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CALIFORNIA ENERGY COMMISSION

Siting, Transmission, and Environmental Protection Division		**File: 11-AFC-04**
	Project Title: Rio Mesa Solar Electric Generating Facility	
Conversation Method: Telephone and E-Mail	**Meeting Location: N/A**	
Name(s): Elizabeth Bagwell	**Date: Varies**	**Time: Varies**
With: Arlene Garcia-Herbst (URS) and Rachael Nixon (URS)		
Subject: Discussions with Applicant Representatives Regarding Draft Archaeological Research Design and Testing Plan		

Background

June 28, 2012- Energy Commission staff wrote a letter to the Applicant summarizing their evaluation of the AFC and the Cultural Resources Technical Report. In this letter staff concluded that it will be necessary to excavate a relatively large subset of archaeological sites in 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. A provisional table listing the 154 sites where evaluation phase excavation was recommended was attached. Staff noted that in order to meet the Committee scheduling order, staff must receive from the applicant an evaluation phase research design for the subset of archaeological deposits listed in the attached table no later than July 10, 2012.

July 5, 2012 – The applicant filed a response to data request 179 which included a map showing archaeological resource locations in relation to the new, reduced Project Area of Analysis PAA).

July 23, 2012 – The applicant filed the Environmental Enhancement Proposal, amending the project from three power plants to two. Information related to the new PAA was also included in this document.

July 30, 2012 – The Draft Archaeological Research Design and Testing Plan (Draft Plan - TN 66395) was docketed.

August 2, 2012 – A data response workshop was held. Webex of the workshop was recorded. Since staff had only a short period of time to review the Draft Plan prior to the workshop, staff's comments were limited. However both parties agreed that URS would provide a table of all of the resources located in the newly defined PAA for archaeological resources, and that after the receipt of that table staff would meet with URS to provide detailed comments on the Draft Plan.

Ongoing Discussions:

August 9, 2012 – A teleconference was conducted between myself, Rachael Nixon (URS) and Arlene Garcia-Herbst (URS). In general, I explained that the research design and the methodology outlined in the Draft Plan were heading in the right direction, but that substantial

revisions would be required. Detailed technical comments on the Draft Plan and a list of the sites which require evaluation phase excavation would be included in an attached document. A list of the topics discussed during the teleconference are provided below:

1) URS identified only 16 resources which they recommended for testing, staff does not agree that these are the only sites that require evaluation phase excavation. Staff has identified 258 archaeological resources in the PAA, 175 of which are prehistoric (or have a prehistoric component) and 1 of which is of undetermined time period. At the time of our discussion, staff estimated that 116 prehistoric archaeological resources would require evaluation phase excavation. This list would be included in the attachment to staff's comments. I noted that some of the sites could be removed from the list depending on the results of the planned geoarchaeological study.
2) Staff explained that the Draft Plan should be revised to include excavations to identify possible buried deposits for sites located in sediments likely to contain buried archaeological resources. The Draft Plan should present a plan which will flex depending upon the results of the geoarchaeological study.
3) Staff requested that the research design be expanded to include research questions specific to the site and feature types found within the PAA, with particular emphasis on the use of the project as a quarry by prehistoric peoples.
4) Staff explained that a feature-based approach, rather than a site-based approach made sense for the analysis of cultural resources in the Rio Mesa PAA. The most common features with archaeological values are lithic reduction loci and thermal features.
5) Staff explained that in our ongoing consultation with Tribal groups the importance of ceramic concentrations (pot drops) had been mentioned. Originally, both staff and URS had intended to collect many of the ceramics in these concentrations and conduct analyses on them, some of which would be destructive. We have requested additional information from the Tribes regarding the appropriate treatment of these features. In the meantime, staff explained that the revised Draft Plan should include a detailed discussion of the planned analyses and sampling strategies, but also mention that implementation would depend upon the results of the consultation process.
6) In our discussion of the excavation of thermal features, staff identified two related goals: a) to identify the function of the feature (either seed processing or lithic raw material processing) and, b) provide chronological information in the form of C-14 dates from any remaining charcoal. Many thermal features are disturbed and unlikely to contain key data. Staff requested that in the revised document URS establish a threshold for determining which thermal features would be excavated and which would not, based on the level of preservation of the feature. Staff estimates that within the PAA there are 16 sites which have thermal features, and 72 features in all.

In our discussion of lithic reduction loci, staff identified a previous study by Mark A. Giambastiani entitled "Archaeological Evaluations at Quackenbush Training Area" to serve as a model for the evaluation of all lithic quarry related sites and features on the Rio Mesa PAA. This study identifies evaluation criteria, and outlines five site attributes which could result in a site being determined eligible. These include: 1) sites with large, intact reduction loci; 2) sites that are representative of "unique" or "signature" quarrying patterns; 3) sites where rare lithics were exploited; 4) any site with notable quantities of non-stoneworking artifacts; and 5) any site with datable materials. Staff estimates that there are approximately 1,650 lithic reduction loci within

the PAA. Some of these are isolated or have low artifact density, which Giambastiani recommends have low data potential, and therefore should not be considered eligible. Others may have buried components. However, resources of this nature often contain redundant data, but this redundancy is not immediately apparent from just a visual inspection of the resource. A statistical analysis of the qualitative and quantitative attributes of the artifacts within a loci can resolve this question. Much of the needed data was collected by URS during survey. The Draft Plan should be revised to include a statistical analysis and interpretation of the results in addition to a sampling strategy for selecting reduction loci to excavate.

cc:	**Date: 10/17/12**	**Signed:**
		Name: