support this course. Later, McCarthy (1982) proposed that this network was the famous Cocomaricopa Trail, although most scholars identify that trail as the precursor of the historic Bradshaw Trail which proceeded south of CA-RIV-53 at Whitewater to Palm Springs, then across the Coachella Valley to Dos Palmas Oasis and then east through the Salt Creek Pass. Such a route was preferred because the distances between water sources would have been shorter than a more direct easterly route through the Chuckwalla Valley. Nevertheless, enough scant evidence remains to posit another important Native American trail network through the Chuckwalla Valley, past Desert Center, and on to the Colorado River.

In their study of traditional cultural properties along the Devers-Palo Verde Transmission Line, based on ethnographic information and interviews with tribal elders, Bean and Vane (1995) do not specifically mention CA-RIV-72 but they list CA-RIV-53 as a resource requiring further research. They emphasize that many trails were integral to "both traditional and current Native American life" (Bean and Vane, 1995: Chapter 7:13). The larger trails especially had not only utilitarian economic functions, but were used for war, peace parties, transfer of sacred goods, and shamanic purposes. Those most used trails, especially when associated with rock art, were thought to have sentient qualities like living things.

The documented portion of CA-RIV-72 with its numerous rock cairns may be included in this category; whereas such isolates are treated as categorically ineligible for the NRHP due to limited research values and do not require any further treatment or consideration. Therefore, its location almost 5 miles west of the Project area would ensure it will not be affected by the proposed Project.

3.8.3.3.2 *Historic Cultural Resources*

Based on the records search and a recent intensive pedestrian survey of the project APE, only one resource is likely eligible for listing in the NRHP (Table 3.8-5). That is the CRA (P-33-006726). It occurs as a deeply buried massive underground pipeline where the

transmission line and waterlines cross the aqueduct route. It is virtually invisible on the surface except for a road and earthen berm.

Table 3.8-5. Recorded Cultural Resources within the Eagle Mountain Pumped Storage Project Boundary

Primary Number	Resource	Date	NRHP Eligibility Recommendation
P-33-006726	Colorado River Aqueduct	1931-present	Recommended eligible
P-33-006913	Eagle Mountain Mine and townsite	1947-1983	Determined not eligible
P-33-017643	Trash dump	1940s-1950s	Recommended not eligible
P-33-017644	Trash dump	1940s-1950s	Recommended not eligible
P-33-017645	Trash dump	1940s-1950s	Recommended not eligible
P-33-017646	Trash dump	1940s-1950s	Recommended not eligible
P-33-017647	Trash dump	1940s-1950s	Recommended not eligible
P-33-017648	Isolate highway marker	1914-1934	Recommended not eligible

Kaiser's developments of Eagle Mountain Mine are partly located within the area of the proposed Project reservoirs. A small portion of the western margin of the Eagle Mountain townsite appears to be located within the Project APE, principally in the vicinity of the desalination area and pipeline. Both the mine and townsite are recorded as P-33-006913. In a previous consultation, the BLM and SHPO concurred that they are not eligible for listing in the NRHP (Letter from Cherilyn Widell to Henri R. Bisson, District Manager, BLM California Desert District, Dec. 12, 1996). The bed of the Eagle Mountain Railroad through the Project area has not been officially recorded or evaluated but is part of the mine and townsite complex. Only the bed and ballast remain as the steel rails and ties have been removed. There are plans to reuse the rail bed and restore the rail line for the proposed Eagle Mountain Landfill project.

Based upon consultation on the status of the Eagle Mountain Mine and townsite, the SHPO requested that it be re-evaluated because at the time of the original 1996 determination and SHPO consultation, the site was less than 50 years old. The SHPO explains "Today they are now 50 years old and would not have to meet this higher level of eligibility. The HPMP should provide for consideration of such an evaluation if these properties could be adversely affected by the undertaking" (Donaldson, 2009). Given that a portion of the townsite, mine, and railroad are located within the Project APE but that the private property in question is not currently open to investigation, provisions are provided for a new inventory and evaluation after the Project has been approved, and prior to any construction, concurrent with final engineering design.

