Version 1.0 Plan Issued on July 26, 2018 Comments Due on August 31, 2018	Word versions will be distributed via secure ShareFile link provided in an email. Comments may be submitted via similarly provided link

CULTURAL RESOURCES STUDY PLAN

BISHOP CREEK HYDROELECTRIC PROJECT (FERC PROJECT NO. 1394)

Prepared for:

SOUTHERN CALIFORNIA EDISON®

Energy for What's Ahead℠

Bishop, California

Prepared by:

Kleinschmidt

Portland, Oregon
www.KleinschmidtGroup.com

July 2018

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CULTURAL RESOURCES STUDY PLAN

BISHOP CREEK HYDROELECTRIC PROJECT
(FERC NO. 1394)

SOUTHERN CALIFORNIA EDISON

1.0 INTRODUCTION

Southern California Edison Company (SCE) is the licensee, owner, and operator of the Bishop Creek Hydroelectric Project (Project) (Federal Energy Regulatory Commission [FERC] Project No. 1394). The Project is located on Bishop Creek in Inyo County, California, approximately 5 miles southwest of the city of Bishop (Figure 1-1), on lands managed by the Inyo National Forest Service (FS), the Bureau of Land Management (BLM), Bishop Field Office and lands owned by SCE. The licensee operates the Project under a 30-year license issued by FERC on July 19, 1994. As the current license is due to expire on June 30, 2024, SCE has initiated the formal relicensing process utilizing the Integrated Licensing Process (ILP) by filing the Notification of Intent (NOI) and Pre-Application Document (PAD) with FERC on XXXX.

In advance of filing the NOI and PAD, SCE worked with stakeholders to identify necessary studies, with the goal of accelerating FERC's ability to issue a Study Plan Determination. Efforts began over a year prior to the formal initiation of the process with FERC, through a series of Technical Working Group (TWG) meetings held in Bishop, California.

During these TWG meetings, stakeholders identified the need to conduct a Cultural Resources Study. This study plan details the study objectives, study area, methods, and schedule for the Cultural Resources Study. Appendix A to this plan is a consultation summary of discussions specific to this plan, along with a table that summarizing stakeholders' comments on previously reviewed versions, and how SCE has addressed those comments. If SCE does not incorporate a comment or request, SCE will provide rationale based on Project specific information and FERC ILP study plan criteria.

