

# **APPENDIX J – TRIBAL CULTURAL RESOURCES**

# **APPENDIX J – TRIBAL CULTURAL RESOURCES**

**J.1. Senate Bill 18 and Assembly Bill 52 Tribal Consultation  
Correspondence**



# Imperial County Planning & Development Services Planning / Building

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March 24, 2020

**Jim Minnick**  
DIRECTOR

Barona Group of the Capitan Grande  
Edwin Romero  
1095 Barona Road  
Lakeside, CA 92040

**CERTIFIED MAIL # 7007 3020 0000 3207 3949**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Romero,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

The proposed project includes a new loop-in substation on the site and connects to the existing IID Campo Verde Imperial Valley 230kV Radial gen-tie line, which connects a one-third mile gen-tie line into the Imperial Valley substation 1/3 mile south of the project site. Access would be on a portion of Assessor's Parcel Number (APN) 051-350-009 (Figure 2).



# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Campo Band of Diegueno Mission Indians  
Ralph Goff  
36190 Church Road, Suite 1  
Campo, CA 91906

**CERTIFIED MAIL # 7016 2140 0000 2121 8324**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Goff,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

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# Imperial County Planning & Development Services Planning / Building

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March 24, 2020

**Jim Minnick**  
DIRECTOR

Eqiiaapaayp Band of Kumeyaay Indians  
Michael Garcia  
4054 Willows Road  
Alpine, CA 91901

**CERTIFIED MAIL # 7016 2140 0000 2121 8331**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Garcia,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Ewiiapaayp Band of Kumeyaay Indians  
Robert Pinto  
4054 Willows Road  
Alpine, CA 91901

**CERTIFIED MAIL # 7016 2140 0000 2121 8348**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Pinto,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Ipai Nation of Santa Ysabel  
Virgil Perez  
PO Box 130  
Santa Ysabel, CA 92070

**CERTIFIED MAIL # 7016 2140 0000 2121 8355**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Perez,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

### **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

The proposed project includes a new loop-in substation on the site and connects to the existing IID Campo Verde Imperial Valley 230kV Radial gen-tie line, which connects a one-third mile gen-tie line into the Imperial Valley substation 1/3 mile south of the project site. Access would be on a portion of Assessor's Parcel Number (APN) 051-350-009 (Figure 2).



# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Inaja-Cosmit Band of Indians  
Rebecca Osuna  
2005 S Escondido Blvd  
Escondido, CA 92025

**CERTIFIED MAIL # 7016 2140 0000 2121 8362**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Osuna,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Jamul Indian Village  
Erica Pinto  
PO Box 612  
Jamul, CA 91935

**CERTIFIED MAIL # 7016 2140 0000 2121 8379**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Pinto,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Jamul Indian Village  
Lisa Cumper  
PO Box 612  
Jamul, CA 91935

**CERTIFIED MAIL # 7016 2140 0000 2121 8386**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Cumper,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Kwaaymii Laguna Band of Mission Indians  
Carmen Lucas  
PO Box 775  
Pine Valley, CA 91962

**CERTIFIED MAIL # 7016 2140 0000 2121 8393**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Lucas,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

La Posta Band of Diegueno Mission Indians  
Javaughn Miller  
8 Crestwood Road  
Boulevard, CA 91905

**CERTIFIED MAIL # 7016 2140 0000 2121 8409**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Miller,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

La Posta Band of Diegueno Mission Indians  
Gwendolyn Parada  
8 Crestwood Road  
Boulevard, CA 91905

**CERTIFIED MAIL # 7016 2140 0000 2121 8416**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Parada,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Manzanita Band of Kumeyaay Nation  
Angela Elliott Santos  
PO Box 1302  
Boulevard, CA 91905

**CERTIFIED MAIL # 7016 2140 0000 2121 8423**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. Santos,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

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# Imperial County Planning & Development Services Planning / Building

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**Jim Minnick**  
DIRECTOR

March 24, 2020

Mission Grande Band of Diegueno Mission Indians  
Michael Linton  
PO Box 270  
Santa Ysabel, CA 92070

**CERTIFIED MAIL # 7016 2140 0000 2121 8430**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Linton,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

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# Imperial County Planning & Development Services Planning / Building

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March 24, 2020

**Jim Minnick**  
DIRECTOR

Quechan Tribe of the Fort Yuma Reservation  
Jill McCormick  
PO Box 1899  
Yuma, AZ 85366

**CERTIFIED MAIL # 7016 2140 0000 2121 8447**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Ms. McCormick,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

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# Imperial County Planning & Development Services Planning / Building

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March 24, 2020

**Jim Minnick**  
DIRECTOR

San Pasquel Band of Diegueno Mission Indians  
Allen Lawson  
PO Box 365  
Valley Center, CA 92082

**CERTIFIED MAIL # 7016 2140 0000 2121 8454**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Lawson,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

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# Imperial County Planning & Development Services Planning / Building

March 24, 2020

**Jim Minnick**  
DIRECTOR

Sycuan Band of Kumeyaay Nation  
Cody Martinez  
1 Kwaaypaay Court  
El Cajon, CA 92019

**CERTIFIED MAIL # 7007 3020 0000 3207 3925**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Martinez,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

The proposed project includes a new loop-in substation on the site and connects to the existing IID Campo Verde Imperial Valley 230kV Radial gen-tie line, which connects a one-third mile gen-tie line into the Imperial Valley substation 1/3 mile south of the project site. Access would be on a portion of Assessor's Parcel Number (APN) 051-350-009 (Figure 2).



# Imperial County Planning & Development Services Planning / Building

March 24, 2020

**Jim Minnick**  
DIRECTOR

Viejas Band of Kumeyaay Indians  
John Christman  
1 Viejas Grande Road  
Alpine, CA 91901

**CERTIFIED MAIL # 7007 3020 0000 3207 3932**

**Re: Project Notification Pursuant to Senate Bill 18 for the CED WESTSIDE  
CANAL BATTERY STORAGE Project in Imperial County, California**

Dear Mr. Christman,

Pursuant to the provisions of Senate Bill 18, as the lead agency under the California Environmental Quality Act (CEQA), the County of Imperial (County) hereby extends an invitation to consult on the CEQA review of the **CED Westside Canal Battery Storage Project**.

To assist in your evaluation the County has conducted a Sacred Land File search through the Native American Heritage Commission.

## **Project Summary**

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP). **The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an amendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**, therefore, the project is subject to tribal consultation pursuant to SB 18 (Figure 1).

The proposed project includes a new loop-in substation on the site and connects to the existing IID Campo Verde Imperial Valley 230kV Radial gen-tie line, which connects a one-third mile gen-tie line into the Imperial Valley substation 1/3 mile south of the project site. Access would be on a portion of Assessor's Parcel Number (APN) 051-350-009 (Figure 2).

The proposed project will utilize two additional parcels on the north side of the Westside Main Canal: APN: 051-350-019 and APN: 051-350-018. This site includes approximately 60 feet of frontage along the north fence line and south of the IID maintenance road to be used for site and public access. The project includes a Caltrans/County specified bridge to span the Westside Main Canal to connect the project site to Liebert Road to the east.

The proposed project will include up to 25 MW of ground-mounted or rooftop behind-the-meter photovoltaic solar generation to provide onsite auxiliary power for the battery storage facilities. The proposed solar facility will not be used to deliver power to the grid. The proposed solar facility will be located on Assessor's Parcels Numbers 051-350-010 and 051-350-011.

**Project Description:**

The proposed Westside Canal Battery Storage Project involves the construction and operation of a utility-scale energy storage complex with a capacity of approximately 2,000 MW on approximately 163.32-acres of land owned by CED, IID, BLM and private landowners. The proposed project will be constructed in 3 – 5 phases over a 10-year period with each phase ranging from approximately 25 MW to 350 MW per phase. Assuming a 10-year development period and 30-year operating life of each phase, the expected end date of the project would be 30 years from the construction of the final phase.

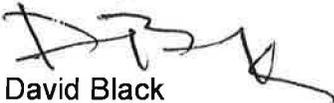
The proposed project would be comprised of lithium ion-battery and/or flow battery energy storage facility, behind the meter solar energy facility, a new 230 kV loop-in substation, underground electrical cables and permanent vehicular access to and fro the site- over a proposed bridge spanning IID's Westside Main Canal.

**SB 18 Notification**

The County would like to initiate government-to-government consultation for this project. Your response to this letter, acknowledging your interest in participating in this undertaking as a consulting party, in identifying any historic properties, including Traditional Cultural Properties that may exist within the project's APE, and providing any key tribal contacts, is greatly appreciated. We are also inviting comments regarding any other tribal concerns the proposed project may raise. Please provide a response no later than June 25, 2020 so that we may discuss this project and any of those identified areas of interest.

Should you have any questions about this project, you may contact David Black, Planner IV, at (442) 265-1746 or via e-mail at [DavidBlack@co.imperial.ca.us](mailto:DavidBlack@co.imperial.ca.us).

Sincerely,

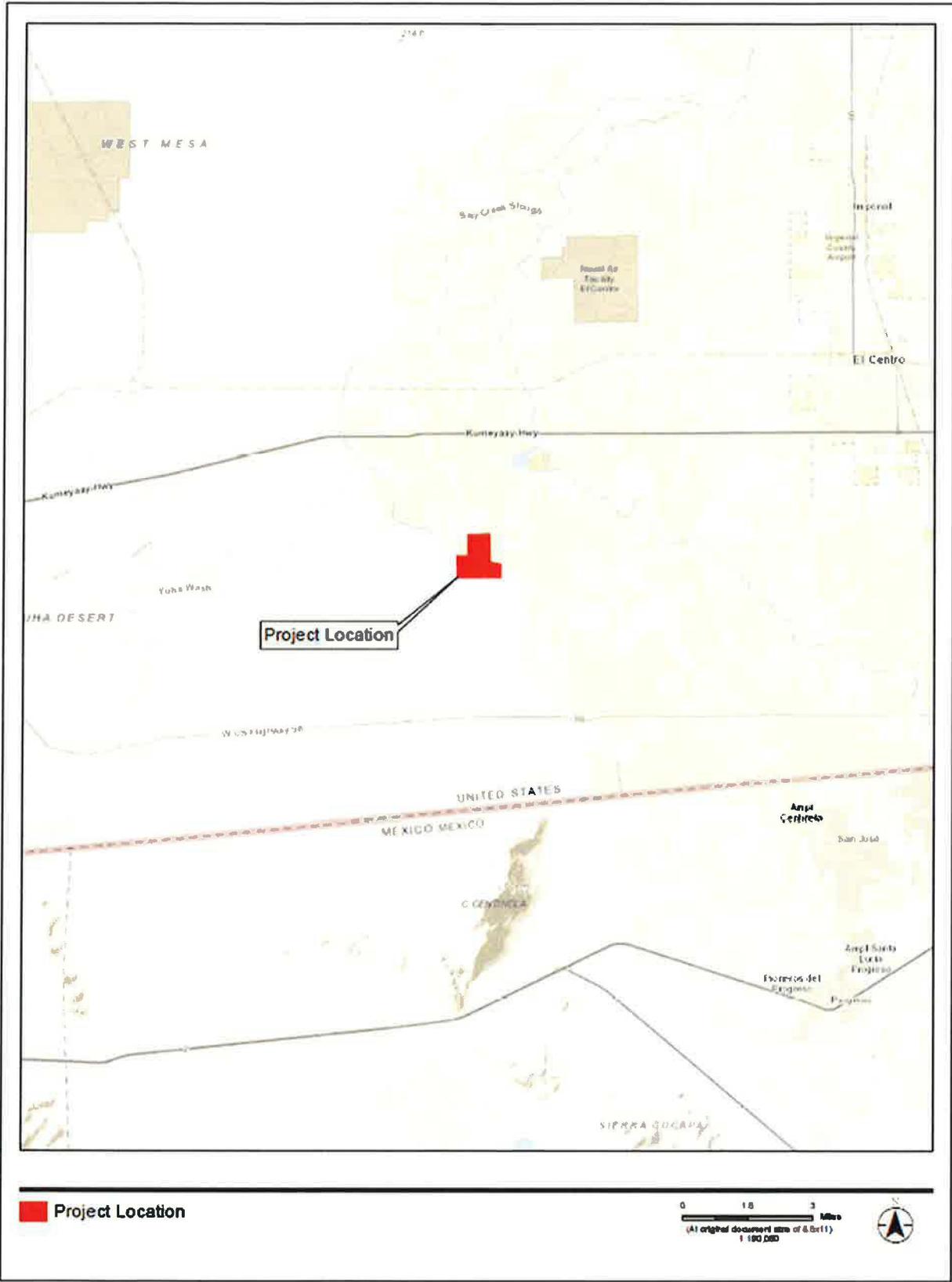


David Black  
ICPDS, Planner IV

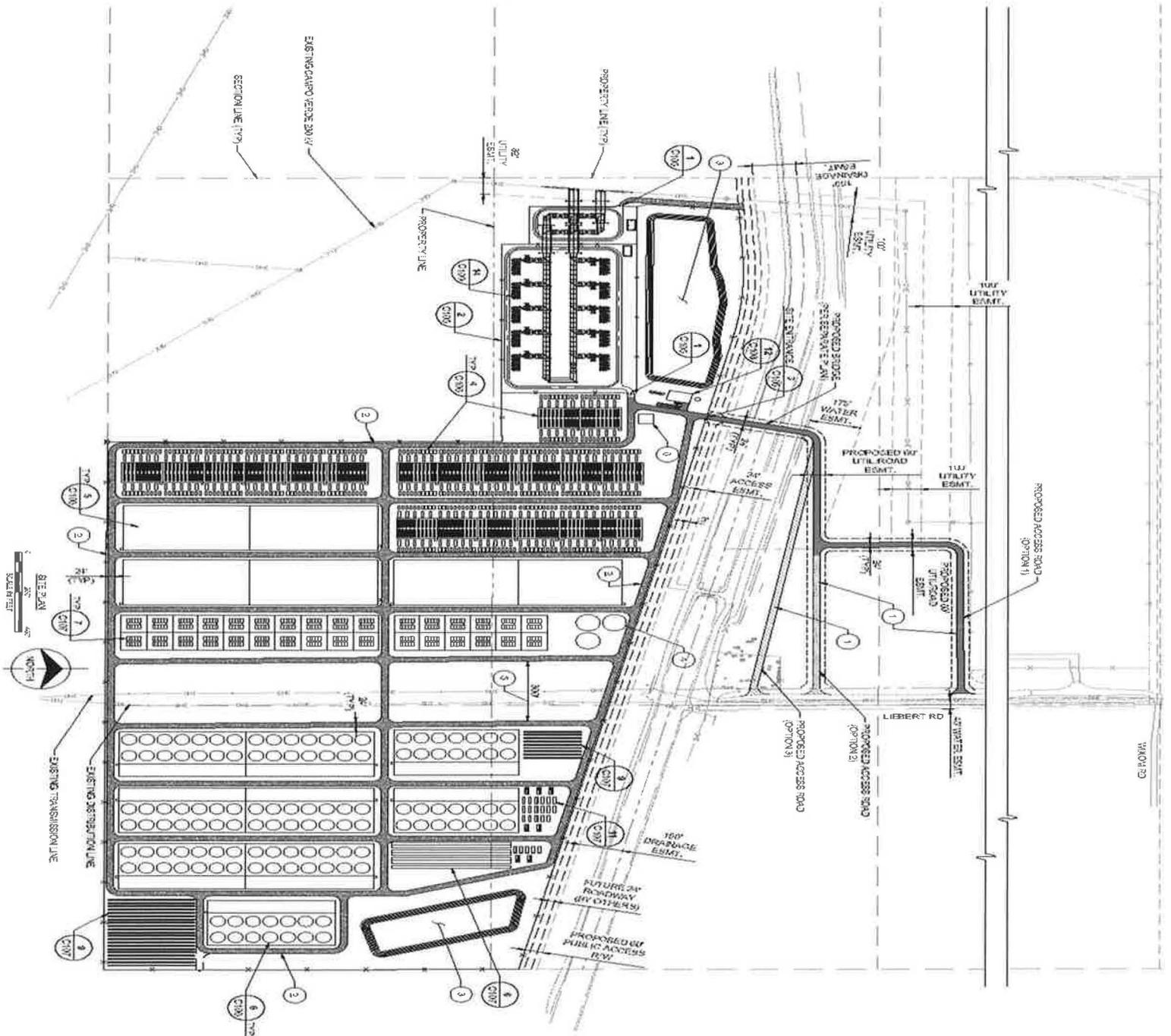
Attachment: Project Location Maps

GR\DB\S:\AllUsers\APN\051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA 19-0003 SB-18 Letters 032420.docx

Figure 1. Regional Location

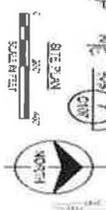


**Figure 2. Project Location**



- KEY NOTES:**
- 1 SITE ACCESS ROAD, GARVELL
  - 2 PROPOSED DRIVE, ROADWAY
  - 3 STORAGE TANK, SECTION 455A 179, SEE NO. 12
  - 4 PROPOSED WATER STORAGE TANK, SEE UTILITY PLAN 2/10/2012
  - 5 TEMPORARY CONCRETE DEFINED EASEMENT TO BE DETERMINED WITH THE LOCAL REGION DISTRICT FOR TRANSMISSION LINE
  - 6 DEVELOPED LOCATION FOR EMERGENCY GENERATORS

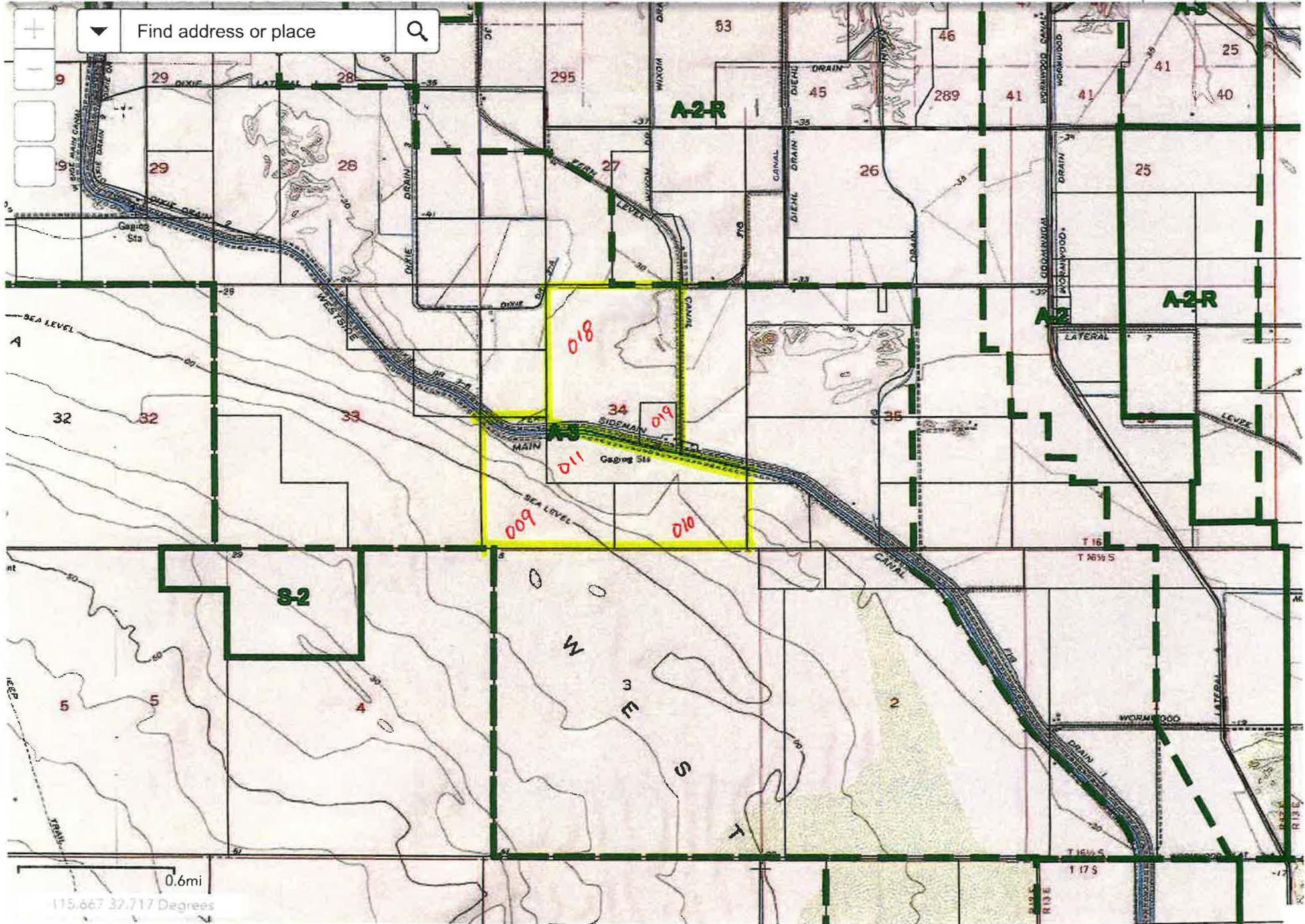
- NOTES:**
- 1. THIS LAYOUT IS CONCEPTUAL IN NATURE AND IS SUBJECT TO CHANGE DEPENDING ON THE DESIGN.
  - 2. STORAGE TANKS WILL BE DESIGNED IN ACCORDANCE WITH REGIONAL DISTRICT REGULATIONS. FINAL LOCATION AND SIZE OF STORAGE TANKS WILL BE DETERMINED AT FINAL DESIGN.
  - 3. ALL COMPONENTS ARE RESPONSIBLE TO ANY LOCATION WITHIN THE SITE BOUNDARY.





