Cultural Resources Management Plan

# List of Tables

[O&M Activity Classes, CRSP Results, and Finding of Effect.](#_bookmark12)

[Standard Study Areas](#_bookmark14)

# List of Attachments

List of Attachments to consider:

SHPO Letter and Concurrence

Tribal Consultation Letter

Cultural Resource Field Office Specific

Permit for Archaeological Investigations and Fieldwork Auth Permit

Cultural Resource Inventory Report

Cultural Resource Monitoring Report Template

Data Sharing Agreement

Contractor Annual Report Template

# List of Acronyms

**List of common acronyms for use, please add or delete as appropriate**.

|  |  |
| --- | --- |
| ACHP | Advisory Council on Historic Preservation |
| AIRFA | American Indian Religious Freedom Act |
| APE | Area of Potential Effect |
| ARPA | Archaeological Resources Protection Act |
| BLM | Bureau of Land Management |
| BLM CR Staff | Bureau of Land Management Cultural Resources Staff |
| BMP | Best Management Practice |
| CFR | Code of Federal Regulations |
| CHRIS | California Historical Resources Information System |
| CHRSM | Cultural Heritage Resource Sensitivity Model |
| Consultant CRS | Consultant Cultural Resource Specialist |
| CRIR | Cultural Resource Inventory Report |
| CRMP | Cultural Resources Management Plan |
| CRS | Cultural Resource Specialist |
| CRSP | Cultural Resources Screening Process |
| DOI | Department of Interior |
| DSA | Data Sharing Agreement |
| DPO | Deputy Preservation Officer |
| DPR | Department of Parks and Recreation |
| EO | Executive Order |
| EPA | Environmental Policy Agency |
| ESA | Environmentally Sensitive Area |
| FLPMA | Federal Land Policy and Management Act of 1976 |
| FM | Field Manager |
| FR | Federal Register |
| FR | Federal Register |
| FWA | Fieldwork Authorization |
| GIS | Geographic Information System |
| MOA | Memoranda of Agreement |
| NAGPRA | Native American Graves Protection and Repatriation Act |
| NAHC | Native American Heritage Commission |
| NCRIMS | National Cultural Resources Information Management System |
| NCSHPO | National Council of State Historic Preservation Officers |
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| nPA | National Programmatic Agreement with the BLM, ACHP, and NCSHPO |
| NRHP | National Register of Historic Places |
| O&M | Operations and Maintenance |

|  |  |
| --- | --- |
| O&M Plan or Plan | Utility Operations and Maintenance Plan |
| PAI | Permit for Archaeological Investigations |
| POC | Point of Contact |
| Protocol | BLM California State Protocol Agreement |
| ROW | Right of Way |
| RPM | Resource Protection Measure |
| SHPO | State Historic Preservation Officer |
| SD | State Director |
| SOI | Secretary of the Interior |
| SSA | Standard Study Area |
| TD | Transmission/Distribution Project Number |
| Utility CRS | Utility Cultural Resources Specialist |

Cultural Resources Management Plan

# Overview

This Cultural Resources Management Plan (CRMP) serves as a nexus between the *State Protocol Agreement* [*1*](#_bookmark2)(Protocol) and the Utility Operations and Maintenance Plan (Plan). The Plan is a term and condition of Utility right-of-way (ROW) grants, to ensure compliance with Section 106 of the National Historic Preservation Act (NHPA) and other applicable laws, regulations, and BLM- specific policies. The CRMP includes the Cultural Resources Screening Process (CRSP) for utility operations and maintenance (O&M) activities on Bureau of Land Management (BLM)-administered lands within the specific state. This is a comprehensive plan coordinated with all parties. Below is a sample plan to guide development of specific cultural resource management plans.

The Protocol serves as the agreement between BLM State and the State name State Historic Preservation Officer (SHPO), that BLM State will meet its responsibilities under the NHPA through the Protocol as provided for in the national *Programmatic Agreement* (nPA)[,3](#_bookmark4) rather than by following the procedure set forth in 36 Code of Federal Regulations (CFR) § 800.3 through 36 CFR § 800.7 for many undertakings. The CRMP follows the structure of the Protocol and enables the BLM to demonstrate compliance by implementing a process to manage historic properties in the context of authorized Utility O&M activities (O&M activities).

In consultation with Utilities, Tribes, and the SHPO, the BLM developed conditions for Class 2 inventory and Class 3 intensive field survey[4](#_bookmark5) (Stipulations add Stipulation and made a subsequent finding of no adverse effect on historic properties (Stipulation add stipulation, CRMP Section add section ). The BLM SHPO consultation letter and SHPO concurrence are found in CRMP Attachment add attachment During the term- year term of the ROW grants, the BLM will uphold the finding of no adverse effect on historic properties through conditions established to avoid and minimize potential effects caused by O&M activities (CRMP Section add section). These conditions are codified in this CRMP, are compliant with applicable Protocol stipulations, and are valid for the life of the ROW grants. The CRMP may be modified as needed during scheduled Plan review (CRMP Section add section).

The collaborative effort to perform the CRSP, oversee CRMP conditions, and ensure compliance with applicable laws and regulations, requires a team of stakeholders including Utility cultural resource specialists (Utility CRS), Consultant cultural resource specialists (Consultant CRS), and BLM Cultural Resource (CR) Staff (CRMP Section add section). Utility and Consultant CRSs will operate under a BLM-

issued Permit for Archaeological Investigations (PAIs) and Fieldwork Authorizations (FWAs) to provide the BLM with supporting documentation for review of O&M activities and regulatory compliance.

## Undertakings [36 Code of Federal Regulations (CFR) Part 800.16 (y)]

This paragraph applies if proposing ROW consolidation.

