

**Historic Properties Management Plan Implementation
2021 Compliance Report**

**Woodleaf-Kanaka Junction (FERC No. 2281) and Sly Creek (FERC No. 4821)
Transmission Lines**

Butte County, California



Prepared by



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July 2022

Historic Properties Management Plan Implementation
2021 Compliance Report
Woodleaf-Kanaka Junction and Sly Creek Transmission Lines
FERC Project Nos. 2281 and 4851

Pacific Gas and Electric Company (PG&E or Licensee) owns and operates the Woodleaf-Kanaka Junction Transmission Line Project (WKTL) and the Sly Creek Transmission Line Project (SCTL) (Projects), Federal Energy Regulatory Commission (FERC) project numbers 2281 and 4851, respectively, located on lands managed by the United States Forest Service, Plumas National Forest (PNF) and other private landowners. The WKTL and SCTL are located near the South Fork Feather River, in Butte County, California. The WKTL and SCTL both serve as the primary transmission lines for the South Feather Water and Power Agency's South Feather Power Project No. 2088. The WKTL occupies 56.55 acres of land, of which 31.79 acres are administered by PNF. The SCTL occupies 49.1 acres of land, of which 2.0 acres are administered by PNF.

The original FERC licenses for WKTL and SCTL both expired on March 31, 2009. PG&E applied for two new operating licenses from FERC on March 30, 2007, and FERC issued PG&E the new licenses on June 10, 2010. At FERC's request, PG&E prepared one joint HPMP that is shared by both projects and as part of each of the relicensing requirements. Stipulation 1.B. of FERC's Programmatic Agreement (PA) for managing historic properties¹ under the current licenses requires PG&E to report annually on the management activities completed under the Projects' joint HPMP for each previous year. The annual report is due within one month of the anniversary of FERC's issuance of the current licenses.

This letter serves to provide a detailed account of the HPMP tasks that PG&E accomplished in 2021. All tasks required under the HPMP are listed in Table 1 that also includes the status of the work required and completed in 2021. Supporting documents are attached to this letter. Attachment 1 includes a summary report and sign-in sheet for PG&E's 2021 annual operations and maintenance (O&M) meeting with PNF that was held on March 18, 2022. Attachment 2 includes the presentation that was provided to PG&E employees and contractors for the annual cultural resources education and sensitivity training that was conducted on October 22, 2021. Site monitoring was not required in 2021, and no updates to the HPMP were proposed.

The following summarizes Project activities completed over the past year (2021) that were subject to the provisions of the HPMP.

¹ Historic Properties are any prehistoric or historical archaeological site, district, building, structure, object, or traditional cultural property listed on or eligible for listing on the National Register of Historic Places.

Table 1. WKTL and SCTL HPMP activities completed in 2021

Subsection No.	Task	Task Required in 2021		HPMP Activities Completed in 2021
		Yes	No	
3.3.1	General Operating Procedures	X		PG&E continues to avoid NRHP ¹ -eligible archaeological sites during on-going ground-disturbing activities and continues to provide an annual positive education program for employee cultural resources training.
3.3.2	Periodic Archaeological Monitoring and Condition Assessments		X	Periodic archaeological monitoring and condition assessments are to occur on the WKTL every five years, starting in 2010. The monitoring and condition assessments were completed for 2020, at NRHP-eligible sites and sites not evaluated for listing on the NRHP. No cultural resources have been documented on the SCTL Project.
3.3.3	NRHP Evaluation of the Woodleaf-Kanaka Transmission Line		X	The WKTL was evaluated in December 2011 as not eligible for listing on the NRHP; SHPO ¹ concurred with the evaluation on February 12, 2012.
3.3.4	NRHP Evaluation of the Sly Creek Transmission Line		X	The SCTL was constructed in the early 1980's. PG&E will evaluate the transmission line for its eligibility for listing on the NRHP in 2030 when it turns 50 years of age.
3.3.4.1	Physical Obstruction of Access		X	The prevention of public access to CA-BUT-1451/H on the WKTL was originally required and implemented, but the site has since been evaluated as ineligible for the NRHP and requires no management or protection. Gates are used on the SCTL and no other obstruction of access to the line is necessary.
3.3.5	Precautionary Measures During Vegetation Management and Hazard	X		PG&E coordinated vegetation management activities with PG&E's CRS ³ throughout the year for both the SCTL and WKTL. No hazard trees or vegetation were removed from within archaeological site boundaries on either

	Tree Removal			project.
3.3.6	Precautionary Measures during Pole Replacement	X		PG&E's WSIP ⁴ pole maintenance, repair, and replacement activities were coordinated with PG&E's CRS for both the SCTL and WKTL to avoid affecting cultural resources.
3.3.7	Management Measures during Emergency Conditions	X		The 2020 North Complex Fire burned through the FERC boundary. The post-fire archaeological site assessment is ongoing and will be submitted to the Agencies when complete.
3.3.8	Management Measures for Project Activities in Unsurveyed Areas		X	No work was conducted on either project in 2020 in areas that have not been previously surveyed for archaeological sites, thus no archaeological surveys were conducted in these areas in 2020 as a result.
3.3.9	Treatment of Project Effects		X	PG&E's 2020 O&M activities did not affect historic properties and no treatment to mitigate effects was necessary for either project as a result.