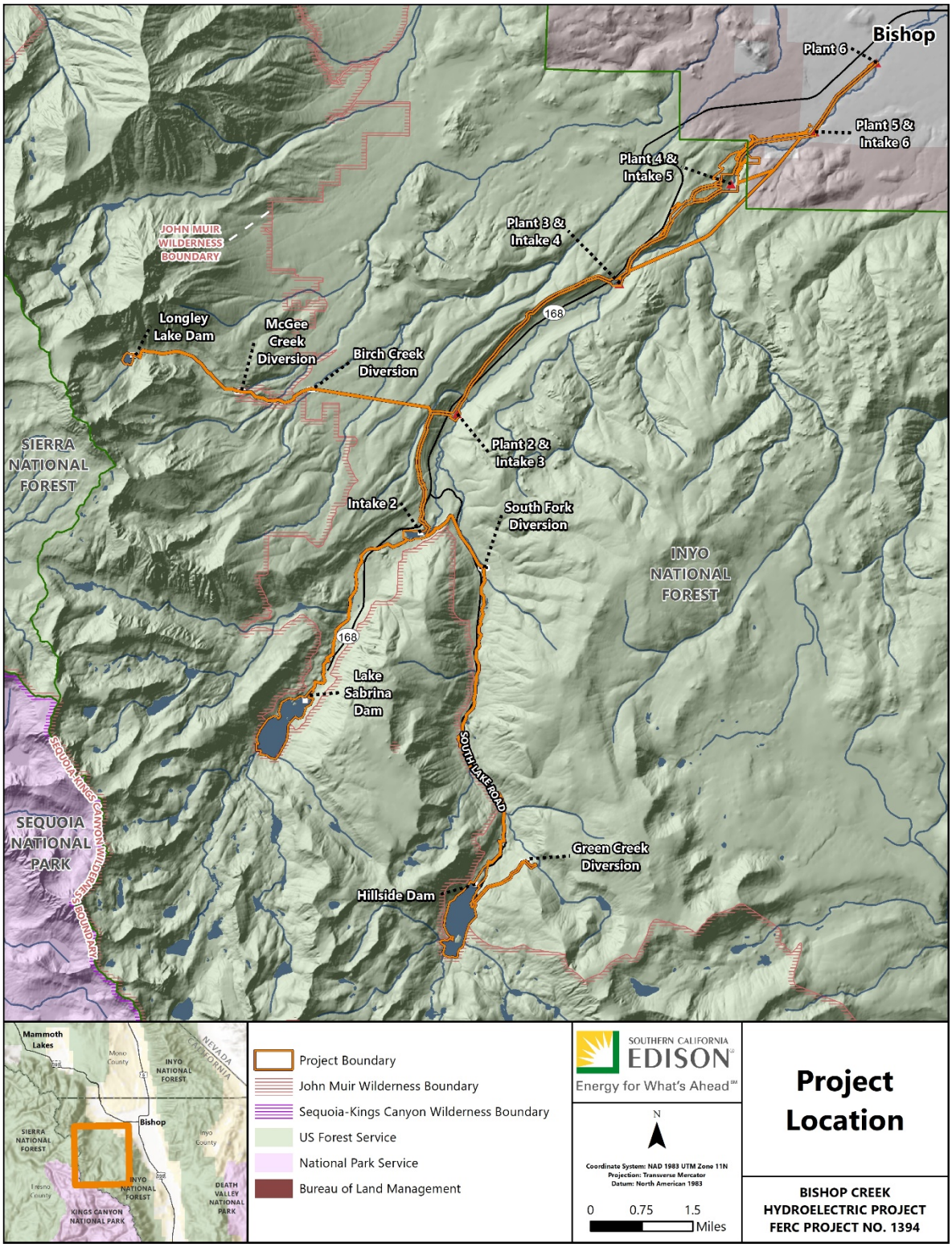

FIGURE 1-1 PROJECT LOCATION MAP

2.0 PROJECT NEXUS

Continued Project operation and maintenance (O&M) and other activities, including public recreation activities, may have an adverse effect on historic properties. The effect may be direct (*e.g.*, result of ground disturbing activities), indirect (*e.g.*, public access to Project areas) or cumulative (*e.g.*, caused by a Project activity in combination with other past, present, and reasonably foreseeable future projects). This study focuses on these potential Project effects to historic properties. Several terms used throughout this study warrant definition at the outset.

- ***Historic properties***, as defined under 36 Code of Federal Regulation (CFR) § 800.16(l)(1), are prehistoric or historic sites, buildings, structures, objects, districts, or traditional cultural properties (TCPs) included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Historic properties are identified through a process of evaluation against specific criteria found in 36 CFR § 60.4.
- ***Historical or archaeological district*** is a geographic area containing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan and physical development. Examples of districts include (but are not limited to) hydroelectric systems, residential areas, commercial zones, mining complexes, transportation networks, rural villages, canal systems, irrigation systems, or large ranches (NPS 2002).
- ***Cultural Resources***, for the purpose of this document, is used to discuss any prehistoric or historic district, site, building, structure, object, or TCP, regardless of its National Register eligibility.

The licensing of the Project is a federal undertaking and compliance with the NHPA is required. For historic properties, appropriate study areas are defined by regulations under 36 CFR § 800 as the area of potential effects (APE).

3.0 STUDY GOALS AND OBJECTIVES

The study goal is to meet FERC compliance requirements under Section 106 of the NHPA, as amended, by determining if relicensing of the Project will have an adverse effect on historic properties.

The objective of this study is to identify archaeological sites, historic architecture and TCPs within the APE, evaluate their eligibility for the NRHP, and identify Project-related effects on those resources.

4.0 STUDY AREA

Under 36 CFR 800.16(d), the APE is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historical properties, if any such properties exist." The Project Boundary will serve as the APE; however, the APE may be amended based on resource agency and or tribal consultation.

It is possible that current recreation, road, or other studies implemented as part of the relicensing process may identify areas outside the FERC Project Boundary that have potential to affect historic properties. It is also possible that the licensee may propose Project improvements that are outside the FERC Project Boundary. If such areas are identified by these studies or as Project improvements, the licensee will expand the APE in accordance with 36 CFR 800.4(a) (1) in consultation with FS and BLM, as appropriate, State Historic Preservation Office (SHPO), other appropriate agencies, Tribes, and interested parties. Appropriate cultural surveys will be completed as part of this study if the APE is expanded. As provided for in 18 CFR § 5.5(e), the licensee under separate cover has requested FERC to designate the licensee as FERC's non-federal representatives for purposes of initiating consultation under Section 106 of the NHPA and the implementing regulations at 36 CFR § 800.2(c)(4).

