

4.18 Tribal Cultural Resources

4.18.1 Introduction

This section presents the environmental setting and potential impacts of the Proposed Project, reasonably foreseeable distribution components, and alternatives related to tribal cultural resources (TCRs). TCRs include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. As such, TCRs may contain physical cultural remains (i.e., materials found in archaeological sites), or they may be places within the natural landscape.

4.18.2 Regulatory Setting

Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies are applicable to TCRs and the Proposed Project, reasonably foreseeable distribution components, and alternatives.

State Laws, Regulations, and Policies

California Environmental Quality Act

AB 52 (Statutes of 2014, Chapter 532) requires that lead agencies under the CEQA consult with California Native American tribes that have requested in writing to be notified and that are traditionally and culturally affiliated with the geographic area of a proposed project, prior to the development of a CEQA document. PRC Section 21084.2 specifies that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. This language was added to Appendix G (initial study checklist) of the CEQA Guidelines in 2016. AB 52 also requires that a project's CEQA lead agency consult with California Native American tribes as required under PRC Section 21080.3.1.

As defined in PRC Section 21074:

(a) TCRs are either of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - A. Included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR).
 - B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section

5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- (b) A cultural landscape that meets the criteria of subdivision (a) is a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a TCR if it conforms to the criteria of subdivision (a).

Mitigation measures for TCRs may be developed in consultation with the affected California Native American tribe(s) in accordance with PRC Section 21080.3.2 or Section 21084.3. The latter section identifies examples of mitigation measures that include avoidance and preservation of TCRs and treating TCRs with culturally appropriate dignity, taking into account tribal cultural values and the meaning of the resource.

California Register of Historical Resources

As described in Section 4.5, “Cultural Resources,” the CRHR is established in PRC Section 5024.1. The CRHR lists all California properties considered to be significant historical resources, including all properties listed in, or determined to be eligible for listing in, the NRHP. Resources listed in, or eligible for listing in, the CRHR are referred to as *historical resources*. The criteria for listing include resources that:

1. Are associated with the events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Are associated with the lives of persons important in our past;
3. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; or
4. Have yielded, or may be likely to yield, information important in prehistory or history.

The CCR Section 4852 sets forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations.

California Native American Heritage Commission

The NAHC was created in 1976 and is a nine-member body whose members are appointed by the Governor. The NAHC identifies, catalogs, and protects Native American cultural resources, which includes ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California (NAHC 2020). The NAHC is also charged with ensuring California Native American tribes’ access to ancient Native American cultural resources on public lands, overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the California Native American Graves Protection and Repatriation Act, among other powers and duties (NAHC 2020).

4.18.3 Environmental Setting

Ethnography

As discussed in Section 4.5, “Cultural Resources,” the Proposed Project, reasonably foreseeable distribution components, and alternatives are located in the ancestral territory traditionally occupied by indigenous populations who spoke the Salinan language. Please refer to Section 4.5.3, “Environmental Setting,” for additional information about the Salinan who lived in the region at the time of colonization.

Native American Consultation

PRC Section 21080.3.1 states that the CEQA lead agency shall provide formal notification of a proposed project to any Native American tribe with a traditional and cultural affiliation with the project’s geographic area, if a tribe has requested such notification in writing. No tribes in the Proposed Project area have requested notification pursuant to 21080.3.1(b)(1) from the CPUC. Nevertheless, the CPUC conducted outreach to tribes about the Proposed Project to determine if they had knowledge about specific TCRs within the Project area or had general concerns about the Project.

The CPUC contacted the NAHC on July 11, 2017, to request a search of the sacred lands files and for a list of all tribes with a traditional and cultural affiliation with the Proposed Project area. The NAHC responded on July 12, 2017, providing a list of nine tribes with a traditional and cultural affiliation with the Proposed Project area. The CPUC subsequently sent letters, via registered mail through the U.S. Postal Service, to all tribes included in the NAHC list on October 6, 2017.¹ The letters described the Proposed Project and summarized the results of the cultural resources studies conducted by the Applicants. The letters provided notice of the CPUC’s consideration of the Proposed Project’s potential to affect TCRs and invited the letter recipients to contact the CPUC if they wished to consult on the Proposed Project in accordance with PRC Section 21080.3.1. The tribes were also sent notices, dated March 28, 2019, of the availability of the Proposed Project’s Alternatives Screening Report, which thoroughly described all of the alternatives proposed. Table 4.18-1 lists the tribes contacted via letters sent on October 6, 2017 and summarizes the consultation with each tribe.