# Land Use Zoning

Imperial County, California



**Native American Heritage Commission  
Tribal Consultation List  
Imperial County  
3/4/2020**

**Barona Group of the Capitan Grande**

Edwin Romero, Chairperson  
1095 Barona Road Diegueno  
Lakeside, CA, 92040  
Phone: (619) 443 - 6612  
Fax: (619) 443-0681  
cloyd@barona-nsn.gov

**Campo Band of Diegueno Mission Indians**

Ralph Goff, Chairperson  
36190 Church Road, Suite 1 Diegueno  
Campo, CA, 91906  
Phone: (619) 478 - 9046  
Fax: (619) 478-5818  
rgoff@campo-nsn.gov

**Ewiaapaayp Band of Kumeyaay Indians**

Michael Garcia, Vice Chairperson  
4054 Willows Road Diegueno  
Alpine, CA, 91901  
Phone: (619) 445 - 6315  
Fax: (619) 445-9126  
michaelg@leaningrock.net

**Ewiaapaayp Band of Kumeyaay Indians**

Robert Pinto, Chairperson  
4054 Willows Road Diegueno  
Alpine, CA, 91901  
Phone: (619) 445 - 6315  
Fax: (619) 445-9126  
wmicklin@leaningrock.net

**lipay Nation of Santa Ysabel**

Virgil Perez, Chairperson  
P.O. Box 130 Diegueno  
Santa Ysabel, CA, 92070  
Phone: (760) 765 - 0845  
Fax: (760) 765-0320

**Inaja-Cosmit Band of Indians**

Rebecca Osuna, Chairperson  
2005 S. Escondido Blvd. Diegueno  
Escondido, CA, 92025  
Phone: (760) 737 - 7628  
Fax: (760) 747-8568

**Jamul Indian Village**

Erica Pinto, Chairperson  
P.O. Box 612 Diegueno  
Jamul, CA, 91935  
Phone: (619) 669 - 4785  
Fax: (619) 669-4817  
epinto@jiv-nsn.gov

**Jamul Indian Village**

Lisa Cumper, Tribal Historic Preservation Officer  
P.O. Box 612 Diegueno  
Jamul, CA, 91935  
Phone: (619) 669 - 4855  
lcumper@jiv-nsn.gov

**Kwaaymii Laguna Band of Mission Indians**

Carmen Lucas,  
P.O. Box 775 Diegueno  
Pine Valley, CA, 91962  
Phone: (619) 709 - 4207  
Kwaaymii

**La Posta Band of Diegueno Mission Indians**

Javaughn Miller, Tribal Administrator  
8 Crestwood Road Diegueno  
Boulevard, CA, 91905  
Phone: (619) 478 - 2113  
Fax: (619) 478-2125  
jmiller@LPtribe.net

**La Posta Band of Diegueno Mission Indians**

Gwendolyn Parada, Chairperson  
8 Crestwood Road Diegueno  
Boulevard, CA, 91905  
Phone: (619) 478 - 2113  
Fax: (619) 478-2125  
LP13boots@aol.com

**Manzanita Band of Kumeyaay Nation**

Angela Elliott Santos, Chairperson  
P.O. Box 1302 Diegueno  
Boulevard, CA, 91905  
Phone: (619) 766 - 4930  
Fax: (619) 766-4957

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65352.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed Westside Canal Battery Storage Project, Imperial County.



## NATIVE AMERICAN HERITAGE COMMISSION

March 4, 2020

David Black  
Imperial County

Via Email to: davidblack@co.imperial.ca.us

**Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, Westside Canal Battery Storage Project, Imperial County**

Dear Mr. Black:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

*Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.*

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
**Merri Lopez-Keifer**  
Luiseño

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

COMMISSIONER  
**Marshall McKay**  
Wintun

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Joseph Myers**  
Pomo

COMMISSIONER  
**Julie Tumamait-Stenslie**  
Chumash

COMMISSIONER  
**[Vacant]**

EXECUTIVE SECRETARY  
**Christina Snider**  
Pomo

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
  - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
  - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
  - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
  - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.
2. The results of any archaeological inventory survey that was conducted, including:
  - Any report that may contain site forms, site significance, and suggested mitigation measures.  
  
All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.
3. The result of the Sacred Lands File (SFL) check conducted through the Native American Heritage Commission was positive. Please contact the tribes on the attached list for more information.
4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
5. Any geotechnical reports regarding all or part of the potential APE.

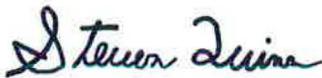
Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: [steven.quinn@nahc.ca.gov](mailto:steven.quinn@nahc.ca.gov).

Sincerely,



Steven Quinn  
Cultural Resources Analyst

Attachment

Barona Group of the Capitan Grande  
Edwin Romero  
1095 Barona Road  
Lakeside, CA 92040

Barona Group of the Capitan Grande  
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1095 Barona Road  
Lakeside, CA 92040

Barona Group of the Capitan Grande  
Edwin Romero  
1095 Barona Road  
Lakeside, CA 92040

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19-0003 SB-18 Letters 032420

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Campo Band of Diegueno Mission Indians  
Ralph Goff  
36190 Church Road, Suite 1  
Campo, CA 91906

Campo Band of Diegueno Mission Indians  
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Campo, CA 91906

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Eqiaapaayp Band of Kumeyaay Indians  
Michael Garcia  
4054 Willows Road  
Alpine, CA 91901

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Alpine, CA 91901

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Ewiaapaayp Band of Kumeyaay Indians  
Robert Pinto  
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Alpine, CA 91901

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Iipay Nation of Santa Ysabel  
Virgil Perez  
PO Box 130  
Santa Ysabel, CA 92070

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Virgil Perez  
PO Box 130  
Santa Ysabel, CA 92070

Iipay Nation of Santa Ysabel  
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Inaja-Cosmit Band of Indians  
Rebecca Osuna  
2005 S Escondido Blvd  
Escondido, CA 92025

Inaja-Cosmit Band of Indians  
Rebecca Osuna  
2005 S Escondido Blvd  
Escondido, CA 92025

Inaja-Cosmit Band of Indians  
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Jamul Indian Village  
Erica Pinto  
PO Box 612  
Jamul, CA 91935

Jamul Indian Village  
Erica Pinto  
PO Box 612  
Jamul, CA 91935

Jamul Indian Village  
Erica Pinto  
PO Box 612  
Jamul, CA 91935

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Jamul Indian Village  
Lisa Cumper  
PO Box 612  
Jamul, CA 91935

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Lisa Cumper  
PO Box 612  
Jamul, CA 91935

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Lisa Cumper  
PO Box 612  
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Kwaaymii Laguna Band of Mission Indians  
Carmen Lucas  
PO Box 775  
Pine Valley, CA 91962

Kwaaymii Laguna Band of Mission Indians  
Carmen Lucas  
PO Box 775  
Pine Valley, CA 91962

Kwaaymii Laguna Band of Mission Indians  
Carmen Lucas  
PO Box 775  
Pine Valley, CA 91962

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La Posta Band of Diegueno Mission Indians  
Javaughn Miller  
8 Crestwood Road  
Boulevard, CA 91905

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Javaughn Miller  
8 Crestwood Road  
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Javaughn Miller  
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La Posta Band of Diegueno Mission Indians  
Gwendolyn Parada  
8 Crestwood Road  
Boulevard, CA 91905

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La Posta Band of Diegueno Mission Indians  
Gwendolyn Parada  
8 Crestwood Road  
Boulevard, CA 91905

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Gwendolyn Parada  
8 Crestwood Road  
Boulevard, CA 91905

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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Manzanita Band of Kumeyaay Nation  
Angela Elliott Santos  
PO Box 1302  
Boulevard, CA 91905

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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Manzanita Band of Kumeyaay Nation  
Angela Elliott Santos  
PO Box 1302  
Boulevard, CA 91905

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Manzanita Band of Kumeyaay Nation  
Angela Elliott Santos  
PO Box 1302  
Boulevard, CA 91905

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Mission Grande Band of Diegueno Mission  
Indians  
Michael Linton  
PO Box 270  
Santa Ysabel, CA 92070

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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Mission Grande Band of Diegueno Mission  
Indians  
Michael Linton  
PO Box 270  
Santa Ysabel, CA 92070

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Mission Grande Band of Diegueno Mission  
Indians  
Michael Linton  
PO Box 270  
Santa Ysabel, CA 92070

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Quechan Tribe of the Fort Yuma Reservation  
Jill McCormick  
PO Box 1899  
Yuma, AZ 85366

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
19-0003 SB-18 Letters 032420

Quechan Tribe of the Fort Yuma Reservation  
Jill McCormick  
PO Box 1899  
Yuma, AZ 85366

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
19-0003 SB-18 Letters 032420

San Pasquel Band of Diegueno Mission Indians  
Allen Lawson  
PO Box 365  
Valley Center, CA 92082

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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Sycuan Band of Kumeyaay Nation  
Cody Martinez  
1 Kwaaypaay Court  
El Cajon, CA 92019

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
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19-0003 SB-18 Letters 032420

Viejas Band of Kumeyaay Indians  
John Christman  
1 Viejas Grande Road  
Alpine, CA 91901

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
19-0003 SB-18 Letters 032420

Viejas Band of Kumeyaay Indians  
John Christman  
1 Viejas Grande Road  
Alpine, CA 91901

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John Christman  
1 Viejas Grande Road  
Alpine, CA 91901

GRIDBAPN051\350\011\GPA 19-0003, ZC 19-0004, CUP 19-0015\SB 18\GPA  
19-0003 SB-18 Letters 032420



# Imperial County Planning & Development Services Planning / Building

March 27, 2020

**Jim Minnick**  
DIRECTOR

**Certified Mail No. 7007 3020 0000 3207 3994**

Quechan Indian Tribe  
Attn: Jordan D. Joaquin  
PO Box 1899  
Yuma, AZ 85366

**RE: Notice of Opportunity to consult on the CED Westside Canal Battery Storage Project.**

Dear Mr. Joaquin,

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP).

**The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

The Battery Energy Storage Facility & related facilities are located in the Mount Signal area in unincorporated Imperial County, approximately 8-miles southwest of the City of El Centro. This project involves an a,,,,,,,,,,,,,mendment to the County's General Plan to implement the proposed projects. The applicant is requesting a General Plan Amendment to include/re-classify the project sites 051-350-011 & 051-350-010-000 from the current **Agriculture Designation** to an **Industrial Designation**.

The proposed project includes a new loop-in substation on the site and connects to the existing IID Campo Verde Imperial Valley 230kV Radial gen-tie line, which connects a one-third mile gen-tie line into the Imperial Valley substation 1/3 mile south of the project site. Access would be on a portion of Assessor's Parcel Number (APN) 051-350-009 (Figure 2).

The proposed project will utilize two additional parcels on the north side of the Westside Main Canal: APN: 051-350-019 and APN: 051-350-018. This site includes approximately 60 feet of frontage along the north fence line and south of the IID maintenance road to be used for site and public access. The project includes a Caltrans/County specified bridge to span the Westside Main Canal to connect the project site to Liebert Road to the east.

The proposed project will also include up to 25 MW of ground-mounted or rooftop behind-the-meter photovoltaic solar generation to provide onsite auxiliary power for the battery storage facilities. The proposed solar facility will not be used to deliver power to the grid. The proposed solar facility will be located on Assessor's Parcel Numbers 051-350-010 and 051-350-011.

**Surrounding land uses and setting:**

The parcels are surrounded by a Heavy Agricultural (A-3) zone on the north, south, east and west side of project.

In accordance with Assembly Bill 52 (AB 52) and Section 21080.3.1(d) of the California Public Resources Code (PRC), we are responding to your request to be notified of projects in our jurisdiction that will be reviewed under CEQA. Your name was provided to us as the point of contact for your tribe. We are hereby notifying you of an opportunity to consult with the County regarding the potential for this project to impact Tribal Cultural Resources, as defined in Section 21074 of the PRC. The purposes of tribal consultation under AB 52 are to determine, as part of the CEQA review process, whether or not Tribal Cultural Resources are present within the project area, and if so, whether or not those resources will be significantly impacted by the project. If Tribal Cultural Resources may be significantly impacted, then consultation will also help to determine the most appropriate way to avoid or mitigate those impacts.

In accordance with Section 21080.3.1(d) of the PRC, you have 30 days from the receipt of this letter to either request or decline consultation in writing for this project. Please send your written response before April 30, 2020 to Imperial County Planning & Development Services Department, 801 Main Street, El Centro, CA. 92243, att. David Black, Planner IV or by email to [CommentLetters@co.imperial.ca.us](mailto:CommentLetters@co.imperial.ca.us). If the County does not receive a response within 30 days, the County will proceed with the project. Thank you and we look forward to your response.

Sincerely,

JIM MINNICK, DIRECTOR  
Imperial County Planning & Development Services

BY:

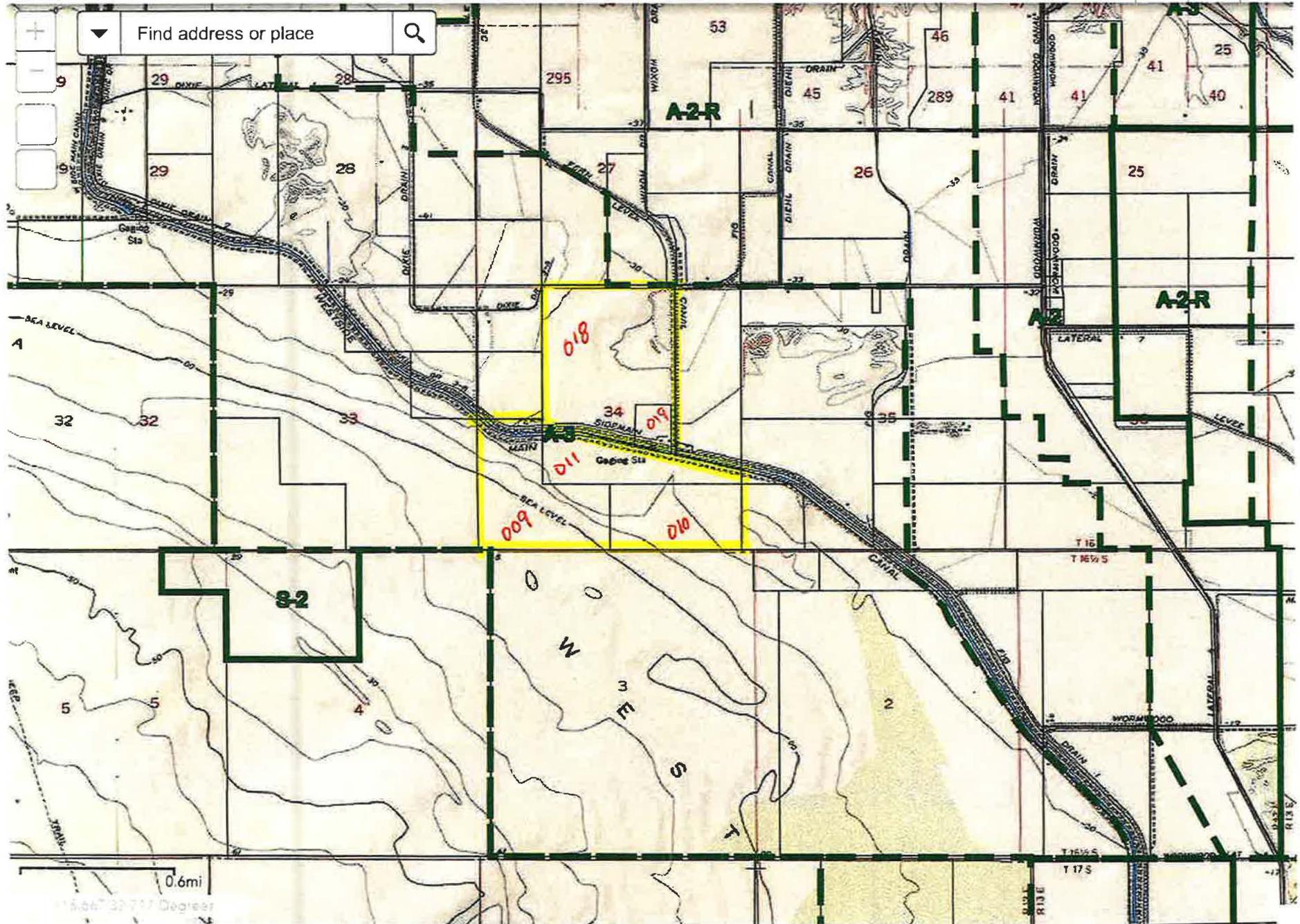
  
David Black  
Planner IV

Attachment: Location Map

cc: Arlene Kingery Tribal Historic Preservation Officer (Mail and Email)  
Jim Minnick, Director, ICPDS  
Michael Abraham, AICP, Asst. Director of ICPDS  
David Black, Planner IV, ICPDS









# Imperial County Planning & Development Services Planning / Building

---

Jim Minnick  
DIRECTOR

March 27, 2020

Certified Mail No. 7007 3020 0000 3207 3987

Quechan Indian Tribe  
Attn: Jill McCormick  
PO Box 1899  
Yuma, AZ 85366

RE: **Notice of Opportunity to consult on the CED Westside Canal Battery Storage Project.**

Dear Ms. McCormick,

The Imperial County Planning & Development Services Department has received applications for the preparation of a comprehensive Environmental Impact Report (EIR) for the attached projects: General Plan Amendment (GPA), Zone Change (ZC), Initial Study (IS) and one Conditional Use Permits (CUP).

