



TECHNICAL MEMO – LETTER REPORT

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FROM: Phil Hanes
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SUBJECT: Cultural Resources Supplemental Letter Report
Panoche Valley Solar Farm Project Telecommunication Service, Fresno County, CA

INTRODUCTION

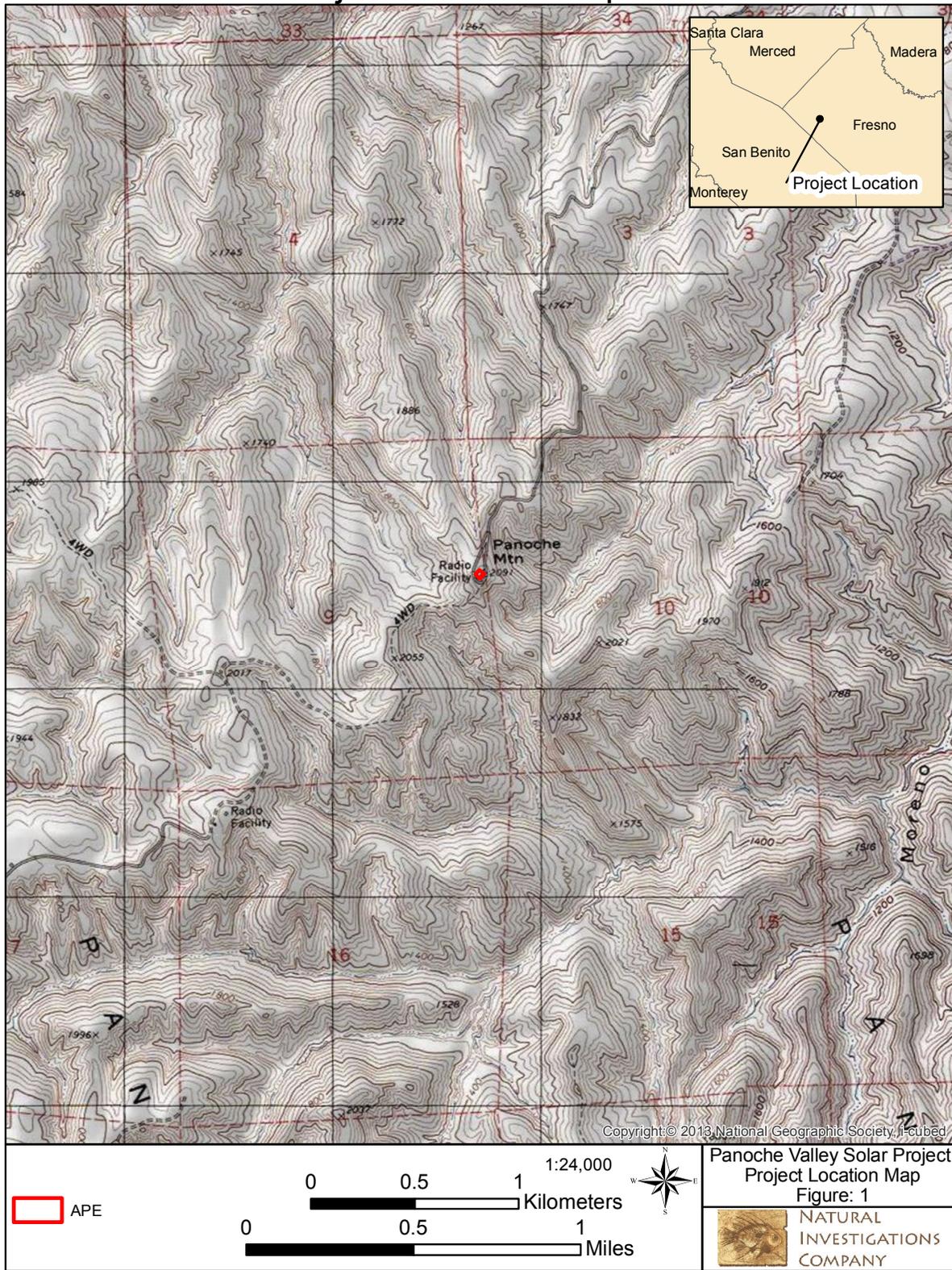
Natural Investigations was retained by Energy Renewal Partners, LLC to provide cultural resources services for establishment of telecommunication services between the Panoche Valley Solar Farm Project (PVSF Project) in southeastern San Benito County and the existing Panoche Substation 17 miles east of the PVSF Project in Fresno County. This would entail installation of optical ground wire (OPGW) on the existing Pacific Gas and Electric Company (PG&E) Moss-to-Panoche 230 kV transmission line and improvements to AT&T's existing telephone and internet system, as well as construction of two offsite microwave towers as backup communications. The microwave towers would be constructed on Call Mountain in San Benito County and on Panoche Mountain in Fresno County to the west and northeast of the PVSF Project, respectively.

