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October 19, 2012

Todd Stewart, Senior Director of Project Development
BrightSource Energy, Inc.
1999 Harrison Street, Ste. 2150
Oakland, CA 94612

RE: RIO MESA SOLAR ELECTRIC GENERATING FACILITY (11-AFC-04)
STAFF COMMENTS ON DRAFT ARCHAEOLOGICAL RESEARCH DESIGN AND TESTING PLAN

Dear Mr. Stewart:

Attached are Energy Commission staff's comments on the Draft Archeological Research Design and Testing Plan submitted on July 30, 2012

If you have any questions, please call me at (916) 651-3765 or email me at pierre.martinez@energy.ca.gov.

Sincerely,

Pierre Martinez, AICP
Project Manager

cc: Docket (11-AFC-04)
Proof of Service Lis

Technical Area: **Cultural Resources**
Authors: Elizabeth A. Bagwell, PhD, RPA, Michael D. McGuirt, RPA

The applicant, in the *Applicant's Reply Brief for the March 19, 2012 Status Conference* (TN 64161), agreed to conduct evaluation phase archaeological field work for the Rio Mesa Solar Electric Generating Facility (Rio Mesa SEGF) application for certification (11-AFC-04). Subsequently, the Energy Commission Cultural Resources Unit staff has reviewed the July 30, 2012 submission of BrightSource's (applicant's) response to staff's (June 28, 2012) letter requesting an evaluation phase research design. In our June 28 letter, staff concluded that it would be necessary to excavate a relatively large subset of the archaeological site inventory of the proposed project area to support the development of staff recommendations on the historical significance of these resources. The applicant's Geoarchaeological Sensitivity Analysis was used to identify sites located in sediments which have the potential to contain buried archaeological deposits. Attached to the June 28 letter was a provisional table listing the 154 sites where evaluation phase excavation was recommended. Staff also advised the applicant that in order to meet the Committee's scheduling order, staff must receive from the applicant an evaluation phase research design for the subset of archaeological deposits listed in the provisional table no later than July 10, 2012. The applicant submitted its *Draft Archaeological Research Design and Testing Plan, Rio Mesa Solar Electric Generating Facility Project, Riverside County* (Draft Plan) on July 30, 2012.

Subsequent to the applicant's July 30, 2012 submission of the subject research design, representatives of the Chemehuevi Tribe, Fort Mojave Indian Tribe, Colorado River Indian Tribe, and Fort Yuma Quechan Indian Nation, became aware of the research design's development and requested the opportunity to review and comment on the revised draft. Staff provided draft copies of the document to the Chemehuevi Tribe, Fort Mojave Indian Tribe, Colorado River Indian Tribe (CRIT), Agua Caliente Band of Cahuilla Indians, Fort Yuma Quechan Indian Nation, and Cocopah Tribe, afforded these groups 15 days to review it, and held a meeting with them on September 24, 2012 at CRIT tribal offices in Parker, Arizona. The assembled attendees – Elizabeth Bagwell (Aspen/CEC), John Bathke (Quechan), Doug Bonamici (CRIT), Wilene Fisher-Holt (CRIT), Thomas Gates (CEC), Roger Johnson (CEC), Linda Otero (Fort Mojave), Ginger Scott (CRIT), Manfred Scott (Quechan) and Edward Smith (Chemehuevi Chairman) – heard and discussed the perspectives of the represented Native American communities. Staff has reviewed the comments provided by the Native American communities and addressed them in the following comments on the Draft Plan.

Staff believes that it is pertinent to a full, accurate, and transparent record of the present administrative proceeding to comment on the quality of the submitted Draft Plan and the material effects that the document's quality has had, and may continue to have, on the progress of this proceeding. In staff's opinion, the Draft Plan is inappropriate as the planning document of record for a project such as Rio Mesa SEGF. This project has the potential to irreparably alter and destroy hundreds of cultural resources. These resources are the only remaining evidence, other than oral tradition, of the daily lives of hundreds of generations of desert peoples. A substantive analysis of the effects of large scale energy projects must be structured by a consideration of the complex and intertwined behavioral themes that underwrote the prehistory and history of the desert. The Draft Plan does not meet this basic test.

Staff found that while the Draft Plan would most likely lead to moderately successful evaluations of individual archaeological sites in the project area, the plan lacks consideration of the broader behavioral themes which may unify various subsets of the archaeological site inventory. The Draft Plan is missing a well-articulated theoretical perspective and does not provide sound rationales for the selection of the research questions that it poses. Staff also believes that the Draft Plan lacks an adequate description of the evaluation methodology that it proposes or the reasons behind that methodology. Staff's comments are intended to try and help the applicant resolve these omissions.

Recognizing that California does not have a formal industry standard for work in regulatory archaeology and qualified archaeologists may agree to disagree, staff believes that the applicant's clearest path to approval of this plan and to moving forward with its implementation is to completely incorporate these comments into what staff hopes will be the final draft of this document.

1. Please adjust the language of the Draft Plan to reflect the fact that the Energy Commission analyzes project impacts using CEQA rather than NEPA and Section 106. Cultural resources are analyzed by staff using a Project Area of Analysis (PAA). Further, impacts to archaeological resources may be direct or indirect, and the current language used in the Draft Plan does not acknowledge this. Staff notes that the area of direct construction impacts has been described inconsistently in the AFC, Technical Report, and Draft Plan. By staff's calculation, construction impacts will take place within the project site (3,805 acres), the construction logistics area (103 acres), the transmission line corridor (130 acres), two access road corridors (134 acres), and four drainage crossing updates (71 acres). Overall, this includes approximately 4,243 acres. If this acreage is in conflict with the applicant's calculations, please have the applicant provide their acreage and an explanation of any differences.

2. Please expand Section 1 (Introduction) to include a discussion of the number of archaeological sites now present in the archaeological PAA. Currently, this discussion is located in Section 4.1 (Field Methods). Staff has identified 183 sites with prehistoric components, and 107 of these where testing is required. For the applicant's convenience, this list is attached to these comments.

3. Section 2 is incomplete. While the Draft Plan does provide a general outline of the prehistory of the project region, specific historic contexts were not discussed in sufficient detail. The Draft Plan has no model for the interpretation of Native American behavioral patterns on the proposed project area or for the interpretation of the archaeological record of this particular place. There is little to no discussion of the actual inventory of archaeological resources on the project area, the site types present, the behavioral patterns that these site types indicate or represent, or how these compare with what is known about adjacent inventories and patterns. In short, there is no interpretation of the local archaeological record. Please revise and expand this section to include the above described detail. In particular, the following feature and site types which will be the focus of the plan should be defined in detail. Some of these types were used during site recording for the proposed project, but were not explained in detail. The revised plan should explain the applicant's

reasoning for choosing particular types as opposed to alternative types and definitions used by other researchers in the region. These definitions should also include the time periods during which these resources were made or deposited, the locations or landforms where they are generally found, and their function. In the case of similar resources, or resources that can be confused with natural features or historic-period resources, the thresholds for placing a resource in one category as opposed to another should be clearly outlined. If significance criteria have been identified for these resource types, these should be explicitly described and the sources cited. If significance criteria have not been defined, then URS should explicitly define them in the revised Plan. The defined prehistoric archaeological property types should include, at a minimum:

a. Pavement quarries

b. Camps

c. Segregated reduction loci

d. Multiple reduction loci

e. Single reduction loci

f. Lithic scatter loci

g. Quartz shatter loci

h. Thermal features

i. Ceramic scatters/ceramic concentrations/pot drops

j. Cleared circles

4. The Section 2 revisions mentioned above should use Giambastiani et al's (2009) "Archaeological Evaluations at Quackenbush Training Area", "Understanding Pavement Quarries in the Mojave Desert" (Giambastiani 2009) and related publications as models for definitions and discussions relating to pavement quarries and lithic reduction loci. In particular the following standards should be incorporated into the Plan:

   a. The minimum unit of analysis should be the reduction locus;

   b. Pavement quarries can produce redundant data, and reduction loci which produce redundant data (see #16 for further discussion of methods) are considered to have low scientific significance;

   c. Portions of reduction loci tend to be buried, so the analysis of a complete locus requires some excavation;

   d. Smaller reduction loci, with less than 40 surface artifacts, typically contribute less data to local research than larger reduction loci;

e. Clusters of reduction loci have more data potential than isolated reduction loci;

f. Following Giambastiani, staff sets the parameter that, for the Rio Mesa PAA, clusters of five or more reduction loci have the most data potential;

g. Attributes which make a pavement quarry or cluster of reduction loci significant and potentially CRHR eligible, and not redundant, are:

i. Site components with large, intact reduction loci;

ii. Site components representative of “unique” or “signature” quarrying patterns;

iii. Site components where rare lithic materials were exploited;

iv. Any site component with any non-stoneworking artifacts; and

v. Any site component with dateable materials.