¹ No mailing address was supplied for Mia Lopez, Chairperson of the Coastal Band of the Chumash Nation, by the NAHC. As a result, the letter was sent to Chairperson Lopez via email on October 6, 2017.

Table 4.18-1. Tribal Consultation

Tribe	Contact	Response Date	Notes
Barbareno / Ventureno Band of Mission Indians	Julie Lynn Tumamait- Stennsle, Chairperson	No response	None
	Eleanor Arrellanes	No response	None
	Raudel Joe Banuelos, Jr.	Letter returned; no forwarding address provided	None
Coastal Band of the Chumash Nation	Mia Lopez, Chairperson	No response	None
Northern Chumash Tribal Council	Fred Collins, Spokesperson	November 7, 2017, via email	Requested consultation on the Project and copies of technical reports. Cultural technical reports for the Proposed Project and alternatives were provided. Additional correspondence occurred through February 2020, at which time Mr. Collins stated that the Northern Chumash Tribal Council has no further comments on the project.
Salinan Tribe of Monterey, San Luis Obispo Counties	Patti Dunton, Tribal Administrator	No response	Ms. Dunton did not respond in writing to the CPUC's letter but had previously met with PG&E's archaeological consultants and requested copies of the technical reports, which were provided. No additional comments have been received.

Tribe	Contact	Response Date	Notes
Santa Ynez Band of Chumash Indians	Kenneth Kahn, Chairperson	October 31, 2017, phone call from Freddie Romero, the designated point of contact	Mr. Romero said the project area is outside of their traditional territory but wanted to make sure someone responded. He noted that it is territory of the Northern Chumash and would not comment unless asked to participate by another tribe.
Xolon-Salinan Tribe	Karen White, Council Chairperson	October 25, 2017, letter via email	Chairperson White had previously met with PG&E's archaeological consultants to discuss the project. In response to the CPUC's letter, copies of technical reports and a map of the Proposed Project and alternatives were requested. These were provided. Additional correspondence occurred through November 2019, including discussion of monitoring of ground disturbance during construction. The CPUC agreed to tribal monitoring.
Yak tityu tityu - Northern Chumash Tribe	Mona Olivas Tucker, Chairperson	No response	None.

As noted in Table 4.18-1, the Salinan Tribe of Monterey and San Luis Obispo Counties requested copies of the archaeological resources technical reports prepared by the Proposed Project Applicants, but the tribe did not request consultation under AB 52. Such consultation was, however, requested by the Santa Ynez Band of Chumash Indians and the Xolon-Salinan Tribe. After reviewing detailed information about the Proposed Project, in February 2020, the Santa Ynez Band of Chumash Indians stated that they had no additional comments about the Proposed Project and consultation with this tribe was complete. The CPUC has continued consultation with the Xolon-Salinan Tribe throughout the duration of the CEQA process. Although the Xolon-Salinan Tribe did not identify specific TCRs within the footprints of the Proposed Project, reasonably foreseeable distribution components, and alternatives, the tribe expressed concern about project impacts near waterways such as Dry Creek, Huero Creek, and the Salinas and Estrella rivers, as they often served as travel and trade routes, and ancestral sites were often located near viable water bodies. The Xolon-Salinan Tribe requested, in writing, that a tribal monitor be present for all ground disturbance to a depth of 6 feet below the surface.

4.18.4 Impact Analysis

Methodology

The analysis of potential impacts to TCRs was qualitative in nature and considered the potential for the Proposed Project, reasonably foreseeable distribution components, and alternatives to cause a substantial adverse change in the significance of a TCR, as identified in the significance criteria below.

