

RECLAMATION

Managing Water in the West

Categorical Exclusion Checklist

Cachuma Drought Contingency Plan Pumping Barge Relocation

CEC-16-005

Prepared by:



Rafn L. Emerson

Supervisory Natural Resources Specialist
South-Central California Area Office

ITA Designee concurred with Item 11. Their determination has been placed within the project file.

Date: 04/06/2016

Concurred by:

See Attachment A

Date: See Attachment A

Mark Carper

Archaeologist

Mid-Pacific Regional Office

Regional Archeologist concurred with Item 8. Their determination has been placed within the project file.

Concurred by:



Lisa Carlson

Wildlife Biologist

South-Central California Area Office

Date: 04/06/2016

Approved by:



Michael P. Jackson

Area Manager

South-Central California Area Office

Date: 4/6/2016



Background

On June 6, 2014, the Bureau of Reclamation (Reclamation) completed a Categorical Exclusion Checklist (CEC) for the proposed installation and operation by the Cachuma Maintenance Operation Board (COMB) of an emergency pumping system within Lake Cachuma to address ongoing drought conditions (CEC-14-014¹). Upon completion of the CEC, COMB installed the emergency pumping system within Lake Cachuma which included: (1) clearing an existing access road and preparing a staging area (Staging Yard), (2) maintenance activities on the Intake Tower gates, (3) installation of a pumping station and power supply, (4) installation of a water transmission pipeline, and (5) pump operation. Lake levels have continued to decline since operation began such that the pumping barge needs to be relocated in order to continue to draw water. COMB has proposed relocating the pumping barge as shown in Figure 1.