**The Planning & Development Services Department** will act as the "Lead Agency" for the preparation of the EIR pursuant to the California Environmental Quality Act (CEQA).

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The proposed project will also include up to 25 MW of ground-mounted or rooftop behind-the-meter photovoltaic solar generation to provide onsite auxiliary power for the battery storage facilities. The proposed solar facility will not be used to deliver power to the grid. The proposed solar facility will be located on Assessor's Parcel Numbers 051-350-010 and 051-350-011.

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The parcels are surrounded by a Heavy Agricultural (A-3) zone on the north, south, east and west side of project.

In accordance with Assembly Bill 52 (AB 52) and Section 21080.3.1(d) of the California Public Resources Code (PRC), we are responding to your request to be notified of projects in our jurisdiction that will be reviewed under CEQA. Your name was provided to us as the point of contact for your tribe. We are hereby notifying you of an opportunity to consult with the County regarding the potential for this project to impact Tribal Cultural Resources, as defined in Section 21074 of the PRC. The purposes of tribal consultation under AB 52 are to determine, as part of the CEQA review process, whether or not Tribal Cultural Resources are present within the project area, and if so, whether or not those resources will be significantly impacted by the project. If Tribal Cultural Resources may be significantly impacted, then consultation will also help to determine the most appropriate way to avoid or mitigate those impacts.

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Sincerely,

JIM MINNICK, DIRECTOR  
Imperial County Planning & Development Services

BY:

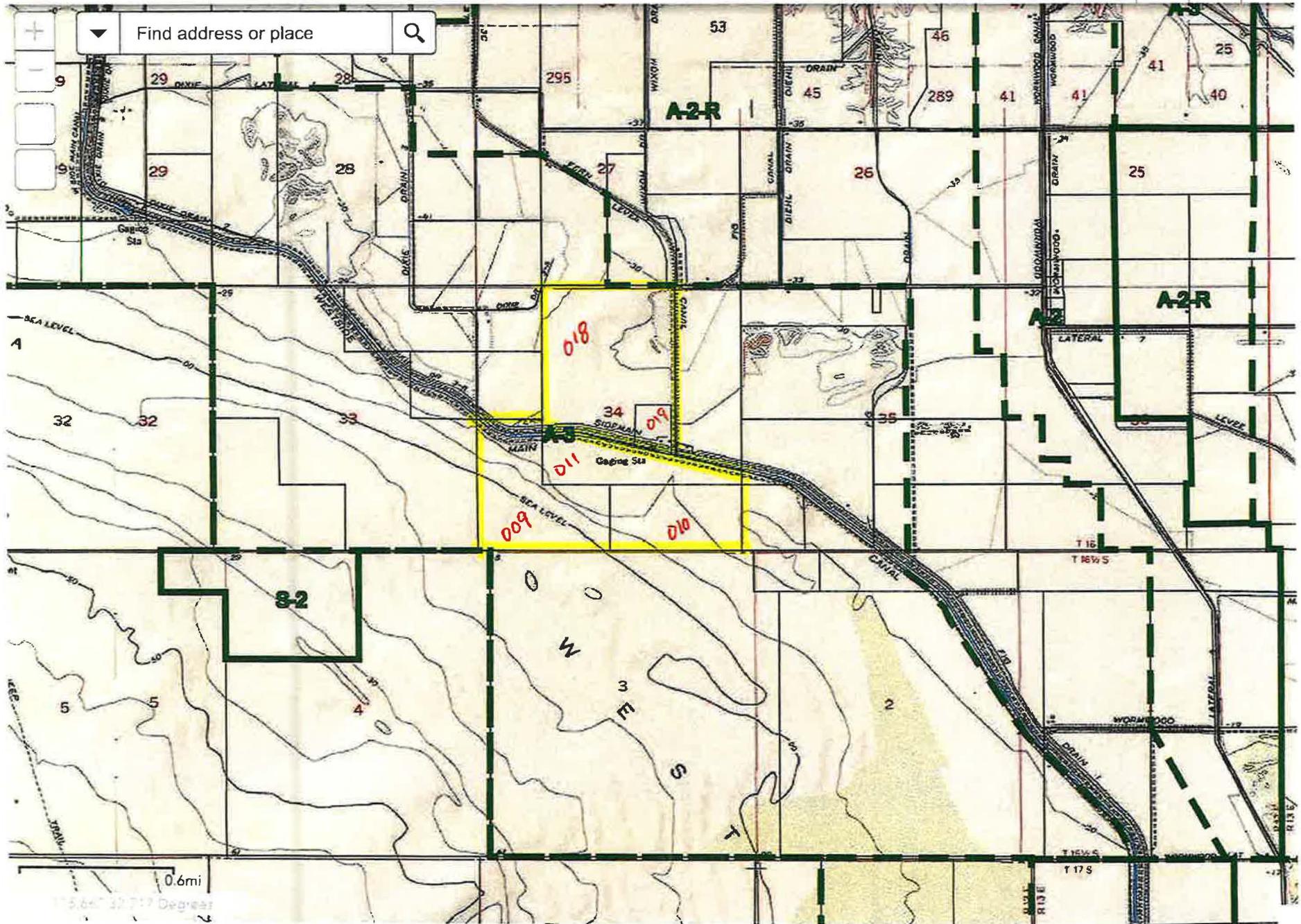
  
David Black  
Planner IV

Attachment: Location Map

cc: Arlene Kingery Tribal Historic Preservation Officer (Mail and Email)  
Jim Minnick, Director, ICPDS  
Michael Abraham, AICP, Asst. Director of ICPDS  
David Black, Planner IV, ICPDS









## SAN PASQUAL BAND OF MISSION INDIANS

### SAN PASQUAL RESERVATION

April 8, 2020

Imperial County Planning and Development services Planning and Building

RE: CED west side canal battery storage project in Imperial County California

#### TRIBAL COUNCIL

Stephen W. Cope  
Chairman

Justin Quis Quis  
Vice Chairman

Tilda M. Green  
Secretary-Treasurer

David L. Toler  
Councilman

Joe Chavez  
Councilman

Dear Mr. Black,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of David L. Toler THPO Officer and San Pasqual Band of Mission Indians.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognize San Pasqual Indian Reservation. The project is within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we defer to the wishes of Tribe in closer proximity to the project. Campo But if Campo Does not Respond in a timely manner, we would like are right to Reserve comment.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone 760-651-5142 or by e-mail at [THPO@sanpasqualtribe.org](mailto:THPO@sanpasqualtribe.org).

Respectfully,

Angelina Gutierrez  
Tribal Historic Preservation Office, Monitor Supervisor  
San Pasqual Band of Mission Indians

# **APPENDIX J – TRIBAL CULTURAL RESOURCES**

**J.2. Senate Bill 18 and Assembly Bill 52 Tribal Consultation  
Correspondence**



**Results of Cultural Resources Survey  
of the Westside Canal Battery Storage  
Project  
Imperial County, California**

*Prepared for*

Con Edison Clean Energy Businesses  
101 W. Broadway, Suite 1120  
San Diego, CA 92101  
Contact: Curtis Kebler

*Prepared by*

RECON Environmental, Inc.  
3111 Camino del Rio North, Suite 600  
San Diego, CA 92108  
P 619.308.9333

RECON Number 8888-1  
January 18, 2021

A handwritten signature in black ink that reads "Carmen Zepeda-Herman".

Carmen Zepeda-Herman, Principal Investigator

A handwritten signature in black ink that reads "Nathaniel Yerka".

Nathaniel Yerka, Project Archaeologist

**NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION**

Authors: Carmen Zepeda-Herman and Nathaniel Yerka

Consulting Firm: RECON Environmental, Inc.  
1927 Fifth Avenue  
San Diego, CA 92101-2358

Report Date: January 18, 2021

Report Title: Results of Cultural Resources Survey of the Westside  
Canal Battery Storage Project, Imperial County,  
California

Prepared for: Con Edison Clean Energy Businesses  
101 W. Broadway, Suite 1120  
San Diego, CA 92101

Contract Number: RECON Number 8888-1

USGS Quadrangle Map: Mount Signal, quadrangle, 1976 edition

Acreage: Approximately 163 acres

Keywords: Cultural resources survey, lithic prehistoric resources,  
Westside Main Canal, Fern Check Dam, Imperial  
Irrigation District, internal canal system

This report summarizes the results of the cultural resources field and archival investigation of the Westside Canal Battery Storage Project (Project), located in the county of Imperial, California. The area of potential effect (APE)/Project area consists of approximately 163 acres of agriculturally-zoned land located in the unincorporated Mount Signal area of the County, approximately 8.0 miles southwest of the city of El Centro. The Project site is comprised of two parcels owned by Westside Canal Battery Storage, LLC (Project Proponent), a subsidiary of Con Edison Clean Energy Businesses, Assessor Parcel Numbers (APNs) 051-350-010 and 051-350-011, totaling approximately 148 acres. The two parcels are proposed for development as a utility-scale energy storage complex. The Project would also utilize portions of two parcels located north of the Westside Main Canal (APN 051-350-019 owned by IID and APN 051-350-018 owned by a private land owner) for site access and as a temporary construction staging area. These two parcels total approximately 15 acres. The Project would also access a small portion of APN 051-350-009 within an IID easement for connection to the existing IID Campo Verde Imperial Valley 230 kilovolt radial gen-tie line during the construction of a substation on the APE/Project area. The total APE/Project area, encompassing both temporary and permanent impacts on the parcels described above, would be approximately 163 acres.

The APE/Project area is located approximately one-third mile north of the Imperial Valley Substation (IV Substation) and directly south of the intersection of Liebert Road and the Imperial Irrigation District's (IID) Westside Main Canal. The APE/Project area is bounded by the Westside Main Canal to the north, Bureau of Land Management (BLM) lands to the

south and west, and vacant private land to the east. The Campo Verde solar generation facility is located north of the APE/Project area, across the Westside Main Canal.

A records search was conducted of the archaeological databases maintained at the California Historical Resources Information System, South Coastal Information Center at San Diego State University. Three cultural resources were mapped within or adjacent to the current APE/Project area. They are P-13-003176 (a lithic and ceramic scatter), P-13-008334 (a section of the Westside Main Canal), and P-13-012692 (the Fern Check Dam).

Twelve previously unrecorded archaeological resources were identified during the survey. The cultural resources consist of three prehistoric sites (CA-IMP-13055/8888.1-NDY-001, CA-IMP-13056/8888.1-RDS-002, CA-IMP-13054/8888.1-CZH-003) and nine prehistoric isolates (P-13-017729/8888.1-ISO-001, P-13-017730/8888.1-ISO-002, P-13-017731/8888.1-ISO-003, P-13-017732/8888.1-ISO-004, P-13-017733/8888.1-ISO-007, P-13-017734/8888.1-ISO-008, P-13-017735/8888.1-ISO-009, P-13-017736/8888.1-ISO-010, P-13-017737/8888.1-ISO-011). It was determined that these newly recorded prehistoric sites and isolates do not meet any of the criteria for listing on the California Register of Historic Places and are, therefore, not significant historical resources under the California Environmental Quality Act (CEQA).

P-13-008334 (a section of the Westside Main Canal) is eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) on the local and state levels under Criterion A/1 for its significance in association with development of the Imperial Valley. This resource would be impacted by the construction of a proposed bridge; however, the proposed bridge would not affect the qualities or values that qualify the resource for listing in the NRHP or CRHR and would not result in a significant impact under CEQA; therefore, the Project would have no adverse effect.

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**ATTACHMENTS**

- 1: Southern Access Addendum to the Results of the Cultural Resources Survey of the Westside Canal Battery Storage Project, Imperial County, California
- 2: Native American Heritage Commission Response Letter

**CONFIDENTIAL ATTACHMENTS (bound under separate cover)**

- 1: Record Search Results
- 2: Location of Cultural Resources within the APE
- 3: Site forms for Newly Identified Cultural Resources

## 1.0 Management Summary

This report summarizes the results of the cultural resources field and archival investigation of the Westside Canal Battery Storage Project (Project), in the county of Imperial, California. The area of potential effect (APE)/Project area is located approximately one-third mile north of the Imperial Valley Substation (IV Substation) and directly south of the intersection of Liebert Road and the Imperial Irrigation District's (IID) Westside Main Canal. The APE/Project area is bounded by the Westside Main Canal to the north, Bureau of Land Management (BLM) lands to the south and west, and vacant private land to the east. The Campo Verde solar generation facility is located north of the APE/Project area, across the Westside Main Canal.

The purpose of this study is to determine the potential effects of the Project on significant cultural resources. For this effort, a records search and an archaeological resources survey were conducted. The records search was requested from the California Historical Resources Information System, South Coastal Information Center at San Diego State University (SCIC). The files at SCIC show three cultural resources mapped within or adjacent to the current APE/Project area. They are P-13-003176 (a lithic and ceramic scatter), P-13-008334 (a section of the Westside Main Canal), and P-13-012692 (the Fern Check Dam).

The on-foot archaeological resources survey was conducted between September 14 through 16, 2018, and a second site visit was completed on February 4, 2019. Twelve previously unrecorded archaeological resources were identified during the survey. The cultural resources consist of three prehistoric sites (CA-IMP-13055/8888.1-NDY-001, CA-IMP-17739/8888.1-RDS-002, and CA-IMP-13054/8888.1-CZH-003) and nine prehistoric isolates (P-13-017729/8888.1-ISO-001, P-13-017730/8888.1-ISO-002, P-13-017731/8888.1-ISO-003, P-13-017732/8888.1-ISO-004, P-13-017733/8888.1-ISO-007, P-13-017734/8888.1-ISO-008, P-13-017735/8888.1-ISO-009, P-13-017736/8888.1-ISO-010, and P-13-017737/8888.1-ISO-011). These resources were recorded using the California State Parks Department of Parks and Recreation (DPR) 523 Primary site forms.

CA-IMP-13055/8888.1-NDY-001, CA-IMP-13056/8888.1-RDS-002, CA-IMP-13054/8888.1-CZH-003, P-13-017729/8888.1-ISO-001, P-13-017730/8888.1-ISO-002, P-13-017731/8888.1-ISO-003, P-13-017732/8888.1-ISO-004, P-13-017733/8888.1-ISO-007, P-13-017734/8888.1-ISO-008, P-13-017735/8888.1-ISO-009, P-13-017736/8888.1-ISO-010, P-13-017737/8888.1-ISO-011, P-13-003176 (a lithic and ceramic scatter), and P-13-012692 (the Fern Check Dam) on the APE/Project area do not meet any of the criteria for listing on the California Register of Historic Places and are, therefore, not significant historical resources under the California Environmental Quality Act (CEQA). Because none of these resources are significant historical resources under CEQA, there would be no adverse effect on historical resources as a result of the Project.

P-13-008334 (a section of the Westside Main Canal) is eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) on the local and state levels under Criterion A/1 for its significance in association with development of the Imperial Valley. This resource would be impacted by the construction of a proposed bridge;

however, the proposed bridge would not affect the qualities or values that qualify the resource for listing in the NRHP or CRHR and would not result in a significant impact under CEQA; therefore, the Project would have no adverse effect.

## 2.0 Introduction

Westside Canal Battery Storage, LLC (Project Proponent), a subsidiary of Con Edison Clean Energy Businesses is proposing to develop, design, construct, own, operate, and maintain the Westside Canal Battery Storage Project (Project), a utility-scale energy storage complex with a capacity of up to 2,000 megawatts (MW). The Project would store energy generation from the electrical grid, and optimally discharge that energy back into the grid as firm, reliable generation and/or grid services.

The Project would be comprised of lithium-ion battery and/or flow battery energy storage facilities, a behind-the-meter solar energy facility, a new on-site 230 kilovolt (kV) loop-in switching station, a 34.5 kV to 230 kV substation, underground electrical cables, and permanent vehicular access to and from the site over a proposed bridge spanning Imperial Irrigation District's (IID's) Westside Main Canal. The proposed loop-in switching station would connect the Project to the existing IID Campo Verde-Imperial Valley 230 kV radial gen-tie line, which connects to the Imperial Valley Substation (IV Substation) and the California Independent System Operator (CAISO), approximately one-third mile south of the Project site. The Project Proponent has submitted the necessary Interconnection Request Applications to the CAISO and IID.

The Project would complement both the existing operational renewable energy facilities, as well as those planned for future development in the County, and would support the broader southern California bulk electric transmission system by serving as a firm, dispatchable resource.

The Project is pursuing the following objectives:

- To receive grid energy during beneficial market and operational periods and store that energy for future dispatch when the customer (i.e., a load-serving entity) deems it to be more valuable.
- To be a valuable resource in allowing the customer and system operators to manage the effect of intermittent renewable generation on the grid and create reliable, dispatchable generation upon demand.
- To utilize available land that has not been used for agricultural production for more than 15 years and enhance the site location by providing for permanent vehicular access.