Environmental Impact Assessment Summary:

(a) *Would the project cause a substantial adverse change in the significance of a historical resource defined in §15064.5?* No. Mitigation measures will minimize adverse changes in historical resources. Historic sites related to the World War II DTC/CAMA are more likely to occur within the study corridor (which extends out 1 mile on each side of the Project area proper). Although visible, based on the distance from the DTC/CAMA, the substation and

transmission line route should not result in significant impacts to cultural resources related to the DTC/CAMA. The transmission and water pipelines cross over buried portions of the CRA, which is very likely eligible for the NRHP based on its historical and engineering significance. Impacts to materials, feeling, setting, and association are therefore expected to be potentially significant. However, implementation of mitigation measures would reduce these effects to less than significant levels. The Eagle Mountain Mine and townsite (and railroad) are over 50 years old and may be NRHP-eligible. Therefore mitigation measures would require inventory and evaluation of the site, and data recovery or alternative mitigation as appropriate.

(b) *Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?* No. The only substantial prehistoric and historic sites identified in either the Class I inventory or Class III survey within the study corridor are located outside of the Project boundaries or APE.

(c) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?* No paleontological resources or unique geologic features have been identified in the Project APE.

(d) *Would the project disturb any human remains, including those interred outside of formal cemeteries?* No human remains are known to be present in the APE. In the event that any unknown human remains are discovered during Project construction, the on-site Project manager will notify the Riverside County Coroner's Bureau within 24 hours under California law (California Health and Safety Code § 7050.5) and all activities in the immediate area of the find shall cease until appropriate and lawful measures have been taken. If the Coroner determines that the remains are Native American, the NAHC shall also be contacted (California Public Resources Code § 5097.98). In accordance with Section 5097.98 of the *California Public Resources Code*, the NAHC shall designate a Most Likely Descendent, who may make recommendations concerning the disposition of the remains in consultation with Riverside County and the Project Archaeologist.

Impact 3.8-1 Transmission Line Route from the Crossing of the CRA to the Interconnector Substation. This impact is considered *potentially significant and subject to the mitigation program*. Construction of the substation and transmission lines will not result in significant impacts on cultural resources related to the World War II DTC/CAMA. Historic sites are more likely to occur within the study corridor (which extends out 1 mile on each side of the Project area proper). The most sensitive would be the remains of Camp Desert Center and the evacuation hospital at the southern end of Eagle Mountain Road. The transmission line route comes no closer than 0.25 miles north of the closest recorded DTC/CAMA site and the Interconnection Collector Substation is located 2 miles to the north and east, respectively, of the known DTC/CAMA features. Although visible, based on the distance from the DTC/CAMA, the substation and transmission line route should not result in significant impacts to cultural resources related to the DTC/CAMA with implementation of several mitigation measures which are intended to ensure potential impacts are minimized (MM CR-3 through MM CR-11).

Impact 3.8-2 Transmission Line and Water Pipeline Crossing of the CRA. This impact is considered *potentially significant and subject to the mitigation program*. The transmission and water pipelines cross over buried portions of the CRA, which is very likely eligible for the NRHP based on its historical and engineering significance. The CRA is not visible from the surface in this area, however, except for a road and flood control berm. Impacts to materials, feeling, setting, and association are therefore expected to be potentially significant. However, implementation of mitigation measures (MM CR-1, MM CR-3, MM CR-5, MM CR-6, MM CR-11) would reduce these effects to less than significant levels.

Impact 3.8-3 Transmission Line Crossing of the Eagle Mountain Railroad. This impact is considered *potentially significant and subject to the mitigation program*. The transmission line crosses over the Eagle Mountain Railroad in two places. A formal significance determination of the rail line remains to be undertaken by the BLM but there have been substantial previous impacts to its integrity and it is unlikely to be found NRHP-eligible. In relation to the proposed Eagle Mountain Landfill project and its related EIR, the BLM determined that the Eagle Mountain Mine and townsite are not NRHP-eligible and received SHPO concurrence. The railroad is likely to be similarly considered in that the landfill project includes reuse of the railroad. Therefore, the impact would be potentially significant; however, mitigation measures (MM CR-2 through MM CR-11) would reduce this impact to *less than significant* by requiring site inventory, worker education, implementation of an HPMP and other measures.