Criteria for Determining Significance

For the purposes of this analysis, based on Appendix G of the CEQA Guidelines, the Proposed Project, reasonably foreseeable distribution components, and/or alternatives would result in a significant impact related to TCRs if they would:

- A. Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
 - a. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k); or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant under the criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Environmental Impacts

Proposed Project

Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource – *Less than Significant with Mitigation*

As described in Section 4.5, “Cultural Resources,” a pedestrian archaeological survey (NEET West and PG&E 2017a) identified three previously unrecorded resources, one of which was a prehistoric lithic scatter (Site 36052-S-003) on the edge of a bluff near the Salinas River and the Proposed Project’s new 70 kV power line segment. For purposes of this analysis, this site is considered potentially CRHR-eligible, and thus is also considered to be a TCR, although none of the tribes contacted by the Applicants or the CPUC through the AB 52 process commented on this site. The pedestrian archaeological survey also identified a number of isolated prehistoric archaeological items, which are not CRHR-eligible, but attest to the widespread use of the Proposed Project area by ancient peoples. In particular, Dry Creek is known to have been used as a transportation corridor by Native Americans and the areas surrounding the Estrella and Salinas Rivers are considered sensitive for cultural resources.

Apart from the general information regarding sensitivity of certain areas for cultural resources, none of the tribes contacted by the CPUC identified known TCRs in the Proposed Project area. As such, it is unlikely that there are any significant above-ground known sites, features, places, or cultural landscapes, other than the prehistoric lithic scatter discussed above, that would be considered TCRs that could be impacted by the Proposed Project. However, archaeological deposits may be buried and exposed during Proposed Project construction (in particular, during deep excavations for installation of pole foundations). Buried archaeological remains may be determined eligible for listing in the CRHR and as TCRs, as would Native American human remains. As described in Section 4.5, “Cultural Resources,” implementation of APMs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, and GEN-1 would generally reduce potential for impacts to any known archaeological sites or buried unknown archaeological resources that could be determined to be TCRs. APM CUL-2 specifically identifies the preference for avoidance of Site 36052-S-003 near the Salinas River by project design, but acknowledges that it could be determined infeasible to avoid the site; therefore, the Proposed Project could have an adverse impact on this potentially eligible site. APM CUL-5 would require that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, which would reduce potential for impacts to TCRs. Additionally, APM GEN-1 would be implemented to ensure that construction workers are aware of the types of archaeological materials that could be encountered in situations when the tribal monitor may not be present (e.g., ground-disturbing activities away from sensitive locations) and the proper protocols to follow for discoveries.

While the APMs would reduce the potential for adverse impacts to any TCRs during construction, it would not be to a level that is less than significant due to a lack of specificity and the limited applicability of the measures. Implementation of **Mitigation Measures CR-1, CR-2, and TCR-1** would reduce the level of impacts to a less than significant level. Both Mitigation Measures CR-1 and CR-2 augment the APMs by providing greater detail about actions to be taken with regard to cultural resources, particularly Native American archaeological sites and human remains, which could be determined to be TCRs. Mitigation Measure TCR-1 will ensure that concerns of the Xolon-Salinan Tribe about potential significant impacts to TCRs will be addressed. Because the Proposed Project would not involve substantial ground disturbance

during operation, it would not affect TCRs during the operation phase. As a result, this impact would be **less than significant with mitigation**.

Mitigation Measure TCR-1: Tribal Monitoring and Treatment of Tribal Cultural Resources.

Prior to the commencement of any ground disturbing activity, the Proposed Project Applicants (HWT and PG&E) shall retain a monitor from the Xolon-Salinan tribe, who consulted on this project pursuant to AB 52. The Xolon monitor will work in tandem with the archaeological monitor. The Xolon monitor will be present during construction phases that involve ground-disturbing activities to depths of 6 feet that may occur within 100 feet of Dry Creek, Huer Huero Creek, the Salinas River, and the Estrella River, all of which have been identified as culturally sensitive, or within 50 feet of all known Native American archaeological sites. Monitoring of ground disturbance would also occur in the vicinity of Santa Ysabel Ranch, which was identified as culturally sensitive by the tribe. Ground-disturbing activities are defined as activities that may include, but are not limited to boring, grading, grubbing, excavation, drilling, and trenching, within the project areas. The tribal monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, and any cultural materials identified. Upon discovery of any TCRs, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed.