3.4.1	Consultation	X		As required, initial consultation with tribes, SHPO, and PNF occurred within one year of license issuance (by July 2011). PG&E continues to meet annually with PNF to review license conditions and to discuss past and future O&M activities, and consults with Tribes and PNF as consultation needs are identified.
3.4.1.1	Avoidance		X	Within one year of license issuance (by July 2011), distribute site location maps to those managing the TLs and vegetation who are in a need to know position. This was completed.
3.4.1.2	Site Condition Monitoring		X	Site Condition Monitoring was completed in 2020. See Task 3.3.2 above. This is applicable only to WKTL as there are no documented cultural resources on the SCTL.
3.7.1	Discovery of Human Remains on Federal Lands		X	This section provides protocols for the discovery of human remains on federally managed lands. PG&E did not encounter human remains in 2021, thus no action was required under this

				measure for either project.
3.7.2	Procedures for the Treatment of Human Remains		X	PG&E did not encounter human remains in 2021 on either project.
3.8	Unanticipated Discoveries		X	PG&E did not encounter any unanticipated discoveries in 2021 on either project.
4.1	HPMP Coordination	X		Coordination between PG&E's TL supervisor and cultural resources specialists occurs on an activity-by-activity basis for ground-disturbing O&M activities on each project.
4.2	Personnel Training	X		PG&E conducted a joint, annual personnel training about cultural and tribal resources for each project on October 22, 2021, as required under this measure.
4.3	Annual Meeting and Periodic Reporting	X		PG&E met with PNF for the annual review of the status of each license condition and past and future O&M activities on November 16, 2021.
4.4	HPMP Periodic Review and Revisions		X	Consultation was conducted in 2020 and no changes were proposed. Consultation regarding review and revisions of the HPMP will occur again in 2025.
4.5	Native American Consultation		X	Native American consultation was not required on any of the projects in 2021.

¹ NRHP = National Register of Historic Places

² SHPO = State Historic Preservation Officer

³ CRS = Cultural Resources Specialist

⁴ WSIP = Wildfire Safety Inspection Program



**Pacific Gas and
Electric Company**

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Via Electronic Submittal (eFile)

December 23, 2021

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Subject: Woodleaf-Kanaka Junction Transmission Line Project, FERC Project No. 2281-011 & Sly Creek Transmission Line Project, FERC Project No. 4851-005
2021 Annual Consultation Meeting Summary**

Dear Secretary Bose:

On June 10, 2010, the Federal Energy Regulatory Commission (FERC or the Commission) issued "Order Issuing Subsequent License (Transmission Line)" (131 FERC ¶ 62,222) for the Woodleaf-Kanaka Junction Transmission Line Project (FERC Project No. 2281-011), and "Order Issuing Subsequent License (Transmission Line)" (131 FERC ¶ 62,223) for the Sly Creek Transmission Line Project (FERC Project No. 4851-005). Pursuant to paragraph 19 of each Order, the License is subject to the Forest Service Final Section 4(e) Conditions set forth in Appendix A of the Orders. Standard Forest Service Condition No. 3 requires that Pacific Gas and Electric Company (PG&E), beginning the first full year after License issuance, participate in annual meetings with the Forest Service to present Project operation and maintenance (O&M) activities planned for the next calendar year. In addition, PG&E shall present results from current year monitoring of noxious weeds and special-status species, as well as any additional information that has been compiled for the Project Area. PG&E must file with the Commission evidence of the Annual Consultation Meeting within 60 days following such consultation.

On November 16, 2021, PG&E and the staff of the Plumas National Forest (PNF) conducted the eleventh Annual Consultation Meeting in compliance with Standard Forest Service Condition No. 3. The purpose of the meeting was to update the PNF staff regarding PG&E's O&M activities conducted in 2020 and 2021 and the overall status of License compliance. The meeting was held virtually due to the ongoing COVID-19. This letter was sent to PNF staff on November 24, 2021, and no comments were received from the PNF. It serves as evidence of consultation and is hereby filed with the Commission.

The list of attendees for the PNF and PG&E is attached to this letter.

ANNUAL CONSULTATION MEETING SUMMARY

PG&E reported on the following Project O&M and License compliance activities completed during 2020 and 2021. The proposed 2022 Project O&M will be discussed at the 2022 Annual Consultation Meeting.

Project-related Operations and Maintenance

PG&E held a Forest-wide online annual meeting with the PNF to provide a high-level overview of PG&E's O&M on all transmission line projects on the PNF, including the subject FERC licensed projects.

The 2020 North Complex fire burned all of the area in and around the FERC Project Boundary of the Woodleaf-Kanaka Transmission Line.

Vegetation Activities

Sly Creek and Woodleaf both get one vegetation inspection per year, usually by foot. Starting in 2019, LiDAR is used in the fall to search for hazard trees. In 2021, there were three different hazard tree removals performed toward the end of the year for the projects. The first involved the removal of 102 trees within 200 feet of the Woodleaf-Kanaka transmission line. The second involved management of around 400 trees, mostly trimming, in or around the FERC Project Boundary of the Woodleaf-Kanaka. Finally, the removal of another 20 trees, 13 at the Sly Creek transmission line on NFS land, and 7 at the Forbestown Tap on NFS lands.

Herbicide Application

Herbicides were not used on in 2021, as described in Condition No. 6 below. Currently, PG&E is planning to use herbicides in 2022.

Roadwork

PG&E did not perform any roadwork in 2021.

Project Changes

No foreseeable changes to project facilities or features.

