



Charles Adamson
Project Manager
Customer Service Business Unit
Transmission Project Licensing

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VIA EMAIL: charles.adamson@sce.com

Subject: Update of Cultural Resources Work Planned for the Eldorado-Ivanpah Transmission Project, San Bernardino County, California and Clark County, Nevada

Charles:

Southern California Edison (SCE) proposes to construct a 230 kV transmission line (T/L Project) between Mountain Pass Substation in California and Eldorado Substation in Nevada to provide interconnection service to third-party alternative energy generation projects proposed for Ivanpah Valley. The T/L Project will also involve construction of a new Ivanpah substation that will serve as the initial point of interconnection between the generation projects and the SCE transmission system. A preferred T/L Project route and several alternatives are being considered. The preferred route will involve tear-down and replacement of approximately 40 miles of SCE's existing Eldorado-Baker-Coolwater-Dunn Siding-Mountain Pass 115 kV Transmission Line. The Eldorado-Baker-Coolwater-Dunn Siding-Mountain Pass 115 kV Transmission Line is a segment of the National Register of Historic Places (NRHP) eligible Southern Sierras Power Company (SSPC) San Bernardino-Boulder Transmission Line (CA-SBR-10315H) constructed in 1930-31 to provide power for the construction of Hoover Dam. The preferred T/L Project route will affect a 12.9-mile section of the SSPC Boulder line in California and a 28.5-mile section in Nevada in the area between Mountain Pass and Eldorado Substations (see attached figure).

The section of the SPCC Boulder line between Mountain Pass and Eldorado Substations exhibits good original integrity, meaning the vast majority of the transmission line tower structures are original. As a result, this portion of the line would be deemed to contribute to the SSPC Boulder Line Historic District. If the preferred route is chosen, BLM Archaeologist, Sarah Murray, representing the Needles field office concurs that the Boulder Dam 115-kV Line (CA-SBR-10315H) is NRHP eligible and that further NRHP evaluation is unnecessary. In addition, she agrees with SCE that Historic American Engineering Record (HAER) documentation is the appropriate treatment for segments of the line that may be affected by the proposed upgrade. Edison will use a qualified architectural historian that meets the Secretary of the Interior's Professional Standards to assess project effects on CA-SBR-10315H and undertake HAER documentation.

A request for proposal (RFP) has been issued for a Class III cultural resources survey of the proposed route and two identified alternative routes associated with the proposed project. We anticipate costs for this work to be in the \$80,000 to \$100,000 range. A separate RFP will be issued or a CWA under one of CEH&S' on-call services POs will be issued to undertake the HABS/HAER documentation for CA-SBR-10315H for any segment of the Boulder Dam-San Bernardino 115 kV T/L that may be affected by the project. This documentation will include a formal NRHP evaluation of a telephone line (CA-SBR-12574H) that is associated with CA-SBR-10315H. Costs for the HAER documentation and the NRHP assessment of the telephone line are expected to be in the \$40,000 to \$60,000 range.

SCE's proposed methodology for the proposed project has been discussed at meetings with BLM archaeologists Sally Murray at the Needles Field Office on January 1, 2008 and Susanne Rowe at the Las Vegas Field Office on January 6, 2008. SCE proposes to conduct cultural resources surveys of the preferred route and alternatives. Once the final project route has been determined, SCE will assist BLM during its consultations with the State Historic Preservation Officer (SHPO), Tribes, and other public as necessary, and prepare a Historic Properties Management Plan (HPMP) that will contain treatment measures for NRHP-eligible resources affected by the project. The HPMP will include stipulations from the National Park Service (NPS) relating to the HAER documentation of CA-SBR-10315H. The federal historic preservation process will conclude with an Agreement Document between the BLM, the SHPO,



and possibly the CPUC whereby the Parties agree that the BLM (and CPUC if they participate) have met their obligations under Section 106 of the National Historic Preservation Act (and CEQA if the CPUC participates). SCE would then undertake the mitigation specified in the HPMP.

If you have any questions or comments regarding this memo please do not hesitate to contact me at (626) 302 7098 or via email at koral.ahmet@sce.com.

Koral Ahmet MA, RPA
Archaeologist
Southern California Edison
Biological & Cultural Resources Group

Cc: Tom Taylor, Messeret Yilma, Nino Mascolo, Susanne Rowe, Sarah Murray, Steve De Young

Enclosed: Figure Showing Preferred Route