All TCRs unearthed by project activities shall be evaluated by the Applicants' qualified cultural resources principal investigator and the tribal monitor or other tribal representative identified by the Xolon-Salinan Tribe. If the TCR cannot be avoided, a detailed archaeological treatment plan shall be developed and implemented by the Applicants' cultural resources principal investigator. The CPUC shall ensure that the treatment plan shall developed with input from and agreed upon by the Xolon-Salinan Tribe per Mitigation Measure CR-1. The Xolon-Salinan Tribe will determine the disposition of any TCRs artifacts discovered during construction or artifacts resulting from execution of a treatment plan, such as, but not limited to, reburying in close proximity of the finds without scientific study, allowing scientific study before reburying the materials either near the origin of the find or in another protected place, or curation at a facility at an institution that meets the U.S. Secretary of the Interiors criteria for curation (36 CFR 79).

If human remains and/or grave goods are discovered or recognized during construction, all ground disturbance shall immediately cease, and the requirements of Mitigation Measure CR-2 shall be implemented.

Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout

The reasonably foreseeable distribution lines would be installed primarily along existing roads and through agricultural areas north and east of the proposed Estrella Substation. Specifically, the southern reasonably foreseeable distribution line segment would be installed along an existing road through agricultural fields immediately north of the Estrella Substation. The

northern reasonably foreseeable distribution line segment would be installed within the SR 46 right-of-way (a short piece would also be installed through an agricultural field), while the 21/12 kV pad-mounted transformers would be installed along existing roads in the area. The southern reasonably foreseeable distribution line segment would come close (approximately 310 feet) to Dry Creek (known to be used as a transportation corridor by Native American peoples), while the northern distribution line segment would cross over Dry Creek via the SR 46 bridge/culvert. Record search information, as reported in Section 4.5.3, is available for all of the reasonably foreseeable distribution lines; however, pedestrian survey has not been conducted. The record search returned negative results. As described in Chapter 2, the equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18.

Although construction and operation of the reasonably foreseeable distribution components and ultimate buildout of Estrella Substation would not impact known TCRs, excavation for installation of distribution poles, grading necessary for establishing work areas, and ground disturbance required for constructing an additional 230 kV interconnection could potentially uncover archaeological materials that could ultimately be determined to be TCRs. Because site preparation and grading would already have been conducted for construction of the Estrella Substation, installation of additional equipment within the substation footprint as part of the reasonably foreseeable distribution components and ultimate substation buildout would not impact buried TCRs. As described in Chapter 2, *Project Description*, the routes of any additional future distribution feeders and/or 70 kV power lines that could be established through ultimate substation buildout are unknown, and thus the impacts of these facilities are speculative and not evaluated. For the reasons discussed in Impact TCR-1 and Section 4.5, “Cultural Resources,” implementation of APMs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, and GEN-1 would serve to minimize potential impacts to archaeological resources that are TCRs, but not to a level that is less than significant. Application of **Mitigation Measures CR-1, CR-2, CR-3, and TCR-1** would ensure that significant impacts to TCRs would be reduced to less than significant. As the reasonably foreseeable distribution components and ultimate substation buildout facilities would be operated remotely and would not require substantial ground-disturbance during operation, they would not substantially affect known or unknown TCRs during the operation phase. Therefore, impacts under significance criterion A would be **less than significant with mitigation**.

Alternatives

No Project Alternative

Under the No Project Alternative, no new substation or 70 kV power line would be constructed. Therefore, no excavation or grading would occur and there would be no potential to impact TCRs during construction activities. As a result, **no impact** would occur under significance criterion A.