Status Update re: FERC License Measures

PG&E reviewed all license conditions for P-2281 and P-4851, with particular focus on the Forest Service 4(e) Conditions, per a 2013 request from PNF Hydroelectric Coordinator. These conditions and the results of PG&E's review are listed below.

Condition No. 1 – Modification of 4(e): No modifications to date, nor are any anticipated, as the Biological Opinion and 401 were completed in 2010.

Condition No. 2 – Approval of Changes: No changes to date.

Condition No. 3 – Consultation: The Annual Consultation Meeting has been held every year since 2011 and was held this year on November 16, 2021. PG&E reviewed all Project O&M activities, as well as all conditions of the license for 2021. A draft version of the Annual Consultation Meeting Summary was submitted to the PNF for review on November 24, 2021 and is due to FERC by December 31, 2021.

Condition No. 4 – Surrender of License or Transfer of Ownership: PG&E has no current plans to surrender license or transfer ownership.

Condition No. 5 – Maintenance of Improvements: PG&E is in compliance with this condition.

Condition No. 6 – Pesticide Use Restrictions: No pesticides were used in 2021. PG&E is still determining if there will be pesticide use in 2022.

Condition No. 7 – Erosion Control Plan: There has been no new construction or non-routine maintenance projects that require an Erosion Control Plan.

Condition No. 8 – Existing Claims: PG&E is in compliance with this condition.

Condition No. 9 – Compliance with Regulations: PG&E complies with regulations for the Projects.

Condition No. 10 – Protection of US Property: PG&E protects US property in accordance with the license condition, on its projects.

Condition No. 11 – Indemnification: This condition is ongoing throughout the life of the Projects.

Condition No. 12 – Surveys, Land Corners: No survey monuments have been disturbed on the projects by O&M activities. It is unknown if the North Fire complex has damaged any of the existing monuments.

Condition No. 13 – Damage to Land, Property, and Interests of the US: There has been no damage to the Projects under the current Licenses by O&M.

Condition No. 14 – Risks and Hazards: There have been no known risks or hazards to date.

Condition No. 15 – Crossings: Roads crossing the Projects right-of-ways have been maintained.

Condition No. 16 – Access: PG&E will look at gate conditions as part of the road surveys and make sure access is maintained.

Condition No. 17 – Signs: PG&E has erected or posted no signs.

Condition No. 18 – Annual Employee Awareness Trainings: Annual Awareness Meeting must be held each year before work begins for the season. The 2021 training was held in October online and

included discussion of license conditions to protect Environmentally Sensitive Areas (SS Plants Invasive Weeds, Cultural Resources), as well as upcoming project activities.

Condition No. 19 – Avian Collision and Electrocution Hazards: The Avian Collision and Electrocution Prevention Plan was developed in December of 2010. No collisions have been reported on the Projects.

Condition No. 20 – New Special-Status Species Surveys: PG&E reviewed the threatened, endangered, and special-status species 2021 lists from the United States Fish and Wildlife Service, California Department of Fish and Wildlife, and California Native Plant Society, as well as the most up-to-date lists from the PNF. There were no changes to the PNF Watchlist in 2021, nor any changes to any lists that would necessitate new surveys or plans. New plant species will be added to the target list for the botanical surveys in 2022 (see Condition No. 21).

Condition No. 21 – Protect Special-Status Plants (SSP) and Habitat: The Special-Status Species Management Plan was developed in May 2011. Botanical surveys are done every ten years, except at Mosquin's clarkia (*Clarkia mosquinii*) occurrences where NNIP are collocated. As of 2020, prior to the North Complex fire, there were 27 known occurrences of SSP on both the Woodleaf-Kanaka and the Sly-Creek Transmission Lines.

No work was done on the projects in 2021 under this plan. Per the terms of the plan, a floristic botanical survey will be performed in 2022 on both projects and all occurrences of special-status plants on NFS lands will be documented. Based on those results, a possible new regime of special-status plant monitoring will be determined in consultation with the PNF.

Condition No. 22 – Invasive Weed Management Plan: The Invasive Weeds Management Plan was developed in May 2011. Inventory and mapping of new populations was most recently done in 2012 & 2013.

PG&E's vegetation management crews are required to clean their equipment prior to entering the work area. Populations of NNIP are identified for crews to avoid. If avoidance is not feasible, crews conduct work in weed-free areas first, and clean the equipment before leaving the area.

In 2020, 13 French broom occurrences with plants were located across both projects, with 7 on NFS lands on the Woodleaf-Kanaka transmission line. 3 Scotch broom occurrences with plants were located on the Woodleaf-Kanaka transmission line. Finally, 32 skeletonweed occurrences were located on NFS lands, one on Sly Creek and the rest on the Woodleaf-Kanaka transmission line. However, the 2020 North Complex fire burned most of the areas containing the known invasive weed occurrences. No work was performed under this plan in 2021.

In 2022, PG&E will conduct a full botanical survey of the projects and map all occurrences of invasive weeds. PG&E proposes to use that information to design an updated management strategy in consultation with the PNF for invasive weed species on the transmission lines, including locations and methodologies. This strategy would be put into effect for 2023.

The large-scale hazard tree removal on the Woodleaf-Kanaka transmission line in 2020 and 2021 will trigger three years of post-treatment NNIP surveys on the line, beginning in 2022. The 2022 survey will be covered by the full line botanical surveys.

Condition No. 23 – Limited Operating Periods: Projects are in compliance with this Condition – part of the Special-Status Species Management Plan.

