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 COTTON, G. SAN DIEGO GAS & ELECTRIC CO.

SUBJECT: COMMENTS ON CULTURAL RESOURCE MGT REPTS FOR SAN ONOFRE TO  
 MISSION & TO ENCIRA 230 KV TRANSMISSION LINES & MAPPING &  
 DATA RECOVERY PROGRAM FOR SITE W-1527. REPTS ARE SUITABLE AS  
 BASELINE STUDIES. IDENTIFIES QUESTIONS FOR CLARIFICATION.

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March 20, 1979

## REGULATORY DOCKET FILE COPY

Mr. Gary Cotton  
San Diego Gas & Electric Company  
P.O. Box 1631  
Building EL-8  
San Diego, CA 92112

Dear Mr. Cotton:

I appreciate the opportunity to comment on the Cultural Resource Management Reports for the San Onofre to Mission and San Onofre to Escondido 230 KV Transmission Lines and the Mapping and Data Recovery Program for Site W-1527.

My staff has reviewed these documents and feel that they are suitable as baseline studies for the preparation of environmental documentation and permitting decisions for these undertakings.

Some questions arose which should be clarified:

1. Did the on-ground survey cover the identification of historic (non-archeological) structural sites not previously recorded? If not, this should be done.
2. Did it cover sites of cultural importance to the Native Americans through a contact program? If not, this should be done.
3. Were the Native American contacts asked to assess the significance of the identified archeological sites in terms of their value system? This should be done, if not, already, and their views plainly stated.
4. Are the current transmission access roads impacting identified archeological sites? If so, which sites, and what stabilization measures might be taken to ameliorate the situation?
5. Where use of access roads will continue to contribute to the degradation of the site, is rerouting feasible? Specifically at Sites SD1-4538, W-1780, W-1782, W-120, and W-119.

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Gary Cotton  
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In considering the proposed mitigation program for the archeological resources several points should be raised:

1. The permitting agency or this Office should review the results of Phase IV when this phase is necessary for sufficiency and prudence of recommendations. Native American concerns should be well developed in this document.
2. Phase IV should include a research design which specifies the range of questions which will be addressed if further excavation is necessary.. This point is equally applicable to W-1527.
3. Mechanical testing should occur only in areas where no cultural material is expected or when a very high level of disturbance is expected.
4. Native Americans should monitor all subsurface work in the vicinity of Native American archeological sites.
5. Recovered materials should be curated in accordance with Native American desires.

If I can be of further assistance, please do not hesitate to contact Mr. William Seidel at (916) 445-8006.

Sincerely yours,

Original signed by

Dr. Knox Mallon  
State Historic Preservation Officer  
Office of Historic Preservation

ES:phb