Impact 3.8-4 Central Project Area. This impact is *potentially significant and subject to the mitigation program.* Class III surveys have not been conducted on the Central Project Area because of a lack of access. Because of the large degree of disturbance on the site, it is unlikely that significant pre-historic cultural resources remaining on the site. However, there is the potential for historic resources. The SHPO commented that the previous determination that the Eagle Mountain Mine and townsite were not eligible for the National Register was primarily based on the fact that in 1996, they were not yet 50 years old and would have had to been of exceptional historical value to qualify. Today, they are over 50 years old and would not have to meet this higher level of eligibility. Therefore, these impacts would be potentially significant and mitigation measures (MM CR-2 through MM CR-11) would require inventory and evaluation of the site, and data recovery or alternative mitigation as appropriate.

Impact 3.8-5 Unknown/ Buried Cultural Resources. This impact is *potentially significant and subject to the mitigation program* (MM CR-2 through MM CR-11). The only substantial prehistoric and historic sites identified in either the Class I inventory or Class III survey within the study corridor are located outside of the Project boundaries or APE. The Project involves grading and excavation for several Project features. In the event that any unknown (remaining) cultural resources, including paleontological or archeological resources, are encountered during Project construction, all earthwork shall cease and a qualified paleontologist/archeologist shall be contacted to evaluate the nature and significance of any such discoveries. In the event that any unknown human remains are discovered during Project construction, the on-site Project manager will notify the Riverside County Coroner's Bureau within 24 hours under California law

(California Health and Safety Code § 7050.5) and all activities in the immediate area of the find shall cease until appropriate and lawful measures have been taken. If the Coroner determines that the remains are Native American, the NAHC shall also be contacted (California Public Resources Code § 5097.98). In accordance with Section 5097.98 of the *California Public Resources Code,* the NAHC shall designate a Most Likely Descendent, who may make recommendations concerning the disposition of the remains, in consultation with Riverside County and the Project Archaeologist.

3.8.4 Mitigation Program

Archaeological isolates or relatively small, simple sites make up the largest portion of the previously recorded cultural resources. Such resources as these will require minimal efforts to manage, in connection with the Project. Although several potentially more significant sites are present in the study corridor, none of similar type is expected in the project area proper based on the results of the Class I and Class III inventories. Some additional small sites may be identified when systematic inventory is undertaken in the Kaiser Mine property and when Native American consultation is completed. In that case, these resources will require further consideration.

The mitigation program includes project design features (PDFs) and mitigation measures (MMs). Project design features are design elements inherent to the Project that reduce or eliminate potential impacts. Mitigation measures are provided to reduce impacts from the proposed Project to below a level of significance, where applicable. As appropriate, performance standards built have been into mitigation measures.

As mentioned under Regulatory Setting, many protective measures are required by local, state, or federal regulations or laws that are independent of California Environmental Quality Act (CEQA) review, yet also serve to offset or prevent certain impacts. The proposed Project will be constructed and operated in conformance with all applicable federal, state, and local requirements.

MM CR-1. **Protect Known Historic Properties.** Of the cultural resources recorded within the Project boundaries (*see* Table 3.8-4), only the CRA (P-33-6726) is evaluated as potentially eligible for listing under Criterion "A" – broad patterns of history; and Criterion "C" – embodies distinctive characteristics of a type, period, region, or method of construction. No formal determination of eligibility has been made, but the CRA will be treated as potentially eligible.

Management Activity: Design transmission line and water pipes to avoid direct or indirect impacts to the buried portion of the CRA. Inspect once every 2 years to observe if conditions are stable or if any disturbance or deterioration has occurred.

The Licensee will design transmission tower locations, plan conductor installation procedures, and design water line placements to avoid impacts to this crucial element of southern California's water delivery infrastructure. Consultation with

the MWD will occur for that purpose. The CRA is buried in the areas of the Project Area of Potential Effect (APE) and no impacts to its integrity are anticipated.