Because the Project would impact U.S. Army Corps of Engineers (USACE) jurisdictional waters, the Project is subject to federal regulations, including Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). The

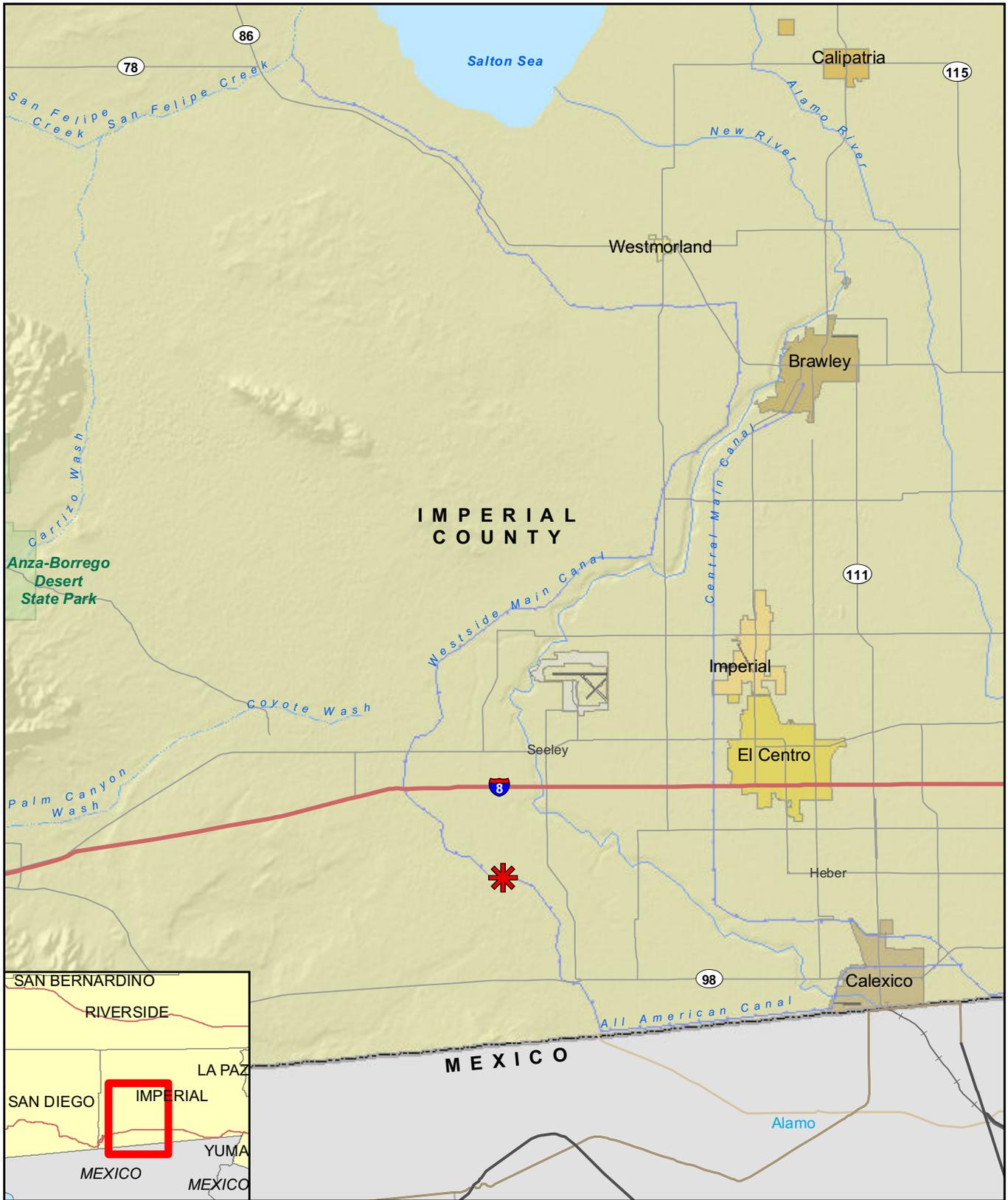
Project is an undertaking as defined in Section 106 of the NHPA. Section 106, as implemented (36 Code of Federal Regulations Part 800), requires federal agencies to identify cultural resources within the area of potential effect (APE), to assess impacts to resources found eligible for the National Register of Historic Places (NRHP), and to mitigate adverse effects to eligible resources. As such, the cultural resources survey was completed to identify cultural resources and any impacts to those resources under Section 106 of the NHPA. Additionally, because the Project must be approved by the County of Imperial, it is also subject to California Environmental Quality Act (CEQA) guidelines. The USACE is the lead for compliance with Section 106 of the NHPA and the NEPA. The County is the lead for the CEQA guidelines and regulations.

## 2.1 Project Location

The APE/Project area would consist of approximately 163 acres of land located in the unincorporated Mount Signal area of the County, approximately 8.0 miles southwest of the city of El Centro and approximately 5.3 miles north of the U.S.-Mexico border. Figure 1 shows the regional location of the APE/Project area. The Project site is comprised of two parcels (Assessor Parcel Number [APN] 051-350-010 and APN 051-350-011) owned by the Project Proponent totaling approximately 148 acres. These parcels have limited access corridors for vehicular traffic and are considered less desirable for agricultural production, as reflected by the last 15 years during which no farming activity has occurred.

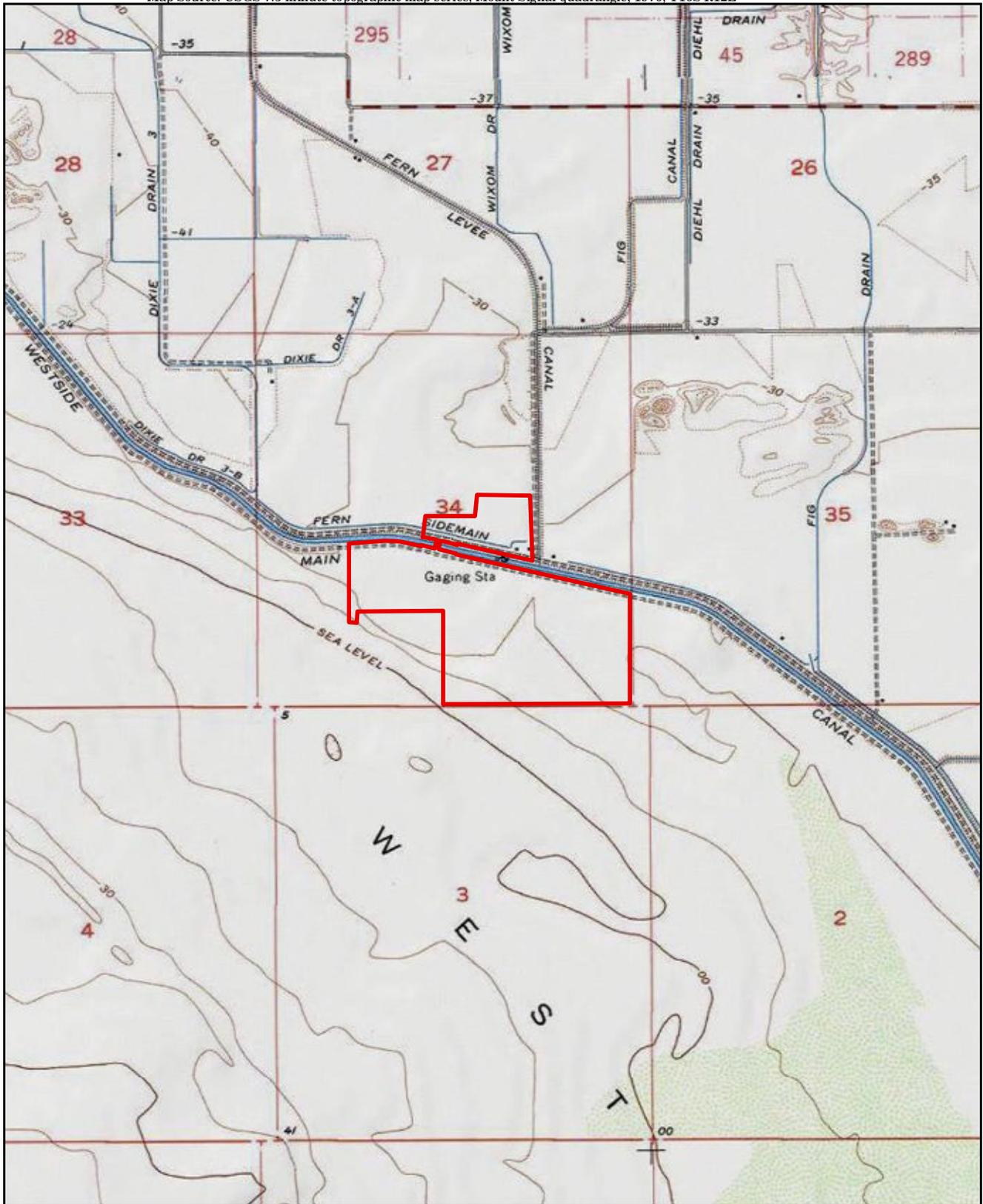
The APE/Project area is approximately one-third mile north of the IV Substation and directly south of the intersection of Liebert Road and the IID's Westside Main Canal. The APE/Project area is bounded by the Westside Main Canal to the north, BLM lands to the south and west, and vacant private land to the east. The Campo Verde solar generation facility is located north of the APE/Project area, across the Westside Main Canal. Figure 2 shows the APE/Project area on a U.S. Geological Survey Map. The APE/Project area is on the U.S. Geological Survey 7.5-minute topographical map series, Mount Signal quadrangle 1976, in Section 34, Township 16 South and Range 12 East.

The two Project parcels are proposed for development as a utility-scale energy storage complex. The Project would also utilize portions of two parcels located north of the Westside Main Canal (APN 051-350-019 owned by IID and APN 051-350-018 owned by a private land owner) for site access and as a temporary construction staging area. The Project would also access a small portion of APN 051-350-009 within an IID easement for connection to the existing IID Campo Verde Imperial Valley 230 kV radial gen-tie line during the construction of a substation on the Project site. The total APE/Project area, encompassing both temporary and permanent impacts on the parcels described above, would be approximately 163 acres.



 Project Location

**FIGURE 1**  
Regional Location



 Project Boundary

FIGURE 2  
Project Location on USGS Map

## 2.2 Project Components

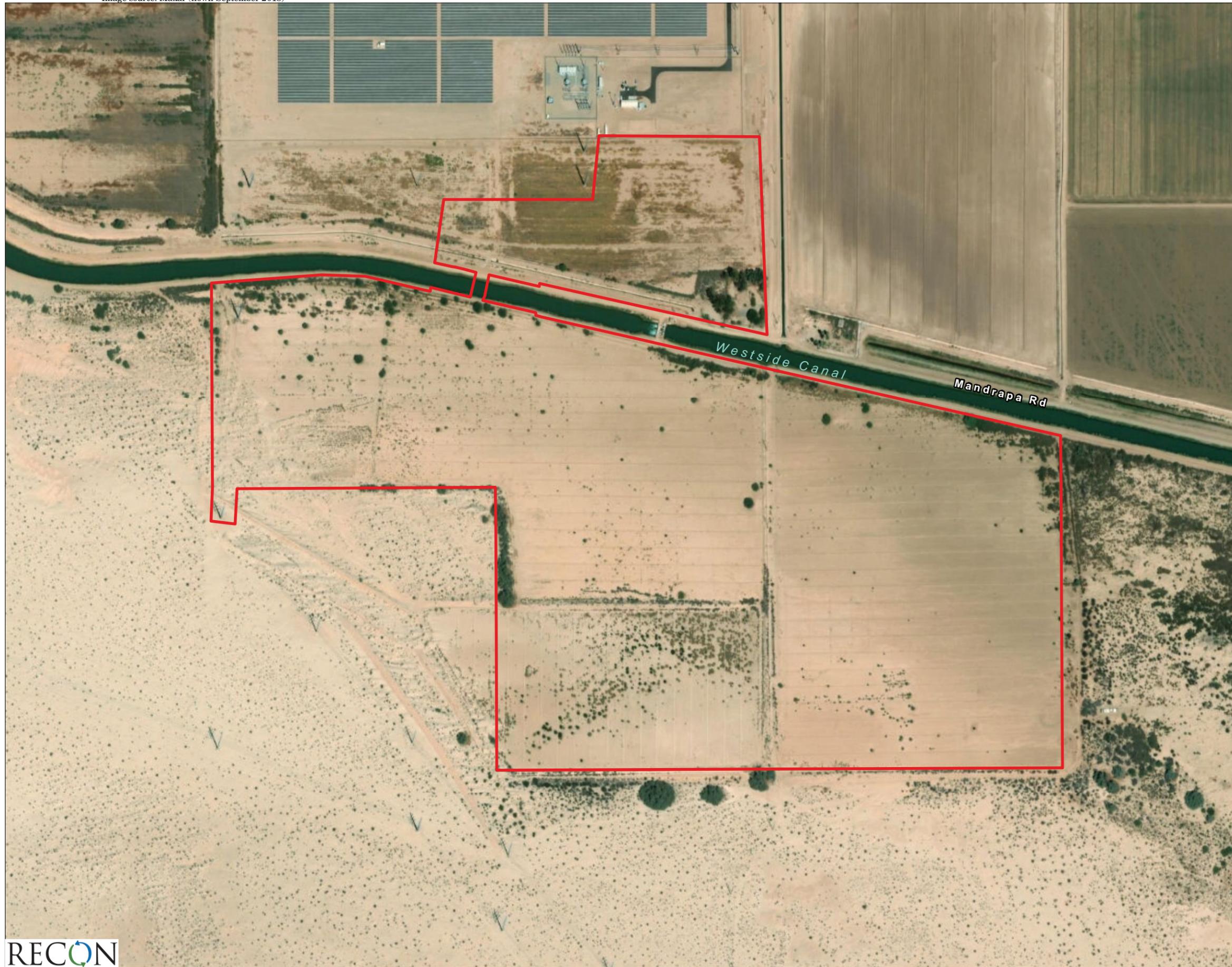
The Project would be constructed in three to five phases over a 10-year period, with each phase ranging from approximately 25 MW up to 400 MW per phase. Depending on the size of the battery system for a given phase, construction and commissioning (approval to operate) is anticipated to take approximately 6 to 12 months. For the purposes of this analysis, the applicant has assumed that construction activities would last for approximately 32 months to complete the full Project build-out.

Construction of the 100- to 200- MW first phase would include roads, a permanent clear-span bridge across the Westside Main Canal, Operations and Maintenance (O&M) facilities, water connections and water-mains, storm water retention, switching station and Project substation, legal permanent vehicle access, as well as the first energy storage facility. To access the Project site, construction workers would travel along Interstate 8 (I-8) and head 4.6 miles south to the Project site, and would utilize the IID Fern Check Bridge as a temporary pedestrian bridge until the permanent bridge is constructed. During peak construction activities, approximately 200 workers and approximately 30 daily deliveries would be required. It is anticipated that construction of the first phase would begin in 2021.

It is anticipated that each subsequent phase would be constructed within one to two years of each other, with the timing and size of each phase dependent on market conditions and the applicant's ability to secure commercial contracts with prospective customers. With the Project being built in phases, the necessary infrastructure, such as water mains, retention ponds, and access roads, would be built out to serve the Project phases from west to east and expanded over time to serve each phase. These subsequent phases would require improvements such as additional substation equipment, water main and site road extension, but would not require construction of additional common facilities which would be completed during the first phase. The total nameplate capacity (or rated capacity) of the Project at full build-out (all phases completed) would be approximately 2,000 MW. On-site photovoltaic solar generation would serve as station auxiliary power and be deployed throughout the Project site, constructed during each phase.

Construction activities during all Project phases would only occur Monday through Friday, between the hours of 7:00 a.m. and 7:00 p.m. or Saturday between the hours of 9:00 a.m. and 5:00 p.m., excluding holidays, per County Ordinance.

The area of potential effect (APE)/Project area is considered the Project boundary as represented on Figure 3a and occurs on the following APNs: 051-350-009, 051-350-010, 051-350-011, 051-350-018 and 051-350-019. The APE/Project area consists of approximately 163 acres.



 Project Boundary



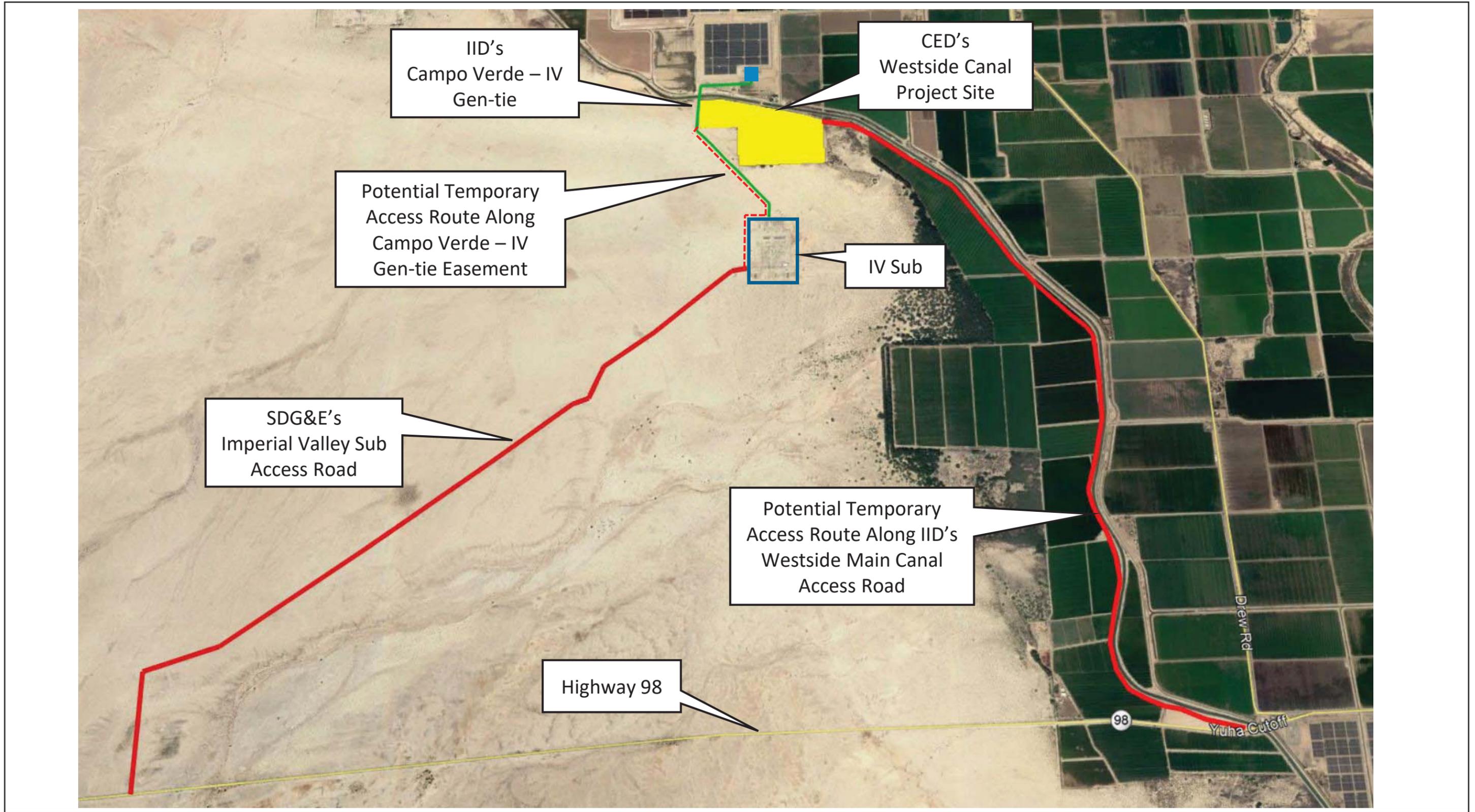
FIGURE 3a  
Project Location on  
Aerial Photograph

Due to the Project site having no direct vehicular access routes, the applicant is proposing to construct roads on both the north and south sides of the Westside Main Canal on private land, and a new clear-span Imperial County-specified bridge over the Westside Main Canal. The permanent new clear-span County-specified bridge would span the Westside Main Canal to connect to a proposed access road easement on the north side of the Westside Main Canal. The north side proposed access road would ultimately connect the Project to county road (CR) Liebert Road.

Construction of the permanent clear-span bridge spanning the IID's Westside Main Canal requires the Project Proponent to have access to both the north side and the south of the canal to perform the necessary construction activities. In addition to being necessary to facilitate construction of the new permanent clear-span bridge, access from the south side of the canal would allow the Project Proponent to commence construction on the first phase of the Project simultaneously, thereby shortening the duration of construction and potentially minimizing the associated impacts. The Project Proponent is evaluating various options for temporary construction access, including accessing the Project site from the south side of the Westside Main Canal off of State Route 98, as well as options involving access from the north side of the Westside Main Canal from I-8.

Option 1 would use the existing SDG&E maintenance road off Highway 98, which extends approximately 4.4 miles to the IV Substation. Option 1 would then continue along an existing 1.2-mile-long dirt access road that leads north, then east, outside the western and northern boundaries of the substation. Option 1 then continues northwest along an existing dirt access road that parallels two power lines until the access road connects with the western edge of the Project. The existing dirt road was constructed for the construction and maintenance of the existing Centinela gen-tie line. Option 2 would use the existing IID Westside Mail Canal access road. The selected temporary access option would be used until construction of the permanent bridge is completed. Both temporary construction access routes are presented in Figure 3b.