Condition No. 24 – Meeting Prior to Any Construction or Maintenance Activities: PG&E will report plans at the O&M meetings. An O&M meeting will also be scheduled for 2022.

Condition No. 25 – Fire Prevention, Response, and Investigation: The Fire Prevention and Response Plan was developed in May 2011 and updated in 2018 for new contacts. The Plan was brought to 2017 standards in 2018 and annual notifications will be sent of any updates. There was no work on or under this plan in 2021. The contacts section of the Plan will be updated in 2022.

Condition No. 26 – Fuel Treatment Plan: Given recent fires in the area of the Sly Creek and Woodleaf-Kanaka transmission lines, an update of the fuels inventory is proposed for 2022. The Fuel Treatment Plan would be updated accordingly.

Condition No. 27 – Road Management Plan: The Road Management Plan was developed in May 2011 and is currently being updated in consultation with PNF staff. PG&E performed roads surveys on 2021 on roads on NFS lands on Sly Creek and the majority of the Woodleaf-Kanaka. Road 20N94X, which is used to access the majority of the Woodleaf-Kanaka transmission line was impassable beyond pole 3/29. This road may be functional when it dries, and the roads survey will be completed in 2022. A roads report for the portion of the projects that was surveyed will be developed and submitted to the PNF at least 30 days prior to the 2022 Annual Consultation Meeting. The Road Management Plan will also be discussed at that meeting, in the hopes of finalizing the contents.

Condition No. 28 – Heritage Resources Management Plan: A joint Historic Properties Management Plan (HPMP) was prepared in 2010 to guide the protection and management of cultural resources identified within the Project boundaries and Area of Potential Effects (APE), in compliance with the conditions of a new Project license when issued by FERC.

Section 4.4 of the HPMP requires that the consulting parties review the effectiveness of the HPMP every 10 years and revise if necessary. PG&E initiated consultation with the parties on November 17, 2020 and did not propose any changes. No comments were received by the consulting parties.

The HPMP requires that archaeological monitoring and site assessment be conducted every five years for the two eligible properties, CA-BUT-3176 (05115300816) and CA-BUT-3405 (05115301057), as well as any additional sites discovered within the FERC project boundaries; these include resources P-04-003879 (05115301188) and P-04-3880 (05115301189). Resources CA-BUT-1451/H (05115300095) and CA-BUT-3255 (05115300817) have been determined ineligible through the Section 106 consensus process.

Table 1. Resources within the Woodleaf-Kanaka Project (FERC No. 2281).

Trinomial or Primary	FS No.	NRHP Eligibility Status	SHPO Concurrence Letter
CA-BUT-1451/H	05115300095	Ineligible	FERC 2016 0311 001
CA-BUT-3176	05115300816	Eligible	FERC 2015 0817 001
CA-BUT-3255	05115300817	Ineligible	FERC 2016 0311 001
CA-BUT-3405	05115301057	Eligible	FERC 2015 0817 001
P-04-003879	05115301188	Undetermined	N/A
P-04-003880	05115301189	Undetermined	N/A

On November 5, 2020, both CA-BUT-3176 (05115300816) and CA-BUT-3405 (05115301057) were revisited. On January 11, 2021, resources P-04-003879 (05115301188) and P-04-3880 (05115301189) were revisited. Data was collected to complete Archaeological Site Condition Monitoring Forms for each resource. In addition, new DPR 523 forms were prepared for each resource, as appropriate. No project-related damage was observed, but the North Complex Fire burned through all of the sites. The site assessment report will be submitted with the 2020 cultural resources report. The annual report for 2020 is being prepared.

Work in 2021 consisted primarily of vegetation management activities along the corridor. The measures outlined in Section 3.3.5 of the HPMP, including directional felling, use of hand tools, and use of existing roads, were employed, as well as flagging and archaeological monitoring where necessary.

Condition No. 29 – Ground-disturbing Activities: There are no planned ground-disturbing activities at this time.

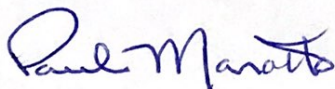
Other Issues

PNF requested PG&E send over a simplified map of the projects, which PG&E has done.

The PNF is in the process of hiring a new botanist.

If you have any questions or concerns regarding this meeting summary, please contact Robin Kent at robin.kent@hdrinc.com or 916-679-8733.

Respectfully submitted,



Paul Marotto
PG&E Principal Land Planner

Attachment: (1) List of Meeting Attendees
(2) Meeting Agenda

cc: via email, w/attachment

Secretary Kimberly D. Bose
December 23, 2021
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Lori Cayo
Plumas National Forest
Amy Lind
Plumas National Forest and Tahoe National Forest

Secretary Kimberly D. Bose
December 23, 2021
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**PACIFIC GAS AND ELECTRIC COMPANY
AND
PLUMAS NATIONAL FOREST**

**WOODLEAF-KANAKA JUNCTION TRANSMISSION LINE PROJECT
FERC PROJECT NO. 2281-011
AND
SLY CREEK TRANSMISSION LINE PROJECT
FERC PROJECT NO. 4851-005**