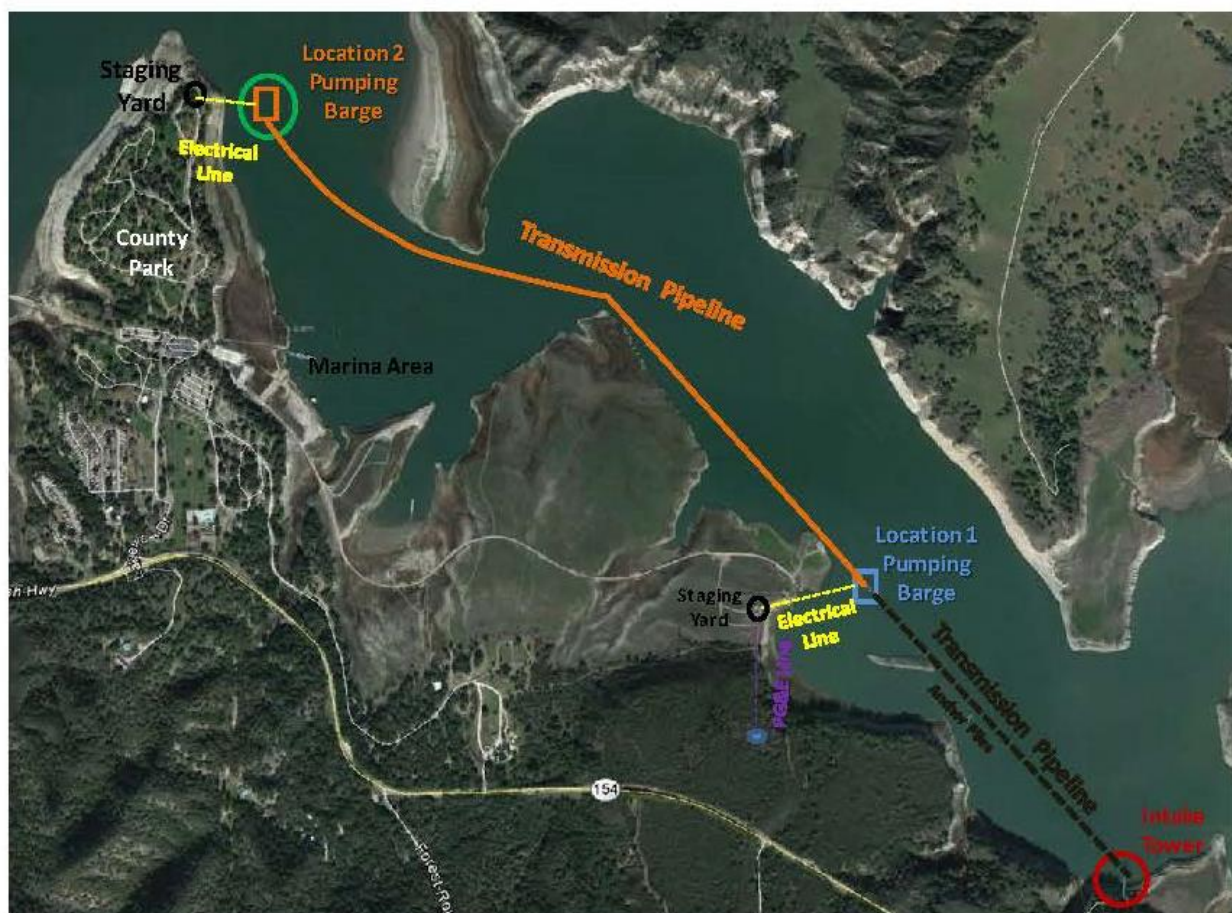


Figure 1 Proposed Relocation of the Cachuma Pumping Barge

¹ Bureau of Reclamation. Cachuma 2014 Drought Contingency Plan (CEC-14-012). Available: http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=20567.

Nature of the Action

COMB, pursuant to its operating agreement with Reclamation (Contract No. 14-06-200-5222R), proposes to relocate the current pumping barge approximately 7,000 feet northwest of its current location (see Figure 1). Operation of the pumping barge at this location will be consistent with all requirements for operation of the Cachuma Project, including but not limited to, Water Rights requirements, the 1995 Cachuma Project Contract Renewal Environmental Impact Report/Environmental Impact Statement, and requirements associated with the National Marine Fisheries Service Cachuma Project biological opinion² (NMFS 2000). Specifically, barge pumping of (1) Water Right 89-18 accounts, (2) Minimum Pool (12,000 acre-feet), and/or (3) any fish account water shall be prohibited.

Operations of the pumping barge at Location 2 will allow continued access by the Member Units to their allocated contract supply carryover balance. In addition, the project will allow the continued transfer of State Water Project (SWP) water supplies and supplemental water without the need for additional pipeline installation by the Central Coast Water Authority (CCWA) whom conveys the SWP supplies to the region. Any additional infrastructure, beyond that addressed in this document, will require additional environmental review.

Specific construction activities associated with the pump barge relocation shown in Figure 2 are described below.

Staging Yard

The existing Staging Yard at Location 1 (Figure 3) would be dismantled (except the small concrete pad from the transformer for potential future use) and relocated to Location 2. The new Staging Yard would be installed next to the existing water extraction and treatment plant for the County Park. The same components from the current Staging Yard (PG&E power drop pole, on-ground electrical lines to the pumping barge, diesel generator for backup power supply, equipment storage container and a contractor management trailer) would be dismantled and transported to and used at this site. The PG&E line will be trenched from the drop pole to within the Staging Yard where the transformer will be placed. PG&E will install a new transformer at Location 2 and retrieve the current transformer at Location 1 to assure a seamless transition from one location to the other. The footprint would be approximately 4,000 square feet and would be surrounded by a chain link fence for security. Construction and maintenance of the Staging Yard will include Stormwater Best Management Practices (BMPs) for the protection of spills and elimination of erosion throughout the duration of the project. The Staging Yard will have contractor personnel onsite 24/7 for operations and safeguarding the facility against public access and potential tampering or theft.