- The inspections will be made at ground surface level as appropriate
- Digital photographs will be taken and compared with photographs from the previous inspections
- The Licensee (Project Environmental Coordinator or designee) will summarize observations made during inspections every 2 years during construction. This summary will be included in the HPMP Implementation Summary Report (HPMP Implementation Report). The Licensee will provide a HPMP Implementation Report on a 6-year review cycle after construction, in coordination with the State Historic Preservation Office (SHPO).
- Although none are presently identified, in the event that interested Indian Tribes identify TCPs in the future during the planning, construction, and/or operation of the Project within the APE, the Project Environmental Coordinator shall direct qualified individuals to conduct additional consultation with the Indian Tribes, BLM, and SHPO to evaluate and document the properties in accordance with National Register Bulletin 38 (Parker and King, 1998). If the properties are determined to be eligible for listing in the NRHP, appropriate measures will be taken to mitigate adverse effects through consultation with the Indian Tribes, BLM, and SHPO. Priority will be given to preservation in place when possible.

Implementation Steps for Performance :

- Inspect the CRA in the area of the APE every 2 years
- Provide a summary of observations on a 2-year cycle during the construction phase and a 6-year reporting cycle thereafter
- If notable changes are observed in site conditions consult with SHPO to determine if further remedial actions are appropriate
- Conduct appropriate consultation and treatment if TCP are identified in the future

MM CR-2. Inventory and Evaluate Cultural Resources Within the Kaiser Mine Property. An inventory of this portion of the APE will be undertaken in compliance with Section 106 of the National Historic Preservation Act and according to regulatory procedures provide in 36 CFR 800. The inventory will also include other accessible portions of the APE within the Kaiser property. The

entire townsite and associated portions of the railroad will be re-recorded, and the various elements will be considered as contributors to a National Register district.

Management Activity: A Work Plan will be developed and executed following issuance of the FERC license and upon gaining legal access to the subject lands. A phased approach will be taken in order to make prudent and well-informed decisions on Section 106 compliance within the Kaiser property. The first phase will be a scoping reconnaissance of the APE within the Kaiser property and the entirety of the Eagle Mountain townsite. Portions of the site have been re-used from 1988 until 2003 for a prison. A high school and residential community has occupied portions of the site until recent years. Today it exists as a mix of abandoned and re-occupied post-war minimal traditional style dwellings, Kaiser operations buildings, modern buildings, ruins, and foundations. Questions concerning what remains of the original townsite plan and integrity of the Eagle Mountain townsite will be assessed to determine whether a district is feasible or warranted and what the scope of a survey should include. This information will be applied to the development of a Work Plan for the recording and evaluation of the site.

- The Work Plan will include a draft historic context and historical information about the footprint and content of the original townsite and its development over time. The context will include a consideration of the Eagle Mountain as a late example of a company town in the American West. This information will be used to develop an approach to the documentation of the site and consideration of whether a potential district may exist. The draft Work Plan will be submitted to SHPO, BLM, and FERC for review, comment, and approval of the survey approach.

- Updates to DPR 523 forms will be developed for the townsite, mine, and railroad and will be used as the basis for formal evaluations of the townsite, mine, and railroad for listing in the NRHP will be made according to 36 CFR 800 and 36 CFR 60.4. Individual buildings or structures will be documented on DPR 523b forms. A District Record (DPR 523d) will be completed, if appropriate. Any other resources discovered during survey also will be documented and evaluated. The results will be provided in California Archaeological Resource Management Report format and to the Secretary of the Interior's standards for archaeological reporting.

Implementation Steps for Performance:

- SHPO, BLM, and FERC concurrence will be obtained for the determination of NRHP-eligibility of the Eagle Mountain townsite, mine, railroad, and any other documented cultural resources within the Project APE, including

consideration for the potential of any resources as contributing elements to a historic district, if evidence exists for one to be present.