5. Staff notes that the research questions provided in Section 3 are not the same as those presented in the AFC and the Technical Report. As discussed in detail below, the research questions provided in the Draft Plan are too general. However, some of the questions provided in the earlier documents may be sufficient.

6. Please revise Section 3 to include research questions that are specific to **pavement quarries and lithic reduction loci**. Questions identified by previous researchers, particularly Giambastiani, and Laylander and Schaefer should be included or addressed. At a minimum the research questions should address: raw material procurement strategies (direct trips or embedded); the types of lithic materials preferred; the sort of tool, blank, or preform produced; and raw material processing strategies. Please include the following research question from the URS Technical Report (p. 3-10): “Are lithic deposits at cobble pavement quarries within the project area the result of embedded or direct acquisition?”

7. Please revise Section 3 to include research questions that are specific to **quartz shatter loci**. At a minimum these questions should relate to identifying feature function, in particular ceremonial associations, travel roles associated with trails, and stone tool production. In addition, the questions should reflect those recommended by Laylander and Schaefer’s 2011 regional context.

8. Please revise Section 3 to include research questions that are specific to **prehistoric cairns**. At a minimum these questions should relate to distinguishing historic cairns from prehistoric cairns and identifying feature function, in particular ceremonial associations and travel roles associated with trails. In addition, the questions should reflect those recommended by Laylander and Schaefer’s 2011 regional context.

9. Please revise Section 3 to include research questions that are specific to **thermal features**. At a minimum these questions should relate to identifying feature function, subsistence strategies (if food was cooked), lithic raw material processing (if chert was heat treated), and chronology (charcoal may provide C-14 dates) and should

reflect the research questions recommended by Laylander and Schaefer's 2011 regional context.

10. Please revise Section 3.1.2 to focus on the geologic strata on the site including what geoarchaeological studies have said to date about the potential for **buried resources** at prehistoric sites within the PAA. Include a discussion of the proposed geoarchaeological field work, and how it relates to the number of sites which will require testing. Discuss the question of the sensitivity of Qa3 and any other sensitive geological strata and how the sensitivity of these strata relates to the number of sites which will need to be tested. For example, staff has identified 29 prehistoric sites within Qa3. Of these, a subset will not need to be tested if ongoing geoarchaeological studies determine that Qa3 is unlikely to contain buried deposits. Please move the discussion of reduction loci and thermal cobble features to other subsections specifically devoted to those component types.

11. Please revise Section 3 to include a discussion of research questions that are specific to **ceramic concentrations**. At a minimum these questions should relate to identifying feature function (ceremonial or subsistence related), subsistence strategies (what was carried or cooked in the vessel), trade and regional interaction (ceramic production location can be identified), and chronology (certain vessel shapes and decorations are associated with particular time periods), and should reflect the research questions recommended by Laylander and Schaefer's 2011 regional context.

12. In the Cultural Resources Unit's ongoing consultation with local Native American communities, the importance of **cleared circles** has been repeatedly brought to staff's attention. We have requested additional information from Native Americans regarding the appropriate treatment of these features, information which staff will share with the applicant whenever it becomes available and which staff may request that the applicant incorporate, as feasible, into the evaluations of resources of this type. In the meantime, is it is essential to determine the nature and function of these circles. In Data Request 173 staff requested additional information about 35 features referred to as "cleared circles" which URS determined to be "naturally occurring plant scars." While URS provided some of the information requested, staff is still unable to evaluate the resources. Staff has identified four sites (CA-Riv-1746, CA-Riv-1748/1752, PVM-CB-030, PVM-PM-38) in the PAA with a total of 20 cleared circles of undetermined function. Additional information about cleared circles is required (specific requirements are outlined below). Toward this end, please revise Section 3 to include research questions that are specific to cleared circles. At a minimum these questions should relate to identifying feature function (natural or cultural, utilitarian or ceremonial) and chronology (prehistoric or historic) and should reflect the research questions recommended by Laylander and Schaefer's 2011 regional context.

13. Please revise Section 3 to include a discussion of research questions specific to **unspecified bone** (animal or human). Staff has identified three sites (CA-Riv-1821, CA-Riv-1822, PVM-DK-045) in the PAA where "bone" or "calcined bone" is mentioned in the DPR forms, but further information is not provided. Further evaluation of these sites is required in order to determine if human cremations are

present at these sites. At a minimum the research questions should address prehistoric subsistence practices as well as prehistoric burial practices and should reflect the research questions recommended by Laylander and Schaefer's 2011 regional context.

14. Please revise Section 3 to include a discussion of research questions specific to **prehistoric camps**. Staff has identified seven sites (CA-Riv-1746, CA-Riv-1748/1752, CA-Riv-1750, PVM-CB-028, PVM-CB-030, PVM-DK-045, PVM-SM-109) where short-term occupation may have taken place. Key feature and artifacts types include cleared circles and rock rings (possible tent locations), thermal features (possible food preparation), formal lithic tools, utilized ground stone, large amounts of ceramics, possible faunal remains, and cremations. These site components are present within the larger context of lithic quarrying activities. At a minimum, research questions should address chronology and the function of these site components (extractive camp or travel camp) and place them in the context of the PAA and its vicinity, particularly in relation to permanent residential sites along the Colorado River, quarrying activities, and travel along nearby prehistoric trails. In addition the research questions should reflect those recommended by Laylander and Schaefer's 2011 regional context.

15. Please revise Section 4 (Methods) to include a discussion of the methods to be used to determine if **buried components** are present in all archaeological sites located within the Qa6, Qa3, Qa5, Qs, Qm, and Qr geologic contexts, as shown in AFC Figure 5-2. Staff identified 83 sites that meet these criteria. One, 1 m by 1 m excavation unit should be excavated at each site. Its location should be determined judgmentally by the field crew. It should be excavated and screened in 20cm levels. Excavation should continue until URS can demonstrate, on the basis of documented observation, that either Pleistocene sediments have been reached, or that the remaining material is inpenetrable (i.e. bedrock or caliche) to a pick. For example, staff considers the presence of heavily rubified sediments to be a reasonable indicator of sediments that are Pleistocene in age. The Plan should also include a discussion of the laboratory analyses planned in the event that artifacts are collected during these excavations. This section of the plan should present several options which will be followed depending on the results of the ongoing geoarchaeological study. The plan should explain that if the geoarchaeological study determines that a particular geologic context is unlikely to be sensitive for buried resources or buried resource components, then all surficial archaeological sites in those contexts will not need to be tested for buried site components. They may, however, need to be tested for other reasons. If a single site needs to be excavated for multiple reasons, testing for buried site components may be combined with the methods used for those other explorations. For example, a 1 m by 1 m portion of a large unit placed over a reduction locus (discussed below) could be continued after all locus material had been collected.