Floating Pipeline

Approximately 7,500 feet of 36-inch diameter high density polyethylene (HDPE) transmission pipeline would be fused and then floated out into the lake at the lowest lake level County Park boat ramp. The boat ramp area used during the first phase of this project for Location 1 will be used for staging only due to the length and steep slope to the lake at the current lake level. The

² National Marine Fisheries Service. 2000. *U.S. Bureau of Reclamation Operation and Maintenance of the Cachuma Project on the Santa Ynez River in Santa Barbara County, California*. September 8.

transmission pipeline will be fused at this site and then fed into the lake off of the peninsula just to the north. Anchor piles would be driven into the lake substrate approximately 15 feet with the same method utilized for Location 1 from a barge with a percussion hammer. Anchor piles for the floating pipeline would be installed (approximately one every 100 feet) up to the marine area of the County Park at which point the pipeline would be sunk to the bottom and held in place with some form of concrete deadman anchors to facilitate boat egress in that area. The piles will be loaded onto the construction barge at the lowest level boat ramps using a crane.

Pumping Barge

The Pumping Barge for Location 2 will be positioned on the east side of the end of the peninsula that contains the Lake Cachuma County Park (Figures 2). The exact location of the barge will be limited by the current length of the electrical lines from the Staging Yard to the pumping barge (approximately 900 feet) and the County requirement to leave sufficient navigable space for boat passage between the land and barge. The Pumping Barge will be held in place using spud piles in the same fashion as is currently in use.

Electrical Lines

The current on-ground/submerged electrical lines (conductor cables) will be moved from Location 1 to Location 2 and laid on the ground from the Staging Yard down a steep embankment to the Pumping Barge on the lake (approximately 600 feet). The current electrical lines are of sufficient length (approximately 900 feet) and still in excellent condition to be utilized at Location 2. This area of the Park is currently and historically closed to the public and is on the other side of the water intake line for the County Park's water treatment plant which provides additional protection against public access. PG&E has verified their ability to serve a 600 horsepower load (approximately 900 kW) at the proposed location.

The electrical lines will be protected by fencing, sandbags near the water's edge, and signage. There will be contractor personnel on site 24/7 to guard the facility. Beyond the embankment, the cables will lie on the lake bottom until they reach the barge, where buoy protection will be provided. The electrical lines are specially designed for submarine applications with thick insulation and are not easily damaged. If they short out underwater, the breaker will trip, but electrical current will simply go to ground (the lake).

Relocation of the pumping barge and associated infrastructure is estimated to take approximately 3 months to complete. COMB is estimating beginning work in April or May of 2016.