- If any resources are determined to be historic properties, recommendations will be developed to avoid or mitigate impacts through appropriate treatments in accordance with the Secretary of the Interior's standards. These include in order of preference: project design to avoid direct impacts; moving of standing buildings or structures in the APE to other areas of the townsite or mine so that integrity of setting, feeling, and materials can be retained; or data recovery and documentation.

MM CR-3. Implement the Historic Properties Management Plan and a Worker Environmental Awareness Program.

Pursuant to CEQA Guidelines §15126.4(b)(3)(A-D) preservation in place is the preferred manner in which to mitigate impacts to archeological sites. Preservation in place maintains the relationship between the artifacts and context, and seeks to avoid conflict values of groups associated with the site. The Historic Properties Management Plan and a Worker Environmental Awareness Program have been prepared to address procedures and treatment for data recovery and will be adopted prior to site excavation.

Management Activity: Implement project-specific education program.

- A qualified archaeologist will implement a cultural resources element for the Worker Environmental Awareness Program that is tailored to the Eagle Mountain Pumped Storage Project and workforce. This Program will focus on possible discovery and mitigation procedures during the construction phase of the Project as well as preservation obligations of Project staff.
- The program will include a printed handout for all Project personnel and a PowerPoint presentation or video that all Project personnel will be required to view.
- The program will present concepts of cultural resources management in a simple, understandable format, including a review of preservation laws and sanctions, examples of possible discoveries, and notification procedures in the event of discoveries. These are key elements of the HPMP including the Unanticipated Discoveries Plan and the steps to follow in evaluating potential cultural resources needs that are triggered by proposed construction activities.
- The program will include a Monitoring Protocol and Provisions for Enforcement that may be presented to refresh personnel and introduce new staff to cultural resource concepts and Project-specific issues.

- Project equipment and vehicle operators will be educated on the importance of staying within Project boundaries and also the prohibitions of going off designated routes of travel such as Eagle Mountain Road or Kaiser Road.

MM CR-4. Offer Opportunities for Public Interpretation. Unlike other hydroelectric projects where public access and recreational opportunities may be afforded, safety concerns and proximity to a proposed landfill project preclude offering public access within the core of the Project boundaries. Opportunities for public interpretation are therefore extremely limited. Some appropriate signage that interprets the history of the area already exists, including the 2009 E Clampus Vitus monument on Eagle Mountain Road for the 36th Evacuation Hospital associated with the World War II DTC and a Riverside County historical marker that acknowledges the Iron Chief, Eagle Mountain, and other mines of the area. The Desert Training Center, California/Arizona Maneuver Area (DTC/CAMA) is also thoroughly and professionally interpreted at the General Patton Memorial Museum in Chiriaco Summit, located off of I-10 between Indio and Desert Center. The prehistory and Native American cultural traditions of the region are interpreted at the Agua Caliente Cultural Museum in Palm Springs, the Malki Museum on the Morongo Indian Reservation, the Palm Spring Desert Museum, the Coachella Valley Museum and Cultural Center, and at Joshua Tree National Park.

Management Activity: Develop informative signage that will be available to the public.

ECE will develop and install one weather-tolerant sign that will be placed outside the main gate of the facility. The sign will provide information about the prehistory and history of the general area, Native American groups who inhabited the area, and background on the functioning of the Project. Local museums and historical monuments will also be identified.

The public interpretive sign will be developed in coordination with the development of the HPMP and will be installed within 1 year of completion of the boundary fence.

MM CR-5. Review Effectiveness of the Historic Properties Management Plan.

Management Activity: Every 6 years, ECE will determine if modifications will improve the effectiveness of the HPMP.

Performance Standard: Develop recommendations for changes to the HPMP that may be discussed with the SHPO, BLM, Riverside County, interested Indian Tribes, FERC, and other consulting parties.

MM CR-6. Consult with SHPO, the BLM, Riverside County, interested Indian Tribes, and FERC.