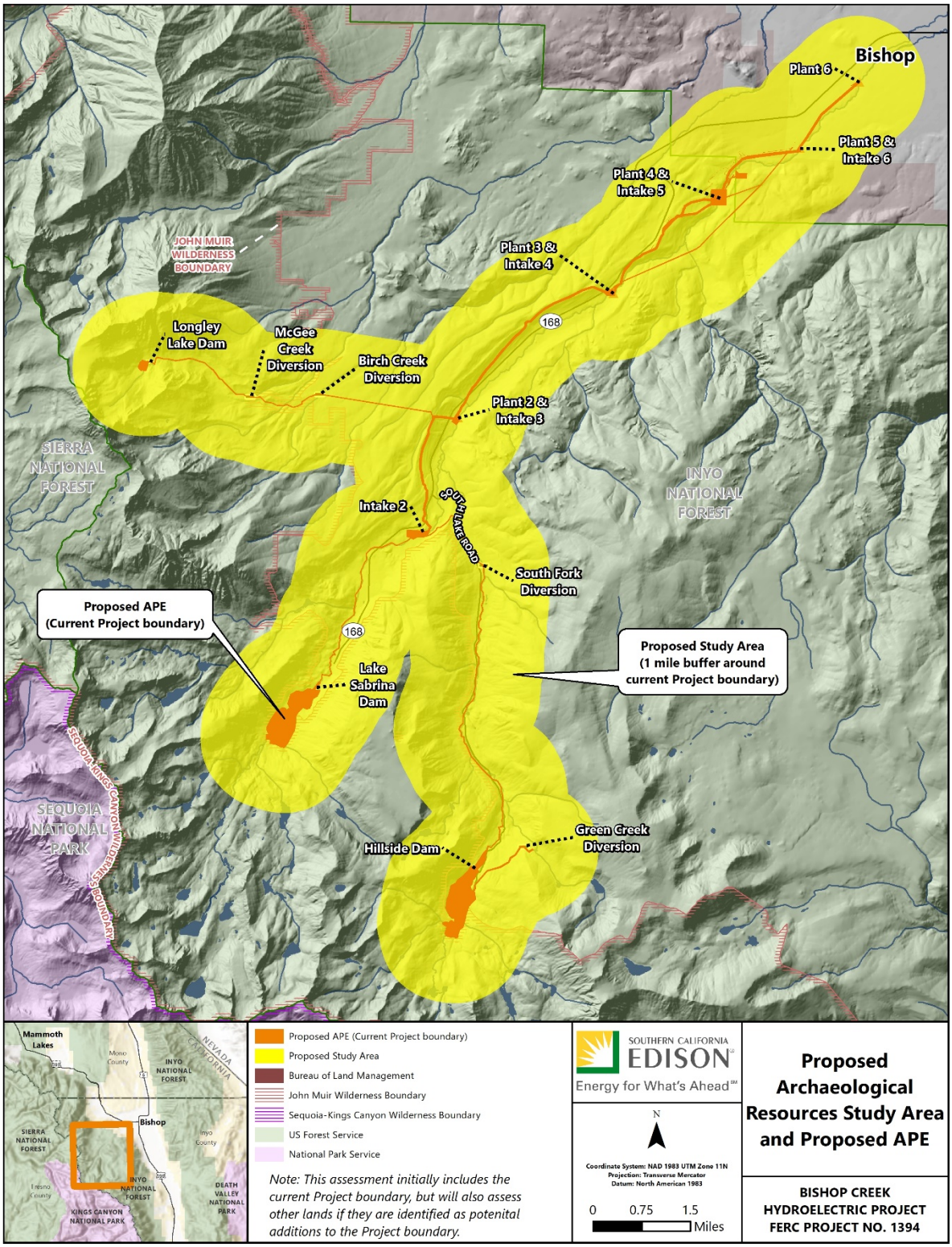

FIGURE 4-1 PROPOSED ARCHAEOLOGICAL RESOURCES STUDY AREA AND PROPOSED APE

5.0 EXISTING INFORMATION AND NEED FOR ADDITIONAL INFORMATION

The licensee conducted an initial search of records and maps on file at the FS, BLM, and the Eastern Information Center (EIC) of the California Historical Resources Information Center at University of California, Riverside. The purpose of this search was to gather existing information regarding previously recorded archaeological sites and historic architecture within the APE, and to assess which areas of the APE had been subjected to previous survey. The records searches include all lands within the FERC boundary plus a study area extending 1-mile around all Project features. For planning purposes, the study area extended beyond the Project APE to obtain existing information both within the APE and in the immediate adjoining area.