This Supplemental Letter Report includes the literature search of the Area of Potential Effects (APE) for the proposed offsite microwave tower on Panoche Mountain in northwestern Fresno County, and an effects assessment of the microwave tower construction. Natural Investigations completed an inventory report for the other telecommunications services improvements in October 2014 (Sikes et al. 2014).

The 0.3-acre APE for the Panoche Mountain microwave tower includes a work area of approximately 100 feet by 100 feet. The work area is accessed via an existing dirt road trending southwest from the Little Panoche Rd. exit from I-5. Figure 1 shows the location of the APE in Section 9 of Township 14S, Range 11E, on the Mercey Hot Springs 1981 USGS 7.5-minute topographic map (Mount Diablo Base and Meridian).

The Final Environmental Impact Report (EIR) for the PVSF Project was released on September 30, 2010 (Aspen 2010). San Benito County is the State Lead Agency for the PVSF Project and is responsible for compliance with the California Environmental Quality Act (CEQA). Because a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers (USACE) is anticipated to be required and the study would be considered a federal undertaking, this study was also completed in compliance with Section 106 of the National Historic Preservation Act (NHPA).

Project Location Map



ENVIRONMENTAL AND CULTURAL SETTING

Located west of the San Joaquin Valley at an elevation of 2091 in the low-lying foothills of the Diablo Range, known as the Panoche Hills, the Panoche Mountain microwave tower site is underlain by the Panoche Formation. A sequence of clay shale, claystone, or sandstone, this rock unit is comprised of marine sedimentary rocks primarily of Cretaceous age (65 million years) (Dibblee and Minch 2007). Soils near the rock outcrops are shallow Wisflat series sandy loam. These soils typically have a 6-inch thick A horizon overlying a thin C horizon, with a depth to bedrock of only 16 to 20 inches below the surface (California Soil Resource Lab 2014; Soil Survey Staff 2014)

Although California was occupied by at least 12,000 years ago, there is little archaeological evidence in the Central Valley or surrounding foothills until after 6,000 years ago, in part due natural geomorphic processes (Rosenthal et al. 2007). In the foothills of the Diablo Range along the western edge of the northern San Joaquin Valley, a local archaeological chronological sequence dating as early as approximately 5,200 years ago was identified based on the results of excavations at five sites in Merced County during projects at Little Panoche, Los Banos, and San Luis reservoirs in the late 1960s (Olsen and Payen 1969). Historically, the Northern Valley Yokuts occupied the Panoche Mountain region (Kroeber 1925; Latta 1977; Wallace 1978). Their villages were generally established on low, natural rises along major watercourses. By 1805, sizeable numbers of Northern Valley Yokuts were transported to the San Juan Bautista, Santa Clara, San José, San Antonio, and Soledad missions established during the Spanish era. Their traditional lifeway changed dramatically and there was a severe decline in Yokuts population. Although the majority of northwestern Fresno County remained void of non-native settlement during the 1800s, by the mid-twentieth century, 39 percent of the county's total agricultural wealth was derived from western Fresno County. With construction of the San Luis Canal as part of the federal Central Valley Project, water was delivered to this arid region starting in the late 1960s. The arid badlands of the Panoche Hills have remained largely undeveloped and the majority are public lands managed by the Bureau of Land Management (BLM 2014).

