

**FINAL APPLICATION FOR LICENSE
OF MAJOR UNCONSTRUCTED PROJECT**

STUDY 33

HPMP WORK PLAN

**LAKE ELSINORE
ADVANCED PUMPED STORAGE PROJECT
FEDERAL ENERGY REGULATORY COMMISSION
PROJECT NUMBER 14227**

Applicant:

THE NEVADA HYDRO COMPANY, INC.

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February 2019



**Garcia and Associates
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To: David Kates, The Nevada Hydro Company
From: Rachael Nixon, MA, RPA, Senior. Cultural Resources Manager, Garcia and Associates (GANDA)
Date: February 5, 2019
RE: *Contract Modification #3 for the Lake Elsinore Advanced Pumped Storage Project, Lake Elsinore, California. – FERC January 2019 HPMP Comments*

Dear Mr. Kates:

Garcia and Associates (GANDA) submits this contract modification to address the comments provided by FERC January 22, 2019 on the Historic Properties Management Plan (HPMP) for the Lake Elsinore Advanced Pumped Storage (LEAPS) Project (Project). This includes addressing comments and additional consultation with Pechanga and Soboba Bands, and the State Historic Preservation Officer (SHPO) to address comments, recirculate for additional review/revisions, and FERC submission.

The as-needed support for this project will include the following tasks.

SCOPE OF WORK

Task 1: Revise Study 33 -- Historic Properties Management Plan (HPMP) – In response to FERC’s comments (dated January 22, 2019) the following tasks shall be completed.

Subtask 1.1: Complete pre-field research described in HPMP Section 4.1.1:

- Obtain site previous reports and site records from Cleveland National Forest (note CNF has been unresponsive, however additional effort to obtain data will be made and will include up to 3 days to meet and search (in-person) the CNF files in coordination with the archaeologist.
- Schedule: Data compiled and integrated into HPMP within 30 days of obtaining data from CNF

Subtask 1.2: Add new section to HPMP (between Sec. 3 and 4):

Upon the completion of Subtask, A, the following will be done.

- Details regarding all previous inventory work completed for Project No. 11858 and identify what cultural resources were located (including NRHP status) within the proposed APE as a result of this previous field work.
- Section to include a discussion and map of all remaining field work that would need to be done if a license is issued for this project. It will specify whether new systematic surveys are needed and where within the APE, and/or whether any existing sites need to be revisited.

Schedule: Within 30 business days of NTP on contract amendment

Subtask 1.3: Update Section 5 of HPMP:

Upon completion of Subtask 1.2, the following will be conducted.

- Include specific details as to what site-specific measures will be completed during future field studies to identify existing National Register-eligible cultural resources that could be potentially adversely affected by the project.
- Include site-specific procedures and protocols to assess NRHP eligibility on existing unevaluated cultural resources and newly inventoried cultural resources based on their site type/characteristics (ex. prehistoric, historic, architectural history features, artifact scatters, bedrock milling features, village sites, etc.) as a result of the post-licensing field work.
- The section will also include a site-specific description regarding management measures that will be taken to resolve potential project related adverse effects to National Register-eligible cultural resources.

Schedule: Within 30 business days of NTP on contract amendment

Subtask 1.4: Pechanga and Soboba Comments:

- **Pechanga comments**, as noted by FERC several comments remain to be addressed in the HPMP and require information from the Tribe to address. Pechanga has been unresponsive with regards to the information needed to address these comments. Specifically, regarding the Traditional Cultural Landscapes (TCLs) and Traditional Cultural Properties (TCPs), including but not limited to the following:
 - Locational Boundary of known Traditional Cultural Properties (TCPs) and Traditional Cultural Landscapes (TCL) including:
 - *Paayaxchi* (Lake and its surroundings) – data on file with info center encompasses the lake only
 - *Paayaxchi Nive’wuna* (Alberhill/Southern Temescal Canyon region) – no data on file with info center, need from Tribe
 - *Paxaavxa* (most of Temescal Valley) - no data on file with info center, need from Tribe
 - Lee Lake will be added as a Pechanga Identified Sacred Site in HPMP
- This task will include time to coordinate with Pechanga and attempt to obtain the information outstanding (see attached matrices regarding remaining comments to be

addressed). All efforts will be done via email and telephone/conference calls. Thirty days from initial outreach is included in this task for this data to be gathered. The tribe was contacted on Feb. 1, 2019 regarding the recent comments and a request for a call to discuss was made. In the event Pechanga does response or provide the data for inclusion that will be documented in the response matrix. A revised HPMP with all available data provide to date will be submitted to the tribe for a second review (per FERC); and 15-day response period will be provided.

- Includes up to 3 conference calls (1 hour) and up to 16 hours to exchange emails/data in order to finalize Soboba comments and to revise and include in the revised draft HPMP. Should additional in person meeting and/or calls may require then additional budget may be required.

Schedule:

- Above items related to Pechanga Tribe first review of HPMP to be completed within 30 business days of NTP on contract amendment. Tribe will be notified that they have 30-days to respond/set up calls, etc.
- Revised draft HPMP submitted to tribe for second review within 45 business days from NTP of contract amendment.
 - Edits/data from second review Pechanga review will be revised and included accordingly (in consult with NHC). Up to 8 hours (archaeological staff) is assumed for this task and completed within one week of receipt of tribe's comments. Tribe will be provided with a 15-day review/comment period.