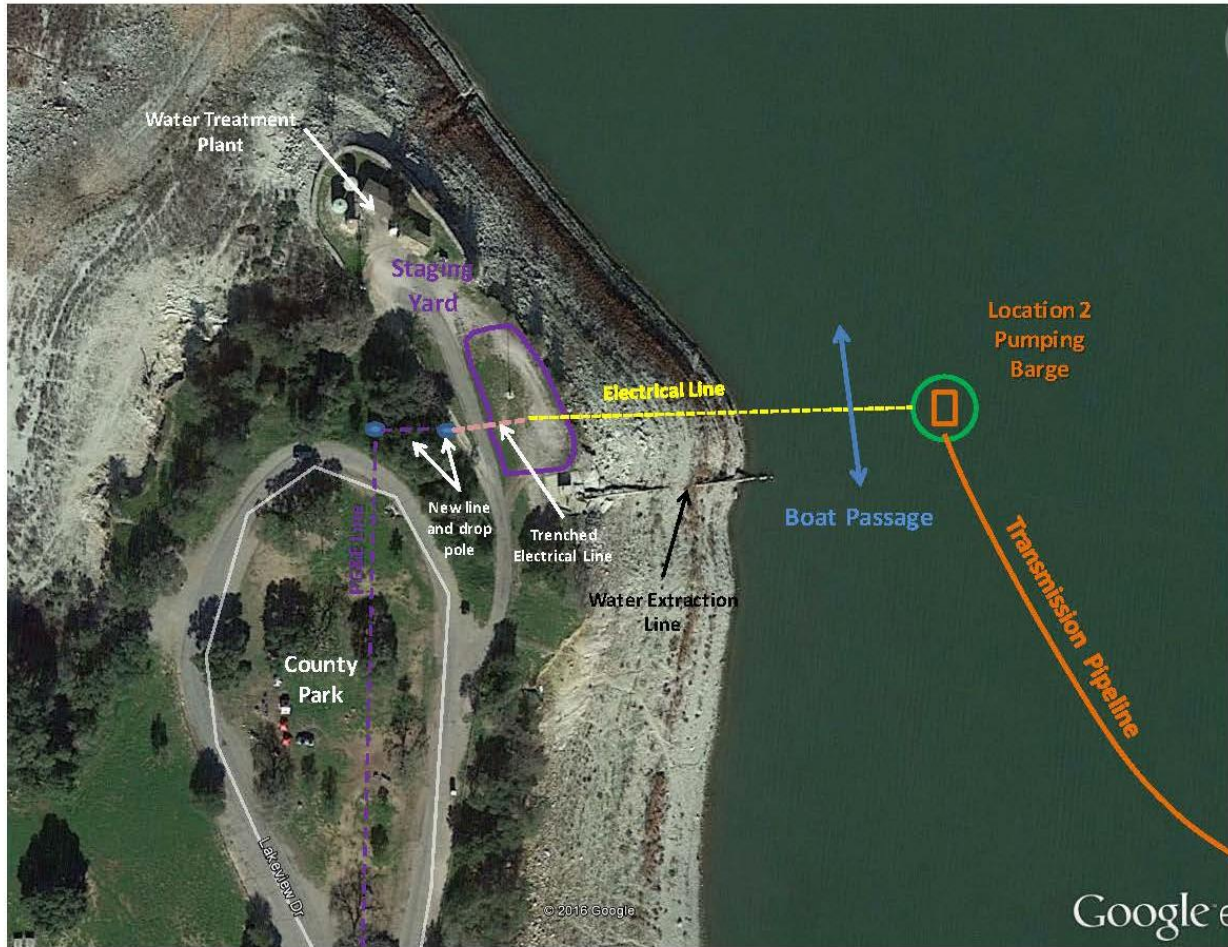


Figure 2 Project Details for Location 2

Environmental Permits

Prior to start of the project, COMB would provide Reclamation all appropriate permits for working within a waterway including, but not limited to:

- California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement
- U.S. Army Corps of Engineers Clean Water Act (CWA) Section 404
- California Regional Water Quality Control Board CWA Section 401



Figure 3 Current Staging Yard Components

Environmental Commitments

COMB, or its designate, would implement the following environmental commitments to avoid any environmental consequences associated with the Proposed Action (Table 1). Environmental consequences for resource areas assume the measures specified will be fully implemented.

Table 1 Environmental Commitments

Resource	Protection Measure
Water Resources	Operation of the pumping barge will be consistent with all requirements for operation of the Cachuma Project. Specifically, barge pumping of (1) Water Right 89-18 accounts, (2) Minimum Pool (12,000 acre-feet), and/or (3) any fish account water shall be prohibited.
Biological Resources	Operation of the emergency pumping barge shall be consistent with the 2000 biological opinion on operation of the Cachuma Project (NMFS 2000).
	To avoid potential impacts to nesting migratory birds, a qualified biologist shall survey the access roads, staging area(s), and any other areas that will be subjected to vegetation clearing/trimming or grading, plus a 20-foot buffer around these areas, for ground-nesting migratory birds such as Killdeer. If any trees or shrubs need to be trimmed, they shall also be surveyed for nesting migratory birds prior to trimming. If an active nest is found during the survey(s), no ground-disturbing activities, trimming or removal of vegetation shall occur within 300 feet of the nest until the young have fledged or until the nest is no longer active.
	All equipment will be maintained in accordance with the manufacturer's directions so there will be no leaks of fluids such as gasoline, oils, or solvents.