This research revealed that the Project area is highly sensitive for archeological and historic-era properties and that many areas within the Project have been subjected to previous surveys. However, the research also revealed that areas within the APE have not yet been surveyed and that some areas should be resurveyed to meet current professional standards. Therefore, to meet the study plan objective, additional information is needed. This study plan will be used to acquire that additional information.

Summary of Records Searches

Placeholder for the results of planned records searches

6.0 STUDY METHODS AND ANALYSIS

Study methods will consist of the following steps:

Archival Research

Information has been obtained from the EIC, FS, and BLM that identified previous cultural surveys and recorded archaeological and historic-era properties within or directly adjacent to the APE. Archival research will also be conducted at the repositories listed below to obtain additional information specific to the prehistory and history of the Project area, the hydroelectric system in whole, and its individual features. This may include contacting licensee employees, as appropriate, to gather feature-specific information. The results of the archival research will serve

as the basis for preparing the prehistoric and historic contexts against which archaeological and historic-era properties may be evaluated. Historical photographs located during the archival research will be cited in the text as figures and provided in a separate appendix unless they are subject to copyright laws. Previous NRHP evaluations of Project system features will be used as much as possible. The places to be contacted or visited shall include:

- California State Historic Preservation Office
- United States Forest Service, Inyo National Forest Ranger District
- United State Bureau of Land Management, Bishop Field Office
- Native American Heritage Commission
- Eastern Information Center, University of California, Riverside
- Bishop Creek Paiute, Cultural Center
- Southern California Edison, Rosemead Office
- Huntington Library, SCE Collection: Records, Documents and Photos

Develop Ethnographic Information

Obtain, compile, review, and summarize existing ethnographic information available for the Bishop Creek Watershed, including:

- ethnographic field notes from previous studies, as available;
- published ethnographic literature;
- ethnographic information held at various tribal repositories; and
- archival and historic photographs.

Conduct a Sacred Lands File search with the Native American Heritage Commission to determine if any known places of importance to Native American groups are present within the study area (i.e. the APE), or in the immediate vicinity.

Consult with appropriate Tribal representatives to identify properties, plants and other resources of traditional cultural or religious importance to Native Americans (including TCPs as discussed in National Register Bulletin No. 38) that may be present in the study area (*i.e*. the APE). This consultation effort will be limited to Tribes with direct historical ties to the lands located within the study area. Consultation may include a combination of written correspondence and follow

up interviews by a qualified ethnographer, depending upon the results of the initial literature review and research efforts.

Ethnographic information developed through this effort will be used to develop background and contextual information. Detailed information that is developed through this effort, especially information that identifies the location of sacred sites, TCPs and other culturally sensitive resources will be documented in a confidential technical report that will only be submitted to select Tribal representatives and resource agencies.

Field Survey

Based on the existing data described above, FERC is required to make a reasonable and good faith effort to identify historic properties that may be affected by the Project. As described at 36 CFR § 800.4(b)(1), this may be accomplished through sample field investigations and/or field surveys that are implemented in accordance with the Secretary of the Interior's Standards and Guidelines for Identification (NPS 1983). FERC is required to consider any other applicable professional standards and Tribal, state or local laws or procedures to complete the identification of historic properties.

To assist FERC in meeting its compliance obligations, and to develop appropriate management measures for historic properties identified within the APE, a field survey will be performed to verify locations of previously recorded cultural resources and to examine all accessible lands not previously surveyed or which were surveyed to less than adequate standards.

Areas within the APE that cannot be accessed in a safe manner (*e.g.*, certain locations containing dense vegetation, or unsafe slopes) will not be included within the survey or recording of archaeological and historic-era properties; these areas will be identified in the resulting survey report and an explanation for survey exclusion will be provided.