The BLM defines the undertakings as the issuance of Utility ROW grants, along with the approval of the accompanying the Plan as a term and condition of the grants. As appropriate, each BLM Field Office (Field Office) will issue one new consolidated ROW grant for existing transmission facilities and access roads (hereafter “roads”) and one new consolidated ROW grant for existing distribution facilities and roads for each Utility. The separate undertakings will be referred to as “undertakings” for the purpose of the CRMP.

# Description of O&M Activity Classes

This section provides an overview of standard, regulatory-driven O&M activity classes (Class I, II, and III) and how they are performed in compliance with the Protocol and applicable state and federal laws and regulations governing the safe and reliable delivery of electricity. See Section add section and Appendix add appendix of the Plan for further details.

The process to identify the proper O&M activity class includes two steps. The first step is when the scope of the O&M activity is defined. The second step is when the CRSP is performed to determine whether cultural resources are present. This O&M activity classification framework uses roman numerals to differentiate itself from cultural resource inventory classes and is defined in the Plan (Plan Section add section) and below in CRMP Sections add section.

The Protocol-defined cultural resource inventory classes (Stipulations add stips) will use Western Arabic numerals (2, 3) and be referred to as “Class 2 inventory,” and “Class 3 intensive field survey,” respectively. See CRMP Sections add stips for additional information.

## Class I Activities [Plan Section add section]

Class I activities have no or very limited (*de minimis*) potential to cause effects to historic properties due to limited scope and duration, location, and/or the application of Best Management Practices (BMPs). Class I activities are further described in Appendix Click or tap here to enter text.and Section Click or tap here to enter text.of the Plan. These activities occur at regularly scheduled intervals or as needed, and no historic properties are anticipated to be affected. Class I activity notifications occur during BLM/Utility annual meetings with details compiled in the Utility annual report (CRMP SectionClick or tap here to enter text.).

## Class II Activities [Plan Section add section]

Class II activities do not have cultural resources in the O&M activities’ Standard Study Areas (SSA, Table add table) and may include, but are not limited to, pole or tower repairs or replacement, internal shoo-fly/inter-set installations, line reconductoring, road grading, and vegetation maintenance such as tree felling, vegetation mastication, and ROW clearing. Class II activities are further described in Appendix add appendix reference and Section add section of the Plan. The need for these activities is identified primarily from

Class I inspections and patrols, and the work is conducted in accordance with state and federal regulatory requirements and timelines. BLM approval is not required prior to Class II activities. A Cultural Resources Inventory Report (CRIR, CRMP Attachment add attachment number) is submitted as part of a complete work package (CRMP Section add section)

## Class III Activities [Plan Section reference section]

Class III activities have cultural resources in the SSA or other situations that warrant BLM notification and require BLM CR Staff to review a CRIR and confirm no adverse effects to historic properties prior to the O&M activity (Plan Section reference section, Table reference table). BLM CR Staff may also confirm CRIR results with the BLM Field Manager (FM). Review and approval of a CRIR is required prior to the O&M Activity and may result in modified or additional Resource Protection Measures (RPMs,Table reference table).

Review of Class III activities is also required under 43 CFR § 2807.11(d), which affords the BLM an opportunity to *review site-specific circumstances or conditions resulting in the need for changes to an approved right-of-way grant or lease, [Plan of Development] POD, site plan, mitigation measures, or construction, operation, or termination procedures that are not substantial deviations in location or use authorized by a right-of-way grant or lease.* The BLM may manage the review of this *site-specific circumstance* in accordance with 43 CFR § 2807.11(b) or 43 CFR § 2807.11(d) as a separate federal undertaking if certain conditions are met (e.g., O&M activity is located outside of the Area of Potential Effect [CRMP Section section]).

A Class III activity’s effect to a historic property does not elevate to the level of adverse effect when there is no change to the character defining features of the property that qualify it for listing in the National Register of Historic Places (NRHP), in accordance with Protocol Stipulations add stipulation reference , and 36 CFR § 800.5(b).

## Conditional Class III Activities [Plan Section add section]

Conditional Class III activities are O&M activities where additional BLM analysis is needed, such as an O&M activity with the potential to adversely affect a historic property. In this situation, the BLM and Utility will first exhaust all resource avoidance and minimization options. If there is potential for an adverse effect, the BLM will manage the review of this *site-specific circumstance* (43 CFR § 2807.11[b] or 43 CFR § 2807.11[d]) as a separate federal undertaking. The FM will then apply the Criteria of Adverse Effect, which may include consultation with SHPO (Stipulation add stipulation), Tribes, and other consulting parties, to determine whether the proposed undertaking may directly or indirectly alter those characteristics in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association (36 CFR § 800.5[a][1]).

The BLM will document this finding according to Protocol Stipulation add stipulation. If the SHPO concurs with the BLM’s finding of adverse effect, the BLM will proceed under 36 CFR § 800 to resolve those effects. The Utilities will support that process by helping the BLM develop and implement a Memorandum of Agreement (MOA)/Historic Property Treatment Plan, which will address the current adverse effect and potential adverse effects to the same historic property from future O&M activities.

**Example Table of O&M activity classes and cultural findings**

**Table 1. O&M Activity Classes, CRSP Results, and Finding of Effect**

**O&M Activity Classes and the Cultural Resources Screening Process**

|  |  |  |  |
| --- | --- | --- | --- |
| **O&M Activity Class** | **CRSP Results** | **BLM Approval Required Prior to O&M Activity** | **Finding of Effect** |
| Class I | Not performed | No | Meets conditions for Undertakings’  Finding of No Adverse Effect |
| Class II | No Cultural Resources in SSA | No | Meets conditions for Undertakings’  Finding of No Adverse Effect |
| Class III | Cultural Resources in SSA\* | Yes | Meets conditions for Undertakings’  Finding of No Adverse Effect |
| Conditional Class III | Cultural Resources in SSA | Yes | Potential for Finding of Adverse Effect as Separate Undertaking |

\*O&M activities may be Class III activities if:

1. the O&M activity requires SSA modification (CRMP Section),
2. the O&M activity falls outside the Area of Potential Effect (CRMP Section),
3. Consultant CRSs encounter limiting field conditions and cannot make an informed decision (CRMP Section), or
4. Consultant CRSs are recording a cultural resource that extends beyond BLM jurisdiction (CRMP Section).