Management Activity: Develop a HPMP Implementation Report. The HPMP Implementation Report will be distributed for review according to a 2-year cycle during the construction phase of the Project because cultural resource discoveries and treatments are most likely during that period. Thereafter, in the operation and maintenance phase, the HPMP Implementation Reports will be coordinated with the 6-year cycle of the Licensed Hydropower Recreation Development Report (FERC Form 80). The report will summarize, in table format, all Licensee cultural resources consultations and/or surveys performed for Project modifications, activities related to the Erosion Control Plan, or any other activities that have been reviewed due to their potential to result in soil disturbance in areas not previously disturbed. The HPMP Implementation Report will:

- Describe the proposed modifications, the type of cultural survey or other activity performed, the results of the survey or other activity, and actions taken (e.g., SHPO consultation and/or other consultation, mitigation, no action determined appropriate, etc.)
- Summarize observations made of historic properties
- Include summaries of cultural resource treatments as an update to a HPMP implementation summary table
- Report the status of Licensee's public interpretation projects
- Recommend modifications to the Project HPMP that will improve its implementation if appropriate

Implementation Steps for Performance: Develop a format for the HPMP Implementation Report and its associated Summary Table that will present the cultural resources activities and considerations in which the Licensee participated over a 2-year reporting cycle during construction and the 6-year reporting cycle thereafter. The HPMP Implementation Report will be provided to the SHPO, BLM, Riverside County, and interested Indian Tribes for a 30-day review and comment period every 6 years in coordination with FERC Form 80. Following a consideration of review comments, the Licensee will file the HPMP Implementation Report with FERC.

MM CR-7. Class I Investigation. In the event that Project activities would extend beyond the areas previously surveyed, then background literature will be reviewed to identify the location, character, and significance of known cultural resources in the area of a proposed action and the potential of the proposed action to affect historic properties. The Class I Investigation will rely on information contained within the Licensee's Project archives. Should these data not prove sufficient, the Project

Environmental Coordinator may determine that additional documentation is necessary to address a particular action under consideration that extends beyond the 1-mile buffer of the already completed Class I Investigation. The most important source of Class I literature review is the Eastern Information Center California (EIC) at the University of California, Riverside.

Management Activity: compare proposed Project location with Cultural Resources Management Maps.

- Determine if the Project area is located within 100 feet of a potentially significant previously recorded archeological site
- Determine if Project area has been characterized as actively eroding or previously disturbed by other ground-disturbing activity (e.g., by machine excavation or underground utility line)
- Determine if the area has been previously surveyed for cultural resources

Implementation Steps for Performance: Based on the results of the above-noted Management Activity.

- Project area is located within 100 feet of a previously recorded potentially significant archeological site. Delay Project pending SHPO consultation and possible follow-up studies by a Secretary of the Interior-qualified professional archaeologist.
- Previous ground-disturbing activity may be documented or observed therefore no Project effect on cultural resources expected. Project may proceed. The Licensee shall include the Project description and permit considerations in the Historic Properties Management Plan (HPMP) Implementation Report that will be distributed to the SHPO, the BLM, Riverside County, interested Indian Tribes and FERC on a 2-year cycle during the construction phase and on a 6-year review cycle thereafter in coordination with Form 80.

MM CR-8. Class III Cultural Resources Field Investigation. Any modifications or additions to the APE in previously unsurveyed and undisturbed areas will require a Class III survey in compliance with Section 106 of the National Historic Preservation Act and according to 36 CFR 800. The Licensee will conduct an on-the-ground inventory of the APE for a proposed action that confirms the presence of known cultural resources and that may result in identification of previously unrecorded cultural resources. A Class III investigation may involve the excavation of shovel tests placed at 50-foot intervals within the APE or implementation of an alternative investigative strategy approved by the Licensee's Project Environmental Coordinator and the SHPO. Any investigations on easements through BLM land require a Fieldwork Authorization to a BLM

permit-holding archaeologist in compliance with the Federal Land Policy and Management Act of 1976, as amended (PL 94-579).