The field survey will be conducted by qualified, professional archaeologists (*i.e.*, individuals who meet the Secretary of the Interior's Professional Qualifications for Archaeology). The purpose of the field survey is to: 1) examine lands which have not been previously surveyed; 2) examine lands previously surveyed but where the field strategy is unknown; and 3) examine lands previously surveyed but for which the field strategy does not meet current professional

standards, as defined in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (NPS 1983). If conditions allow, lands will be examined that are typically inundated by Project reservoirs, but which may become accessible during the survey season as a result of normal reservoir drawdowns.

Locations of previously recorded cultural resources will be verified, and the sites re-recorded only if their existing site records or other documentation do not meet current standards for recording, or if the condition and/or integrity of the property has changed since its previous recording. Newly discovered cultural resources, including isolated finds, will be fully documented following the recordation procedures outlined in Instructions for Recording Historical Resources (OHP 1995), which utilizes State of California, Department of Parks and Recreation (DPR) forms DPR 523 A-L. A sketch map for each site recorded or re-documented will be drawn to-scale and the property photographed. The locations of all archaeological sites and isolates documented during the survey will be plotted by the licensee cultural resources specialist or cultural consultant onto the appropriate United States Geological Survey (USGS) 1:24,000 scale (7.5 minute) topographic map at the time of discovery. Field personnel will use a global positioning system (GPS) receiver to document the location of cultural resources (including isolates) recorded during the survey, which will be plotted onto the appropriate USGS 7.5-minute topographic quadrangle using the Universal Transverse Mercator (UTM) coordinate system. GPS data collection will adhere to the FS specifications for accuracy and site-specific procedures. Additionally, the areas examined will be plotted onto the appropriate USGS 7.5-minute topographic quadrangle for comparison with previous survey coverage maps.

Archaeological surveys that occur on FS and BLM lands will require valid permits. Licensee, or, as appropriate, their consultants will obtain all required permits prior to the start of field work. Licensees will notify FS and BLM when field work is scheduled to begin. All artifacts encountered during the field survey will be left in place; no artifacts will be collected during the field survey.

Historic-Era Inventory of Project System Features

A field inspection, documentation, and subsequent NRHP evaluation (see below) of the entire Project system will be undertaken by qualified, professional individuals meeting the Secretary of

the Interior Professional Qualifications for Architectural History. Individual components will be recorded or re-recorded to meet current DPR standards. This will include digital color photography and sketch maps of individual features that show the relationship of buildings within each compound or camp that may be associated with them.

Discovery and Treatment of Human Remains

Should human skeletal materials, burials and/or associated funerary objects be identified during the survey or other phases of the Project or prior to license issuance, they will be treated in accordance with California Health and Safety Code (CHSC) Section 7050.5(b). At the moment of discovery, all work in the immediate area will cease. Personnel responsible for the discovery will notify the licensee's Cultural Resources Specialist who in-turn, given that the skeletal materials are verified as human, will contact the County Coroner and a qualified archaeologist will be secured to evaluate the find to determine, in consultation with the coroner, if the remains are or are not Native American. The skeletal remains will be treated following CHSC Section 7050.5. If the human skeletal remains are Native American then FERC and the licensee's cultural resources specialist shall coordinate with the FS and BLM to comply with the Native American Graves Protection and Repatriation Act (NAGPRA) pursuant to 25 U.S.C. 3001 et seq.

National Register of Historic Places Evaluation

The licensees shall utilize the results of the field survey to prepare, in collaboration with FS, BLM, Tribes, and other relicensing participants, a plan to evaluate the eligibility of potential historic properties for the NRHP. The plan will include an assessment of past, present and reasonably foreseeable Project effects on potential historic properties and detail the methods of evaluation to be implemented. The evaluation plan will be provided to FS, BLM, Tribes, and other relicensing participants for review 30 days prior to submitting to SHPO.

For prehistoric sites, the plan will include procedures for the recovery of cultural patrimony artifacts or other sensitive items in consultation with participating Tribes. Additionally, during test excavations at prehistoric sites or sites with a prehistoric component, reasonable compensation shall be provided for Tribal monitoring.

Historic-era archaeological sites that do not contain prehistoric deposits will be formally evaluated for the NRHP. Subsurface test excavation may be appropriate at historical archaeological properties and may be undertaken if evaluations are not feasible otherwise. Formal evaluations of archaeological sites within the APE will utilize the National Register criteria, which are defined in 36 CFR 60.4, and which include the following:

National Register Criteria for Evaluation. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

a. that are associated with events that have made a significant contribution to the broad pattern of our history;
b. that are associated with the lives of persons significant in our past;
c. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
d. that have yielded, or may be likely to yield, information important to prehistory or history.