Alternative SS-1: Bonel Ranch Substation Site

As described in Section 4.5, “Cultural Resources,” the records search for Alternative SS-1 did not reveal the presence of any known previously recorded archaeological sites, including any Native American sites. Additionally, none of the tribes contacted through the AB 52 process identified

any TCRs on or near the Alternative SS-1 site. However, the Alternative SS-1 site was not surveyed by foot for archaeological resources. Given the proposed substation's location adjacent to the Estrella River, which was identified by tribes as being sensitive for cultural resources, there is an elevated potential compared to the Proposed Project for encountering archaeological resources that could be determined to be TCRs. If construction activities for Alternative SS-1 were to encounter above-ground or buried resources that could be determined to be TCRs and proper protocols are not followed, this would result in a significant impact.

To avoid or minimize potential impacts, **Mitigation Measure CR-3** would be implemented to require that a pedestrian archaeological survey of the Alternative SS-1 site be conducted prior to final design and construction, and that any identified resources are avoided or treated. APMs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5 and GEN-1 would be implemented for Alternative SS-1 and would serve to reduce potential impacts on archaeological resources, including potential TCRs. APM CUL-5, in particular, requires that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, including near Estrella River, which would reduce potential for impacts to TCRs, as the tribal monitor would have traditional knowledge not available to the archaeological monitor. APM GEN-1 would be implemented to ensure that construction workers are trained regarding the types of cultural resources that could be encountered when tribal monitors may not be present and the proper protocols to follow for discoveries. While implementation of the APMs would reduce the potential to impact TCRs, impacts would not be reduced to a less than significant level. Application of **Mitigation Measures CR-1, CR-2, CR-3, and TCR-1** would reduce impacts to less than significant. Once constructed, the substation under Alternative SS-1 would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative PLR-1A: Estrella Route to Estrella Substation

As described in Section 4.5, "Cultural Resources," no archaeological resources (including Native American sites or TCRs) were identified along the Alternative PLR-1A route during a pedestrian survey conducted for the length of Alternative PLR-1A. The only item discovered was a prehistoric isolated chert flake that was deemed ineligible for listing. Additionally, none of the tribes contacted through the AB 52 process identified any TCRs along or near the Alternative PLR-1A alignment. Given the fact that the alignment would cross Dry Creek (known to be used as a transportation corridor by ancient peoples) and Huer Huero Creek, and would parallel Salinas River for a portion of its length (i.e., reconductoring segment), there remains potential to encounter buried archaeological resources that could ultimately be TCRs. If construction activities for Alternative PLR-1A were to encounter buried resources that could be determined to be TCRs and proper protocols are not followed, this could result in a significant impact.

To avoid or minimize potential impacts, APMs CUL-1, CUL-3, CUL-4, CUL-5, CUL-6, and GEN-1 would be implemented for Alternative PLR-1A, all of which would serve to reduce potential impacts on cultural resources, including potential TCRs. APM CUL-5, in particular, would require that a tribal monitor is present for initial ground-disturbing activities in culturally sensitive areas, which would reduce potential for impacts to TCRs. APM GEN-1 would ensure that construction workers are trained regarding the types of cultural resources that could be encountered when tribal monitors may not be present and the proper protocols to follow for discoveries. Application of these APMs, however, would not reduce impacts to TCRs to a less than significant level. **Mitigation Measures CR-1, CR-2, CR-3, and TCR-1** would reduce such impacts to less than

significant. Once constructed, the power line under Alternative PLR-1A would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1

As described in Section 4.5, “Cultural Resources,” no archaeological resources (including Native American sites or TCRs) were identified along the Alternative PLR-1C route. The only item discovered was the same prehistoric isolated chert flake (deemed ineligible for listing) noted above for Alternative PLR-1A. Additionally, none of the tribes contacted through the AB 52 process identified any TCRs along or near the Alternative PLR-1C alignment. However, the eastern-most portion of the alignment was not subject to pedestrian survey. Given the fact that the alignment (particularly MRV 1) would occur in proximity to Estrella River, which is known to be sensitive for cultural resources, and Huer Huero Creek, and would parallel Salinas River for a portion of its length (i.e., reconductoring segment), there would be potential to encounter buried archaeological resources that could ultimately be determined to be TCRs. If construction activities for Alternative PLR-1C were to encounter above-ground or buried resources that could be determined to be TCRs and proper protocols are not followed, this could result in a significant impact.