16. Please revise Section 4 (Methods) to expand the discussion of methods to be used to evaluate 1,650 resources referred to in the Draft Plan as "**cobble pavement quarry loci."** As discussed in the August 9, 2012 phone call attended by Elizabeth Bagwell, Rachael Nixon and Arlene Garcia-Herbst, at a minimum, key questions to be explored are: data redundancy, unique quarrying patterns, and the exploitation of

unusual lithic materials. The revised Plan should include explicit thresholds for these key issues, and should be accompanied by arguments for the validity of these thresholds which cite current archaeological literature. During the initial pedestrian survey, URS collected detailed information on all artifacts in each reduction loci. In order to identify patterns relevant to the above key questions, these data should be subject to statistical analysis. All 1,650 reduction loci within the PAA should be analyzed in this manner, regardless of site boundaries. Based on the August 9, 2012 phone call with URS, staff understands that all of data related to this analysis has been collected and entered into a database, and no further field work will be necessary. A statistical analysis of all 1,650 reduction loci will require little or no additional work on the part of the applicant, but will benefit the overall comparative analysis greatly by increasing the sample size. The revised Plan should include a detailed discussion of attributes that will be analyzed in order to address these questions, and the statistical analyses to be employed. The attributes should include but are not limited to: artifact type, material type, production stage (primary, secondary, etc.), condition, form, length, width, and thickness. The statistical analysis should be a comparison which measures the amount of overall variation of all the attributes measured between all of the loci analyzed. For metric attributes (such as width) an adjusted Coefficient of Variation (CV), Mann-Whitney, and Kruskal-Wallis tests would be appropriate. For non-metric attributes (such as material type) Chi-square, spatial autocorrelation analysis, and Kruskal-Wallis tests would be appropriate. The least variable reduction loci will be determined to have redundant data, and therefore not eligible for the CRHR for their information value. The lithic specialist who will conduct these analyses and interpret the results should be identified in the plan (with resume), and the amount of time needed to complete these identified tasks should be estimated. Reduction loci often have a buried component. The second stage of this evaluation, based on Giambastiani's (2009) work, involves excavation of a sample of the reduction loci. This sample allows the analyst to understand what portion of every locus is buried and what portion is easily visible on the surface. This process is essential in order to determine how well the easily visible surface sample represents each locus as a whole. Fifteen percent of the reduction loci per quarry site should be excavated. The excavation will prioritize the largest and best preserved loci. Rather than excavating 2 x 2 m units as proposed in the Draft Plan, the excavation should encompass the entirety of each locus.

17. In the Cultural Resources Unit's ongoing consultation with local Native American communities, the importance of **quartz shatter loci** has been repeatedly brought to staff's attention. We have requested additional information from Native Americans regarding the appropriate treatment of these features, information which staff will share with the applicant whenever it becomes available and which staff may request that the applicant incorporate, as feasible, into the evaluations of resources of this type. Please revise Section 4 (Methods) to include a discussion of the methods to be used to evaluate quartz shatter loci. An unknown number of the lithic reduction loci appear to be composed entirely of quartz shatter. The number and location of these loci within the PAA should be identified. The overall context of the features in relation to other sites and features within the PAA and the project vicinity should be mapped, considered and discussed. The map should emphasize the location of quartz shatter

loci, trails , cleared circles, rock rings, cairns, pot drops and passes through the nearby mountains. The particular specialist who will perform this evaluation and the length of time required should be identified in the revised Plan.

18. In the Cultural Resources Unit's ongoing consultation with local Native American communities, the importance of **cairns** has been repeatedly brought to staff's attention. We have requested additional information from Native Americans regarding the appropriate treatment of these features, information which staff will share with the applicant whenever it becomes available and which staff may request that the applicant incorporate, as feasible, into the evaluations of resources of this type. Please revise Section 4 (Methods) to include a discussion of methods to be used to evaluate **prehistoric cairns.** Staff has identified 20 cairns at five sites (CA-RIV-00672 / 05539, CA-RIV-01748 / 01752, CA-RIV-01095, CA-RIV-06613, PVM-MN-063, and PVM-PM-058) within the PAA. The sites where these features are present should be revisited, and each feature should be re-examined. In addition to photographs, detailed plan drawings of each cairn should be made. The overall context of the features in relation to other sites and features within the PAA and the project vicinity should be mapped, considered and discussed. The map should emphasize the location of cairns, trails, cleared circles, rock rings, pot drops and passes through the nearby mountains. The particular specialist who will perform this evaluation and the length of time required should be identified in the revised Plan. In addition, Members of appropriate Native American communities should be contacted, should be consulted as to character-defining aspects of cairns, and, upon their request, should be escorted to visit all 20 cairns in person.

19. Please revise Section 4 (Methods) to expand the discussion of methods to be used to evaluate **thermal features**. Staff has identified 72 such features within the PAA. As discussed in our August 9, 2012 phone call, the revised plan should identify thresholds relative to which a 25 percent sample of the 72 features would be selected for excavation. This sample should not be random, but instead should prioritize the best preserved features. Minimally, staff considers the best preserved thermal features to be those where the fire-altered stones appear to be on or near the location where they were originally heated, rather than dispersed randomly across the site. Staff finds the proposed excavation strategy outlined in the Draft Plan to be acceptable, with some minor additions. In addition to photographs, a detailed, scaled feature plan map should be drawn of each tested feature. Also, an unscreened sediment sample should be collected from each feature and submitted for macrobotanical, palynological, and other Quaternary science analyses in order to determine the materials which were cooked in the feature and perhaps the seasonality of the feature's use. The Plan should include a discussion of how these analyses would be conducted, how long each analysis would take, and the specific analysts (or companies) which would conduct them. Charcoal fragments large enough for C-14 or AMS dates should be analyzed. The plan should discuss how many samples from a single feature will be analyzed if multiple samples are collected. In addition the plan should discuss the total number of samples which will be analyzed, and the thresholds to be used if choosing between multiple features is necessary. Finally, the revised plan should include a discussion of what sort of artifact analysis will take place if any are collected as part of the excavation. Again,

list the length of time the analyses will take, and the specialists who will perform the work.

20. Please revise Section 4 (Methods) to expand the discussion of methods to be used to evaluate **ceramic scatters** (also called ceramic concentrations or pot drops). Staff has identified 89 ceramic concentrations within the PAA. Twenty-five percent of these features should be selected for limited further study. The artifacts from the sample group should be examined in detail in the field by a ceramic specialist, generally using non-destructive techniques. The sherds should be photographed, and if possible the number of vessels present in each feature should be identified, and each vessel should be identified to type if possible using the system identified in the recent field manual by Laylander and Schaefer (2011b). After the in-field analysis, a small sample of sherds shall be selected for destructive analysis. As outlined in Laylander and Schaefer (2011b), thin sections of one sample per feature in the sample group will be prepared for petrographic analysis. Petrographic analysis of these samples should be conducted. One sample per feature in the sample group will be collected for TL dating. Published protocols for collecting TL samples should be followed (Feathers and Rhode 1998), including collection of sediment samples from beneath ceramics.

21. Please revise Section 4 (Methods) to include a discussion of methods to be used to evaluate **cleared circles.** The four sites (CA-Riv-1746, CA-Riv-1748/1752, PVM-CB-030, PVM-PM-38) where the 20 cleared circles of undetermined function are present, should be revisited. In addition to photographs, detailed, scaled plan drawings of each cleared circle should be made. The overall context of the features in relation to other sites and features within the PAA and the project vicinity should be considered and discussed. At a minimum, the following observations about each cleared circle should be made, and used to assess whether each feature may be natural or cultural, and, if cultural, either historic or prehistoric in age:

    a. The presence or absence of berms around the circle, and their height if present;

    b. The distance between the edge of the circle to prehistoric features, particularly prehistoric trails and other cleared circles;

    c. The number, type, and distance of nearby prehistoric artifacts;

    d. Orientation of the feature in relation to the downslope erosional direction;

    e. When multiple features are present at the same site, the average distance between features;

    f. The dimensions/diameter of each feature;

    g. The height of an elevated feature center, or the depth of a depressed feature center in relation to the surrounding pavement;

    h. Color of the inside of the circle and the surrounding pavement using the Munsell Color System;

i. The average stone size within the feature and the average stone size in the surrounding pavement;

j. The presence or absence of animal burrows within each feature;

k. The presence or absence of plants growing within each feature and the plant species if present;

l. The presence or absence of tightly packed stones forming a pavement with minor amounts of varnish within the feature;

m. Geological context on either a Pleistocene or Holocene alluvial fan;

n. Distance from the circle edge to the nearest arroyo margin.