Resource	Protection Measure
Various	The generator and all fuel repositories would be placed in containment vessels and follow established BMPs for spill containment.
	Construction and maintenance of the Staging Yard would include Stormwater BMPs for the prevention of spills and elimination of erosion throughout the duration of the project.
	All float sections and skiffs would be inspected for Quagga and Zebra mussels prior to mobilization to Lake Cachuma.

Exclusion Category

516 DM 14.5 C (3): *Minor construction activities associated with authorized projects which correct unsatisfactory environmental conditions or which merely augment or supplement, or are enclosed within existing facilities.*

Evaluation of Criteria for Categorical Exclusion

- | | | | |
|---|---|---------------------------------------|---------------------------------|
| 1. This action would have a significant effect on the quality of the human environment (40 CFR 1502.3). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 2. This action would have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA Section 102(2)(E) and 43 CFR 46.215(c)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 3. This action would have significant impacts on public health or safety (43 CFR 46.215(a)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 4. This action would have significant impacts on such natural resources and unique geographical characteristics as historic or cultural resources; parks, recreation, and refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); flood plains (EO 11988); national monuments; migratory birds; and other ecologically significant or critical areas (43 CFR 46.215 (b)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 5. This action would have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks (43 CFR 46.215(d)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 6. This action would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects (43 CFR 46.215 (e)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |

- | | | | |
|--|---|---------------------------------------|---------------------------------|
| 7. This action would have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects (43 CFR 46.215 (f)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 8. This action would have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by Reclamation (LND 02-01) (43 CFR 46.215 (g)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 9. This action would have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species (43 CFR 46.215 (h)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 10. This action would violate a Federal, tribal, State, or local law or requirement imposed for protection of the environment (43 CFR 46.215 (i)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 11. This action would affect ITAs (512 DM 2, Policy Memorandum dated December 15, 1993). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 12. This action would have a disproportionately high and adverse effect on low income or minority populations (EO 12898) (43 CFR 46.215 (j)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 13. This action would limit access to, and ceremonial use of, Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007, 43 CFR 46.215 (k), and 512 DM 3)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |
| 14. This action would contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act, EO 13112, and 43 CFR 46.215 (l)). | No
<input checked="" type="checkbox"/> | Uncertain
<input type="checkbox"/> | Yes
<input type="checkbox"/> |

NEPA Action: Categorical Exclusion

The Proposed Action is covered by the exclusion category and no extraordinary circumstances exist. The Action is excluded from further documentation in an EA or EIS.

Attachment A


Reclamation's Cultural Resources Determination

CULTURAL RESOURCES COMPLIANCE
Division of Environmental Affairs
Cultural Resources Branch (MP-153)

MP-153 Tracking Number: 16-SCAO-062

Project Name: Cachuma Drought Contingency Plan Pumping Barge Relocation, Santa Barbara County

NEPA Contact: Rain Emmerson, Natural Resource Specialist

MP 153 Cultural Resources Reviewer: Scott Williams, Archaeologist 
on behalf of Mark Carper, Archaeologist

Date: April 4, 2016

Reclamation proposes to approve the inclusion of the Cachuma Drought Contingency Plan Pumping Barge Relocation COMB) to relocate an existing pumping barge with an already installed emergency pumping system within Reclamation owned Lake Cachuma. This action constitutes an undertaking with the potential to cause effects to historic properties, assuming such properties are present, requiring compliance with Section 106 of the National Historic Preservation Act (NHPA) as amended.

Based on historic properties identification efforts conducted by Lloyed (2007) and supplemental information provided by Reclamation (Fogerty and Noble 2016), which included an in-house background research, Reclamation consulted with, and received concurrence from, the State Historic Preservation Officer (SHPO) on a finding of no historic properties affected pursuant to 36 CFR §800.4(d)(1) on April 04, 2016. Consultation correspondence between Reclamation and the SHPO has been provided with this cultural resources compliance document for inclusion in the administrative record for this action.

This document serves as notification that Section 106 compliance has been completed for this undertaking. Please note that if project activities subsequently change, additional NHPA Section 106 review, including further consultation with the SHPO, may be required.