The 4.4-mile segment of Option 1 consisting of the SDG&E maintenance road off Highway 98 is a graded and improved dirt road. Therefore, use of this roadway segment would impact any cultural resources. Potential impacts on cultural resources associated with use of the 1.2-mile-long dirt access road segment of Option 1 have been analyzed in the Southern Access Addendum to the Results of the Cultural Resources Survey of the Westside Canal Battery Storage Project, Imperial County, California (Attachment 1). The IID Westside Mail Canal access road that would be used under Option 2 is a graded and improved dirt road. Therefore, use of this roadway segment would not impact any cultural resources.



## 3.0 Physical and Cultural Setting

### 3.1 Physical Setting

The Campo Verde solar generation facility is located north of the APE/Project area and agricultural uses are located northeast of the Project site. Parcels farther north of the APE/Project area also include a mix of agricultural uses and solar generation facilities. The parcel immediately east of the APE/Project area is undeveloped. BLM land south and west of the APE/Project area is generally undeveloped, relatively flat, and barren. The IV Substation is located approximately one-third mile south of the southern property line of the APE/Project area. The APE/Project area is relatively flat, and consists of a system of interior concrete canals, agricultural fields, and dirt roads (see Figure 3b).

Project elevation is approximately 10 feet below sea level. Existing surrounding uses include several large solar projects (the 20-megawatt Ocotillo Solar project, the 125-megawatt Acorn Solar project, and the 140-megawatt Campo Verde Solar project), agricultural fields, the Imperial Irrigation District's Westside Main Canal, and the Imperial Valley Substation to the south (see Figure 3b).

The APE/Project area is underlain by deep deltaic alluvial fills deposited by the Colorado River. Soils in the APE/Project area are described as Imperial–Glenbar silty clay, 0 to 2 percent slopes (115), Meloland fine sand (121), Meloland very fine sandy loam, wet (122), Rositas fine sand, wet, 0 to 2 percent slopes (135), Vint loamy very fine sand, wet (142), and Vint and Indio very fine sandy loams, wet (144). Imperial–Glenbar typically has a surface layer that is pinkish gray silty clay loam to about 12 inches. The underlying material is pinkish gray and light brown silty clay to a depth of 60 inches. Efflorescence of gypsum and brown stains are common in the cracks and pores. Meloland fine sand typically has a surface layer that is reddish yellow fine sand about 12 inches thick where the underlying material is stratified very pale brown loamy very fine sand and silt loam that is about 14 inches thick. Some areas see silty clay layers that are moderately to strongly saline and have gypsum efflorescence in the cracks where other areas have partial desert pavement of soft, flat sandstone fragments, waterworn gravel, and lime concretions. The typical Meloland very fine sandy loam is light brown very fine sandy loam that is about 12 inches thick where the underlying material is stratified, very pale brown loamy fine sand and silt loam that is about 14 inches thick. Below this is pink silty clay to a depth of 71 inches that has gypsum efflorescence in the cracks. Typically, Rositas fine sand is reddish yellow fine sand to a depth of 60 inches or more. In some places, soil color is less bright. Typically, Vint loamy very fine sand is light brown in color and is about 10 inches thick underlain by pink and light brown loamy fine sand to a depth of 60 inches, with several thin lenses of heavy silt loam between depths of 10 and 40 inches. Vint and Indio very fine sandy loams have a 10-inch surface layer that is light brown with underlying material being a stratified light brown and pink loamy fine sand with thin lenses of silt loam to a depth of 40 inches (U.S. Department of Agriculture 1981).

## 3.2 Cultural Setting

The prehistory of Imperial County may be divided into three major temporal periods: Paleoamerican, Archaic, and Late Prehistoric. These time periods have regional expression through various regional archaeological complexes or archaeological cultures.

### 3.2.1 Paleoamerican Period

The earliest part of the Paleoamerican Period in the region is represented by the Fluted Point Tradition. Fluted points have been well documented and dated for the Rocky Mountain and Great Plains areas (Haury 1975; Hester 1972; Jennings 1978; McGuire and Schiffer 1982). In these regions, they are often associated with big game kill sites and are interpreted to reflect a Big Game Hunting Tradition. In the Great Basin and California, however, their dating is more problematic. They are typically found along the shorelines of Pleistocene playas, along fossil streams, and in passes connecting such places (Fredrickson 1973; Riddell and Olsen 1969). Some researchers suggest that this reflects a lacustrine or riparian adaptation ancestral to the Western Pluvial Lakes Tradition or San Dieguito–Lake Mojave Complex that developed after about 12,000 Before Present (BP) (Moratto 1984).

The San Dieguito–Lake Mojave Complex is thought to have existed approximately 10,000 to 7,000 years ago during a time of greater rainfall than the present in southeastern California (Warren and Crabtree 1986). The assemblage consists of heavy percussion, core, and flake-based tools: domed and keeled choppers, planes, and scrapers. One also finds light-percussion flaked spokeshaves, flaked stone crescentics, and leaf-shaped projectile points. In the Mojave Desert, the distinctive Lake Mojave and Silver Lake stemmed projectile points also occur. Milling equipment is apparently rare or absent (Warren and Crabtree 1986:184). Subsistence is generally thought to have been focused on highly ranked resources such as large mammals. This subsistence strategy may have encouraged a pattern of relatively high residential mobility. Some cleared circles, trails, and geoglyphs in the Colorado Desert have been tentatively included in the San Dieguito–Lake Mojave Complex. Temporal placement of these sites is based on degree of embeddedness in desert pavements and patination, a dating method that has not been proven reliable (Hayden 1976; McGuire and Schiffer 1982; Rogers 1939).

### 3.2.2 Archaic Period

The early Archaic Period is represented by the Pinto Complex (7,000 to 4,000 BP) in the Colorado Desert. There is an apparent shift to a more generalized economy and a gradually increased emphasis on the exploitation of plant resources. The ground stone artifacts associated with this complex are typically thin slabs with smooth, highly polished surfaces, not the basin metates and manos typical of later times. Rogers (1939:52-53) argued that the thin, polished “slab metates” were not milling stones, but rather were used to process fibrous leaves or skins (Susia 1964; Wallace 1962; Warren 1984). Projectile points consist of the distinctive Pinto Series atlatl points made by hard hammer percussion technique. The assemblage also includes scrapers, knives, scraper-planes, and choppers. The mixed

core-based tool assemblage of the Pinto Complex may indicate a range of adaptations to a more diversified set of plant and animal resources brought about by a generalized desiccating trend in the West, punctuated by occasional, more mesic times. In general, archaeological sites dating to this period are rare in the Colorado Desert (Cleland et al. 2003).

According to Schaefer (1994), Indian Hill Rockshelter (CA-SDI-2537), located in the eastern foothills of the Jacumba Mountains, is the only well-documented site in the Colorado Desert of this period. This site contained rock-lined features, Elko points, core tools, hammerstones, manos reused as cooking stones and in hearths, brown ware and buff ware ceramics, ceramic pipes, and shell beads (McDonald 1992). The ceramics were found in the upper levels of the deposit and date to a later site component. McDonald (1992) suggests that Indian Hill Rockshelter was a multi-component site used as a food storage facility with numerous rock-lined features, occupied during the winter and spring.

Following the Pinto Complex is the Gypsum Complex, or Amargosa Complex (4000 to 1500 BP). This complex is characterized by the presence of fine pressure-flaked Elko and Humboldt series and Gypsum-type projectile points. The assemblage also contains leaf-shaped points; rectangular-based knives; flake scrapers; T-shaped drills; and occasional large scraper-planes, choppers, and hammerstones. Manos and basin metates become relatively common, and the mortar and pestle were introduced late in the complex (Warren 1984:416). The diversity of tool types and the refinement of milling equipment suggest a more generalized and effective adaptation to desert conditions in the Greater Southwest (Warren and Crabtree 1986).

### **3.2.3 Late Prehistoric Period**

The Late Prehistoric Period, also known as the Patayan Complex, begins by approximately 1500 BP. The Patayan Complex is characterized by dramatic cultural change and an expanded population in the Salton Trough. Paddle and anvil pottery was introduced, probably from Mexico by way of the Hohokam Complex of the middle Gila River area (Schroeder 1975, 1979; Rogers 1945). Lower Colorado Buff Ware, as described in the Patayan Complex, appears by about 1250 BP in the Colorado Desert (Waters 1982; Hildebrand 2003). Tizon Brownware, found in San Diego County, northern Baja California, and the western Salton Basin, occurs slightly later (Griset 1996).

The Patayan Complex is divided into three phases: Patayan I, II, and III. The terms Yuman I, II, and III—as termed by M. Rogers (1945)—coincide with the three Patayan periods with slight differences in terms of ceramic types and are defined by changes in ceramic types and the filling and desiccation of Lake Cahuilla (Waters 1982; Weide 1976).

The settlement system of Patayan I (1250–950 BP) is characterized by small mobile groups living in dispersed seasonal settlements along the Colorado River. Hunting and gathering was the subsistence strategy used by these mobile groups. A subsistence shift to floodplain horticulture occurred along the Colorado River and perhaps along the Alamo River and New River during the Patayan II Period (950–450 BP) (Baksh 1994; Forde 1931). Like elsewhere in the Southwest, principal crops were maize, beans, and squash, but mesquite was actually

more important to the diet. Fish from the Colorado River was the main source of protein (Castetter and Bell 1951). The shift to Patayan II coincides with the various filling–recession episodes of Lake Cahuilla and the lacustrine environment created by the lake. Yuman II also spanned from 900 to 450 BP and is characterized with an expansion into large settlement areas because of filling of Lake Cahuilla (Rogers 1945). During Patayan III (450–20 BP), there was a population shift because of the final desiccation of Lake Cahuilla (Rogers 1945; Waters 1982). Rogers (1945) also mentioned this population shift during his discussion of the Yuman III Period.

Smaller projectile points signifying the advent of the bow and arrow appear about 1050 BP in the Colorado Desert. Also during this period, burial practices shifted from inhumations to cremations. Other culture traits generally associated with this period include increasingly elaborate kinship systems, rock art including the famous geoglyphs or ground figures found along the Colorado River, and expanded trading networks as evidenced by the presence of shell from the Pacific Ocean and Gulf of California in Colorado Desert sites (Davis 1961; McGuire and Schiffer 1982; Warren 1984; Schaefer 1994).

The greatly increased number of Late Period archaeological sites suggests an expansion of population. The settlement pattern is characterized by small mobile groups living in seasonal settlements along the Colorado River floodplain. These locations were influenced by the filling and desiccation of Lake Cahuilla at least four times during this period (Schaefer 1994).

### 3.2.4 Ethnohistory

The APE/Project area was utilized prehistorically by a variety of Native American groups, including the Kumeyaay (the Kamia are a subset of this group), the Cocopah, and the Quechan. These three groups speak the language of the Yuman family of the Hokan language stock (Kroeber 1920). Short descriptions of their individual ethnographic context are outlined below.

At the time of the Spanish occupation, the Kumeyaay (also known as Kamia, Ipai, Tipai, and Diegueño) occupied the southern two-thirds of San Diego County and Imperial County. The term Kamia refers to the desert Kumeyaay while Ipai refers to the Kumeyaay north of Agua Hedionda to the San Luis Rey River and Tipai refers to the Kumeyaay south of Agua Hedionda to Todos Santos Bay, Mexico, and east to the Imperial Sand Dunes.

The Kamia traditional territory included the southern Imperial Valley from the latitude of the southern half of the Salton Sea to well below what is the U.S.–Mexico international border (Forbes 1965; Luomala 1978:593). Their main settlements were along the New and Alamo rivers (Gifford 1931).

Subsistence among the Kamia consisted of hunting and gathering, and floodplain horticulture (Barker 1976; Gifford 1931). In normal years, the Colorado River would overflow its banks in the spring and early summer and fill rivers such as the New and Alamo. When the floodwater receded, the Kamia would plant in the mud. A dam was maintained at *Xatopet* on the east/west portion of the Alamo River to control water flow and allow farming in years

when water flow was insufficient (Castetter and Bell 1951:43). Gifford (1931:22) and Castetter and Bell (1951:43) suggested these were recent adaptations and not traditional life ways. Bean and Lawton (1973), Lawton and Bean (1968), and Shipek (1988) argue that irrigation was indigenous.

The Kamia's major food staple was mesquite and screwbean (Gifford 1931:23). Seeds of the ironwood (*Palo fierro*) and palo verde (*Parkinsonia* sp.) were also used. Acorns were at times an important food. They were gathered in the mountains to the west of Kamia territory in October and acquired through trade from the southern Kumeyaay (Gifford 1931).

Small game, primarily rabbits, was most frequently taken, using bow and arrow or rabbit stick (*macana*). Sometimes fires were set along sloughs to drive rabbits out. Individuals with bow and arrow also hunted deer and mountain sheep. Fish were also taken in sloughs with bow and arrow, by hand, hooks, basketry scoops, and seine nets (Gifford 1931:24).

The Cocopah lived on the west side of the Colorado River delta from the tidewater area, north from a little above the latitude of Volcano Lake or Cerro Prieta to several miles south of the U.S.–Mexico border (Castetter and Bell 1951:52; Gifford 1933:261; Kroeber 1920). Like other river Yumans, the Cocopah settlements were dispersed residential areas or rancherias, not close-knit villages (Castetter and Bell 1951:53).

Cocopah subsistence was similar to other river Yuman people, although their location in the Colorado River delta area had a somewhat different environment from that of the upstream tribes. The Colorado River frequently changed course within the general floodplain throughout the area below the Grand Canyon, requiring settlement and field movement among the Cocopah and other delta peoples (Castetter and Bell 1951; Sykes 1937). Mesquite and screwbean grew in profusion and formed a dietary staple of the Cocopah. Other important wild food sources of the delta region were “wild rice or wild wheat,” and *quelite* or amaranth (Castetter and Bell 1951:192). The Cocopah planted a variety of maize, pumpkins, tepary beans, cowpeas, muskmelons, watermelons, and *heshmicha* (grain resembling wheat), and sugar cane (Gifford 1933).

Hunting was relatively unimportant and was confined primarily to the hills and mountains. The Cocopah fished in the Colorado and Hardy rivers, and occasionally parties would fish along the Gulf of California. Fish were also taken with bow and arrow, as well as by spears, gill nets, and dip nets (Castetter and Bell 1951:216; Gifford 1933:268).

The Cocopah frequently visited the mountainous Paipai territory west of the delta to trade and to gather pine nuts and acorns. Tobacco, mescal (roasted agave), and mountain sheep skins were obtained from the Paipai in exchange for delta foodstuffs. The Cocopah also obtained tobacco and eagle feathers from the Kumeyaay (Castetter and Bell 1951:54; Kelly 1977; Sample 1950:22). At times, the Cocopah traded seashells to the Kamia (Gifford 1931:37).

The Quechan (*Kwatsan*) were formerly called the Yuma Indians. Their territory was centered at the confluence of the Gila and Colorado rivers (present-day Yuma, Arizona), but extended north on the Colorado about 60 miles and 30 miles up the Gila. According to Quechan

tradition, the northern boundary was in the vicinity of Blythe, California; the southern boundary reached into Baja California and Sonora, Mexico. Their neighbors on the northwest were the Cahuilla and Luiseño, and to the west the Kamia. Their eastern boundary was just west of Gila Bend, Arizona (Miguel n.d., cited in Bee 1982:37).

The Quechan had a relatively large population. Juan Oñate, a visitor through the area, estimated a population of about 4,000 in 1604 (Bee 1983; Forbes 1965:343). He mentioned a stable horticultural and gathering economy. Throughout winter and spring, the Quechan lived in large seasonal settlements or rancherías located on terraces above the Colorado River floodplain. These winter settlements were moved from time to time (Bee 1982:40-44, 1983:87; Forde 1931:101). When the floodwaters of spring receded, the Quechan left their winter villages on the river terraces and dispersed into camps near their 2- to 3-acre horticultural plots distributed along the river floodplain. Extended families resided in these camps. Major crops included maize, squash, pumpkin, watermelon, and wheat (Castetter and Bell 1951). Wheat was introduced by Kino in 1700 (Castetter and Bell 1951:123). After the fall harvest season, the Quechan would reconvene in villages on terraces above the river to avoid seasonal flooding (Bee 1983:88; Forde 1931:101).

Quechan villages were actually a collection of houses, or rancherías, dispersed along the Colorado and Gila rivers. Households consisted of composite families that lived together and moved, more or less as a unit from place to place within a constantly changing floodplain environment. The Quechan burned the houses and possessions of the dead (Bee 1982, 1983; Forde 1931; Trippel 1889:583), which also contributed to the movement of villages from time to time (Trippel 1889:583).

### **3.2.5 Spanish/Mexican/American Periods**

The Spanish Period (1769–1821) in the Colorado Desert begins with the Alarcon exploration up the Colorado River in 1540 and the land expedition to the Colorado River by Melchior Diaz in the same year. Cabrillo claimed the coast of Alta California for Spain in 1542. It was not until 1769 that a permanent settlement was founded. In that year, the San Diego Presidio and the San Diego Mission—in what is now Old Town—were established (Rolle 1998). Native American culture in the coastal strip of California rapidly deteriorated despite repeated attempts to revolt against the Spanish invaders (Carrico 1987; Cook 1976). One of the hallmarks of the Spanish colonial scheme was the rancho system, in which large land grants were made to meritorious or well-connected individuals to encourage settlement (Rolle 1998).

The first Spanish explorer to actually enter the Imperial Valley was Pedro Fages, who rode along the northwestern edge of the Colorado Desert while looking for deserters from San Diego in 1772. He apparently entered the desert on an Indian trail he discovered, which led through Oriflamme Canyon to Carrizo Creek and the desert floor (Bolton 1930; Lawton 1976:47; Pourade 1961:53-54). Fages was followed by Juan Bautista de Anza. Both of the 1774 and 1775 Anza expeditions (guided by Padre Francisco Garcés) set out from Tubac, Sonora, to Yuma; south into Mexico; then west to Imperial Valley; and stopped at what he called Santa Rosa de las Lajas (Yuha Well). From there the expedition continued north through the Yuha Desert and went to what is now the community of Borrego Springs and

north to San Gabriel (Forbes 1965). The route was abandoned in 1781 after the Quechan revolted against two Spanish settlements near Yuma (Forbes 1965). Both Fages and Anza passed west of the APE/Project area.

During the Mexican Period (1822–1848), the mission system was secularized by the Mexican government and these lands allowed for the dramatic expansion of the rancho system. The southern California economy became increasingly based on cattle ranching. General Stephen Kearney, guided by Kit Carson, and his troops crossed the Colorado Desert east of the APE/Project area in 1846 following the Native American trails. The famous Mormon Battalion, under the command of Philip St. George Cook, followed a similar route in 1847. The Mexican Period ended, when Mexico signed the Treaty of Guadalupe Hidalgo on February 2, 1848, concluding the Mexican–American War (1846–1848; Rolle 1998). California became a state in 1850 (Rolle 1998).