In addition, members of local Native American communities should be contacted and consulted as to the character-defining aspects of cleared circles, and, upon their request, should be escorted to visit all 20 cleared circles in person.

22. Please revise Section 4 (Methods) to include a discussion of methods to be used to evaluate **bones** recovered at three sites (CA-Riv-1821, CA-Riv-1822, PVM-DK-045) in the PAA to determine if they are animal or human. A specialist should visit these three sites and examine the bones in question, attempt to make a final determination in the field, or, if necessary, conclude the final determination on the basis of laboratory analysis. The particular specialist who will perform this evaluation and the length of time required should be identified in the revised plan.

23. Please revise Section 4 to include a discussion of the methods to be used to evaluate the historical significance of seven sites (CA-Riv-1746, CA-Riv-1748/1752, CA-Riv-1750, PVM-CB-028, PVM-CB-030, PVM-DK-045, PVM-SM-109) where **short-term occupation** (camp) may have taken place. Studies described in other parts of the plan for ceramic concentrations, thermal features, cleared circles, and faunal remains should be incorporated (or referenced) here as well. In addition to those studies, diagnostic lithics and utilized ground stone should be collected and analyzed. If appropriate, use-wear and residue analyses should be conducted. The particular specialist who will perform the analyses and the length of time required should be identified in the revised plan. As discussed in the August 9, 2012 phone call, a spatial analysis of the relevant site components should be conducted and maps generated. The plan should outline exactly what the spatial analysis will entail. At a minimum, it should include a map showing the relationship of the relevant features. The map should be accompanied by a discussion of the spatial relationships between features, and their average distances, at other camp sites in the region. Finally, there should be a comparison and contrast between patterns found at regional camps, with the patterns found at the seven sites listed above. This analysis should result in a well-articulated argument as to whether each site component should actually be considered a camp, and exactly what type of camp (using Laylander and Shaefer's types) is the most appropriate.

24. In order to maintain the Committee's schedule, it is critical that the applicant revise the Draft Plan as requested in this letter in a timely manner and efficiently execute the plan upon its ultimate approval. Towards this end, please add a **"Schedule"** section to the plan. This section should specify milestone dates for fieldwork, laboratory processing, analysis completion, and report submittal. In addition, the time required for each task should be estimated as well as the number and duties of the people involved. Based on the Committee's current schedule for the FSA, staff needs to receive the final report detailing the results of the implementation of the proposed plan no later than December 15, 2012. Given the anticipated volume of new data that the report would present, the incorporation of that data into staff's final analysis poses a significant challenge for staff if staff is to meet the Committee's scheduled publication date for the FSA of January 2013.

25. Please add a **"Curation"** section to the plan, where the curation agreement required by the Energy Commission and BLM is described and the facility that will curate the recovered materials is specifically identified.

26. Please add a **"Native American Coordination"** section to the plan. Several local Native American communities have asked the Energy Commission to have Native American monitors present during all ground disturbance at the Rio Mesa SEGF site (personal communication, Thomas Gates, staff ethnographer). This section should describe the role of Native American monitors during any excavation outlined in the plan and should follow the guidance provided by the Native American Heritage Commission (www.nahc.ca.gov). This section should include the following topics:

    a. The number of Native American monitors who will be working simultaneously,

    b. Methods for choosing particular monitors (see the NAHC discussion of preference), and

    c. The required knowledge, abilities, and experience which will be required for each monitor.

References Cited

Feathers, James K. and David Rhode

1998 Luminescence Dating of Protohistoric Pottery from the Great Basin. Geoarchaeology 13(3):287-308.

Giambastiani, Mark A.

2008 Understanding Pavement Quarries in the Mojave Desert. In Avocados to Millingstones: Papers in Honor of Delbert L. True, edited by Georgie Waugh and Mark E. Basgall. Monographs in California and Great Basin Anthropology No. 5. California State University, Sacramento.

Giambastiani, Mark A., Mark A. Giambastiani, Micah J. Hale, and

Andrea Catacora

2009 Archeological Evaluations at 43 Prehistoric Toolstone Quarry Sites and Review of Evaluations at 26 Additional Quarry Sites in the Quackenbush Training Area, Marine Air Ground Task Force Training Command, Marine Corps Air Ground Combat Center, Twentynine Palms, California. Prepared by ASM for United States Marine Corps, Marine Air Ground Task Force Training Command.

Laylander, Don and Jerry Schaefer

2011a Chuckwalla Valley Prehistoric Trails Network Cultural Landscape: Historic Context, Research Questions, and Resource Evaluation Criteria (DRAFT). Prepared by ASM for the California Energy Commission.

Laylander, Don and Jerry Schaefer

2011b Chuckwalla Valley Prehistoric Trails Network Cultural Landscape: Field and Laboratory Manual (DRAFT). Prepared by ASM for the California Energy Commission.

CULTURAL RESOURCES Table A
Prehistoric Resources in the Rio Mesa SEGF PAA Where Testing is Required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
CA-RIV-00343	Updated	Johnston et al. 1964; UC Riverside Anthropology Department 1978 & 1980; Mooney & Associates 2004; ICF Jones & Stokes 2008; URS Corp. 2011	Multi-component	Multicomponent. Trail segment,133 m, east-west; previous site record also mentions thermal hearth feature and historic cans.	Trail/ Processing; Historical refuse (non-military)	Qa6, Qpv	Additional information required; Not eligible
CA-RIV-00672 / 05539	Updated	Imperial Valley College Museum 1978; URS Corp. 2011 [CA-RIV-5539 component: Western Cultural Resource Management 1994; KEA Environmental, Inc./EDAW, Inc. 2000/2001]	Multi-component	Multicomponent. 74 acres. 11,798 artifacts. Prehistoric lithic quarry/workshop and resource processing site with 180 lithic reduction loci, 4 thermal features, 2 rock piles, and 3 ceramic concentrations/pot drops. The site is crossed by a segment of prehistoric trail PVM-CB-016. Historic component consists of 2 refuse loci dating to the late 1950s or early 1960s; artifacts include cans, glass, and housewares.	Lithic Quarry/Processing/Pot Drop; DTC food related refuse	Qpv	Additional information required; Not eligible
CA-RIV-01095	Updated	Imperial Valley College Museum 1974; San Bernardino County Museum 1976; URS Corp. 2011	Multi-component	Multicomponent. 66 acres. 5,275 total artifacts. Prehistoric lithic quarry/workshop with 130 lithic reduction loci and ceramic scatter. The WWII era historic component consists of 17 excavated depressions which may be foxholes, 1 tent pad, 1 tank maneuver area, tank tracks, roads, and 3 historic refuse loci. Artifacts include cans, glass, hardware, wood, housewares and metal. 12 rock clusters and 5 thermal features are of unknown temporal association.	Lithic Quarry; DTC Maneuvers	Qa6	Additional information required; Eligible contributor to DTCCL

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
CA-RIV-01745 (P-33-001745)	Updated	Imperial Valley College Museum 1978; URS Corp. 2011	Multi-component	Multicomponent. 18 acres. 1,487 surface artifacts. Prehistoric component consists of lithic quarry/workshop, with 57 loci (28 segregated reduction, 22 multiple reduction, 3 ceramic scatter, and 4 lithic scatter). Ceramics include buff and brown ware (n= 124); 3 concentrations/potential pot drops. Historic artifacts consist of 7 cans and 2 pieces of wire. 1 rock ring feature also present.	Lithic Quarry/Pot Drop; Mid-20th century refuse	Qa6	Additional information required; Not eligible
CA-RIV-01746	Updated	Imperial Valley College Museum 1978; URS Corp. 2011	Multi-component	Multicomponent. 39 acres. 3,147 total artifacts. Prehistoric lithic workshop/quarry with multiple lithic tools, 1 thermal feature, 1 ceramic concentration/pot drop, 22 segregated reduction loci, 9 multiple reduction loci, 12 lithic scatter loci, and 1 ground stone manufacturing loci. Evidence of groundstone manufacture. 1 possible intaglio and 1 trail were not relocated. The historic component consists of 2 refuse loci; WWII era refuse and non-military refuse appears to be represented. 9 cleared circles identified in the 1970s of unknown function and temporal association.	Camp; DTC Maneuvers	QTmw	Additional Information Required; Not eligible