Attachments:

Letter: Reclamation to SHPO dated March 14, 2016
Letter: SHPO to Reclamation dated April 04, 2016



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825-1898

IN REPLY REFER TO:

MP-153
ENV-3.00

MAR 14 2016

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Subject: National Historic Preservation Act (NHPA) Section 106 Consultation for the
Cachuma Drought Contingency Plan Pumping Barge Relocation, Santa Barbara
County, California (Project #16-SCAO-062)

Dear Ms. Polanco:

The Bureau of Reclamation is initiating consultation under Title 54 USC § 306108, commonly known as Section 106 of the NHPA, and its implementing regulations found at 36 CFR Part 800, for the proposed authorization of the Cachuma Operations and Maintenance Board (COMB) to relocate an existing pumping barge with an already installed emergency pumping system within Reclamation owned Lake Cachuma (Figure 1, enclosed). Reclamation determined that authorization of the proposed relocation constitutes an undertaking as defined in 36 CFR § 800.16(y) and involves the type of activity that has the potential to cause effects on historic properties under 36 CFR § 800.3(a). We are entering into consultation with you on this undertaking and notifying you of our finding of no historic properties affected. This is a California Drought-related project and Reclamation is, therefore, requesting an expedited review.

In 2014, COMB installed an emergency pumping system within Lake Cachuma to address ongoing drought conditions and receding reservoir levels. Installation of the emergency pumping system included: (1) clearing an existing access road and preparing a staging area (Staging Yard), (2) maintenance activities on the Intake Tower gates, (3) installation of a pumping station and power supply, (4) installation of a water transmission pipeline, and (5) pump operation. Part of the access to the staging area was along a section of the normally inundated historic San Marcos Road. Reclamation consulted with you for this undertaking, and received concurrence for a determination of no adverse effect to historic properties, on June 13, 2014 (Reference# BUR_2014_0612_001). However, lake levels have continued to recede since operation began such that the pumping barge needs to be relocated in order to continue to draw water. COMB proposes to move the pumping barge further west towards deeper waters near Tequepis Point (refer to the enclosed project description for additional details and figures). The

staging yard will need to be moved as well and COMB is proposing a location near Tequepis Point adjacent to the existing water extraction and treatment plant. In addition, a power drop pole will need to be installed in the staging yard to provide power to the barge pump from the existing power grid. The staging yard will then include a back-up power generator, equipment storage container, and a contractor management trailer. A chain-link fence will be installed around the yard (an area of approximately 200 square feet). The power line will run above-ground from the staging yard, down the bank, into the water to the barge.

Reclamation has determined the area of potential effects (APE) for this undertaking includes the new staging yard, the new PG&E pole, and the power conduit which will run down the bank slope into the water to power the barge (Figures 2 and 2a, enclosed). The other project components such as the floating pumping barge and the power conduit will be within the lake. The vertical APE will be approximately 2-3 inches deep for placement of the staging yard conduit placement and 6 feet deep for the power pole. The legal description for the APE is Section 28, T. 6 N., R. 29 W., Mount Diablo Baseline and Meridian, as depicted on the Lake Cachuma, CA 7.5' U.S. Geological Survey topographic quadrangle.

In an effort to identify historic properties within the APE, Reclamation referred to the record search conducted in 2014 for the previous pump installation project. Reclamation also reviewed an inventory report (Lloyd 2007) prepared for a nearby water system upgrade project. This previous project encapsulated the entire peninsula within which the current project is situated. The Lloyd (2007) report is included on the enclosed CD for your reference. In addition, in February 2016, Mr. John Fogerty and Ms. Michelle Noble, Reclamation Archaeologists, conducted a survey of the currently proposed project APE (Field Report enclosed). No resources were identified during the survey. The proposed project area has been graded and graveled in the past, apparently as a result of the construction of the nearby water treatment facility. The area is used periodically for parking by facility personnel. While numerous sites are in the general area, none have been documented on the northern portion of the peninsula known as Tequepis Point, where the current project is proposed.