Management Activity: Consult with BLM or other land holding agencies as to what Section 106 or Section 110 compliance needs may still be required and implement as specified. Engage services of a qualified archaeologist to brief the Project Environmental Coordinator on correct scoping and protocols and conduct Class III survey such as a walkover survey and/or systematic subsurface shovel testing (e.g., perform an identification level archeological field survey.) The actual scope of work will depend upon the proposed Project location and size of the proposed activity as well as BLM requirements on BLM land. The archaeologist will perform the Class III survey and prepare a report that describes the investigation and results. The Licensee will forward this report to the SHPO, interested Indian Tribes, and FERC. All new reports and site forms will be submitted to the EIC, University of California, Riverside.

Implementation Steps for Performance: Review results of the Class III Survey and the associated recommendations.

- If the Class III Survey did not locate cultural resources, then the proposed action may proceed following consultation with the BLM and SHPO.
- If the Class III Survey locates cultural resources that the archaeologist recommends as not potentially significant, then the Licensee's Project Environmental Coordinator consults with the SHPO. If consensus is reached on the recommendation, then the action may proceed.
- If the Class III Survey locates cultural resources that the archaeologist recommends as potentially significant (i.e., demonstrates good integrity, identifiable limits, structure, function, research potential, and cultural/historical context – see definition in Section 4.2.3), then the Licensee's Project Environmental Coordinator consults with SHPO. If SHPO concurs with evaluation, then a Testing Phase investigation is recommended unless action may be designed to avoid the resource. Alternative Project locations will be reviewed.

MM CR-9. Testing Phase Cultural Resources Field Investigation. Limited archeological excavations and analyses, possibly including documentation of structures will be conducted, to assess the National Register eligibility of individual resources and Project effects on historic properties.

The criteria for sites eligible to the NRHP may be found at 36 CFR 60.4. A site is eligible to the NRHP if it contains qualities that are significant in American history, architecture, archaeology, engineering, and culture and possesses integrity of location, design, setting, materials, workmanship, feeling, and association and:

- is associated with events that have made a significant contribution to the broad patterns of history
- is associated with the lives of persons significant in the past
- embodies the distinctive characteristics of a type, period, or method of construction; or represents a significant and distinguishable entity whose components may lack individual distinction or
- has yielded, or may be likely to yield, information important in prehistory or history

Management Activity: Engage services of a qualified archaeologist to collect data sufficient to determine if a cultural resource qualifies as significant. If the site is located on BLM land, an excavation permit is required for testing programs that remove more than one cubic meter of soil from an individual site, in compliance with the Archaeological Resources Protection Act of 1979, as Amended (PL 96-95). Archaeological Resources Protection Act permits require submittal of a Treatment Plan/Research Design for which the BLM is required to consult with the SHPO and interested Indian Tribes prior to approving field investigation. The archaeologist will perform a Testing Phase investigation and prepare a report that describes the Testing Phase investigation and results. The Licensee will forward this report to the BLM for consultation with the SHPO, interested Indian Tribes and FERC.

Implementation for Performance: Review results of the Testing Phase Report and the associated recommendations, and consult with the BLM and SHPO.

- If the Testing Phase investigation indicates that the cultural resource does not qualify as significant, Project may proceed following consultation with SHPO.
- If the Testing Phase investigation indicates that the cultural resource qualifies as significant, ECE Manager consults with the BLM and SHPO. If SHPO concurs with the recommendation that the cultural resource is potentially eligible for listing in the NRHP and if the Project is not amended to avoid the resource, consultation with the SHPO will continue. A qualified archaeologist will develop the scope of work that will serve as mitigation of Project effects. ECE Manager will consult with the SHPO and gain consensus on the appropriate mitigation (may involve further data recovery field investigation, monitoring, or another alternative treatment measure).