A great influx of Americans and Europeans followed the discovery of gold in northern California in 1848. The gold seekers and homesteaders traveled through the Colorado Desert using the same route as Kearny and the Mormon Battalion, then known as the Southern Emigrant Trail in the early 1900s. In 1853 the route was used by the Birch Overland Mail and later in 1858 by the Butterfield Southern Overland Mail Line. After 1861, when the mail route stopped service, the route was used mostly for cattle drives from Mason and Vallecitos valleys to Carrizo Valley and the Fish Creek area in the desert (Cook and Fulmer 1980). In 1890, prospectors in search of minerals in the Anza–Borrego Desert began using the route (Cook and Fulmer 1980). Today this old Indian and pioneer route is called County Route S2, or the Great Southern Overland Stage Route of 1849, which connects Ocotillo at Interstate 8 with Warner Springs to the north.

Around the turn of the century, the Imperial Valley experienced considerable population growth after the construction of irrigation projects, and agriculture became a prime focus of economic activity. The first canal built was the Imperial Canal. The Westside Main Canal is a 40-mile canal alignment built in 1907 that later became part of the All-American Canal system. The construction of the All-American Canal to transport water from the Colorado River to Imperial Valley between 1934 and 1940 transformed agricultural development and settlement of the Imperial and Coachella valleys. The areas served by the canal have become some of the richest and most important agricultural areas in the U.S. since the completion of the canal in 1938 (Queen 1999).

## 4.0 Study Methods

Site record searches were conducted through the SCIC (Confidential Attachment 1).

The APE/Project area was surveyed on September 14, 15, and 16, 2018 by RECON archaeologists Harry Price, Richard Shultz, Nathaniel Yerka, and Carmen Zepeda-Herman, accompanied by Shuuluk Linton, Native American Monitor from Red Tail Environmental. A second survey to accommodate additional and right-of-entry property was conducted on February 4, 2019 by RECON archaeologists Harry Price and Nathaniel Yerka, accompanied by Banning Taylor IV, Native American Monitor from Red Tail Environmental. The field inspection was conducted on foot, in conditions consisting of warm temperatures, bright daylight, and occasional breezes (the February 4, 2019 visit occurred in cool temperatures, under cloudy skies, with a steady breeze). The APE/Project area was covered in a mix of east-west and north-south transects spaced approximately 15 meters apart. Transect direction was dictated by the already present wind-rows or old furrows from previous agricultural activities within the APE/Project area.

The APE/Project area was inspected for evidence of archaeological materials such as flaked and ground stone tools or fragments, ceramics, milling features, and human remains. The field team navigated the APE/Project area by means of a sub-meter global positioning system (GPS) unit. RECON downloaded a georeferenced map into a field GPS unit to facilitate route finding and resource recording. The field GPS unit consisted of a handheld Trimble GEO 7 series with Floodlight™ satellite shadow reduction technology allowing data collection even when working in areas of heavy overhead cover, such as trees and buildings. These instruments provided the field team with sub-meter accuracy and real-time position correction and recording capability. Aerial photographs of the APE/Project area and compasses were also used. When archaeological materials were found, the transect intervals were reduced from 15 meters to 3-5 meters. The locations of the features and the artifacts within new site areas were recorded using a sub-meter GPS. A site was defined as three or more artifacts or features within 30 meters of each other. A 5-meter buffer around these artifacts designated a site boundary. Sketch maps were made by means of GPS data and aerial photographs of the site location. General photographs of the site area and close-up shots of diagnostic items or other descriptive scenes were taken. Natural features, such as shrubs and drainages, and modern features, such as roads, were depicted on maps as appropriate. No artifacts were collected during the survey. California DPR site forms, update forms, and maps were be submitted to the SCIC.

## 5.0 Survey Results

### 5.1 Record Search

The records search obtained from the SCIC identified 116 cultural resources within a one-mile radius of the APE/Project area. Three of these resources were mapped within or adjacent to the current APE/Project area. They are P-13-003176 (a lithic and ceramic scatter), P-13-008334 (a section of the Westside Main Canal), and P-13-012692 (the Fern Check Dam). The

latter two are segments of the IID canal and drain system. P-13-003176 was recorded as a small temporary camp in 1979 consisting of ceramic sherds and lithics. The site was expanded in 2012 to include two deposits consisting of 18 calcined bones. P-13-008334 is a west-northwest-trending dirt segment of the IID's Westside Main Canal, which intersects the northern segment of the Project property. The canal is approximately 80 feet wide. It is banked by earthen levees of vegetation and is unlined. Dirt access roads run along the levees on both sides of the canal for maintenance and dredging access. Smaller interior canal sections occur within the APE/Project area, which delivered water to crops. P-13-012692 is the Fern Check Dam, a circa 1947 concrete and metal check structure that controls and measures the flow of water in the Westside Main Canal entering the Fern Side Main Heading and into the Fern Side Main, which runs parallel to the Westside Main Canal. Record search results are included as Confidential Attachment 1.

No historic addresses are listed on, adjacent to, or within one mile of the APE/Project area.

Forty-five reports have been recorded at the SCIC occurring within one mile of the APE/Project area. Seven of these occur within portions of the APE/Project area. A list of all reports is included in Confidential Attachment 1.

A letter was sent to the Native American Heritage Commission in Sacramento on August 27, 2018 requesting a search of their Sacred Lands File. The Native American Heritage Commission replied on August 27, 2018, indicating that they had no record of Native American cultural resources in the immediate area of the APE/Project area. The response letter from the Native American Heritage Commission is included as Attachment 2.

## **5.2 Field Survey Results**

Three new prehistoric cultural resources, nine prehistoric isolates, and three previously recorded cultural resources were identified during the field survey. The new resources include three lithic scatters and nine isolated lithic artifacts. Detailed site descriptions for the three new resources and isolates are given below. Confidential Attachment 2 presents the locations of the sites and Confidential Attachment 3 contains the updated site forms and newly recorded site forms. These forms were submitted to the SCIC, and trinomial numbers will be requested once the forms are reviewed.

The vast majority of the APE/Project area is currently fallow agricultural fields with dirt roads, concrete canal sections and gates, chain link fencing, and overhead utility lines. The main feature is the Westside Canal, which intersects the APE/Project area along with smaller interior canal or drain sections that occur within the APE/Project area.

Ground visibility across the APE/Project area on the south side of the Westside Canal was 95 to 100 percent (Photographs 1 and 2). With the exception of a few cleared areas and dirt roads, ground visibility in the parcels situated north of the Westside Canal was approximately 20 to 30 percent (Photographs 3 and 4). At the time of the survey the APE/Project area had not been planted, and had been fallow for several years. The vegetation on the APE/Project area can be characterized as early seral disturbed desert scrub. Minimal ruderal weed growth was present but owing to the time of year, had mostly died off (Photograph 5). The ground was compact and relatively easy to walk on. Project topography is generally flat. Elevations range between -5 feet below mean sea level (BMSL) at the south end of the Project property to -23 feet BMSL on the north side of Westside Canal. Along the northwestern property boundary, the agricultural field landscape has given way to penetrating sand dunes (Photograph 6). Generally, dirt roads are raised approximately 12 to 24 inches above the adjacent fields or have a berm of similar height between them and the fields; these roads and berms are most likely artificially raised (Photographs 7 and 8).

RECON performed a second site visit that surveyed the required area around a power pole at the west side of the APE/Project area (Photograph 9) as well as a portion of property north of the Westside Main Canal (Photograph 10).

### 5.2.1 Newly Recorded Sites

CA-IMP-13055/8888.1-NDY-001 is a lithic scatter comprised of nine lithics including one tool and eight flakes. The tool is a coarse-grained porphyritic metavolcanic (CGPM) core/scrapper that exhibits secondary edge retouch along one margin and measures 66 millimeter (mm) x 61 mm x 40 mm. The remaining lithics consist of three fine-grained porphyritic metavolcanic (FGPM) secondary reduction flakes, one FGPM primary reduction flake, one FGPM tertiary reduction flake, two FGPM primary shatter, and one fine-grained metavolcanic (FGM) secondary reduction flake. The site is situated in an agricultural field and measures 40 meters (northwest/southeast) x 16 meters (southwest/northeast).

CA-IMP-13056/8888.1-RDS-002 is a lithic scatter comprised of 14 lithics including four tools, eight flakes, and two pieces of fire-affected rock (FAR). The tools consisted of one bifacial and shouldered quartz ground stone fragment that is 33 mm thick; one bifacial and multi-marginal FGPM scrapper exhibiting one bifacial edge, two unifacial edges, and measures 73 mm x 52 mm x 16 mm; one bifacial and multi-marginal FGPM spent core that measures 46 mm x 36 mm x 23 mm; and one fragmented FGPM hammerstone measuring 62 mm x 50 mm x 47 mm. Flakes consisted of one FGPM primary reduction flake, one secondary reduction flake, one FGPM primary shatter, and five FGPM secondary shatter. The two pieces of FAR are recorded as FGPM and qualified as possible. The site is situated in an agricultural field and measures 31 meters (northwest/southeast) x 20 meters (southwest/northeast).



**PHOTOGRAPH 1**  
View of APE/Project Area South of Westside Main Canal  
(Imperial Substation in Background); Looking South



**PHOTOGRAPH 2**  
View of APE/Project Area from Southeast Corner South of Westside  
Main Canal (Fern Check Dam in Right Background);  
Looking Northwest



**PHOTOGRAPH 3**  
View of APE/Project Area North of Westside Main Canal from  
Northeast Corner; Looking West-Southwest



**PHOTOGRAPH 4**  
View of APE/Project Area North of Westside Main Canal;  
Looking North



**PHOTOGRAPH 5**  
View of APE/Project Area South of Westside Main Canal  
(Fern Check Dam in Right Background); Looking Northeast



**PHOTOGRAPH 6**  
View of APE/Project Area South of Westside Main Canal;  
Looking West



**PHOTOGRAPH 7**  
View of APE/Project Area South of Westside Main Canal  
(Fern Check Dam in Background); Looking North



**PHOTOGRAPH 8**  
View of APE/Project Area from Southeast Corner South of Westside  
Main Canal; Looking North



**PHOTOGRAPH 9**  
View of APE/Project Area from Power Pole (BLM Land) South of Westside Main Canal; Looking Southeast



**PHOTOGRAPH 10**  
View of APE/Project Area North of Westside Main Canal; Looking East-Northeast

CA-IMP-13056/8888.1-CZH-003 is a lithic scatter comprised of two tools and one flake. The tools consist of one FGPM utilized flake exhibiting unifacial retouch and rounding on the proximal end; the flake measures 42 mm x 29 mm x 4 mm. One FGPM core exhibiting two platforms where one is bifacially flaked, measures 43 mm x 40 mm x 25 mm. The lone flake is a FGPM secondary shatter. The site is situated in an agricultural field and also measures 31 meters (northwest/southeast) x 20 meters (southwest/northeast).

### **5.2.2 Newly Recorded Isolates**

P-13-017729/8888.1-ISO-001 is an isolated chert secondary reduction flake.

P-13-017730/8888.1-ISO-002 is an isolated FGPM tertiary reduction flake.

P-13-017731/8888.1-ISO-003 is an isolated FGPM utilized flake that exhibits unifacial retouch and rounding on the margin. The flake measures 45 mm x 45 mm x 12 mm.

P-13-017732/8888.1-ISO-004 is an isolated FGPM secondary reduction flake.

P-13-017733/8888.1-ISO-007 is an isolated chalcedony assayed cobble with three flakes removed. The cobble measures 49 mm x 41 mm x 36 mm.

P-13-017734/8888.1-ISO-008 is an isolated rhyolite primary reduction flake.

P-13-017735/8888.1-ISO-009 is an isolated FGPM secondary reduction flake.

P-13-017736/8888.1-ISO-010 is an isolated FGPM retouched flake that exhibits bifacial retouch on one margin and unifacial retouch on another. The flake measures 46 mm x 29 mm x 6 mm.

P-13-017737/8888.1-ISO-011 is an isolated find consisting of two artifacts. One FGPM core fragment exhibits bifacial flaking along one edge and unifacial flaking along the other. The core measures 65 mm x 38 mm x 22 mm. Also observed was one FGPM secondary reduction flake.

### **5.2.3 Previously Recorded Resources within the APE/Project Area**

The files at SCIC show three cultural resources mapped within or adjacent to the current APE/Project area. They are P-13-003176 (a lithic and ceramic scatter), P-13-008334 (a section of the Westside Main Canal), and P-13-012692 (the Fern Check Dam). All three resources were relocated.

P-13-003176 was first recorded in 1979 by von Werlhof as a temporary camp consisting of ceramic sherds and lithics spread over a three meter area. Rowe (2008) did not relocate the site in December of 2007. Bowden-Renna located the site in 2010 observing two flakes but no ceramics while noting heavy disturbance by vehicles, agriculture, and a dirt access road. In 2010, Kp Environmental revisited and relocated the site and expanded the site boundary. No

ceramics were observed but lithic artifacts including a core, a core tool, and three pieces of debitage were recorded. Also recorded were two deposits which each contained calcined bones. RECON relocated the site at its mapped location but did not observe any previously recorded artifacts. However, RECON did locate several bone fragments in the area of recorded Bone Feature 1 and determined these fragments as being sunbleached rather than calcined, two of which were identified as long bone from a medium-sized mammal due to their thin wall. RECON did note disturbances including evidence of off-highway vehicle (OHV) activity crossing the site as well as the presence of numerous varied ammunition casings.

P-13-008334 is the Westside Main Canal, an irrigation canal that runs through agricultural lands in the Imperial Valley section of Imperial County and serves as a part of the Imperial Irrigation District's canal system within Imperial Valley. Construction of the Westside Main Canal began in 1906 with numerous updates over time. The portion of the Westside Main Canal that was surveyed is an approximately 500-foot dirt segment that runs east-southeast to west-northwest just south of Mandrapa Road, and 1,100 feet west of Liebert Road. The segment is approximately 80 feet wide, is banked by earthen levees with vegetation, and is unlined. Dirt access roads run along the levees on both sides of the canal for maintenance and dredging access. A smaller interior canal segment, Westside Main Canal Pump 6, was previously recorded within the APE/Project area which delivered water to crops. This segment was recorded by Chambers Group (Davis et al. 2011) and updated by kp Environmental (Mitchell 2012) to include a 900-foot segment that makes a northwest turn.

P-13-008334 was checked to determine if there had been any noticeable changes since it was last recorded. No apparent changes were observed regarding the Westside Main Canal proper. The smaller interior canal system, Westside Main Canal Pump 6, recorded in 2011 has continued to fill with windblown area sediments and the associated structures have become further dilapidated.

P-13-012692 is the Fern Check Dam, a circa 1947 concrete and metal check structure that is part of the Westside Main canal system which distributes irrigation water throughout Imperial County. The Fern Check Dam controls and measures water flow and aids in the diversion of water through the Fern Side Main Heading and into the Fern Side Main, which runs parallel to the Westside Main Canal. The Fern Check Dam is a concrete and metal structure which spans the Westside Main Canal. The structure features concrete headwalls, four concrete and metal gates operated by a pulley system, two concrete passageways (one auto and one pedestrian), metal safety railings, and an ancillary 16 x 16-foot metal shed with shallow gabled roof placed atop a concrete slab. The Fern Check Dam appears on the 1976 Mount Signal 7.5-minute USGS map as "Gaging Sta"[tion].

P-13-012692 was checked to determine if there had been any noticeable changes since it was last recorded. Only minor changes were observed which included new overhead lights and fresh paint.

## 6.0 Management Recommendations

### 6.1 Regulatory Background

The Project is subject to state and County environmental regulations and may be subject to federal regulations if jurisdictional waters/wetlands are identified. The County is the lead for compliance with the CEQA guidelines and regulations. If required, the U.S. Army Corps of Engineers would be the lead for compliance with Section 106 of the NHPA and NEPA.

#### 6.1.1 Federal Regulations

The Project may be an undertaking as defined in Section 106 of the NHPA. Section 106 of the NHPA, as implemented (36 Code of Federal Regulations [CFR] Part 800), requires federal agencies to take into account the effects of their undertakings on historic properties.

A key consideration for management is whether these resources are eligible for inclusion on the NRHP. A resource must qualify under one or more criteria in order to be considered eligible for listing.

A property that qualifies for the NRHP is considered significant in terms of the planning process under the NHPA, NEPA, and other federal mandates. The National Register Criteria for Evaluation (36 CFR 60.4) provides guidance in determining a property's eligibility for listing on the NRHP. This states that the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. is associated with the lives of persons significant in our past; or,
- C. embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; or
- D. has yielded, or may be likely to yield, information important in prehistory or history [36 CFR 60.4].

Further, a property must be evaluated within an important historic context and retain integrity of those features necessary to convey its significance.

The NRHP identifies seven aspects of integrity—location, design, setting, materials, workmanship, feeling, and association—that help define the character and significance of a cultural resource. An historic property will possess and maintain several, if not most, of these

aspects (National Park Service 1997). Aspects of integrity are defined in National Park Service Bulletin 15 as follows:

- Location—is the place where the historic property was constructed or the place where the historic event occurred.
- Design—is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting—is the physical environment of a historic property.
- Materials—are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship—is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling—is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association—is the direct link between an important historic event or person and a historic property (National Park Service 1997).

Cultural resources that are less than 50 years of age may be eligible for NRHP listing if they are found “exceptional” on the local, regional, or national level; in addition, they must meet one or more of the NRHP criteria and retain integrity as described above (Criterion Consideration G).

The integrity of a historic property can be adversely affected by an undertaking (36 CFR 800.5). An adverse effect is one that alters, “directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” (36 CFR 800.5(1)).

Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (36 CFR 800.5(2)).

Cultural isolates (isolated artifacts) are not considered significant, because they lack characteristics that would qualify them for listing on the NRHP.

## 6.1.2 State Regulations

As stated above, the Project is also subject to CEQA guidelines. Significance criteria are found in CEQA Guidelines 15064.5(a) and Section 5024 of the Public Resources Code, and CEQA Guidelines 15064.5(c).

A resource shall be considered historically significant if it meets one of the following criteria for listing on the CRHR (PRC Section 5024.1):

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
2. Associated with the lives of persons important to local, California or national history;
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values;  
or
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to meeting one of the above criteria, a resource must have integrity; that is, it must evoke the resource's period of significance or, in the case of criterion 4, it may be disturbed, but it must retain enough intact and undisturbed deposits to make a meaningful data contribution to regional research issues (California Code of Regulations Title 14, Chapter 11.5 Section 4852 [c]).

## 6.2 Evaluations of Resources

Of the six sites within the APE/Project area, one site (P-13-008334) has been formally recommended eligible for the NRHP; one site (P-13-012692) has been recommended not eligible for the NRHP, CRHR, or considered a historical resource for the purposes of CEQA; and four sites (P-13-003176, CA-IMP-13055/8888.1-NDY-001, CA-IMP-13056/8888.1-RDS-002, and CA-IMP-13054/8888.1-CZH-003) are recommended not eligible for the NRHP or

CRHR. Cultural isolates are not considered significant historical resources, because they generally lack characteristics that would qualify them for listing on the NRHP and CRHR. Therefore, the nine isolates found during the survey are not eligible for listing. See below for detailed evaluation discussion.

Four of the sites within the APE/Project area (P-13-003176, CA-IMP-13055/8888.1-NDY-001, CA-IMP-13056/8888.1-RDS-002, and CA-IMP-13054/8888.1-CZH-003) are not associated with a specific event or individual and are not considered significant under Criterion A/1 or B/2. Furthermore, these four sites do not contain distinctive characteristics to be considered eligible under Criterion C/3. Examination of the APE/Project area recorded disturbances substantial enough to compromise overall site integrity, most notably, off-road vehicle and agricultural activities. Criterion D/4 is discussed below.