Pursuant to the regulations at 36 CFR § 800.3(f)(2), Reclamation identified the Santa Ynez Band of Chumash Mission Indians as an Indian tribe who might attach religious and cultural significance to historic properties within the APE. Reclamation initially contacted Mr. Freddie Romero, Cultural Resources Coordinator for the Santa Ynez Band Elders Council, by telephone to inform him of the proposed project. In addition, Reclamation sent a letter to the tribe on February 18, 2016, inviting their participation in the Section 106 process, and requesting their assistance in the identification of sites of religious and cultural significance or historic properties that may be affected by the proposed undertaking pursuant to 36 CFR § 800.4(a)(4). Mr. Romero initially expressed concerns for the project, but his concerns were abated after a site visit with COMB Senior Resources Scientist, Mr. Timothy Robinson. Because of the depth of disturbance for the proposed power pole Mr. Romero requested, and COMB agreed, that a Tribal Monitor be on site during the excavation of the power pole hole. A final phone call was received by Mr. Romero on March 1, 2016, to inform Reclamation that by including the tribal monitor for the pole installation, the Santa Ynez Band had no further concerns for the proposed project. Should unanticipated historic properties be discovered, Reclamation will follow the procedures identified in 36 CFR § 800.13(b).

No historic properties were identified in the APE through the efforts described above and, pursuant to 36 CFR § 800.4(d)(1), Reclamation finds no historic properties affected for the undertaking. We invite your comments on the delineation of the APE and the appropriateness of the historic properties identification efforts for the undertaking. We are also notifying you of our finding of no historic properties affected. If you have any questions or concerns regarding this project, please contact Mr. Mark Carper, Archaeologist, at 916-978-5552 or mcarper@usbr.gov.

Sincerely,



Anastasia T. Leigh

Regional Environmental Officer

Enclosures – 6

References:

Lloyd, J.B.

2007 Cultural Resources Survey for the Lake Cachuma Water System Upgrade, Santa Barbara County, California. Prepared by Applied Earthworks, Inc. for Santa Barbara County Parks, on file with the Bureau of Reclamation, Sacramento, CA.
Project No. 10-SCAO-080.

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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calshpo@parks.ca.gov
www.ohp.parks.ca.gov



April 04, 2016

Reply in Reference To: BUR_2016_0321_001

Anastasia T. Leigh
Regional Environmental Officer
United States Department of the Interior
Bureau of Reclamation, Mid-Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825-1898

Re: National Historic Preservation Act (NHPA) Section 106 Consultation for the Cachuma Drought Contingency Plan Pumping Barge Relocation, Santa Barbara County, California (Project #16-SCAO-062)

Dear Ms. Leigh:

On March 21, 2016 the Office of Historic Preservation received your letter requesting to initiate consultation for the above-referenced undertaking. The Bureau of Reclamation (Reclamation) is consulting pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36CFR Part 800 (as amended). Along with the consultation letter, the following documents were provided:

- Cultural Resources Survey for the Lake Cachuma Water System Upgrade Project, Santa Barbara County, CA (J.B. Lloyd, Applied Earth Works, November 2007). [CD copy]
- Reclamation MP-153 Cultural Resources Post Field Summary Record (M. Carper, March 2016)
- DRAFT- Emergency Pumping System Project at Lake Cachuma-Project Description Augmentation for Pumping Barge Location 2 (Cachuma Operation and Maintenance Board, February, 2015)
- Figure 1- Project Location Map and Figures 2 and 2a - Area of Potential Effects Maps

The currently proposed project is a relocation of an initial 2014 emergency pumping barge system installed by the Cachuma Operations and Maintenance Board (COMB) to address ongoing drought conditions and receding reservoir levels. Scope of work included clearing silt from an existing road; creating a staging area and Yard 1; conducting maintenance on the Intake Tower gates; adding a pump station with power; installing a water transmission pipeline and the pump operation. A determination of no adverse effect to historic properties was provided on June 13, 2014 (BUR_2014_0612_001). As part of that review two National Register of Historic Places (NRHP) eligible properties were identified: the Tecolote Tunnel Complex with Intake Tower (Criterion C-engineering and construction); and a previously unrecorded section of the historic San Marcos Road with an associated concrete bridge--the road and bridge were treated as eligible for purposes of the initial project only.