## Area of Potential Effects [36 CFR § 800.16(d) and Stipulation X]

The BLM defined the Area of Potential Effects (APE) for each undertaking as the utility ROW corridors and buffer (e.g., 200 feet wide for transmission and distribution) and road corridors and buffer, averaging add dimensions ft wide, ranging from add dimensions ft wide. The APE corridor widths include those areas near ROWs and roads where the Utilities are reasonably expected to operate. The Field Office-specific ROW APE width is found in CRMP Attachment add attachment. The roads APE dimensions are the current road width

(add dimensions feet wide), with add dimensions-foot berms on either side where applicable, and a add dimensions-foot buffer on either side of road prism or berm edge. These roads APE dimensions are the same for all Field Offices.

Routine O&M activities authorized under the ROW grants are assigned Standard Study Areas (SSAs) within the APE that are subject to Class 3 intensive field survey to inventory for historic properties. SSAs are activity-specific areas within utility ROWs, roads, and those areas near ROWs where the Utilities are conducting permitted activities. The SSA uniform dimensions are the same for O&M activities across Utility service territories and were approved by the BLM as adequate dimensions to encompass O&M activity ground disturbance as it relates to cultural resources inventory. Table add table reference includes routine O&M activities and associated SSAs. While the formal identification of cultural resources was completed using a Class 2 inventory strategy (CRMP Section), these SSAs may need Class 3 intensive field survey on either a case-by-case basis or as part of a larger Field Office inventory.

If an O&M activity requires an SSA modification, it will be submitted as a Class III activity. The Class III activity is then subject to BLM CR Staff review and approval prior to the O&M activity. Additional SSAs for routine O&M activities may be added to the CRMP as needed with concurrence from BLM CR Staff, Utilities, and the appropriate authorized officer as part of the Plan revisions process (Plan Section add section, CRMP Section add section).

**Example table of Standard study areas**

**Table 2. Standard Study Areas**

**Operations and Maintenance Activity Standard Study Area**

Electrical facility repair/replacement (e.g., towers, poles, shoo-fly, conductor, communications)

Existing underground repair/replacement (e.g., vaults, conduits)

-foot (-meter) radius -foot (~-meter) radius

Hazard tree felling Radius equal to height of hazard tree + feet

Overland travel to feet (~to ~ meters) off center line Routine and minor road maintenance Road prism with -foot berms on either side

where applicable and ft. buffer on either side

If an O&M activity is located outside the APE, it will be submitted as a Class III activity and the BLM will manage it as a separate federal undertaking in accordance with 43 CFR § 2807.11(b) or 43 CFR

§ 2807.11(d) (CRMP Section add section). In that situation, the undertaking shall be subject to the provisions of the Protocol or 36 CFR § 800. When applicable, the undertaking may be treated as an exempt undertaking under the Protocol (Protocol Appendix add appendix).

## Roles and Responsibilities

### BLM Field Manager [Stipulation add stipulation]

The FM concurs with recommendations and determinations developed by BLM CR Staff, including but not limited to, determinations of the APE, determinations of NRHP eligibility, and finding of effects. The FM also initiates formal consultation with the SHPO, executes MOAs and Treatment Plans for adverse effects to historic properties, represents the United States in government‐to‐ government meetings with Tribes at the Field Office level, and establishes working relationships with Tribal officials.

### BLM Cultural Resources Staff [Stipulation add stipulation]

BLM CR Staff are the designated coordinators and leads for cultural resource management activities described in the Plan. BLM CR Staff are responsible for following the Plan, including adhering to established activity notification package timelines (Plan Section add section), participating in scheduled communications, maintaining cultural resource records and associated spatial data of previous approvals, assisting in revisions to the Plan, and overseeing the cultural resources data sharing for BLM (CRMP Section add section). BLM CR Staff also define APEs consistent with CRMP Section add section, review Utility-defined SSAs, determine NRHP eligibility of historic properties, make findings of no historic properties affected and/or no adverse effect to historic properties, and maintain cultural resource records.

##### Consultant Cultural Resource Specialists

Consultant CRSs comply with their PAI and FWA. They facilitate the CRSP, document cultural resource inventories and site recordations in accordance with the Protocol, and may serve as archaeological monitors. Consultant CRSs also comply with confidential cultural resources data requirements and provide recommendations on RPMs, NRHP eligibility, and effects to historic properties.

##### Utility Personnel (Employees and Utility Contractors)

Utility CRSs and other Utility Personnel will comply with the CRMP, participate in scheduled communications, assist in revisions to the Plan, and provide BLM CR Staff and FMs with appropriate data to make informed decisions. Utility CRSs serve as Points of Contact (POC) between the BLM and other Utility personnel. O&M work contractors comply with and implement RPMs and BMPs in the Utility Environmental Requirements Document, which may include working directly with Consultant CRS archaeological monitors to avoid effects to historic properties.

### Tribal and Public Engagement [Stipulations add stipulation

The BLM conducted tribal consultation on the Utility grant undertakings by following the processes outlined in Protocol Stipulation add stipulation. (CRMP Attachment add attachement). Any tribal consultation results the Tribes agreed to share were conveyed to the Utilities to ensure tribal concerns/interests are represented throughout the ROW grants’ terms.

