



Energy Renewal Partners, LLC  
305 Camp Craft Road, Suite 575  
West Lake Hills, Texas 78746

## Project Memo

Date: November 3, 2014

To: Panoche Valley Solar, LLC

From: Brandon Richards, Project Scientist (Archaeologist)  
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Subject: **Archaeological Survey  
Telecommunication Upgrades Survey Memo**

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### Summary

On behalf of Energy Renewal Partners, LLC (Energy Renewal), Natural Investigations Company, LLC (Natural Investigations) was retained to provide cultural resources services related to the proposed Panoche Valley Solar Farm (PVSF), PG&E telecommunication upgrades. As a result of the field survey, no cultural resources were newly identified. Furthermore, the implementation of the telecommunication improvements will have no effect and no adverse change on documented resources within the Area of Potential Effects (APE). Six of the seven known resources within the APE are not eligible for NRHP or CRHR inclusion. Cultural resources that have been determined ineligible for the NRHP and CRHR are not required to be avoided by project design or implementation. Four of the ineligible resources are more than 28 meters (92 feet) distant from the proposed improvement areas, one is partially adjacent, and one (PG&E's Moss Landing-Panoche 230 kV transmission line) is overlapped by the proposed improvement areas. The seventh resource within the APE remains unevaluated (P-10-000046, CA-FRE-46) and will be avoided by the planned telecommunication improvements.

### Recommendations

Natural Investigations recommends that all construction ground-disturbing activities occurring in native sediments/soils during wood pole installation in Study Areas 6 and 7 be monitored by a qualified archaeologist and a Native American monitor. This is due to the archaeological sensitivity of these two areas, and is consistent with Mitigation Measures CR-2.1, CR-2.2, and CR-2.3 for the Mitigation Monitoring and Reporting Program (MMRP) adopted for the Final Environmental Impact Report (EIR) for the PVSF Project. In addition, and consistent with MMRP Mitigation Measure CR-2.4, Natural Investigations recommends a worker cultural awareness training session be conducted prior to initiation of ground-disturbing activities. In the event cultural resources are discovered during project activities, work in the immediate area must be halted and a qualified archaeologist notified, who will then

evaluate the resource and consult with the County of San Benito or Fresno, Panoche Valley Solar, LLC, and relevant regulatory or utility agencies, as appropriate.

It was also recommended that a survey be conducted and report prepared prior to ground-disturbing activities for the separate 23-acre APE for the offsite microwave tower on Call Mountain, as access was unavailable at the time of the study. However, a subsequent change to the project plans and proposed construction methods will eliminate ground-disturbing activities at this location. Therefore, a follow-up archaeological survey will not be necessary.

It was also recommended that should plans for the proposed telecommunications services change and have the potential to impact the unevaluated prehistoric site (P-10-000046, CA-FRE-46) a significance evaluation be conducted by a qualified archaeologist prior to any ground disturbance within a minimum of 100 feet of this resource. Project plans are not anticipated to change and all ground-disturbing activities will avoid this site. Therefore, a follow-up evaluation of this site will not be necessary.

#### Follow-up Items

The Native American Heritage Commission (NAHC) was contacted on September 15, 2014 regarding a search of their Sacred Lands File for traditional cultural resources within or near the APE. Replies were received from the NAHC for Fresno County and San Benito County dated September 22 and October 27, 2014, respectively, stating that the searches failed to indicate the presence of Native American sacred lands or traditional cultural properties in the immediate vicinity of the project area. By letters dated September 25 and October 28, 2014, Natural Investigations then contacted each of the Native American tribes or individuals provided by the NAHC for Fresno County and San Benito County, respectively. If no response is received to the letters, follow-up telephone calls are made between two to three weeks after mailing the letters. Follow-up telephone calls were made to the Fresno County contacts on October 10, 2014. As of the date of this letter, follow-up telephone calls to the San Benito County contacts have not yet been placed.