Evaluation of Historic Project System Features

Previously evaluated systems or individual features will not be re-evaluated unless substantial changes in their conditions have been observed and documented during the study. If deemed appropriate by a qualified, professional cultural resources specialist, individual features may be evaluated together as a district.

All previously unevaluated Project features will be formally evaluated for eligibility to the NRHP. The evaluation will consist of three tasks: 1) a historic context for the APE will be developed through archival research; 2) each feature will be examined and the level of integrity estimated, both individually and as an element of the Bishop Creek Hydroelectric Historic District; and 3) the historical information and the physical site data obtained during background and field research will be used to evaluate the eligibility of each Project feature individually and as part of a the historic district.

Reporting and Historic Properties Management Plan

A summary of the non-confidential information and findings will be reported in the Initial Study Report and will be include in Exhibit E of the license application. Both FERC and SHPO require detailed reporting to demonstrate compliance with Section 106 of the NHPA. SCE anticipates FERC will enter into a Programmatic Agreement with the Advisory Council on Historic Preservation (ACHP), SHPO, and any other agencies or entities FERC elects to include, and it would call for the completion and implementation of a Historic Properties Management Plan (HPMP).

The HPMP will be included in the final license application and will require the avoidance and protection of specified cultural resources, wherever possible. Processes and procedures will be developed for general and site-specific treatment measures. Moreover, the HPMP may identify measures to be taken should impacts to resources be unavoidable.

Coordination with Other Studies

To the extent feasible, SCE will coordinate cultural resources field studies with other Project-related environmental studies (*i.e.*, habitat surveys) and conduct them in a manner that does not affect other sensitive natural resources. When conducting cultural resources investigations, Project sponsors and/or their contractors should not violate other federal or state laws or regulations protecting natural resources including, but not limited to, the Endangered Species Act and the Clean Water Act. Project sponsors should consider that Tribes may utilize natural resources for subsistence or specific ceremonial uses and should avoid impacting those uses or events while conducting studies.

7.0 SCHEDULE AND REPORTING

Archival research and records searches will be completed by the fall of 2018 to assist in scoping the effort. Following FERC's anticipated study plan determination in early 2020, it is anticipated to implement the first field season in 2020. FERC's ILP requires an initial study report 1 year following the determination. This provides opportunities to review results and as necessary adjust scope and methods. Follow up work will be scheduled for 2021, if needed.

8.0 REFERENCES

To be added.

APPENDIX A: Study Plan Consultation Record

Appendix A

Study Plan Consultation Record

This study plan has been developed in consultation with the Bishop Creek Cultural Resources Technical Working Group (TWG). The intent of the consultation process is to achieve consensus, to the degree possible, on the need for specific studies, the key resource questions to be addressed by the studies, and the appropriate methodology and level of effort for the study.

This appendix summarizes the key consultation milestones for each study plan (Table 1), and how Southern California Edison Company (SCE) has addressed comments received through the consultation process. Table 2 is a Response to Comments Table for comments received from stakeholders, and how comments have been addressed in the final study plan. Where stakeholder comments requests have not been incorporated, Table 2 provides a rationale based on Project specific information and Federal Energy Regulatory Commission's (FERC) Study Plan Criteria (18 Code of Federal Regulation [CFR] § 5.9).

TABLE 1 KEY STUDY PLAN DEVELOPMENT MILESTONES AND TECHNICAL WORKING GROUP PLANNING SCHEDULE

DELIVERABLE	MATERIAL DISTRIBUTED	MEETING TYPE	TWG MEETING DATES	PROPOSED DATES FOR COMMENTS
Project Description	5/25/2018	TWG	6/4/2018, 6/5/2018, and 6/7/2018	7/9/2018
Annotated Study Plans, Goals, Objectives	7/26/2018	TWG	8/14/2018 and 8/15/2018	8/31/2018
Draft Study Plans	9/17/2018	TWG	10/9/2018 to 10/11/2018	10/26/2018
Final Study Plans	11/15/2018	TWG	12/4/2018 to 12/6/2018	1/7/2019

TABLE 2 SCE RESPONSES TO COMMENTS RECEIVED ON STUDY PLANS

COMMENT NO.	DATE OF TWG MEETING	ENTITY	COMMENT	SCE RESPONSE