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CA-RIV-01748 / 01752	Updated	Imperial Valley College Museum 1978; Mooney-Lettieri & Associates, Inc. 1984; URS Corp. 2011	Multi-component	Multicomponent. 2,241 acres. Over 27,750 total artifacts. Prehistoric component includes 19 thermal features, 7 cleared circles, 3 rock piles/cairns, 22 ceramic concentrations/pot drops (23 ceramic scatter loci), 174 segregated reduction loci, 22 multiple reduction loci, and 201 lithic scatter loci. Groundstone also present. Conflicting reports of a cremation. Extensive WWII era military refuse deposits and features including tank tracks, bulldozer scrapes, rock rings and trenches as well as non-military refuse deposits - cans, shoe soles, and metal. 4 historic refuse loci.	Camp; DTC Maneuvers	Qa3, QTMW, Qa6	Additional information required; Eligible contributor to DTCCL
CA-RIV-01749 (P-33-001749)	Updated	Imperial Valley College Museum 1978; URS Corp. 2011	Multi-component	Multicomponent. 17.3 acres. Prehistoric component consists of lithic quarry/workshop (21 segregated reduction, 34 lithic scatter), 1 ceramic concentration/pot drop with 24 Colorado buff ware sherds, and 2 thermal features. 1 historic survey marker feature.	Lithic Quarry/Processing/Pot Drop; Government survey marker	Qpv	Additional information required; Not eligible
CA-RIV-01750	Previous	Imperial Valley College Museum 1978	Prehistoric	Prehistoric. Multiple campsites, with groundstone, 1 thermal feature, lithics, 1 ceramic concentration/pot drop, and hammerstones.	Camp	Qpv, Qw	Additional information required

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CA-RIV-01819	Updated	BLM 1980; Mooney & Associates 2004; Mooney/Jones & Stokes 2005; ICF Jones & Stokes 2008; Applied Earthworks 2011; URS Corp. 2011	Multi-component	Multicomponent. 0.9 acres. Prehistoric lithic quarry/workshop. 312 lithics include flakes, cores, cobbles, and hammerstone, with 3 loci (2 segregated reduction and 1 lithic scatter). Historic DTC refuse includes 9 cans.	Lithic Quarry; DTC food related refuse	Qa3, Qa6	Additional information required; Eligible contributor to DTCCL
CA-RIV-01821	Updated	BLM 1980; Mooney & Associates 2004; Mooney/Jones & Stokes 2005; ICF Jones & Stokes 2008; URS Corp. 2011	Prehistoric	Prehistoric. No dimensions provided. Low density artifact scatter with 3 thermal features, 1 ceramic scatter, calcined bone and bisected by two previously recorded trail segments (CA-RIV-343T and CA-RIV-650T).	Processing	Qpv	Additional information required
CA-RIV-01822	Updated	BLM 1980; Mooney & Associates 2004; Mooney/Jones & Stokes 2005; ICF Jones & Stokes 2008; URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Low -density artifact scatter with 1 ceramic concentration and 3 thermal features near previously recorded trail CA-RIV-00343. Calcined bone present.	Processing	Qa6, Qpv	Additional information required

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CA-RIV-05533/05534/06616	Updated	Western Cultural Resource Management 1994; KEA Environmental, Inc./EDAW, Inc. 2000/2001; URS Corp. 2011	Multi-component	Multicomponent. 101 acres. 8,210 total artifacts. Prehistoric component consists of lithic quarry/workshop, with cores, cobbles, flakes, hammerstones, shatter, preforms, and other lithics. 23 lithic scatter loci, 13 segregated reduction loci, and evidence of groundstone manufacture. 10 likely prehistoric features, including 8 thermal features. The historic component includes military and historic refuse, with 2 historic debris loci. 6 WWII era foxhole features, 2 historic and modern thermal features, and 1 rock cluster/cairn feature.	Lithic Quarry/Processing; DTC food related refuse	Qpv, Qw	Additional information required; Eligible contributor to DTCCL
CA-RIV-05538 (P-33-005809)	Updated	Western Cultural Resource Management 1994; KEA Environmental, Inc./EDAW, Inc. 2000/2001; URS Corp. 2011	Multi-component	Multicomponent. 7.3 acres. 482 artifacts.. Prehistoric component comprised of lithic quarry/workshop; 7 lithic scatter loci, 8 segregated reduction loci, and 1 undefined prehistoric locus. Historic artifacts located out of loci and include 6 military-related food and beverage cans.	Lithic Quarry; DTC food related refuse	Qpv	Additional information required; Eligible contributor to DTCCL

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
CA-RIV-05540/05541	Updated	Western Cultural Resource Management 1994; KEA Environmental, Inc./EDAW, Inc. 2000/2001; URS Corp. 2011	Prehistoric	Prehistoric. 16.1 acres. Lithic quarry/workshop, with 3,877 artifacts, including flakes, cores, cobbles, hammerstones, and ceramics. 76 loci (35 lithic scatter, 40 segregated reduction, and 1 lithic/ceramic scatter). 2 ceramic concentrations/pot drops, with 115 total sherds.	Lithic Quarry/Pot Drop	Qpv	Additional information required
CA-RIV-05543	Previous - Not Relocated	Western Cultural Resource Management 1994; KEA Environmental, Inc./EDAW, Inc. 2000/2001	Prehistoric	Prehistoric. 6 acres. Lithic quarry/workshop. Low density lithic scatter (n= 300), with 8 lithic reduction loci, 1 sherd of pottery.	Lithic Quarry	Qpv	Additional information required
CA-RIV-06533/05531	Updated	Western Cultural Resource Management 1994; Tierra Environmental Services 2000; KEA Environmental, Inc./EDAW, Inc. 2000/2001; URS Corp. 2011	Multi-component	Multicomponent. 6.3 acres. 561 artifacts. Prehistoric lithic quarry/workshop, with lithic artifacts including flakes, tested cobbles, shatter, cores, hammerstones, and anvils; 14 segregated reduction loci and 7 lithic scatter loci. Historic artifacts include cans, glass, and hardware; 1 historic refuse locus. One feature consists of a circular depression with raised berm.	Lithic Quarry; DTC Maneuvers	Qpv	Additional information required; Eligible contributor to DTCCL
CA-RIV-06613	Updated	Tierra Environmental Services 2000; URS Corp. 2011	Multi-component	Multicomponent. 6.6 acres. Prehistoric component comprised of 3 ceramic concentrations/pot drops (n= 225 buffware sherds). Historic WWII era refuse includes cans, hardware, auto parts, and glass; 1 historic refuse locus. 2 rock rings and 1 pile of rocks with undetermined temporal association.	Pot Drop; DTC Maneuvers	TRqm, Qa6	Additional information required; Eligible contributor to DTCCL