The BLM may perform additional tribal consultation in the event adverse effects cannot be ruled out by BLM CR staff during Conditional Class III activity-specific review and approval (Protocol Stipulations add stipulation. BLM will manage this O&M activity as a separate federal undertaking in accordance with 43 CFR § 2807.11(b) or 43 CFR § 2807.11(d) (CRMP Section add section). These separate undertakings result in a BLM finding of adverse effects to historic properties (Stipulation add stipulation; 36 CFR § 800.5[a][1]).

##### Public Involvement [StipulationClick or tap here to enter text.]

Public comment and input were solicited as part of the BLM’s National Environmental Policy Act (NEPA) scoping process for the Categorical Exclusions issued to the Utilities for ROW renewal and consolidation (43 CFR § 46.235).

### Archaeological Permitting

In support of O&M activities, all Consultant CRSs will maintain active State Name State Office-issued PAIs and obtain FWAs, pursuant to the respective PAIs, from the appropriate Field Office(s). Utility CRSs will also have active PAIs and obtain FWAs as appropriate.

##### Permit for Archaeological Investigations Modifications

Under BLM policy (Manual 8150), the BLM State Director (SD) (or his/her delegate) has authority to modify a PAI whenever essential management considerations have changed, including modification of any pertinent State-specific permit condition. Modifications may be needed to facilitate data sharing, reporting, and other requirements of this Plan. The BLM State name State Office (CASO) is encouraged to continue to modify PAIs in a manner that facilitates implementation of the Plan.

Template PAI language is located in CRMP Attachment add attachment.

##### Fieldwork Authorizations

PAI Standard Condition reference condition and BLM State Condition reference condition require consultants to obtain FWAs from the pertinent Field Office(s) prior to starting fieldwork under the consultant’s PAI. Field Offices are encouraged to issue 3-year blanket FWAs covering all O&M activities authorized under the ROW grants, rather than FWAs specific to each O&M activity involving cultural resources fieldwork. Field Offices are also encouraged to renew blanket FWA permits at 3-year intervals in alignment with PAI renewals. Blanket FWAs cannot exceed the essential conditions of a consultant’s PAI such as the permit’s expiration date, geographic scope, nature of work, and listed Field Directors and Principal Investigator, unless approved in advance by the BLM State office. A permittee will not be issued a blanket FWA without a current PAI. Template blanket FWA language may be found in CRMP Attachment Attachment.

### Class 2 Inventory [Stipulation x]

The CRMP uses protocol-defined cultural resource inventory classes (Stipulations X) identified with numbers (Class 2 inventory and Class 3 intensive field survey), in contrast to the roman numerals used to denote O&M activity classes (CRMP Section X). See CRMP Section X for additional information on Class 3 intensive field survey.

The BLM used a statistical analysis of existing adequate survey coverage (CRMP Section X) and Indigenous and historic-period resource sensitivity models to perform a Class 2 inventory of the entire APE as the reasonable and good faith identification effort of the undertakings. Class 2 inventory is defined as “statistically based sample surveys designed to aid in characterizing the probable density, diversity, and distribution of cultural properties in the area, to develop and test predictive models, and to answer appropriate research questions” (Stipulation X). The statistical analysis and sensitivity models comprised the two parts of the Class 2 inventory and are both described further, below. SHPO concurrence on the Class 2 inventory, which included no new Class 3 intensive field survey, is in CRMP Attachment X.

In addition to the BLM’s Class 2 inventory, the Utilities will perform Class 3 intensive field survey (Stipulation X) to confirm the presence/absence of cultural resources in the SSAs. Class 3 intensive field survey will be performed on an individual activity-specific basis, Field Office-wide, or circuit- wide by an archaeologist who meets BLM professional qualification standards (BLM Manual 8150.12[B][2]). See CRMP Section Xfor a description of the CRSP and how Class 3 intensive field survey will be implemented.

##### Existing Survey Statistical Analysis

Existing adequate Class 3 intensive field survey coverage (CRMP Section X) was compiled and analyzed at a Field Office-level as the first part of the Class 2 inventory. This analysis found that the existing adequate Class 3 intensive field survey coverage represented a randomized, statistically confident, and statistically significant representative sample of the APE.

##### Cultural Resource Sensitivity Models

The BLM used sensitivity models for the second part of the Class 2 inventory to identify historic properties within the APE. The models were Field Office-specific and created with tailored, regional search parameters that utilized environmental variables such as slope, distance to freshwater features, and hydrologic filtering. The BLM used these models and existing regional cultural resource datasets to identify Field Office-specific levels of cultural sensitivity within the APE. The

sensitivity models’ output then forecasted the probability of encountering Indigenous and historic- period cultural resources within the APE.

The BLM generated these sensitivity models specifically for the Class 2 inventory of the

undertakings’ APE. Following the creation of the sensitivity models, the models’ input and output data were provided to the BLM CR Staff. The BLM CR Staff may share the models’ results with Utility and Consultant CRSs under an executed Data Sharing Agreement (CRMP SectionClick or tap here to enter text., CRMP AttachmentClick or tap here to enter text.). The BLM also may use the models’ output to coordinate with the Utilities on Class 3 intensive field survey strategies. The sensitivity model results may not be used as a replacement for Class 3 intensive field survey of an SSA.

Indigenous Resources Model

The Indigenous resources sensitivity model was generated through the BLM’s National Cultural Resources Information Management System (NCRIMS) web application, an application designed to conduct landscape-level suitability analyses for planning purposes. Within NCRIMS, the Cultural Heritage Resource Sensitivity Model (CHRSM) platform utilizes predictive modeling to incorporate expert knowledge and environmental or evidentiary data for identifying areas with a higher likelihood of containing cultural resources. The CHRSM accepts a series of cultural datasets to provide consistent and repeatable spatially explicit analyses of landscape characteristics as they relate to cultural resources (NCRIMS User Manual). The model outputs help inform management decisions regarding the protection of historic properties.