**ANNUAL CONSULTATION MEETING
November 16, 2021**

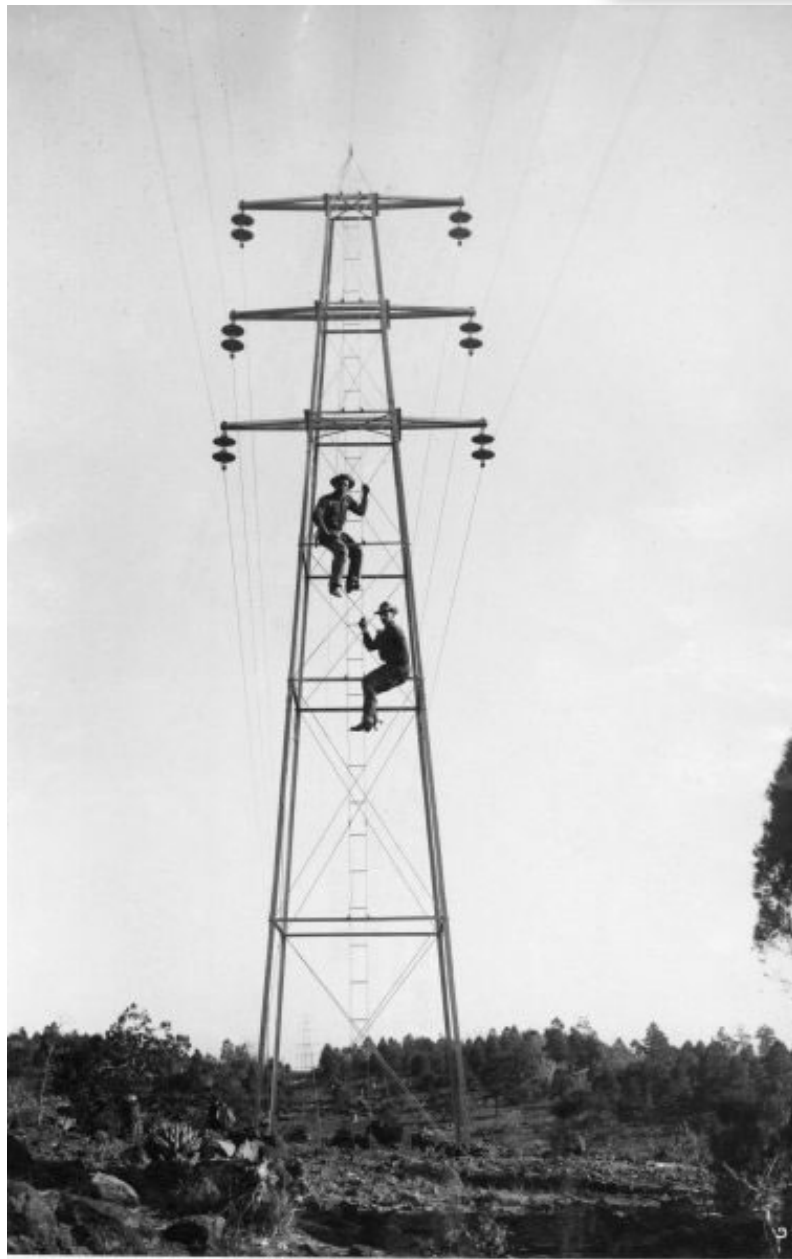
ATTENDEES

	NAME	COMPANY	POSITION
1	Lori Cayo	PNF-FRRD	Public Services Staff Officer
2	Eric Murphy	PNF-FRRD	Timber Management Officer
3	Ryan Davy	PNF-FRRD	Silviculturist
4	Paul Marotto	PG&E	Senior Land Planner
5	Emily Moghaddas	PNF	Public Services Staff Officer for Supervisor's Office
6	Kathleen Forrest	PG&E	Cultural Resources Specialist
7	Robin Kent	HDR	Consultant Project Manager & Senior Biologist

PNF Plumas National Forest
FRRD Feather River Ranger District
TNF Tahoe National Forest

Annual Consultation Meeting: 2021 Agenda

1:00 PM	Purpose of the Meeting – Comply with Forest Service 4(e) Condition No. 3 Consultation and Coordination
1:05 – 1:10 PM	Introductions
1:10 – 2:10 PM	Operations & Maintenance Activities
	<ul style="list-style-type: none"> • Routine and Non-Routine Maintenance • Foreseeable changes to project facilities or features • Elements of current year maintenance • Planned pesticide use • Other
2:10 – 3:15 PM	Report on License Compliance
	<ul style="list-style-type: none"> • General License Measures (Robin Kent, HDR) – a brief review of all the license measures and compliance for each. • Fuel Treatment (Robin Kent, HDR) • Special Status Plants (Robin Kent, HDR) – ongoing monitoring of Mosquin’s clarkia occurrences. • Noxious Weeds (Robin Kent, HDR) – monitoring and management of broom and skeletonweed occurrences. Surveys in the areas of ground disturbing activities. • Cultural Resources (Kathleen Forrest, PG&E) • Roads Management Plan (Robin Kent, HDR) – General discussion.
3:15 – 4:00 PM	Other Issues or Concerns
	<ul style="list-style-type: none"> • Other Items • Summarize Action Items



Cultural Resources Awareness and Compliance Training

Woodleaf – Kanaka Junction
115 kV Transmission Line
Project
(FERC No. 2281)

and

Sly Creek 115 kV
Transmission Line Project
(FERC No. 4851)

October 22, 2021

01 What Are Cultural Resources

02 How Do We Find Them

03 The Compliance Process

04 Cultural Resources
Management



- Buildings, structures, objects, archaeological sites (i.e., concentrations of artifacts, features, cultural soils, etc.), and traditional tribal locations and resources 50 years old or older;
- May occur as individual artifacts, individual features, or structures, archaeological sites, or as a collection of cultural resources (districts).