### 6.2.1 Previously Recorded Sites

Of the three previously recorded sites, portions of P-13-008334 (the Westside Main Canal) have been determined eligible for listing on the NRHP and CRHR (Davis et al. 2011 and Mitchell 2011). Kp Environmental determined P-13-008334 eligible for the NRHP and CRHR under the themes of agriculture and economic development until it is demonstrated that it is not (Mitchell 2011). ASM Affiliates has recommended a section that encompasses the Project segment of the Westside Main Canal eligible for the NRHP and CRHR on the local and state levels under criterion A/1 for its significance in association with development of the Imperial Valley (Davis et al. 2011). Based upon an assessment prepared by the Bureau of Reclamation and Office of Historic Preservation, the All-American Canal is significant under Criterion A and C of the NRHP and Criterion 1 and 3 of the CRHR due to its association with development of irrigated commercial agriculture in Imperial County west of the New River. By extension, the Westside Main Canal being a part of the larger All-American Canal system appears NRHP and CRHR eligible (Mitchell 2011). RECON concurs with these assessments.

P-13-012692 (the Fern Check Dam) is not considered to be individually eligible for listing to the NRHP, CRHR, or considered a historical resource under CEQA (Mutaw et al. 2010). Although the Fern Check Dam is associated with the Westside Main Canal, it is not a contributing element to this NRHP-eligible resource. The Fern Check Dam has undergone numerous improvements and does not appear to possess sufficient integrity of workmanship, design, setting, and feeling (Mutaw et al. 2010).

RECON recommends P-13-003176 not significant under Criterion D/4 due to lack of sufficient data that could make a meaningful contribution to regional research issues and due to substantial disturbance to the site and overall lack of integrity. . The completion of recorded DPR site forms has exhausted the archaeological information potential of P-13-003176.

### 6.2.2 Newly Recorded Sites

All three of the newly recorded sites, lithic scatters: CA-IMP-13055/8888.1-NDY-001 (1 core/scrapper; 8 flakes), CA-IMP-13056/8888.1-RDS-002 (1 mano; 1 scrapper; 1 core; 1 hammerstone; 2 possible FAR; 8 flakes), and CA-IMP-13054/8888.1-CZH-003 (1 utilized

flake; 1 core; 1 flake), are recommended not significant or eligible for listing on the NRHP or the CRHR under criterion D/4 and overall lack of integrity. These sites lack intact and undisturbed data that could make a meaningful contribution to regional research issues. They cannot be placed chronologically, because they do not contain any temporally diagnostic artifacts or features. These sites likely represent short forays for expedient resource exploitation. These sites are located in fallow agricultural fields where approximately 40 centimeters of substantial ground disturbance within the plow-zone has occurred from repeated agricultural activities. The likelihood of deposits being found below the plow-zone is considered low. Based on studies on the West Mesa of the Colorado Desert, resources typically consist of surface artifact scatters and shallow middens. There is a lack of large sites with deep middens and high density and diversity of artifacts (Schaeffer 2018). The areas of higher sensitivity for buried resources or those with deep middens in the Colorado Desert include the floodplains of the Colorado, New and Alamo rivers, the high stand and recessional beach berms of Lake Cahuilla, and ephemeral pans (Schaeffer 2018). Cultural resources with subsurface deposits typically are residential or temporary camps where prehistoric people had more extended stays than expedient exploitation. Therefore, it is recommended that the archaeological data potential for the three lithic scatters would not yield substantial data to national or regional research issues. These scatters are not unique resources. Through the recording of the location and artifact assemblage of these three lithic scatters, their archaeological information potential has been exhausted.

### **6.2.3 Newly Recorded Isolates**

Cultural isolates are not considered significant historical resources, because they generally lack characteristics that would qualify them for listing on the NRHP and CRHR. Therefore, the nine isolates found during the survey (8888.1-ISO-001, 8888.1-ISO-002, 8888.1-ISO-003, 8888.1-ISO-004, 8888.1-ISO-007, 8888.1-ISO-008, 8888.1-ISO-009, 8888.1-ISO-010, 8888.1-ISO-011) are not historic properties and historical resources under the NRHP and CRHR. Past agricultural plowing may have resulted in dispersing some of the artifacts from each other so that prior to agricultural activity, some of these isolates may have been part of a lithic scatter. As noted above, lithic scatters are not unique resources in Imperial County.

## **6.3 Recommendations**

The Project has the potential to adversely affect historic properties as defined under Section 106 and historical resources as defined under CEQA guidelines. As stated above, federal agencies are required to take into account adverse effects to eligible resources per Section 106. Similarly, mitigation is required under CEQA if a project would cause a substantial adverse change in the significance of a historical resource.

A substantial adverse change is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Avoidance of the historic property/historical resource through project redesign is the preferred mitigation measure. If redesign is not feasible, minimizing impacts by limiting the degree of impacts or reducing the

impact through a data recovery excavation and/or construction monitoring are mitigation options.

The Project would not result in significant impacts to P-13-012692, P-13-003176, 8888.1-NDY-001, 8888.1-RDS-002, and 8888.1-CZH-003 since these resources have been recommended not eligible for listing on the NRHP or the CRHR. One cultural resource (P-13-008334/Westside Main Canal) recommended eligible for the NRHP and CRHR would be impacted by the Project due to the construction of a proposed bridge across the canal to provide vehicular access from Liebert Road. The proposed bridge would not result in physically destroying or altering that canal, but would result in a visual impact to the Westside Main Canal. Because there are other visual impacts along the Westside Main Canal including other bridges and impacts from maintenance improvements such as dredging and concrete lining, the proposed bridge would not affect the qualities or values that qualify the resource for listing in the NRHP or CRHR and would not result in a significant impact under CEQA; therefore, the Project would have no adverse effect. The Westside Canal would still maintain its association with the development of agriculture in Imperial Valley.

The potential for intact subsurface prehistoric or historic historical resources to be present on the APE/Project area is considered very low due to extensive disturbance owed to agricultural activities. Because of this, RECON recommends no additional historical resources work for this Project. No mitigation measures are recommended.

## 7.0 Certification and Project Staff

This report was prepared in compliance with NEPA and CEQA (Section 21083.2 of the Statutes and Appendix K of the Guidelines) and with policies and procedures of Imperial County. RECON archaeologist Carmen Zepeda-Herman, M.A. served as principal investigator. Ms. Zepeda-Herman is a member of the Register of Professional Archaeologists and meets the Secretary of the Interior Standards for Archaeology and Historic Preservation. The individuals listed below participated in the field tasks or preparation of this report. To the best of our knowledge, the statements and information contained in this report are accurate.




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## **ATTACHMENTS**

## **ATTACHMENT 1**

Southern Access Addendum to the Results of the Cultural  
Resources Survey of the Westside Canal Battery Storage  
Project, Imperial County, California



*An Employee-Owned Company*

January 18, 2021

Mr. Curtis Kebler  
Director, Business Development  
Con Edison Clean Energy Businesses  
101 W. Broadway, Suite 1120  
San Diego, CA 92101

Reference: Southern Access Addendum to the Results of the Cultural Resources Survey of the Westside Canal Battery Storage Project, Imperial County, California (RECON Number 8888-1)

Dear Mr. Kebler:

This letter serves as an addendum to the Results of the Cultural Resources Survey of the Westside Canal Battery Storage Project prepared by RECON (January 2021). This addendum analyzes impacts to cultural resources from the proposed temporary southern access route for the Westside Canal Battery Storage Project (Project) in support of the request for a Right-of-Way (ROW) grant from the Bureau of Land Management (BLM). The Project is currently proposed by Westside Canal Battery Storage, LLC, a subsidiary of Con Edison Clean Energy Businesses. The Project will provide a utility-scale energy storage complex incorporating lithium ion battery systems and/or flow battery technologies in the county of Imperial, approximately one-third mile north of the Imperial Valley Substation (Figures 1 and 2). The Project encompasses approximately 163 acres including development of the storage complex, site access from the north end, and a temporary construction staging area. The current survey area, or area of potential effect (APE), consists of approximately 1.2 miles of a 300-foot-wide corridor centered along a proposed temporary southern access route to support construction of the proposed bridge spanning Imperial Irrigation District's (IID's) Westside Main Canal, totaling approximately 45 acres (Figure 3). The APE is within BLM managed lands in Township 16 South, Range 12 East Section 34 and Township 16.5 south, Range 12 East Section 3 on the Mount Signal quadrant.

### **Location and Description**

The proposed temporary southern access route (APE) begins at the entrance to the San Diego Gas & Electric-owned Imperial Valley Substation and follows an existing dirt access road that leads north, then east, outside the western and northern boundaries of the substation. The proposed temporary southern access route (APE) then continues northwest along an existing dirt access road that parallels two power lines until the access road connects with the western edge of the Project. The existing dirt road was constructed for the construction and maintenance of the existing Centinela gen-tie line. The proposed southern access route (APE) is approximately 1.2 miles long.

The Project is surrounded by private landowners to the east, BLM land to the south and west, and IID maintenance roads and Westside Main Canal to the north. Due to the need to access the Project on both the north and south side of the West Main Canal to initiate construction of the proposed bridge, the applicant is proposing to construct a new clear-span Imperial County-specified bridge to span the Westside Main Canal which would connect to a proposed access road easement on the north side of the Westside Main Canal. The north side proposed access road would ultimately connect the Project to Liebert Road, which is a county road. Therefore, the Project proposes use of the temporary access route (APE) leading from the Imperial Valley Substation until more permanent access to the site is developed. Once access to the Project is secured from Liebert Road, the proposed temporary southern access route (APE) would no longer be utilized.

Use of the temporary southern access route (APE) would consist of driving construction-related trucks and equipment along the existing dirt access road in order to access the south side of the Westside Main Canal. Construction-related trucks and equipment would include the following: wheeled loader, scraper, grader, dozer, excavator, backhoe, rollers, fork lift, crane, skid steer, water trucks, drill rig, battery racks, inverters, concrete trucks, semi-trailer, dump truck, personal vehicles, and a bus. Minor road improvements may be necessary in certain areas where small sand dunes have formed within the roadbed. These small dunes would be graded level using a skid steer or similar piece of equipment. In areas where the existing access road contains loose sand, matting (the specific type to be determined at a later date) would be laid down within the existing roadbed to provide stability for construction equipment.

### **Survey Methods**

Fieldwork proceeded under BLM Cultural Resource Use Permit CA-19-02 and a fieldwork authorization CA-670-20-030 FA01 from the El Centro Field Office (Confidential Attachment 1). RECON archaeologist Carmen Zepeda–Herman, M.A., served as principal investigator and field supervisor. Ms. Zepeda–Herman is a member of the Register of Professional Archaeologists and meets the Secretary of the Interior Standards for Archeology and Historic Preservation. Archaeologist Nathaniel Yerka participated in the field crew. Shuuluk Linton participated as the Native American representative on behalf of Red Tail Environmental.

Prior to the survey, the record search results from the 2018 survey of the Westside Canal Battery Storage Project were reviewed to determine if any previously recorded sites were recorded within the temporary access route. RECON archaeologists conducted the pedestrian survey of the 45-acre APE on March 26, 2020, using 15-meter transects. The field team navigated the Project area by means of a global positioning system (GPS) unit. RECON downloaded a georeferenced map into a field GPS unit to facilitate finding survey area. The field GPS unit consisted of a iPad running ESRI's ArcGIS Collector. Additionally, a handheld Trimble GEO-XH with linked beacon receiver was used to record resources. These instruments provided the field team with sub-meter accuracy and real-time position correction and recording capability. Aerial photographs of the Project area and compasses were also used.

The APE was inspected for evidence of archaeological materials such as flaked and ground stone tools or fragments, ceramics, milling features, and human remains. If archaeological materials were found, the transect intervals were reduced from 15 meters to 3 meters. The locations of the features and the artifacts would be recorded using the GEO-XH. No artifacts were collected during the survey. California Department of Parks and Recreation site forms and maps will be submitted to the South Coastal Information Center (Confidential Attachment 2).

### **Results of Record Search**

After review of the 2018 records search, RECON identified seven cultural resources within the current APE (Table 1). These include one prehistoric site, four prehistoric isolated artifacts, and two historic isolated artifacts. A survey of the Project APE in 2018 identified four prehistoric sites, nine isolated artifacts, and two historic resources (see Confidential Attachment 2).

### **Results of Survey**

The survey crew identified one (P-13-012696) of the seven previously recorded cultural resources and two new isolated artifacts (Attachment 1). All nine resources were located within the areas that have been previously disturbed during the construction of the existing Centinela gen-tie line. Updated descriptions for the resources identified are given below. Updated site forms will be submitted to the SCIC (see Confidential Attachment 2). P-13-013105, P-13-009861, P-13-013850, P-13-013852, P-13-013856, and P-13-014267 were not located on the current survey.

The vast majority of the APE/Project area consists of creosote bush scrub on the lower lake basin of ancient Lake Cahuilla. Noted disturbances include the graded access road, a series of berms, power pole structures, and off-highway vehicle activity. Ground visibility across the APE/Project area was 95 percent. The ground

was compact and relatively easy to walk on. Project topography is generally flat with several compact berm prominences with accompanying low-lying sandy troughs. Elevations range between -4 feet below mean sea level at the north end of the APE/Project area to 13 feet above mean sea level to the south on the west side of the Imperial Valley Substation.

#### Previously Recorded Resources

P-13-012696 was first recorded by URS in 2009; however, the kp environmental LLC survey crew was unable to locate the resource in 2012. The resource is described as an isolate consisting of five ceramic Brownware sherds that appear to belong to a single vessel. The current survey located two of the five sherds (one of the five fragmented pieces has further fragmented into two pieces), identified as matching those featured in the site form, located at the mapped location, though situated approximately 5 meters apart. There is evidence of surface raking below the power pole that penetrates the ground surface approximately 3 centimeters. This raking and construction of the power poles are the most likely reason for dispersal of the artifacts.

RECON identified a Colorado Buff ceramic body fragment (032620-ISO-1) situated 13 meters south-southeast of the mapped location of P-13-013850, a single green, porphyritic volcanic interior flake. RECON was unable to locate the flake on the current survey.

RECON identified one Colorado Buff ceramic body fragment (032620-ISO-2) that exhibits a slight depression on the inner situated 3 meters east-southeast of the mapped location of P-13-013856, a single green, porphyritic volcanic interior flake. RECON was unable to locate the flake on the current survey. The 2011 aerial photograph in the site form does not show the power pole structures. The construction of the power pole structures likely moved both the flake and ceramic fragment from their original location.

These five isolates (P-13-012696, P-13-013850, P-13-013856, 032620-ISO-1, and 032620-ISO-2) are located within 30 to 45 meters of each and were likely at one time one sparse lithic and ceramic scatter that has been moved around by sheetwash events and the construction of the gen-tie power poles and access road.

#### **Regulatory Framework**

The Project is subject to federal environmental regulations. The BLM El Centro Field Office is the lead for compliance with Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). The Project is an undertaking as defined in Section 106 of the NHPA. Section 106 of the NHPA, as implemented (36 Code of Federal Regulations [CFR] Part 800), requires federal agencies to take into account the effects of their undertakings on historic properties. Under the Section 106 process, the BLM is obliged to identify cultural resources within its APE, to assess impacts to resources found eligible for listing in the National Register of Historic Place (NRHP), and to mitigate adverse effects to eligible resources.

For planning purposes, all of the cultural resources in the Project that have not yet been formally evaluated for their eligibility to the NRHP are considered to be eligible for listing, with the exception of cultural isolates. Preliminary eligibility recommendations are discussed below. Cultural isolates are not considered significant because they generally lack qualities that would qualify them for listing in the NRHP. As such, the isolates identified during this survey are not considered eligible for listing on the NRHP.

#### **Management Recommendations**

The APE has been disturbed in the past by the construction of the gen-tie power poles and access road. The temporary use of the APE will not result in an adverse effect to historic properties. RECON does not recommend any mitigation measures.

Mr. Curtis Kebler  
Page 4  
January 18, 2021

If you have any questions concerning the contents of this letter, please contact me by phone or e-mail at (619) 308-9333 extension 133 or [czepeda@reconenvironmental.com](mailto:czepeda@reconenvironmental.com).

Sincerely,

A handwritten signature in black ink that reads "Carmen Zepeda-Herman". The signature is written in a cursive, flowing style.

Carmen Zepeda-Herman  
Principal Investigator

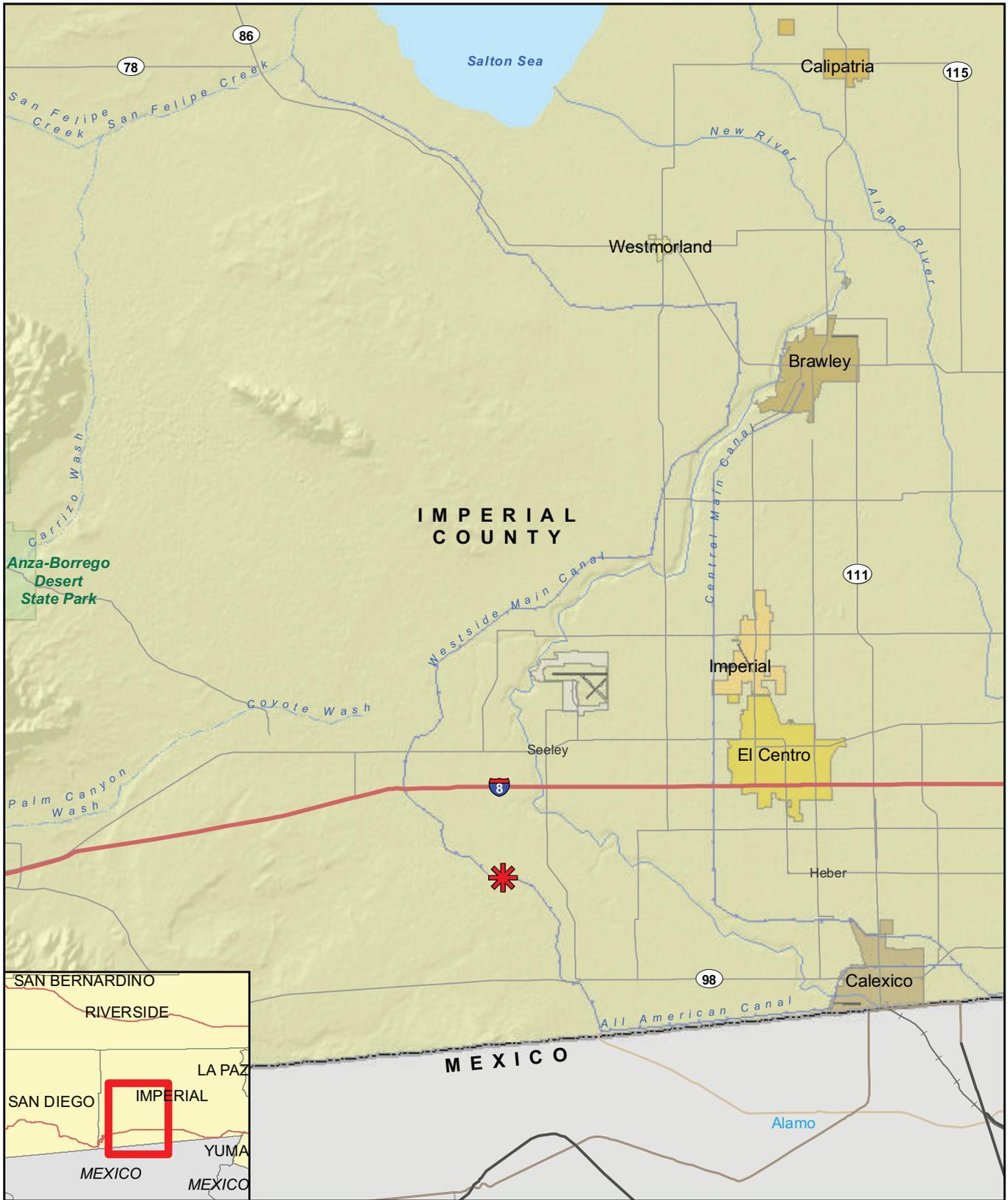
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Attachments