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
CA-RIV-06677	Updated	KEA Environmental, Inc. 2000; URS Corp. 2011	Multi-component	Multicomponent. 13.6 acres. 861 total artifacts. Prehistoric component consists of lithic quarry/workshop; lithic artifacts include flakes, cores, cobbles, and shatter. 6 lithic scatter loci and 8 segregated reduction loci. Historical component primarily includes cans and jars, as well as ceramics, metal, and automotive. 2 historic refuse scatter loci and 2 historic scatter loci.	Lithic Quarry/Processing; Historical refuse (non-military)	Qa6, Qpv	Additional information required; not eligible
CA-RIV-09012	Updated	ICF Jones & Stokes 2008; URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. 2 thermal features with no associated artifacts.	Processing	Qpv	Additional information required
PVM-CB-006	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 30 lithic artifacts and 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-CB-008	New	URS Corp. 2011	Multi-component	Multicomponent. < 0.1 acre. Lithic quarry/workshop, with 13 lithic artifacts and 1 segregated reduction locus. 1 historic five gallon can isolate.	Lithic Quarry; Isolated Historic Artifacts	Qa6	Additional information required; Not eligible
PVM-CB-028	New	URS Corp. 2011	Prehistoric	Prehistoric. 35.5 acres. 2 thermal features, 1 dirt mound, 47 segregated reduction loci, 33 lithic scatter loci, 14 ceramic concentration/pot drops, 1 cremation, and multiple lithic tools surrounded by a low density artifact scatter (n= 6,576).	Camp	Qa6, Qpv	Additional information required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
PVM-CB-030	New	URS Corp. 2011	Multi-component	Multicomponent. 46 acres. Prehistoric component consists of 1 thermal feature and 1 cleared circle. Lithic quarry/workshop with 30 segregated reduction loci, 18 lithic scatter loci, and multiple lithic tools surrounded by a low density lithic scatter. Historic component consists of low density WWII era artifact scatter.	Camp; DTC food related refuse	Qa6, Qpv, Qw	Additional information required; Eligible contributor to DTCCL
PVM-DK-003	New	URS Corp. 2011	Multi-component	Multicomponent. 319 acres. 12,370 total artifacts. Prehistoric lithic quarry/ workshop, with lithic scatter (including flakes, cobbles, hammerstones, and anvils) and 38 segregated reduction loci and 15 lithic scatter loci. 4 loci of ceramic concentrations/pot drops, with Colorado Buff Ware sherd counts of 26, 135, 24, and 69, respectively. 1 thermal feature, possibly prehistoric. Historic component primarily consists of food and beverage containers. Other historic artifacts include fuel, solvent, and oil containers; cans and tins; metal; wood; glass bottles; other household and automotive items. 13 historic refuse loci and 1 modern ceramic loci. 29 historic features include 18 excavated depressions, 4 berm piles, 1 55-gallon drum, 1 fence, 2 concrete/cement, 1 rock alignment, 1 thermal, and 1 wood.	Lithic Quarry/Pot Drop; DTC Maneuvers	Qa6, Qpv	Additional information required; Eligible contributor to DTCCL

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
PVM-DK-017	New	URS Corp. 2011	Prehistoric	Prehistoric. 11.3 acres. Lithic quarry/workshop, with 1,102 lithics (primarily flaked stone debitage) and 25 loci (19 segregated reduction and 6 scatter). Features include 1 thermal feature and 1 DTC tank tracks.	Lithic Quarry/Processing	Qpv, Qw	Additional information required
PVM-DK-045	New	URS Corp. 2011	Multi-component	Multicomponent. < 0.1 acre. 166 total artifacts. Prehistoric lithic quarry/workshop, with bone, ceramic, and lithic scatter. Ceramic concentration/pot drop (n= 39) of Colorado buff ware body sherds. 1 bone and lithic scatter loci; 1 ceramic and lithic scatter loci; and 1 lithic scatter loci. 5 associated prehistoric thermal features. Historic component primarily consists of food and beverage cans, with 1 historic refuse loci.	Camp; DTC food related refuse	Qpv	Additional information required; Eligible contributor to DTCCL
PVM-DK-047	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Low density artifact scatter (n= 112). 3 ceramic concentrations/pot drops located in 2 ceramic scatter loci and 1 ceramic and lithic scatter locus.	Pot Drop	Qa6	Additional information required
PVM-EK-030	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 23 lithic artifacts and 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-EK-031	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with 14 lithic artifacts (flakes, core, hammerstone, and cobble) and 1 locus.	Lithic Quarry	Qa3	Additional information required
PVM-EK-035	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 5 lithics consisting of flakes, core, and cobble.	Lithic Quarry	Qa6	Additional information required

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PVM-EK-036	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 26 lithic artifacts (flakes, shatter, and hammerstone) primarily located within 2 loci.	Lithic Quarry	Qa5	Additional information required
PVM-EK-038	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with 11 sparse lithic artifacts, including flakes, shatter, and cobble.	Lithic Quarry	Qa6	Additional information required
PVM-EK-040	New	URS Corp. 2011	Multi-component	Multicomponent. 5.2 acres. Prehistoric component (n= 390) consists of lithic quarry/workshop (308 lithics; 17 loci- 3 lithic scatter, 8 segregated reduction, and 6 multiple reduction) and ceramic concentration/possible pot drop (82 sherds; 1 locus). Historic component consists of 2 metal and 1 plastic artifacts and 3 sets of tank tracks.	Lithic Quarry/Pot Drop; DTC Maneuvers	Qa6	Additional information required; Eligible contributor to DTCCL
PVM-EK-043	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, 4 flakes.	Lithic Quarry	Qa6	Additional information required
PVM-EK-046	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop (n=77) 2 segregated reduction loci and 1 lithic scatter locus.	Lithic Quarry	Qa6	Additional information required
PVM-EK-053	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.6 acres. Lithic quarry/workshop, 10 low density lithic scatter.	Lithic Quarry	Qa3, Qa6	Additional information required
PVM-EK-058	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 1 segregated reduction locus containing 6 lithics.	Lithic Quarry	Qa6	Additional information required
PVM-JR-001	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Low density ceramic scatter, 44 Colorado Buff Ware sherds and 1 lithic. Possible deflated ceramic concentration/pot drop.	Artifact Scatter	Qa6	Additional information required

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PVM-JR-005	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop. Complex lithic scatter (n= 10).	Lithic Quarry	Qa6	Additional information required
PVM-JR-007	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Low density artifact scatter, with a ceramic concentration/pot drop of 5 Colorado Buff Ware sherds and 3 lithics.	Pot Drop	Qa6	Additional information required
PVM-JR-008	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acre. Low density artifact scatter (n=15) including ceramics and lithics.	Artifact Scatter	Qa6	Additional information required
PVM-JR-012	New	URS Corp. 2011	Multi-component	Multicomponent. 23 acres. 1,032 total artifacts. The prehistoric component consists of a lithic quarry/workshop, with flaked stone debitage as the primary constituent. Evidence of groundstone manufacture, and 1 thermal feature. Prehistoric loci include 30 segregated reduction, 2 ceramic scatter, 2 lithic scatter, and 2 multiple reduction. 2 ceramic concentrations/pot drops consist of Colorado buff ware sherds. Historic artifacts include glass, ceramics, metal, cans, and miscellaneous items; 1 historic refuse scatter locus. 4 historic features include 2 barbed wire fences, 1 RR tie set, and 1 cairn.	Lithic Quarry; DTC Maneuvers	Qa3, Qa6, Qw	Additional information required; Eligible contributor to DTCCL
PVM-JR-015	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 18 lithics including flakes, core, cobbles, and percussion tools.	Lithic Quarry	Qa6	Additional information required
PVM-JR-016	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.5 acres. Lithic quarry/workshop, with 27 lithics including flakes, cores, cobbles, and percussion tools.	Lithic Quarry	Qa6	Additional information required