The Indigenous resources sensitivity model, generated through the CHRSM platform to support the Class 2 inventory, weighed the influence of environmental factors to assign levels of cultural sensitivity within the APE. While the computation factors were pre-programmed into the CHRSM platform, there were three user-defined environmental variables that contributed to assigning levels of sensitivity: slope, hydrological characteristics, and hydrologic filtering. The model’s levels of sensitivity represented the probability of encountering Indigenous resources. In general, areas that exhibited a higher sensitivity for Indigenous resources were those that were flatter (lower slope percentages) and were closer to designated water features.

The BLM used Field Office-specific regional templates to populate the sensitivity model. The regional templates were portions of the APE that had been split into pre-defined eco-regions (as defined by the US Environmental Policy Agency [EPA] Level IV). These regional templates had designated user-defined variables, pre-assigned for the BLM to enter when running the CHRSM program. The CHRSM results were tested using existing known Indigenous resource locations.

The model input and output data were provided to the BLM CR Staff. The BLM CR Staff may share the models’ results with Utility and Consultant CRSs under an executed Data Sharing Agreement (CRMP Section X, CRMP Attachment X).

Historic Period Resource Model

The BLM generated a historic-period resources model using existing historic-period cultural resource locations, historic maps (e.g., General Land Office township plats of mining surveys), hydrologic features, and other regional data to identify the probability of historic-period resource presence within the APE. Areas that exhibited a higher sensitivity for historic-period resources were those that were closer to known historic-period resources and to designated water features.

Future Targeted Survey

The models’ outputs also provide a statistical method to prioritize additional Class 3 intensive field survey that may be conducted on an individual O&M activity or whole-circuit basis. The BLM requires all areas subject to Utility Class II, Class III, and Conditional Class III O&M activities (regardless of whether they are high or low probability areas) be screened for cultural resources in advance of the O&M activity and receive Class 3 intensive field survey if the existing survey coverage does not meet the adequate survey conditions (CRMP Section X).

### Cultural Resources Screening Process

In accordance with Protocol Stipulation X, the SSA will be screened for cultural resources prior to O&M activities. The CRSP begins with determining whether the SSA was previously adequately inventoried (CRMP Section X), and if so, whether cultural resources are present and avoidable. The following sections describe the CRSP fundamental components and how the different O&M activity classes are managed to demonstrate compliance with the Protocol. The CRSP for each O&M activity class is illustrated in Figure X.

##### Prior Identification and Adequate Survey [Stipulation X]

BLM CR Staff and Utility CRSs shall work together to develop criteria for prior adequate Class 3 intensive field survey, beginning with the criteria below. The intent of Class 3 intensive field survey is to locate and record all historic properties and produce a total inventory within an SSA. The BLM will determine the adequacy of existing Class 3 intensive field survey reports that the Utilities will use to demonstrate adequate survey coverage prior to the issuance of ROW grants. No additional identification efforts are required if the entirety of an SSA was subject to adequate Class 3 intensive field survey. Utility CRSs and BLM CR Staff will then share all survey reports that meet these criteria as part of the data sharing process (CRMP Section; CRMP Attachment X).

In deciding which previous survey is adequate, BLM CR Staff will consider the following as adequate Class 3 intensive field survey report criteria:

1. Inventory Date: consider a Field Office-specific date benchmark as a starter adequacy review point. BLM CR Staff may qualify or disqualify prior inventories at their discretion. The adequate survey date shall be included in the CRMP Field Office-Specific Attachment.
2. Inventory Methodology: survey must have accounted for Indigenous resources, historic-period resources, built-environment resources, and potentially properties of traditional religious and cultural significance.
3. Changes in Environmental Conditions: SSA has not been subject to wildfire, erosion, landslides, flood events, or other actions since the survey which may cause new exposure or natural destruction of cultural resources.
4. Quality: survey was performed by and/or supervised by a cultural resource professional(s) who meets BLM standards for archaeology (BLM Manual 8150.12[B][2]) and adhered to the required permit stipulations.
5. Spatial Data: survey report provides accurate mapping of the APE.

Prior adequate survey, approved by BLM CR Staff, is considered adequate for the life of the ROW grants, with the following exceptions:

1. Changes in environmental conditions (e.g., wildfire, shifting sands, landslides, etc.).
2. Changes in Secretary of Interior (SOI) standards.
3. Substantial change in technology and/or methodology.
4. Evolution of what is considered a historic property and/or eligible for the NRHP (i.e., negative surveys that may not be negative several years from present; revisiting a previously evaluated cultural resource).

##### New Inventory [Stipulations X]

If results of the CRSP indicate that prior adequate Class 3 intensive field survey of the SSA was not performed, Class 3 intensive field survey will be completed by the Utilities consistent with the SOI’s Standards and Guidelines for Archaeology and Historic Preservation (Protocol Stipulation Xand Part). All Class 3 intensive field survey performed under the Plan are good for the life of the ROW grants unless there are significant changes to land use within the ROW, or if any of the prior survey adequacy exceptions from CRMP Section X are applicable.

As part of the CRSP and per cultural resource permit stipulations, Consultant CRSs will notify the BLM to discuss options prior to fieldwork if the SSA includes limiting field conditions such as steep slopes (>X 0%) or other impediments that may prevent Class 3 intensive field survey. The notification shall be reasonably far in advance of the fieldwork and consist of the project details, record search results, and anticipated survey impediments. If limiting field conditions consist of access issues or safety concerns, it is generally recommended that fieldwork wait until access is no longer hindered or other safety concerns are resolved prior to conducting Class 3 intensive field survey. If limiting field conditions do not exist, the SSA is accessible and inventoried with negative findings, and a Consultant CRS can make a professional and informed decision regarding the presence of historic properties, it is submitted as a Class II activity for cultural resources.