Prehistoric Archaeological Resources

- Isolated artifacts
- Stone (lithic) artifact scatters
- Plant/animal milling features
- Habitation sites
- Rock art
- Human Burials
- And much more!



Historical Archaeological Resources

- Refuse and Privy Deposits
- Trails and Roads
- Mining Features
- Homesteads/Residential Remains
- Cemeteries
- And much more!



Historical Built Environment Resources

- Transmission Lines
- Powerhouses/Buildings
- Dams/Reservoirs
- Structures
- Bridges/Culverts
- Tunnels
- And much more!



Tribal Resources

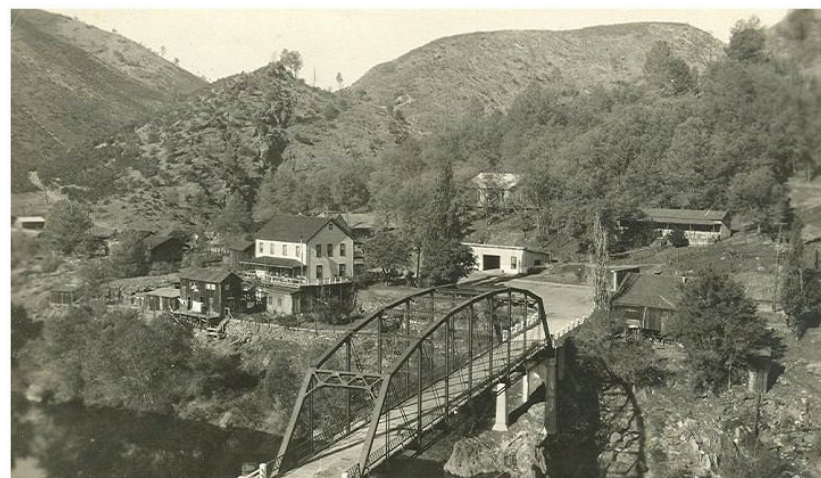
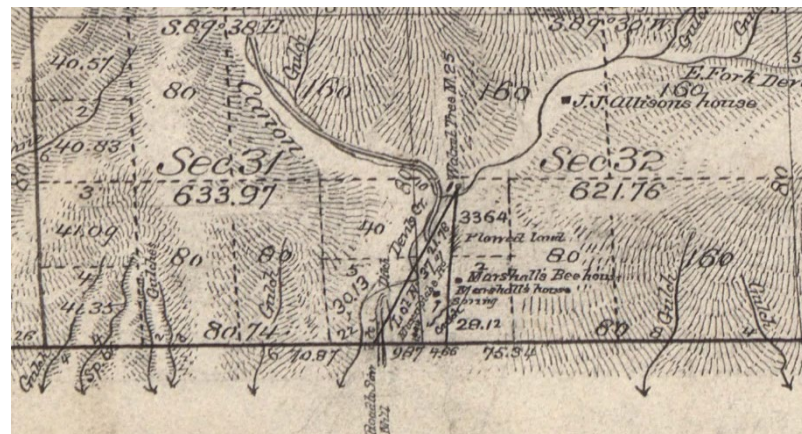
(Ethnographic Sites, Traditional Cultural Properties, Other Resources)

- Plant Gathering Areas
- Ceremonial Locations
- Fishing Locations
- Other Locations of Traditional Community Practices



Archival Research and Information Center Data Searches

- Review Library/Other Repository Historic Maps, Documents, Photographs, and Other Records
- Obtain Information Center (IC) Confidential Cultural Resources Records, Mapped Resource Locations, and Reports
- Include a Research Area – Commonly Inside Project Boundary and 0.25-1.0 Mile Radius Around a Project Boundary, Depending on the Project
- Changing Standards and Conditions May Negate Previous Results
- Locations of Cultural Resources Are Confidential!
- Absence of Evidence is NOT Evidence of Absence



FieldWork

- Pedestrian Survey
- Archaeological Monitoring
- Interviews/Consultation
- Subsurface Exploration



Legislative Overview

■ Two Primary Drivers in Cultural Resources Compliance

- National Historic Preservation Act, Section 106
- California Environmental Quality Act

■ Generally Parallel Processes

- Identify Potential Cultural Resources
- Evaluate Cultural Resources Against a Set of Significance Criteria for Listing on National, State, or Local Registers
- Mitigate Significant Impacts to Historical Resources (CEQA)
- Treat Adverse Effects to Historic Properties (NHPA Section 106)

■ NHPA Section 106 and CEQA Both Require Consultation with Native American Tribes, Tribal Representatives and Other Stakeholders

- Assembly Bill 52 – Introduced into CEQA in 2015
- Requires Early Consultation with Tribes, Formal Conclusion of Consultation, Defines New Tribal Cultural Resources, Includes Specific Triggers and Deadlines