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PVM-JR-018	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 4 lithics including core, cobbles, and an anvil.	Lithic Quarry	Qa6	Additional information required
PVM-JR-019	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop. Complex lithic scatter (n= 7) includes flakes, core, and cobble.	Lithic Quarry	Qa6	Additional information required
PVM-JR-020	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with 19 lithics (flakes, core, cobble, shatter, and hammerstone) and 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-JR-029	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Complex lithic scatter (n= 15) including flakes, core, core tools, cobble, and hammerstone. 1 multiple reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-MK-021	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with low density lithic scatter (n= 21).	Lithic Quarry	Qa6	Additional information required
PVM-MK-022	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 7 lithics including flakes and tested cobbles.	Lithic Quarry	Qa6	Additional information required
PVM-MK-023	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 10 lithics (flakes, core, and tested cobbles) and 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-MK-024	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.6 acres. Lithic quarry/workshop, with 86 lithic artifacts and 4 segregated reduction loci.	Lithic Quarry	Qa6	Additional information required
PVM-MK-025	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop. Low density lithics (n= 10) include flakes and tested cobbles.	Lithic Quarry	Qa6	Additional information required
PVM-MK-066	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Ceramic scatter (n=25) disturbed by multiple WWII era tank tracks.	Ceramic Scatter	Qa6	Additional information required
PVM-MK-103	New	URS Corp. 2011	Multi-component	Multicomponent. 6.2 acres. Low density	Artifact Scatter/Processing/Pot	Qpv	Additional information

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				prehistoric artifact scatter (n= 36) surrounding 8 thermal features and 1 ceramic concentration/pot drop. Low density historic artifact scatter (n= 105), with 1 artifact concentration. Tank tracks and 2 historic thermal features also present.	Drop; DTC Maneuvers		required; Eligible contributor to DTCCL
PVM-MK-126	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Thermal feature with 40+ fractured cobbles. No associated artifacts.	Processing	Qpv	Additional information required
PVM-MN-002	New	URS Corp. 2011	Prehistoric	Prehistoric. 4.3 acres. Lithic quarry/workshop, 60 lithics (including flakes, shatter, cobbles, core, hammerstone). Majority of artifacts located outside the 1 lithic scatter locus.	Lithic Quarry	Qa6	Additional information required
PVM-MN-004	New	URS Corp. 2011	Multi-component	Multicomponent. 0.9 acres. Prehistoric lithic scatter (n= 8) including flakes, core, cobbles, hammerstone. WWII era refuse (n= 84) consisting of cans, glass, metal, and wood, throughout site and within 1 historic refuse locus.	Lithic Quarry; DTC Maneuvers	Qa6	Additional information required; Eligible contributor to DTCCL
PVM-MN-015	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with low density artifact scatter (n=26). 1 lithic concentration, 1 ceramic concentration/pot drop (n=9), and 1 biface.	Lithic Quarry/Pot Drop	Qa6	Additional information required
PVM-MN-016	New	URS Corp. 2011	Multi-component	Multicomponent. 4.2 acres. Prehistoric component consists of lithic quarry/workshop; lithic scatter (n= 5) consists of flakes and cobble. Historic DTC refuse (n= 40) consists of metal, cans, and glass. 1 historic rock cluster feature.	Lithic Quarry; DTC Maneuvers	Qa6, Qw	Additional information required; Eligible contributor to DTCCL
PVM-MN-031	New	URS Corp. 2011	Multi-component	Multicomponent. 4 acres. Prehistoric component consists of 3 lithics (core, cobble,	Lithic Quarry; DTC Maneuvers	Qa6	Additional information required; Eligible

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				and hammerstone) and 14 ceramics (13 body and 1 rim sherd), with 1 ceramic loci (n= 11). Historic component consists WWII era refuse (n= 154) containing cans, can parts, blank ammunition, metal, and c-ration wrapping; 1 historic refuse scatter locus.			contributor to DTCCL
PVM-MN-035	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with lithic scatter (9 flakes) and 1 lithic scatter locus.	Lithic Quarry	Qa6	Additional information required
PVM-MN-036	New	URS Corp. 2011	Multi-component	Multicomponent. 2.1 acres. Prehistoric component consists of 1 ceramic concentration/pot drop (n=4). Historic component consists of a low density artifacts scatter (n=45), and 2 features including 1 metal rod and 1 ironwood tree with wire.	Pot Drop; DTC food related refuse	Qa6	Additional information required; Eligible contributor to DTCCL
PVM-MN-039	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop; 7 lithics include flakes, core, and hammerstone.	Lithic Quarry	Qa6	Additional information required
PVM-MN-060	New	URS Corp. 2011	Multi-component	Multicomponent. 0.4 acres. Prehistoric component consists of 1 hammerstone and 2 pieces of groundstone. Historic component consists of 3 quartz shatter loci likely associated with historic gold prospecting, WWII era excavated depressions (2), pit (1), and trench (1). 21 cleared circles of unknown function and temporal association.	Artifact Scatter/Cleared Circle; DTC Maneuvers	Qa3	Additional information required; Eligible contributor to DTCCL
PVM-MN-062	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with flakes, cobble, and hammerstone (n= 11) and 1 segregated reduction locus	Lithic Quarry	Qa3	Additional information required
PVM-MN-063	New	URS Corp.	Undetermined	Undetermined. < 0.1	Cairn	Qa3	Additional

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		2011		acre. 1 rock cairn feature.			information required
PVM-MN-074	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with lithic scatter (n= 9) including flakes, cobbles, core.	Lithic Quarry	Qa3	Additional information required
PVM-MN-096	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with scatter (n= 12) including flakes, cores, and cobbles.	Lithic Quarry	Qa3	Additional information required
PVM-MN-097	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with lithic scatter (n= 12) including flakes, shatter, cores, and cobbles.	Lithic Quarry	Qa3	Additional information required
PVM-MN-098	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Lithic quarry/workshop, with lithic scatter (n= 4) consisting of flakes and cobble.	Lithic Quarry	Qa3	Additional information required
PVM-MN-099	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop; scatter (n= 4) consists of flakes.	Lithic Quarry	Qa3	Additional information required
PVM-MN-100	New	URS Corp. 2011	Prehistoric	Prehistoric. 3.3 acres. Cobble pavement quarry with 4 segregated reduction loci, 5 larger lithic scatter loci, 1 tool and 3 pestle blanks surrounded by a low density lithic scatter (n= 1,172). Evidence of groundstone manufacture.	Groundstone Quarry	Qa3, QTmw	Additional information required
PVM-MN-101	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.1 acre. Low density artifact concentration with 2 ceramic concentrations/pot drops including Salton Brown Ware (n= 120) prehistoric ceramic sherds.	Pot Drop	Qa3	Additional information required
PVM-MN-124	New	URS Corp. 2011	Prehistoric	Prehistoric. 1.7 acres. Lithic quarry/workshop; 149 lithics include flakes, shatter, cobbles, and hammerstones. Distributed within and surrounding 7 loci (5 lithic scatter and 2 segregated reduction).	Lithic Quarry/Rock Ring	Qa6	Additional information required