MM CR-10. Data Recovery or Alternative Mitigation. The Licensee will investigate activities designed to mitigate effects upon a historic property that an action will affect. This may include data recovery, documentation, restoration or other

measures. Such investigations will be preceded by development of an action-specific Memorandum of Agreement that has been approved by the Licensee, SHPO, BLM, Advisory Council on Historic Preservation, FERC, and, as appropriate, interested Indian Tribes

Management Activity: The Licensee's Project Environmental Coordinator works with the Licensee and qualified archaeologist and consults with the SHPO to avoid Project adverse impacts, minimize Project adverse effects through possible design modifications and or through data recovery or an alternative mutually agreed-upon method. If NRHP-eligible resource may not be avoided, the Licensee's archaeologist develops a Memorandum of Agreement (MOA) and the Licensee consults with SHPO, BLM, Advisory Council on Historic Preservation, and interested Indian Tribes, as appropriate and files the MOA with FERC for approval. When an appropriate MOA is agreed upon, the archaeologist will perform the Data Recovery mitigation and prepare a report that describes the mitigation and the results. The Licensee will forward this report to the consulting parties.

Implementation for Performance: Review results of the data recovery or other mitigation and consult with the SHPO, BLM, Advisory Council on Historic Preservation, interested Indian Tribes, and FERC. When consulting parties concur that mitigation has been successfully achieved, the action may proceed.

MM CR-11. Treatment of Unanticipated Discoveries of Cultural Resources and Human Remains. As with all development projects in the state, should unforeseen artifacts become uncovered during site grading, the Licensee is required to adhere to all state of California procedures, including Section 21083.2(i) of the CEQA Statutes and Section 15064.5 of the CEQA Guidelines regarding stoppage of work, handling of discovered materials, and notification of proper authorities to ensure that the construction/operation of the Project would not have an adverse effect on cultural resources. The Licensee is responsible for addressing action impacts to cultural sites and human remains should they be exposed as a result of ground disturbing activities by the Licensee or one of its contractors; erosion control measures; erosion of any inventoried historic properties; or resources that are exposed in the event of a Project operation emergency.

Management Activities: The Licensee shall follow the Project specific Plan and Procedures Addressing Unanticipated Discoveries of Cultural Resources and Human Remains, found in Appendix A of the HPMP in the event that unanticipated cultural materials or human remains are found within the Project area.

Implementation Steps for Performance: The Licensee shall consult with SHPO, BLM, interested Indian Tribes, Riverside County Coroner, as appropriate and depending on the land jurisdiction on which any discovery is made, and FERC., If the Licensee or its contractors discovers contemporary contexts with human remains, local law enforcement agencies and the Riverside County Coroner shall be notified and consulted.

3.8.5 Level of Significance after Implementation of Mitigation Program

Impact 3.8-1 Transmission Line Route from the Crossing of the CRA to the Interconnector Substation. This impact is considered *potentially significant and subject to mitigation*. Mitigation measures MM CR-3, MM CR-4, MM CR-5, MM CR-6, MM CR-7, MM CR-8, MM CR-9, MM CR-10, and MM CR-11 are intended to reduce the potential impact to less than significant.

Impact 3.8-2 Transmission Line and Water Pipeline Crossing of the CRA. This impact is considered *potentially significant and subject to mitigation*. Mitigation measures MM CR-1, MM CR-3, MM CR-5, MM CR-6, MM CR-11 will reduce the potential impact to *less than significant*.

Impact 3.8-3 Transmission Line Crossing of the Eagle Mountain Railroad. This impact is *potentially significant and subject to mitigation*. Mitigation measures MM CR-2, MM CR-3, MM CR-4, MM CR-5, MM CR-6, MM CR-7, MM CR-8, MM CR-9, MM CR-10, and MM CR-11 will reduce the impact to *less than significant*.

Impact 3.8-4 Central Project Area. This impact is *potentially significant and subject to mitigation.* Mitigation measures MM CR-2, MM CR-3, MM CR-4, MM CR-5, MM CR-6, MM CR-7, MM CR-8, MM CR-9, MM CR-10, and MM CR-11 will reduce the impact to *less than significant*.

Impact 3.8-5 Unknown/ Buried Cultural Resources. This impact is *potentially significant and subject to mitigation.* Mitigation measures MM CR-2, MM CR-3, MM CR-5, MM CR-6, MM CR-7, MM CR-8, MM CR-9, MM CR-10, and MM CR-11 will reduce the impact to *less than significant*.

No residual impacts to cultural resources would occur with Project implementation.