If Consultant CRSs do encounter limiting field conditions (e.g., impenetrable vegetation, safety concerns) when attempting Class 3 intensive field survey and cannot make a professional and informed decision regarding the presence of historic properties, it will be submitted as a Class III activity. In situations where limiting field conditions are presented to BLM as a Class III activity, proposed and/or already-implemented identification procedures will be submitted for approval by BLM CR Staff prior to the O&M activity and may include the following:

1. Pre-work survey of the SSA.
2. Reconnaissance/cursory survey coverage (>30-meter transects) will be implemented where intensive field survey is not feasible (i.e., slopes >30%).
3. Inaccessible areas will be spot-checked to verify assumed conditions.
4. Binoculars may be used to locate visible cultural resources (e.g., structures, abandoned water conveyance features, mining features, and rock art).
5. Aerial visualization (i.e., light detection and ranging, unmanned aerial vehicles) may be used to identify areas with potential for cultural resources. BLM CR Staff permission is required prior to use.

All inventory methods must be conducted in accordance with Stipulations Xand Click or tap here to enter text.of the Protocol. Regional survey limitations, location-specific Class III activity RPMs, and other situational information are found in the Field Office-specific Attachment (CRMP Attachment X).

New Inventory Planning

When feasible, the Utilities are encouraged to perform circuit-wide or Field Office-wide Class 3 intensive field survey of the entirety of the APE for each undertaking. Circuit-wide Class 3 intensive field surveys shall be based on planned and prioritized O&M work per Field Office.

##### Class I Activity CRSP

Class I activities have a very low/no potential to cause effects on historic properties. The BLM made this determination based on the nature of the Class I activities performed. Class I activities will be jointly discussed by the Utility and the BLM at annual meetings, or more frequently as needed.

Further, Class I activities are performed by implementing applicable BMPs (Plan Appendix X). Should the nature of a Class I activity change to have the potential to affect historic properties, the activity will be managed as a Class II activity and subject to the Class II activity CRSP.

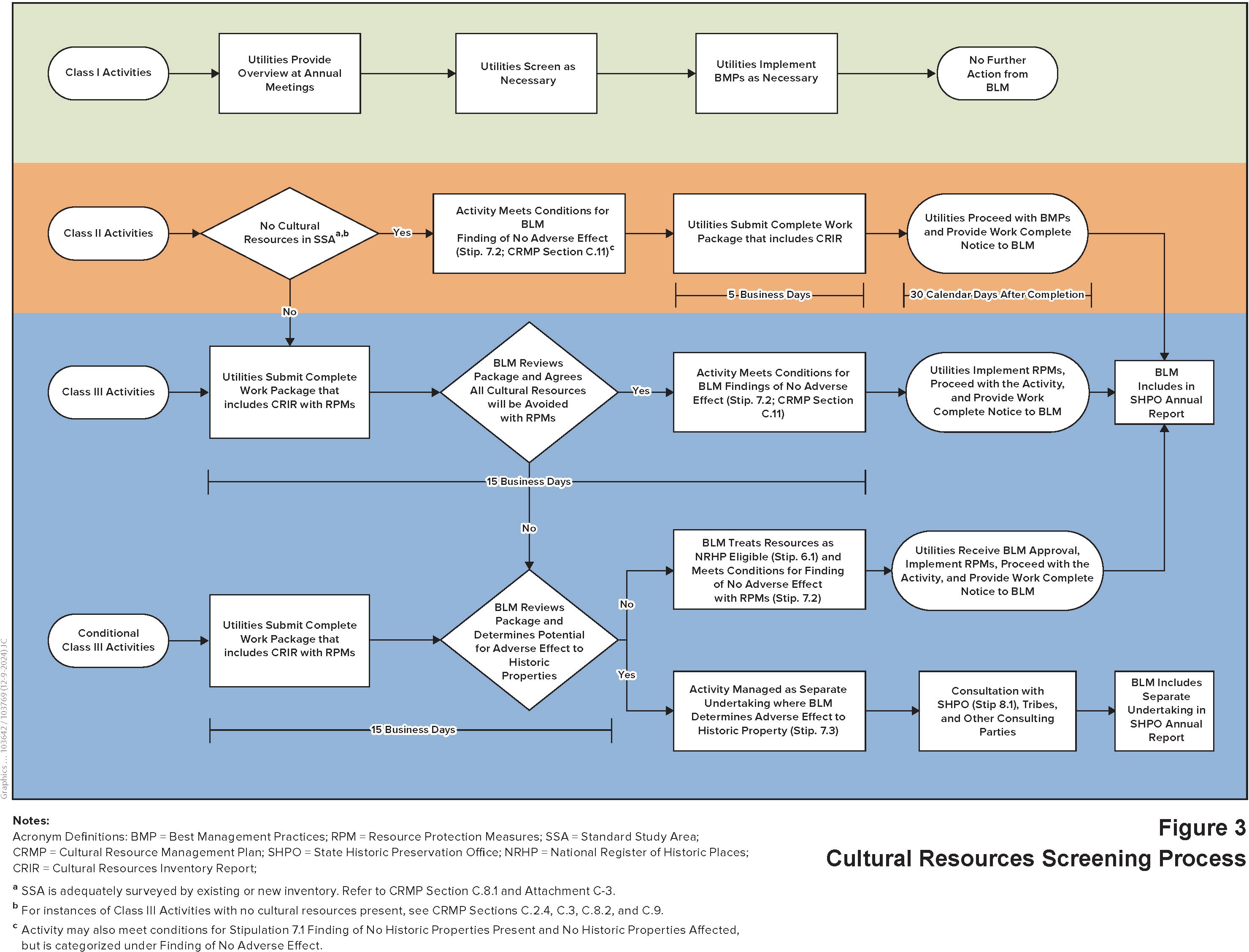
Class I Activity Deliverables

There is no notification prior to, or after, performing Class I activities. They are discussed during annual meetings, which also include Class I activity updates and future workload projections (Plan Section X).