The new scope of work includes moving and relocating the pumping barge; adding about 7000 feet of circa 36-inch HDPE transmission pipeline to connect two locations; installing anchor piles about every 100 feet up to the marina area of the Cachuma County Park then sinking the remaining line and holding it down with deadman anchors to allow for boat egress; creating a new, fenced staging Yard 2 and moving Yard 1 components including back-up generator, equipment storage container and contractor trailer to the new Yard 2 which is next to an existing water extraction and treatment plant situated on the north-east end of Tequepis Point.

A new PG&E power drop pole with an above ground power line supply to the barge will be placed in the new Yard 2 locale.

Reclamation has determined that the area of potential effects (APE) for this undertaking includes a new staging yard, a new PG&E pole location, and power conduit which will run down a bank slope into the water then to the barge adjacent to the staging yard. The vertical APE varies, with a depth of about 2-3 inches deep for placement of staging Yard 2 conduit and six feet deep for the power pole installation. The legal description was noted on Figure 1.

Reclamation's efforts to identify historic properties included referencing the previous installation record search (2014) and a cultural resources survey which covered all of Tequepis Point and subsumes this proposed project's APE and surroundings (see: Figure 1-2, J.B.Lloyd, Nov. 2007, p. 3). The report includes a pedestrian survey result and analysis and evaluation of resources. Further, on February 18, 2016 Reclamation archaeologists surveyed the area of the APE.

Overall, the project area has been thoroughly surveyed with 17 archaeological sites recorded within one mile of, or at, Tequepis Point. Three are located about a half mile from the proposed work area, but well to the south and east of the boundary of the APE. While the broader survey area is considered moderately to highly sensitive for the presence of archaeological resources, several pedestrian surveys of the north tip of Tequepis Point have not found any resources and the APE's western area is in a previously disturbed setting and its eastern margin is near the lake drawdown zone and erosion and scour from wave action is apparent. As no resources are known to exist and the prospect of intact sub-surface deposits appears to be minimal, it is concluded that there is a low probability of impacting any unknown buried historic properties.

Pursuant to regulations at 36 CFR §800.3(f)(2) and §800.4(a)(4), Reclamation identified the Santa-Ynez Band of Chumash Mission Indians as an Indian tribe who might attach religious and cultural significance to historic properties in the APE and invited them to consult. Mr. Freddie Romero, Cultural Resources Coordinator, expressed concerns and COMB agreed that a Tribal Monitor be on site during the excavation of the power pole hole. On March 1, 2016 Mr. Romero informed Reclamation that the Tribal Monitor's presence addressed concerns. Reclamation will follow 36 CFR § 800.13(b) procedures to manage any unanticipated discoveries, if necessary.

Reclamation is requesting review and comment on the delineation of the APE, efforts to identify historic properties, and is seeking concurrence with the effect finding for this undertaking. Following staff review of the documentation, I have the following comments:

- Pursuant to 36 CFR 800.4(a)(1), I have no objections to the APE as defined
- Pursuant to 36 CFR 800.4(b), I find that Reclamation has made a reasonable and good faith effort to identify historic properties within the area of potential effects.
- Reclamation has determined that the proposed undertaking would result in no historic properties affected. Pursuant to 36 CFR 800.4(d)(1), **I do not object.**

Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, Reclamation may have additional future responsibilities for this undertaking under 36 CFR Part 800 (as amended). Should you require further information, please contact Jeanette Schulz at Jeanette.Schulz@parks.ca.gov or (916) 445-7031.

Respectfully,



Julianne Polanco
State Historic Preservation Officer