For a more detailed overview of the prehistoric, ethnographic, and historic context of the Project, see the inventory report for the PVSF Project telecommunications services improvements (Sikes et al. 2014).

PRE-FIELD RESEARCH

Literature Search Methods and Results

To determine if prehistoric or historic cultural resources were previously recorded within the project area, a cultural resources literature search was completed on November 17, 2014, by archaeologist Phil Hanes of Natural Investigations at the California Historical Resources Information System, Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield. The records search was conducted to determine the extent to which the project area had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the APE. The archival search consisted of an archaeological and historical records and literature review.

The literature search shows that 1 prior cultural resources study has been completed within a 0.25-mile radius of the APE (Table 1).

Table 1. Prior Cultural Resources Studies in 0.5-mile of APE

SSJVIC Report No.	Study	Author	Year	Proximity to APE
FR2010	Historical and Cultural Resource Assessment Existing Telecommunications Facility Site No. PL-700-04, Panoche Mountain, Fresno County, California	Brown and Mills, Inc.	2000	Encompasses APE

The records search indicates no cultural resources have been previously recorded within the APE, nor have any resources been recorded within a 0.25-mile radius of the APE.

Sacred Lands File Search

Natural Investigations contacted the Native American Heritage Commission (NAHC) on October 14, 2014, requesting a search of their Sacred Lands File for traditional cultural resources within or near the project. The reply from the NAHC, dated October 21, 2014, states that the search does not to indicate the presence of Native American sacred lands or traditional cultural properties in the immediate vicinity of the project area.

PEDESTRIAN FIELD SURVEY

After analysis of the project APE, it was determined that a field survey would not be necessary. The entire current APE was originally surveyed in 2000 by Brown and Mills, Inc. for the *Historical and Cultural Resource Assessment Existing Telecommunications Facility Site No. PL-700-04, Panoche Mountain, Fresno County, California*. The current project falls entirely within the fenced and graded pad established following the 2000 study. No disturbances will take place outside of the existing pad or roadways surveyed in 2000.

DETERMINATION OF EFFECTS

Based on the results of current research, prior survey, prior evaluations, and this assessment, implementation of the microwave tower construction improvements will have no effect on cultural resources. No cultural resources have been previously recorded within the APE, or within a 0.25-mile radius of the APE.

RECOMMENDATIONS

No Construction Monitoring

Based on the results of the records searches, field survey, and historic use of the land, construction monitoring is not recommended. The project area lies within an area previously disturbed by grading and by road and building construction.

Inadvertent Discoveries

Based on the record search and previous survey of the APE, inadvertent discoveries are unlikely. However, if such discoveries are made, work at that location would be immediately halted and BLM’s authorized official immediately notified. Construction activities could continue in other areas while the discovery is protected and evaluated. Ground-disturbing activity would not resume in the area of the discovery until written approval from BLM’s authorized official is received.

Human Remains

The record search and previous survey of the APE found no evidence of human remains, and inadvertent discoveries are unlikely. However, if such discoveries are made, construction activities in the vicinity of the discovery would cease immediately and the discovery treated in compliance with federal statutes. If Native American cultural items, including human remains, funerary objects, sacred objects, and items of cultural

patrimony, are inadvertently discovered, the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (25 United States Code 3001-3013), and implementing regulations at 43 CFR 10.4, would be followed. Ground-disturbing activity would resume in the area of the discovery only after until written approval is received from USFS's authorized official.

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