■ Other Federal or State Laws May Also Apply

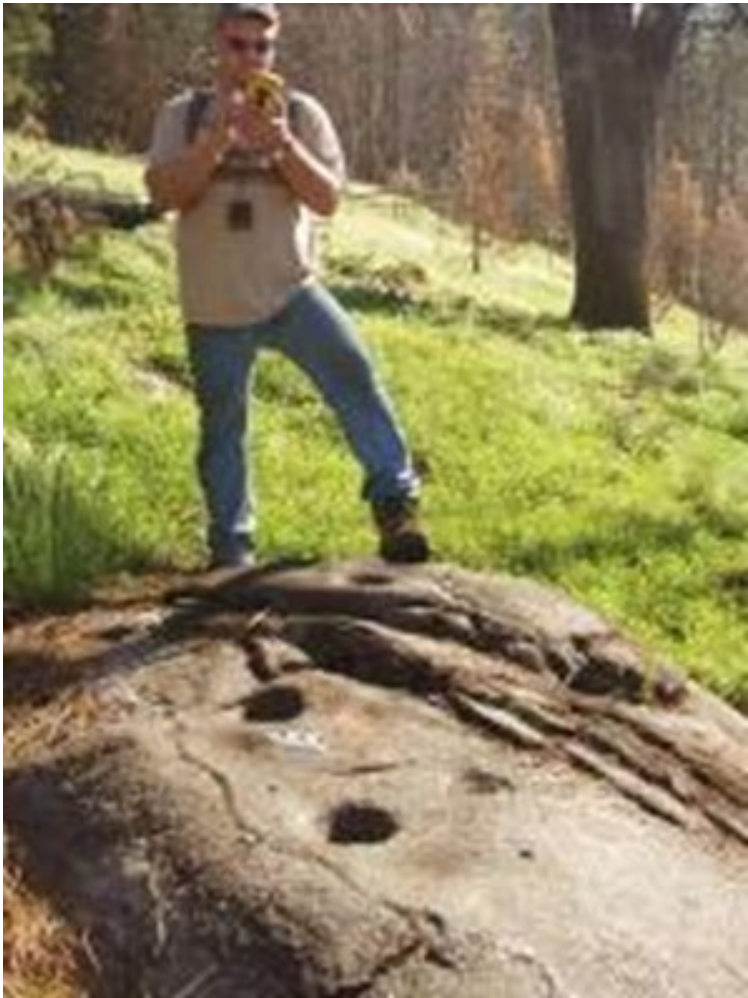
FEDERAL ENERGY REGULATORY COMMISSION (FERC)- LICENSED TRANSMISSION LINE PROJECTS

- FERC-licensed projects require compliance specifically with NHPA Section 106
- FERC as the Lead Federal Agency issuing project licenses is responsible for addressing potential effects on cultural resources that could occur under the FERC licenses
- FERC issues PG&E Programmatic Agreements (PAs) between FERC, SHPO, and potentially the ACHP as part of a new license
- The PAs conclude FERC's Section 106 responsibilities for issuing licenses by requiring that PG&E prepare and execute Historic Properties Management Plans (HPMPs)
- HPMPs provide procedures that PG&E must follow to comply with the laws and regulations for managing and protecting cultural resources in the Project Area of Potential Effects (APE) under the license
- PG&E implements a joint HPMP for the Sly Creek and Woodleaf-Kanaka Junction Transmission Line Projects. PG&E must follow the HPMP management measures and procedures for the entire term of each license – typically for a term no less than 30 years

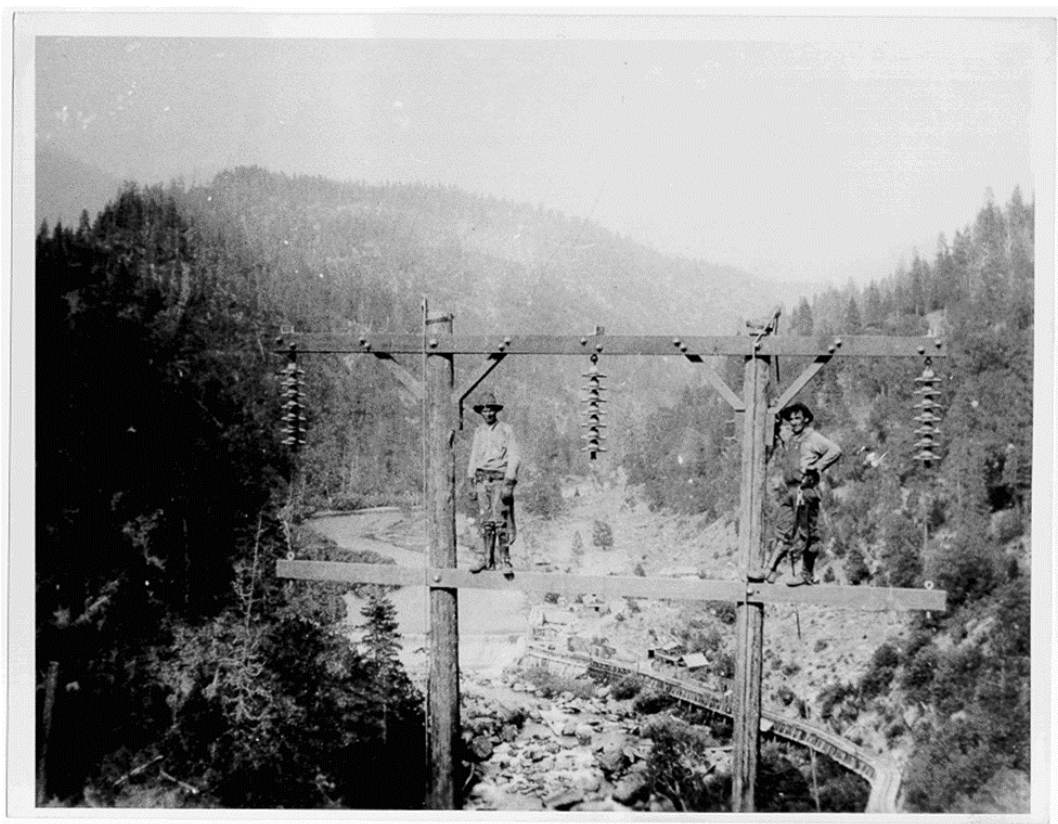
What Happens When Cultural Resources Laws Are Violated?