Assumptions: Up to 33 hours for technical archaeological staff and up to 6 hours of support staff (GIS/tech editor) for address Pechanga comment in this task.

- A matrix will be appended to the revised draft HPMP to include the specific Pechanga and Soboba comments made on the document and how Nevada Hydro either adopted or provide reasons why it did not. Assumes up to 6 hours to prepare matrix.

Schedule: Matrix to be included within second submission of HPMP and ready for NHC review by June 15, 2019.

- **Soboba comments:** The remaining Soboba comments will be addressed and a coordinated with the tribe to confirm the additions are acceptable. Includes up to 2 (1 hour) conference calls and up to 6 hours to exchange emails/data in order to finalize Soboba comments and include in the revised draft HPMP.

Schedule:

- Above items related to Soboba Tribe first round of comments to be completed within 30 business days of NTP on contract amendment. Tribe will be notified that they have 30-days to respond/set up calls, etc.

- Revised draft HPMP submitted to tribe for second review within 45 business days from NTP of contract amendment.
 - Edits/data from second review Soboba review will be revised and included accordingly (in consult with NHC). Up to 8 hours (archaeological staff) is assumed for this task and completed within one week of receipt of tribe's comments. Tribe will be provided with a 15-day review/comment period for second review.

Assumptions: Up to 16 hours for archaeological technical staff and up to 3 hours of support staff time (GIS/tech editors) included to address comments) from Soboba Band comments.

- A matrix will be appended to the revised draft HPMP to include the specific Pechanga and Soboba comments made on the document and how Nevada Hydro either adopted or provide reasons why it did not. Assumes up to 6 hours to prepare matrix.

Schedule: Matrix to be included within second HPMP submission and ready for NHC review by June 15, 2019.

Subtask 1.5 State Historic Preservation Officer (SHPO) Comments:

- The SHPO is still in the process of reviewing the draft HPMP and have indicated they would provide comments in 30 days as feasible. Per FERCs comment SHPO comments (and Pechanga and Soboba comments) need to be addressed and submitted for second review, and a matrix of how the second round of comments were addressed (or rationale if not) and all information resubmitted to FERC by June 30, 2019. Because SHPO has not provided comments yet it is unknown the degree of additional revisions that will be required in the HPMP. Up to 27 hours (technical and support staff) is assumed to address SHPO comments. Should the comments require more time than scoped additional time may be required.
 - **Schedule:** Above items related to SHPO comments to be completed within 30 business days of NTP on contract amendment.
 - Revised draft HPMP submitted to SHPO for second review within 45 business days from NTP of contract amendment.
 - Edits/data from second SHPO review to be revised and included accordingly (in consult with NHC) within one week of receipt of SHPO's comments. SHPO will be provided with a 15-day review/comment period for second review.
- A matrix will be appended to the revised draft HPMP to include the specific SHPO comments made on the document and how Nevada Hydro either adopted or provide reasons why it did not.

Schedule: Matrix to be included within second HPMP submission and ready for NHC review by June 15, 2019.

Subtask 1.6 General FERC Comments

The following summarizes the specific FERC edits that will be done for the cover letter and HPMP as requested by FERC.

- A revised cover letter will be included with revised draft HPMP submittal package to include the following;
 - Page 2, indicate what SHPO has (or has not) concurred with to date (APE, HPMP, etc.)
- HPMP Substantive Edits
 - Section 2, Table 1, revise to only identify cultural resources within the proposed project APE. The will also include a summary of all the cultural resources previously identified within the APE, including what features and components they contain, where and when these were located/recorded and how these resources were determined eligible, potentially eligible, ineligible, unevaluated, or recognized as historically significant. The summary will reflect the sequence of surveys done over the years.
 - Revise Appendix B APE maps (previously recorded resource maps) to include nomenclature for age and eligibility status of sites as outlined by FERC. This will include the following in the site labels.
 - P = Prehistoric sites
 - H = Historic sites
 - e = eligible sites
 - i = ineligible sites
 - u = undetermined/unevaluated
- Revise Appendix B maps (previous conducted studies maps) to include dates for the previous surveys (color code if necessary).
- Up to 40 hours is assumed for substantive technical edits to maps and text
- HPMP General Technical edits
 - Page 3 revise to say FERC would execute PA before license issuance, and if a license is issued, the executed PA would either implement a final HPMP, or have the licensee file for Commission approval of a final HPMP after license issuance.
 - Page 101 (Section 4), methods on how the remaining inventory field work will be conducted will be added to this section. To include how survey transects, recordation, and evaluations will occur.
 - Page 105 GANDA will remove the paragraph regarding the “Programmatic Agreement”
- Up to 5 hours is assumed to address minor technical edits

Schedule:

- Above items related to FERC comments to be completed within 30 business days of NTP on contract amendment.
- Revised draft HPMP submitted to NHC for review June 15, 2019; revised HPMP inclusive with any NHC edits ready within 10 days of receipt of NHC comments, and provided to NHC for submission.