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				1 rock ring feature.			
PVM-MN-153	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic scatter (n= 3) including cobbles and hammerstone. 1 thermal feature.	Processing	Qpv	Additional information required
PVM-MN-507	Updated	URS Corp. 2011 & 2012	Multi-component	Multicomponent. 3 acres. Prehistoric component consists of 3 segregated reduction loci, 1 lithic scatter loci, 2 ceramic concentration/pot drops surrounded by a low density artifact scatter including groundstone production debris. Probable evidence of groundstone manufacture. Historic component consists of 4 refuse scatter loci and surrounded by a low density historic artifact scatter.	Lithic Quarry/Pot Drop; Historical refuse (non-military)	Qpv	Additional information required; Not eligible
PVM-PM-023	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.7 acres. Lithic quarry/workshop, with 100 lithics (flakes, shatter, cobbles, and core) and 6 loci (3 segregated reduction and 3 lithic scatter).	Lithic Quarry	Qa6	Additional information required
PVM-PM-024	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 19 lithics (flakes, cobbles, and cores).	Lithic Quarry	Qa6	Additional information required
PVM-PM-025	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 62 lithics (flakes, shatter, cobbles, and core) and 3 loci (2 lithic scatter and 1 segregated reduction).	Lithic Quarry	Qa6	Additional information required
PVM-PM-026	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 10 lithics (cobbles, flakes and shatter).	Lithic Quarry	Qa6	Additional information required
PVM-PM-027	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.9 acres. Lithic quarry/workshop. Lithic scatter (n= 50) includes flakes, cores, cobbles, and core tool.	Lithic Quarry	Qa6	Additional information required
PVM-PM-035	New	URS Corp. 2011	Prehistoric	Prehistoric. 1.0 acre. Lithic quarry/workshop, with 145 lithics (flakes, shatter, cores, cobbles, hammerstone, and core	Lithic Quarry	Qpv	Additional information required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
				tools) artifacts and 6 loci (4 segregated reduction and 2 lithic scatter).			
PVM-PM-038	New	URS Corp. 2011	Prehistoric	Prehistoric. 3.3 acres. Lithic quarry/workshop, with 227 lithic artifacts (flakes, shatter, cores, cobbles, hammerstones) and 3 loci (2 segregated reduction and 1 lithic scatter). 3 cleared circles or foxholes, with unknown function and temporal association.	Lithic Quarry	Qpv	Additional information required
PVM-PM-056	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. 1 thermal feature located within 1 lithic scatter loci surrounded by a low density lithic scatter (n= 62).	Lithic Quarry/Processing	Qpv	Additional information required
PVM-PM-058	New	URS Corp. 2011	Multi-component	Multicomponent. 0.6 acres. Prehistoric lithic quarry/workshop (flakes, cores, cobbles, and cobble tool) with 1 thermal feature. 1 historic refuse scatter locus (n= 26, including metal, glass, and shell button). 1 cairn with no clear temporal association.	Lithic Quarry/Processing; Historical refuse (non-military)	Qpv	Additional information required; Not eligible
PVM-PM-064	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with lithic scatter (n= 12) consisting of flakes and cobbles.	Lithic Quarry	Qa6	Additional information required
PVM-PM-066	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, 6 flakes. 1 thermal feature present.	Lithic Quarry/Processing	Qa6	Additional information required
PVM-PM-069	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, 5 cobbles.	Lithic Quarry	Qa6	Additional information required
PVM-PM-082	New	URS Corp. 2011	Prehistoric	Prehistoric. 1.0 acres. Lithic quarry/workshop. 291 lithics (flakes, shatter, cores, cobbles, and hammerstones) and 6 loci (4 lithic scatter and 2 segregated reduction).	Lithic Quarry	Qpv	Additional information required
PVM-PM-089	New	URS Corp. 2011	Prehistoric	Prehistoric. 2.3 acres. Lithic quarry/workshop, with 278 lithics (flakes,	Lithic Quarry	Qpv	Additional information required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
				cores, cobbles, core tool, shatter, and hammerstones) and 7 loci (5 segregated reduction and 2 lithic scatter).			
PVM-SM-019	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 168 lithics (consisting of flakes, shatter, core, and hammerstones) primarily located in 7 segregated reduction loci.	Lithic Quarry	Qa3	Additional information required
PVM-SM-023	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 23 lithics (flakes, cores, and hammerstones) located within 3 segregated reduction loci.	Lithic Quarry	Qa3	Additional information required
PVM-SM-028	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 7 lithics (flakes, hammerstone, and core) located within 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-SM-032	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 11 lithics and groundstone (flakes, cobbles, cores, hammerstone, milling slab, metate fragment) and 1 segregated reduction locus.	Lithic Quarry	Qa6	Additional information required
PVM-SM-037	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 63 lithics (flakes, shatter, core, hammerstone) located within 1 segregated reduction locus.	Lithic Quarry	Qa5	Additional information required
PVM-SM-053	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. 6 lithic artifacts (flakes, cores, cobbles, hammerstone, and core tools) located within 1 lithic scatter locus.	Lithic Quarry	Qa3	Additional information required
PVM-SM-054	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.6 acres. Lithic quarry/workshop, with 29 lithics (flakes, core, core tools, cobbles, and hammerstone) and 2	Lithic Quarry	Qa5	Additional information required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
				segregated reduction loci.			
PVM-SM-058	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 13 lithics (including flakes, core tool, cobbles, and hammerstone) and 1 segregated reduction loci.	Lithic Quarry	Qa5	Additional information required
PVM-SM-060	New	URS Corp. 2011	Multi-component	Multicomponent. 63.3 acres. 4,031 artifacts and 210 loci. Prehistoric component consists of lithic quarry/workshop (190 segregated reduction loci, 19 lithic scatter loci), 1 prehistoric thermal feature and evidence of groundstone manufacture. Historic component consists of WWII era refuse (cans, glass, metal, wood, and household refuse) and 9 maneuver features (foxholes, upright buried cans, bulldozed trench, and defense position).	Lithic Quarry/Processing/Pot Drop; DTC Maneuvers	Qa5	Additional information required; Eligible contributor to DTCCL
PVM-SM-061	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 39 lithics (including flakes, cores, cobble, and hammerstone) 3 segregated reduction loci.	Lithic Quarry	Qa5	Additional information required
PVM-SM-071	New	URS Corp. 2011	Multi-component	Multicomponent. 0.3 acres. 71 artifacts. Prehistoric component consists of lithic quarry/workshop, with 2 segregated reduction loci. Lithic scatter includes flakes, shatter, core, cobbles, and hammerstone. Historic refuse consists of a shoe sole, glass, and cans.	Lithic Quarry; Historical refuse (non-military)	Qa6	Additional information required; Not eligible
PVM-SM-075	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.2 acres. Lithic quarry/workshop, with 84 lithics (including flakes, shatter, core, cobbles, and hammerstones) and 6	Lithic Quarry	Qa3	Additional information required

Resource Identifier	When Recorded	Information Source	Era / Resource Type	Description	Site Type	Geological Context	CRHR Eligibility (Staff)
				segregated reduction loci.			
PVM-SM-076	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 78 lithics (including flakes, cores, cobbles, hammerstones) primarily located within 3 segregated reduction loci.	Lithic Quarry	Qa3	Additional information required
PVM-SM-077	New	URS Corp. 2011	Prehistoric	Prehistoric. < 0.1 acre. Lithic quarry/workshop, with 30 lithics (including flakes, shatter, cores, hammerstones, and cobbles) and 2 segregated reduction loci.	Lithic Quarry	Qa3	Additional information required
PVM-SM-079	New	URS Corp. 2011	Prehistoric	Prehistoric. 0.7 acres. Lithic quarry/workshop, with 93 lithics (including flakes, cores, cobbles, and hammerstone) within and surrounding 5 segregated reduction loci.1 thermal feature.	Lithic Quarry	Qa3	Additional information required
PVM-SM-109	New	URS Corp. 2011	Multi-component	Multicomponent. 35.8 acres. Prehistoric component includes ~12,556 artifact (projected). Lithic quarry/workshop, with lithic scatter including flakes, cobbles, core tools, hammerstone. No reduction loci. Evidence of groundstone manufacture; utilized groundstone also present. Historic component consists of DTC refuse (n= 226; including cans, hardware, metal, shell casings, wire, and glass). 2 loci of historic DTC refuse..	Camp; DTC Maneuvers	Qpv	Additional information required; Eligible contributor to DTCCL

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
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APPLICATION FOR CERTIFICATION FOR THE RIO MESA SOLAR ELECTRIC GENERATING FACILITY

DOCKET NO. 11-AFC-04
PROOF OF SERVICE
(Revised 10/16/12)

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DECLARATION OF SERVICE

I, Alicia Campos, declare that on October 19, 2012, I served and filed a copy of the attached document Rio Mesa Solar Electric Generating Facility (11-AFC-04) Staff Comments on Draft Archaeological Research Design and Testing Plan, dated October 19, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: http://www.energy.ca.gov/sitingcases/riomesa/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(*Check all that Apply*)

For service to all other parties:

X Served electronically to all e-mail addresses on the Proof of Service list;

____ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses marked *"hard copy required" or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

X by sending electronic copies to the e-mail address below (preferred method); *OR*

____ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

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1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
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OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

____ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Originally Signed By:
Alicia Campos
Siting, Transmission and Environmental Protection Division

*indicates change