##### Class II Activity CRSP

The CRSP for Class II activities begins with the desktop review of State Name State Historical Resources Information System (CHRIS) data and shared BLM cultural resources data, and review of prior adequate survey of the SSA. After desktop review is complete, the Utilities will either validate that BLM CR Staff have previously approved adequate survey of an SSA, perform new Class 3 intensive field survey, or a combination of the two.

Sample Figure of Cultural Resource Screen Process



Once the Class II activity desktop review of BLM shared geospatial cultural resources data (CRMP Section X) and CHRIS data is performed, the desktop review will result in one of five outcomes:

1. SSA is surveyed, the survey is adequate (CRMP Section X), and no cultural resources and/or BLM-determined NRHP-ineligible resources are present. The Consultant CRS will document findings in a CRIR for submittal to the BLM as part of a complete work package five business days prior to releasing the work.
2. SSA is partially surveyed, the partial survey is adequate (CRMP Section X), and NRHP ineligible resources[5](#_bookmark33) or no cultural resources are present. The Consultant CRS will complete Class 3 intensive field survey of the un-surveyed portions of the SSA. If no cultural resources are identified, the Consultant CRS will document findings in a CRIR for submittal to the BLM as part of a complete work package five business days prior to releasing the work.
3. SSA is surveyed, the survey is adequate (CRMP Section X) and cultural resources are present. The Consultant CRS will complete a CRIR documenting the desktop review findings and submit directly to the BLM CR Staff for review. This is a Class III activity, which requires BLM approval prior to O&M activities.
4. SSA is partially surveyed, the partial survey is adequate (CRMP Section X), and cultural resources are present. The Consultant CRS will confirm the status of known cultural resource(s), complete Class 3 intensive field survey of the un-surveyed portion of the SSA, document findings in a CRIR, and submit directly to the BLM CR Staff for review. This is a Class III activity, which requires BLM approval prior to O&M activities.
5. SSA is not surveyed. The Consultant CRS will complete a Class 3 intensive field survey of the SSA. If no cultural resources are identified, the Consultant CRS will complete a CRIR for submittal to the BLM as part of a complete work package five business days prior to releasing the work. If cultural resources are present in the SSA, the Consultant CRS will document findings in a CRIR and submit directly to the BLM CR Staff for review. This is a Class III activity, which requires BLM approval prior to O&M activities.

Class II Activity Deliverables

The Utilities will provide the BLM with a complete work package that includes the work scope, location, schedule, and CRIR. Contents of the work package are included in Section X of the Plan.

Finalized CRIRs must be submitted no later than 180 days after completion of cultural resources fieldwork, pursuant to the PAI (PAI Department of the Interior [DOI] Standard Permit Conditions R and S). Finalized CRIRs include all resolved BLM CR Staff edits or revisions. Consultant CRSs must account for the time it takes to resolve BLM CR Staff suggested edits or revisions.

Under Condition X of the PAI, a preliminary report is required; however, since the fieldwork involves only “minor work or minor findings” (as detailed in PAI Condition X), a final CRIR may be submitted in place of a preliminary report.

A CRIR template is provided in CRMP Attachment X and includes the following:

* + - * 1. Project name and other identifiers (i.e., BLM ROW case number, Transmission/Distribution [TD] project #, Salesforce #, etc.)
        2. Utility/Consultant names
        3. Report date
        4. Date(s) of survey/fieldwork
        5. BLM PAI number
        6. BLM FWA number
        7. Fieldwork location (i.e., County and State, USGS 7.5’ quadrangle map[s], legal description)
        8. Project description
        9. Description of examination procedures/field methods (i.e., number of field staff, BLM inventory type [Class 3 intensive field survey, etc. per BLM 8110 Manual], limitations [vegetation/ground visibility, steep terrain, etc.])
        10. Legally definable acres surveyed
        11. Map(s) showing area surveyed
        12. GIS data/shapefiles for the survey area with unique designation for each survey area
        13. Literature/records search summary (i.e., by whom, where records were found, date)
        14. NRHP-ineligible cultural resources in the SSA
        15. Conclusion/recommendations
        16. Field Director/Principal Investigators leading survey
        17. Literature cited

Relevant, non-confidential data from Class II activity CRIRs will be documented in annual report summaries submitted to BLM CR Staff (CRMP SectionClick or tap here to enter text.).

Class II Activity BLM Review

The O&M work will automatically be released after 5 business days from when the complete work package was submitted to the BLM. If the BLM needs additional resource information in a Class II work package, the BLM will contact the Utility within the 5-business day review period, and the Utility will adjust the work schedule as necessary (Plan Section X). Following completion of the O&M work, a Work Complete Notice will be provided to the BLM (Plan Section X).

##### Class III Activity CRSP

Class III activities have cultural resources in the SSA or other situations that warrant BLM notification (e.g., Class 3 intensive field survey impediments, safety issues, cultural resources that extend beyond BLM jurisdiction, SSA modifications, etc.) prior to O&M activities. The overall review and work package submittal process for Class III activities is described in Plan SectionClick or tap here to enter text.. The complete work package will include a detailed activity description and documentation of environmental reviews (Plan Section X).

Bureau of Land Management

Appendix C Cultural Resources Management Plan

Class III Activity Deliverables

The Utilities will provide the BLM with a complete work package that includes the work scope, location, schedule, and CRIR (Plan Section X). The CRIR, containing confidential cultural resource information, will be submitted directly to BLM CR Staff for review. The CRIR will include details in CRMP Section Xas well as RPMs (Table 3) and other applicable recommendations for BLM CR Staff to make informed decisions regarding RPMs, field methods, O&M activity approval, etc.