cc: Kate Crosmer, Bureau of Land Management El Centro Field Office

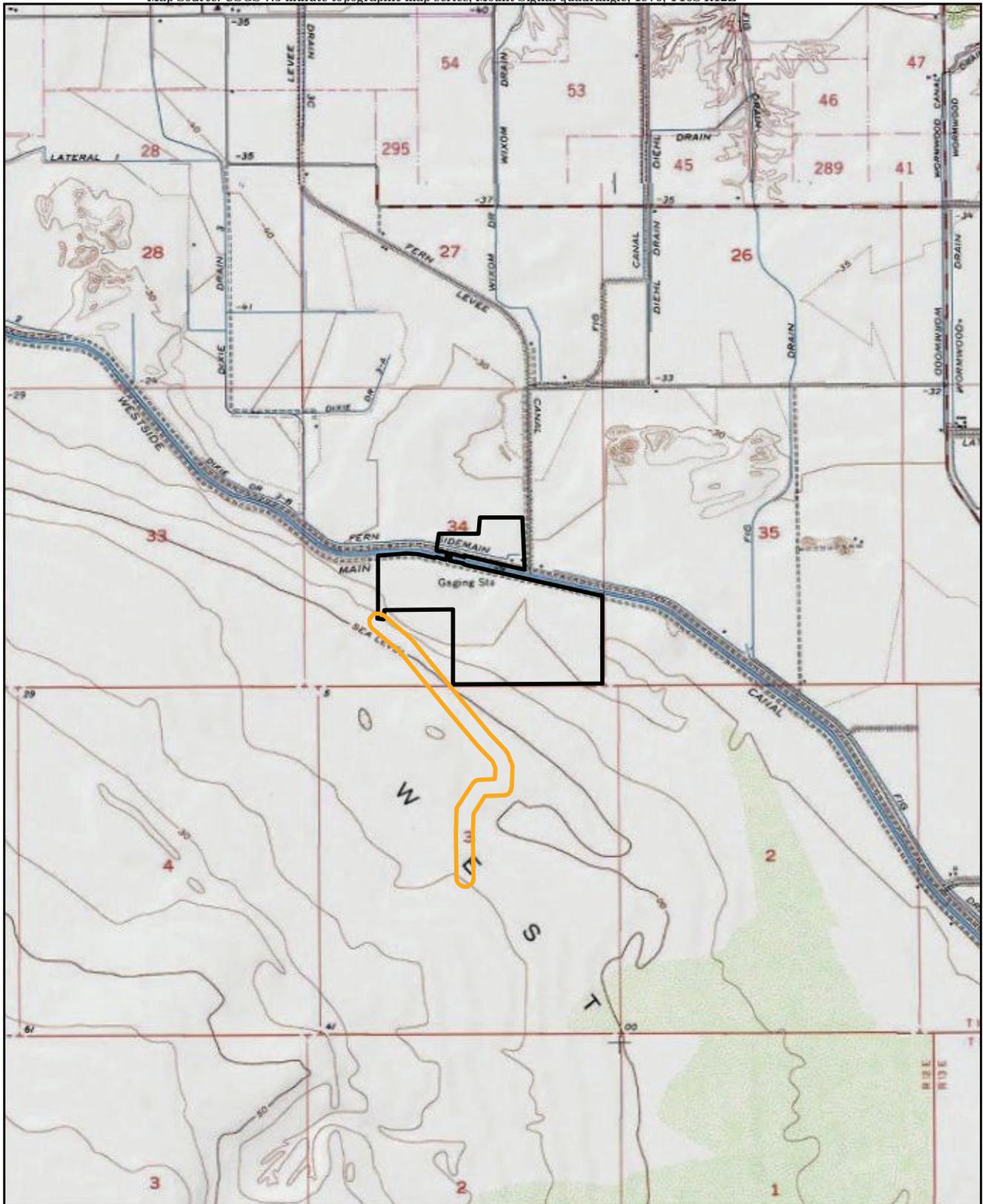
**Table 1  
Cultural Resources within the APE and Battery Storage**

Primary #	Trinomial #	Temporary #	Period	Site Type	Date Recorded	Land Ownership	Location
P-13-009861			Prehistoric	Isolate: mano	2007, 2012	BLM	Gen-tie
P-13-012696			Prehistoric	Isolate: ceramic sherds	2009, 2012	BLM	Gen-tie
P-13-013105			Historic	Isolate: amethyst glass fragment	2009, 2012	BLM	Gen-tie
P-13-013850			Prehistoric	Isolate: flake	2012	BLM	Gen-tie
P-13-013852	IMP-11789		Prehistoric	Ceramic, ground stone scatter	2012	BLM	Gen-tie
P-13-013856			Prehistoric	Isolate: flake	2012	BLM	Gen-tie
P-13-014267			Historic	Isolate: tin can	2011	BLM	Gen-tie
P-13-017738	CA-IMP-13055	8888.1-NDY-001	Prehistoric	Lithic scatter	2018	Private	Project Area
P-13-017739	CA-IMP-13056	8888.1-RDS-002	Prehistoric	Lithic scatter	2018	Private	Project Area
P-13-017728	CA-IMP-13054	8888.1-CZH-003	Prehistoric	Lithic scatter	2018	Private	Project Area
P-13-017729		8888.1-ISO-001	Prehistoric	Isolate: flake	2018	Private	Project Area
P-13-017730		8888.1-ISO-002	Prehistoric	Isolate: flake	2018	Private	Project Area
P-13-017731		8888.1-ISO-003	Prehistoric	Isolate: utilized flake	2018	Private	Project Area
P-13-017732		8888.1-ISO-004	Prehistoric	Isolate: flake	2018	Private	Project Area
P-13-017733		8888.1-ISO-007	Prehistoric	Isolate: assayed cobble	2018	Private	Project Area
P-13-017734		8888.1-ISO-008	Prehistoric	Isolate: flake	2018	Private	Project Area
P-13-017735		8888.1-ISO-009	Prehistoric	Isolate: flake	2018	Private	Project Area
P-13-017736		8888.1-ISO-010	Prehistoric	Isolate: retouched flake	2018	Private	Project Area
P-13-017737		8888.1-ISO-011	Prehistoric	Isolate: core fragment, flake	2018	Private	Project Area
P-13-003176	IMP-3176		Prehistoric	Lithic, ceramic scatter	1979, 2007, 2010, 2012, 2018	Private	Project Area
P-13-008334			Historic	Westside Main Canal	1999, 2000, 2007, 2009, 2011, 2012, 2016	Imperial Irrigation District	Adjacent
P-13-012692			Historic	Fern Check Dam	2009, 2010, 2011, 2012	Imperial Irrigation District	Adjacent



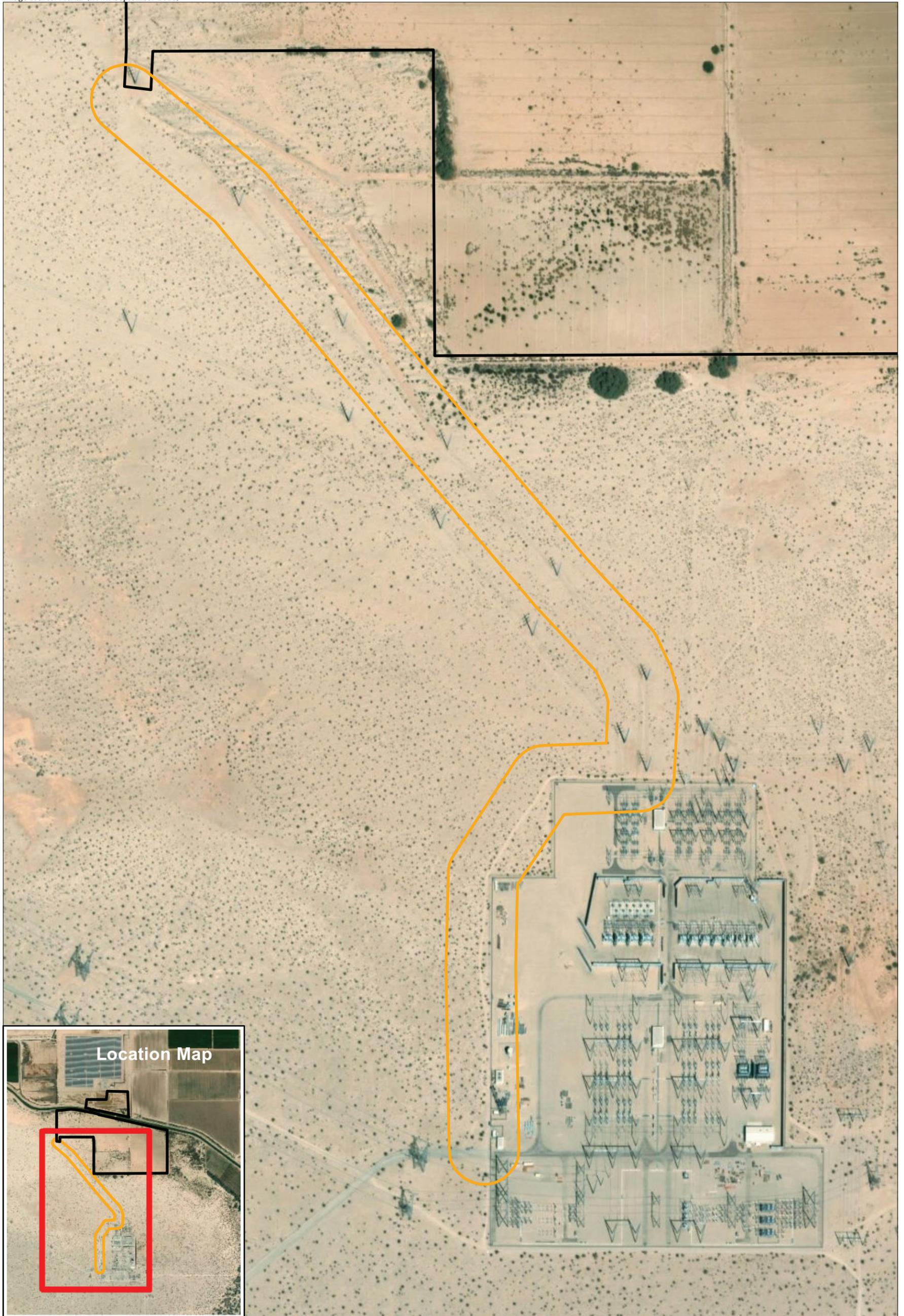
 Project Location

**FIGURE 1**  
Regional Location



-  Survey Area/Area of Potential Effect
-  Battery Storage Project

FIGURE 2  
Project Location on USGS Map



-  Survey Area/Area of Potential Effect
-  Battery Storage Project

0 Feet 400 

## **ATTACHMENTS**

# **ATTACHMENT 1**

## Supplemental Project Statistics Report

1. Project Name.	Southern Access Addendum to the Results of the Cultural Resources Survey of the Westside Canal Batter Storage Complex Project, Imperial County, California	
2. BLM State Permit Number.	CA-19-02	
3. Field Authorization Number.	CA-670-20-030 FA01	
4. Dates of Field Survey.	March 26, 2020	
5. Total acreage of lands surveyed at BLM Class II level.	0	
Of Item 5 above:		
A) Acreage of BLM lands surveyed	N/A	
B) Acreage of other lands surveyed (Private, State, Other Federal) List separately	N/A	
6. Total acreage of lands surveyed at BLM Class III level.	45 acres	
Of Item 6 above:		
A) Acreage of BLM lands surveyed	45	
B) Acreage of other lands surveyed (Private, State, Other Federal) List separately	N/A	
7. Total number of cultural properties in project Area (of Potential Effect).	7	
Of Item 7 above:		
A) Total number of cultural properties for which site records were completed (newly recorded cultural properties).	2 (3 updated)	
B) Number of new cultural properties on BLM lands	2	
C) Number of new cultural properties on other lands (Private, State, Other Federal)	0	
8. Of the cultural properties located within the Area (of Potential Effect): [If properties are not located on BLM, place this number in parentheses ( ) after the number of BLM properties.]		
A) Number of cultural properties that you are recommending as eligible for the National Register.	0	
B) Number of cultural properties you are a recommending as not eligible for the National Register.	5	
Of Item 8A above:		
a) Number of cultural properties that can/will be avoided.	0	
b) Number of cultural properties that will be affected.	0	

	c) Number of cultural properties that you are recommending data recovery/mitigation.	0
	d) Number of cultural properties that were data recovered/mitigated.	0
Of Item 8B above:		
	a) Number of cultural properties that can/will be avoided.	0
	b) Number of cultural properties that will be affected.	5

**CONFIDENTIAL ATTACHMENTS**

**Are not for public review**

## **ATTACHMENT 2**

### **Native American Heritage Commission Response Letter**

**NATIVE AMERICAN HERITAGE COMMISSION**

Environmental and Cultural Department  
1550 Harbor Blvd., ROOM 100  
West SACRAMENTO, CA 95691  
(916) 373-3710  
Fax (916) 373-5471



August 27, 2018

Carmen Zepeda-Herman

RECON Environmental

Sent by Email: [czepeda@reconenvironmental.com](mailto:czepeda@reconenvironmental.com)

Re: Westside Canal Emergency Center Project R8888.1, Imperial County

Dear Ms. Zepeda-Herman,

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not preclude the presence of cultural resources in any project area. Other sources for cultural resources should also be contacted for information regarding known and/or recorded sites.

Enclosed is a list of Native Americans tribes who may have knowledge of cultural resources in the project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at 916-573-1033 or [frank.lienert@nahc.ca.gov](mailto:frank.lienert@nahc.ca.gov).

Sincerely,



Frank Lienert  
Associate Governmental Program Analyst

**Native American Heritage Commission**

**Native American Contacts**

**August 27, 2018**

**Ewiiaapaayp Band of Kumevaay Indians**

**Robert Pinto Sr., Chairperson**

**4054 Willows Road  
Alpine, CA 91901**

**(619) 445-6315**

**(619) 445-9126 Fax**

**Diegueno/Kumevaay**

**Chemehuevi Indian Tribe**

**Charles F. Wood, Chairperson**

**P.O. Box 1976  
Havasu Lake, CA 92363**

**chairman@cit-nsn.gov**

**(760) 858-4219**

**(760) 858-5400 Fax**

**Chemehuevi**

**La Posta Band of Diequeño Mission Indians**

**Gwendolyn Parada, Chairperson**

**8 Crestwood Road  
Boulevard, CA 91905**

**LP13boots@aol.com**

**(619) 478-2113**

**(619) 478-2125 Fax**

**Diegueno/Kumevaay**

**Kwaavmii Launa Band of Mission Indians**

**Carmen Lucas**

**P.O. Box 775  
Pine Valley, CA 91962**

**(619) 709-4207**

**Diegueno-Kwaaymii**

**Kumevaav**

**Manzanita Band of Kumevaav Nation**

**Angela Elliott-Santos, Chairperson**

**P.O. Box 1302  
Boulevard, CA 91905**

**(619) 766-4930**

**(619) 766-4957 Fax**

**Diegueno/Kumevaay**

**Colorado River Indian Tribes of the Colorado River Indian Reservation**

**Dennis Patch, Chairman**

**26600 Moiave Road  
Parker, AZ 85344**

**crit.museum@vahoo.com**

**(928) 669-9211 Tribal Office**

**(928) 669-8970 Ext 21**

**(928) 669-1925 Fax**

**Mojave**

**Chemehuevi**

**Cabazon Band of Mission Indians**

**Doug Welmas, Chairperson**

**84-245 Indio Springs Parkway  
Indio, CA 92203**

**(760) 342-2593**

**(760) 347-7880 Fax**

**Cahuilla**

**Quechan Tribe of the Fort Yuma Indian Reservation**

**Michael Jackson, Sr., President**

**P.O. Box 1899  
Yuma, AZ 85366**

**aitores@quechantribe.com**

**(760) 572-0213**

**(760) 572-2102 Fax**

**Quechan**

**Campo Band of Diequeño Mission Indians**

**Ralph Goff, Chairperson**

**36190 Church Road, Suite 1  
Campo, CA 91906**

**rgoff@campo-nsn.gov**

**(619) 478-9046**

**(619) 478-5818 Fax**

**Diegueno/Kumevaay**

**Augustine Band of Cahuilla Indians**

**Amanda Vance, Chairperson**

**P.O. Box 846  
Coachella, CA 92236**

**(760) 398-4722**

**(760) 369-7161 Fax**

**Cahuilla**

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed

**Westside Canal Emergency Center Project R8888.1, Imperial County**

**Native American Heritage Commission  
Native American Contacts  
August 27, 2018**

Aqua Caliente Band of Cahuilla Indians  
Jeff Grubbe, Chairperson  
5401 Dinah Shore Drive           Cahuilla  
Palm Springs , CA 92264  
(760) 699-6800

(760) 699-6919 Fax

Aqua Caliente Band of Cahuilla Indians  
Patricia Garcia-Plotkin, Director, THPO  
5401 Dinah Shore Drive           Cahuilla  
Palm Springs , CA 92264  
ACBCI-THPO@aquacaliente.net

(760) 699-6907

(760) 699-6924 Call

(760) 699-6924 Fax

Cahuilla Band of Indians  
Daniel Salgado, Chairperson  
52701 U. S. Highway 371           Cahuilla  
Anza , CA 92539  
Chairman@cahuilla.net

(951) 763-5549

(951) 763-2808

Soboba Band of Luiseno Indians  
Joseph Ontiveros, Cultural Resource Department  
P.O. BOX 487                       Luiseno  
San Jacinto , CA 92581       Cahuilla  
iontiveros@soboba-nsn.gov

(951) 663-5279

(951) 654-5544 ext 4137

(951) 654-4198 Fax

Torres-Martinez Desert Cahuilla Indians  
Michael Mirelez, Cultural Resource Coordinator  
P.O. Box 1160                       Cahuilla  
Thermal , CA 92274  
mmirelez@tmdci.org

(760) 399-0022, Ext. 1213

(760) 397-8146 Fax

Ewiiaapaavp Band of Kumevaav Indians  
Michael Garcia, Vice Chairperson  
4054 Willows Road               Diegueno/Kumevaav  
Alpine , CA 91901  
michaela@leaninarock.net

(619) 445-6315

(619) 445-9126 Fax

Ewiiaapaavp Band of Kumevaav Indians  
Robert Pinto Sr., Chairperson  
4054 Willows Road               Diegueno/Kumevaav  
Alpine , CA 91901  
(619) 445-6315

(619) 445-9126 Fax

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This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed **Westside Canal Emergency Center Project R8888.1, Imperial County**

**CONFIDENTIAL ATTACHMENTS**  
(Bound Under Separate Cover)