To avoid or minimize potential impacts, **Mitigation Measure CR-3** would be implemented to require that a pedestrian archaeological survey of the un-surveyed portions Alternative PLR-1C route be conducted prior to final design and construction requiring any identified resources to be avoided or treated. APMs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, and GEN-1, would be implemented for Alternative PLR-1C, all of which would serve to reduce potential impacts on archaeological resources, including potential TCRs, but not to a less than significant level. Implementation of **Mitigation Measures CR-1, CR-2, CR-3, and TCR-1** would ensure impacts to TCRs would be reduced to a level that is less than significant. Once constructed, the power line under Alternative PLR-1C would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative PLR-3: Strategic Undergrounding (Option 1 & 2)

As described in Section 4.5, “Cultural Resources,” the Alternative PLR-3 alignments (both options) were generally covered by the Proposed Project cultural resources studies, which found no archaeological resources along this section of the Proposed Project’s overhead 70 kV power line route. The only place not surveyed is the portion of Alternative PLR-3, Option 1 within Wisteria Lane and Golden Hill Road, where the underground power line would be installed underneath the pavement. Additionally, none of the tribes contacted through the AB 52 process identified any TCRs along or near the Alternative PLR-3 alignment. Although resources were not identified along these alignments and much of their length occurs within the roadway, the potential remains for intact buried archaeological deposits that could ultimately be determined to be TCRs to be discovered during construction. If proper protocols are not followed this could result in a significant impact to TCRs.

To avoid or minimize potential impacts, APMs CUL-1, CUL-3, CUL-4, and GEN-1 would be implemented for Alternative PLR-3, all of which would serve to reduce potential impacts on

archaeological resources, including potential TCRs. Because no portion of the Alternative PLR-3 (Option 1 or 2) alignment occurs within close proximity to streams or known prehistoric archaeological sites, a tribal monitor would not be required under APM CUL-5. APM GEN-1 would be implemented to ensure that construction workers are trained regarding the types of cultural resources that could be encountered and the proper protocols to follow for discoveries. Although these APMs would be enacted, they would not reduce impacts to a less than significant level. However, application of **Mitigation Measures CR-1, CR-2, and TCR-1** would ensure that TCRs, should they be uncovered during construction, would be treated such that impacts would be less than significant. Once constructed, the underground power line under Alternative PLR-3 would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative SE-1A: Templeton Substation Expansion – 230/70 kV Substation

As described in Section 4.5, “Cultural Resources,” the records search and site survey for Alternative SE-1A did not reveal the presence of any archaeological sites, including any Native American sites that could be TCRs. Additionally, none of the tribes contacted through the AB 52 process identified any TCRs on or near the Alternative SE-1A site. Even while TCRs have not been identified, however, there is always potential for the excavation, grading, and other ground-disturbing activities during construction of Alternative SE-1A to encounter buried archaeological resources that could ultimately be determined to be TCRs. If this were to occur and proper protocols are not followed, it could result in a significant impact.

To avoid or minimize potential impacts, APMs CUL-1, CUL-3, CUL-4, and GEN-1 would be implemented for Alternative SE-1A, all of which would serve to reduce potential impacts on archaeological resources, including potential TCRs. Because there are no streams or known prehistoric archaeological sites in proximity to the Alternative SE-1A site, a tribal monitor is not anticipated to be necessary during construction activities under APM CUL-5. APM GEN-1 would be implemented to ensure that construction workers are trained regarding the types of cultural resources that could be encountered and the proper protocols to follow for discoveries. Although application of the APMs would minimize potential impacts to TCRs, they would not be reduced to a less than significant level. Implementation of **Mitigation Measures CR-1, CR-2, and TCR-1** would ensure impacts to TCRs would be less than significant. Once constructed, the substation under Alternative SE-1A would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative SE-PLR-2: Templeton-Paso South River Road Route