- Licenses and Permits Revoked
- Costly Project Delays
- Fines (Both Company and Personal Fines)
- Litigation
- Loss of Trust





Potential Project Effects to Cultural Resources



- Operations and Maintenance
 - Tower/Pole Repair and/or Replacement
 - Conductor Repair and/or Replacement
 - Vegetation Management and Hazard Tree Removal
 - Road Maintenance

Roles and Responsibilities

- *Transmission Supervisor* – primary liaison between project personnel and Cultural Resources Specialist, responsible for identifying any projects that may affect cultural resources.
- *Vegetation Program Manager* – responsible for identifying projects that may affect cultural resources.
- *Cultural Resources Specialist (CRS)* – responsible for compliance with HPMP and preservation of resources; consults with Forest and District Archaeologist.
- *Forest or District Archaeologist* – oversight of HPMP implementation, tribal consultation (when necessary), review of project-specific and annual HPMP reports.

- AVOIDANCE - \$
 - Exclusion Fencing
 - Buffers
 - Signage
- EVALUATE/ASSESS - \$\$
 - Subsurface Test Excavation
 - Archival Research
 - Assess Effects on Resources
- TREAT/MITIGATE - \$\$\$
 - Subsurface Data Recovery
 - Excavation
 - Artifact Analyses
 - Archival Research
 - Interpretive Displays
 - Popular Publications
 - Other Treatment/Mitigation Measures



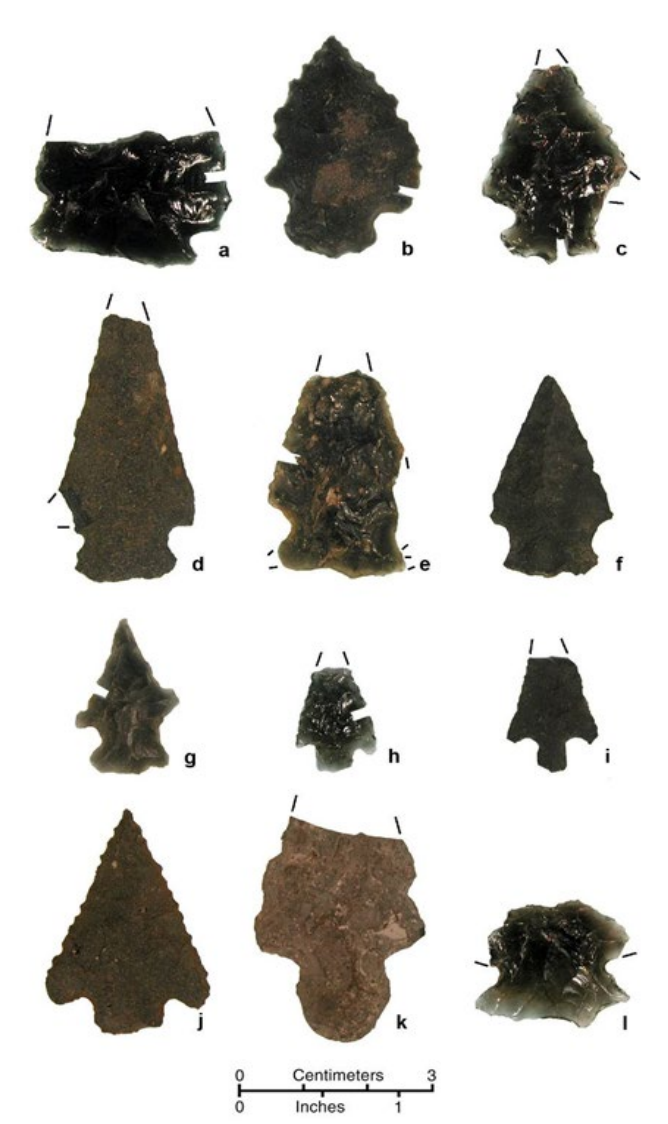
If You Encounter Cultural Resources

- **Immediately stop** all work within 100-foot radius of the discovery
- Secure location, but do not touch or remove artifacts
- Do not remove associated spoils or pick through them
- Record the location and keep notes of all calls and events
- **Immediately** notify the Transmission Line Supervisor and the responsible Cultural Resources Specialist
- Do not publically reveal the location
- Do not proceed with work until provided clearance by PG&E's Cultural Resource Specialist

What to Do if You Discover Human Remains

- **Human remains are protected by Federal Law on Federal lands (Native American Graves Protection and Repatriation Act) and State Law on non-Federal lands (California Health and Safety Code 7050.5, 7051, 7054; California Public Resources Code 5097).**
- **Immediately stop** all work within a 100-foot radius of the discovery
- Secure the location, but do not touch or remove associated artifacts
- Treat the remains with respect
- Do not remove associated spoils or pick through them
- Record the location (GPS) and keep notes of all calls and events
- **Immediately** notify the Transmission Line Supervisor and the responsible Cultural Resources Specialist
- Do not publically reveal the location
- Do not proceed with work until provided clearance by PG&E's Cultural Resources Specialist

Questions?



THANK YOU!

Should you be unsure about any project activities or want additional information about cultural resources, please contact Paul Marotto or Kathleen Forrest below.

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