As described in Section 4.5, “Cultural Resources,” no Native American sites or TCRs were identified along the Alternative SE-PLR-2 route during the records search or field survey. Additionally, none of the tribes contacted through the AB 52 process identified any specific TCRs along or near the Alternative SE-PLR-2 alignment, although tribe members did indicate that the Santa Ysabel Ranch area (through which the Alternative SE-PLR-2 alignment would pass) is sensitive for cultural resources. Given the fact that the alignment would pass through an area identified as sensitive by Native American peoples, there would be potential to encounter buried archaeological resources that could ultimately be determined to be TCRs. If construction activities for Alternative SE-PLR-2 (in particular, deep excavations for pole foundations) were to

encounter buried resources that could be determined to be TCRs and proper protocols are not followed, this could result in a significant impact.

To avoid or minimize potential impacts, APMs CUL-1, CUL-3, CUL-4, and GEN-1 would be implemented for Alternative SE-PLR-2, all of which would serve to reduce potential impacts on archaeological resources, including potential TCRs. APM GEN-1 would be implemented to ensure that construction workers are trained regarding the types of cultural resources that could be encountered and the proper protocols to follow for discoveries. Application of the APMs would not reduce potential impacts to TCRs to a less than significant level, while implementation of **Mitigation Measures CR-1, CR-2, and TCR-1** would achieve this goal. Of particular note is the presence of both archaeological and Xolon monitors during construction through the Santa Ysabel Ranch through Mitigation Measures CR-1 and TCR-1, which was not addressed by the APMs. Once constructed, the power line under Alternative SE-PLR-2 would not require substantial excavation, grading, or other ground-disturbing activities; thus, it would not impact TCRs during the operation phase. Overall, impacts under significance criterion A would be **less than significant with mitigation**.

Alternative BS-2: Battery Storage to Address the Distribution Objective

As described in Section 4.5, "Cultural Resources," no previously recorded Native American sites or other archaeological resources were identified by records searches of the illustrative FTM sites that are examined as part of the DEIR for Alternative BS-2. Only FTM Site 6 was surveyed in the field, producing no significant finds. Additionally, none of the tribes contacted through the AB 52 process identified any TCRs on or near the illustrative FTM sites. In general, many of the FTM sites considered (i.e., FTM Sites 1-4 and 7) are vacant parcels within developed areas of Paso Robles or Atascadero. FTM Site 5 is in an undeveloped area next to the Paso Robles Municipal Airport, while FTM Sites 6 and 8 are adjacent to existing substations in relatively rural parts of the county. While TCRs were not identified for those potential FTM sites that are examined as part of the DEIR, because excavation, grading, and other ground-disturbing activities are required for construction of individual FTM BESS facilities, the potential remains that buried archaeological resources, including TCRs, could be encountered under Alternative BS-2. Once constructed, the BESS facilities under Alternative BS-2 would not require substantial excavation, grading, or other ground-disturbing activities; thus, they would not impact TCRs during the operation phase.

Overall, FTM BESS sites were selected for illustrative purposes only, BESS installations have not been designed and technologies have not been selected, and the specifics of Alternative BS-2 are unknown. Thus, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is provided for any of the significance criteria.

Alternative BS-3: Third Party, Behind-the-Meter Solar and Battery Storage

The specific locations of the BTM solar and battery storage facilities that could be installed under Alternative BS-3 are not known at this time. However, these facilities are anticipated to be installed largely within or on existing buildings in the greater Paso Robles area. In some cases, there could be BESSs or solar systems that are installed on undeveloped portions of existing properties, requiring some grading and excavation. Overall, however, due to the small-scale of

individual BTM facilities and their anticipated location within developed areas within and around Paso Robles, they are unlikely to impact TCRs during construction or operation.

Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is reached under any of the significance criteria.