Class III Activity BLM Review

CRIRs included in the Class III activity complete work package are submitted directly to the BLM CR Staff for review. The BLM CR Staff will review the complete work package and related CRIR as part of the Class III Activity Process (Plan Section X) and respond to the Utility within 15 business days. If the BLM CR Staff approves the CRIR as submitted, and the rest of the work package is approved by the BLM, the Utility will release the O&M activity. Alternatively, the BLM CR Staff may respond with one of the following responses:

* + - * 1. Request additional clarification, if necessary, so the BLM can complete the review and approval within the original 15 business days; or
        2. Deem the CRIR incomplete, suggest revisions, and request a resubmittal of the updated CRIR with the necessary information; or
        3. Determine that the O&M activity be reclassified as Conditional Class III requiring additional analysis. Additional analysis may include specific cultural resource management considerations (e.g., NRHP evaluations, potential Tribal/SHPO consultation, additional RPMs required, adverse effects to historic properties, etc.).

If the Utility has not received a response from the BLM after 15 business days, the Utility will elevate the request to the respective Field Office’s FM. The FM (or delegated acting FM) will attempt to resolve any concerns within 5 business days (Plan Section X).

If the BLM has previously reviewed and approved a Class III activity to be implemented with RPMs, the Utilities may request to treat the same or very similar future O&M activities within that same SSA as a Class II activity. If BLM CR Staff approve this request, the approval will be captured in writing and referred to when processing subsequent O&M activities related to that specific cultural resource. This request may apply when one or more of the following conditions are met:

1. All the cultural resources in the SSA are documented as not NRHP eligible in a finalized CRIR and updated DPR.
2. The SSA includes linear cultural resources (i.e., roads, transmission lines, and railroads) not adversely affected by the O&M activity.
3. The activity is within the boundary of a large cultural resource/district/landscape where the activity will not adversely affect the resource.

##### Conditional Class III CRSP

Conditional Class III activities require additional analysis and BLM approval prior to conducting the O&M activity. Conditional Class III activity complete work packages are submitted to the BLM for review and approval in accordance with 43 CFR § 2807.11(d). Conditional Class III activities may require additional consultation (e.g., tribal consultation, SHPO consultation, etc.), additional

archaeological field methods (e.g., limited testing for presence/absence, cultural resource evaluation, or mitigation for adverse effects to historic properties, etc.), and associated deliverables. In these instances, the Utility will provide a complete work package with the acknowledgement that additional analysis may be required.

Conditional Class III Activity Deliverables

Similar to the Class III activity deliverable, the Utilities submit a complete work package to the BLM that includes the work scope, location, schedule, and CRIR (Plan Section X). The CRIR, containing confidential cultural resource information, will be submitted directly to BLM CR Staff for review. The CRIR will include details in CRMP Section X and may include RPMs (Table X) and other applicable recommendations for BLM CR Staff to make an informed decision.

Conditional Class III Activity BLM Review

The BLM will review the work package and respond to the Utility within 15 business days confirming that the O&M activity is appropriately classified as a Conditional Class III due to the need for additional analysis, or otherwise advise the Utility on how the work should be submitted for BLM review.

After BLM CR Staff complete their review, they will determine whether the Conditional Class III activity meets the conditions for the undertakings’ Finding of No Adverse Effect, or whether there is potential for a Finding of Adverse Effect (CRMP Section X).

In the event adverse effects to historic properties are unavoidable, the BLM will manage the review of this site-specific circumstance as a separate federal undertaking in accordance with 43 CFR § 2807.11(b) or 43 CFR § 2807.11(d) (CRMP Section X). In these cases, the separate undertaking will result in a BLM finding of adverse effects to historic properties (Stipulation; 36 CFR § 800.5[a][1]) and meet a Protocol threshold for SHPO review (Stipulation X) and additional consultation.

After the Conditional Class III confirmation, within the next 15 business days, the BLM and the Utility will develop a joint strategy and schedule to approach the additional analysis. The timeframe needed for the additional analysis will vary based on the necessary analysis and/or consultation. The BLM will review the updated analysis and will approve the work if no additional information or analysis is needed (Plan Section X).

### Cultural Resource Recordation [Stipulations and, and Part]

Utilities and Consultant CRSs will follow the Secretary of the Interior’s Guidelines for Archaeological Documentation in accordance with 48 Federal Register (FR) 44716, along with the relevant stipulations listed in the Consultant CRS’s PAI and FWAs. To provide comprehensive documentation (e.g., Department of Parks and Recreation [DPR] forms, GIS spatial data, CRIR, etc.), cultural permit-holders will record the entirety of the cultural resource within and outside the SSA unless the cultural resource extends beyond BLM jurisdiction or those areas within which the Utilities are reasonably expected to operate. In these instances, recordation strategies will be discussed with the BLM under the Class III activity review process. When feasible, Consultant CRSs shall provide NRHP eligibility/ineligibility recommendations within newly created and updated DPR forms for cultural resources that intersect the SSA.

See Section Xof the Field Office-specific Attachment (CRMP Attachment X) for Field Office- specific guidance on cultural resource recordation and eligibility recommendations.

It is rarely necessary to pursue recordation of the entirety of large districts or landscapes, large rural parcels, extensive functional systems, or long linear resources/features if the O&M activities’ potential effects on the whole would clearly be negligible. The guiding principle on excluding these cultural resource types from recordation of the entire resource is that the cultural resource management effort should be commensurate with, and provide for, an appropriate and reasonable level of effort. This accounts for an undertaking’s potential to directly or indirectly alter the characteristics of a historic property that would make it eligible (Stipulation X).

New or updated site records for large and/or linear cultural resources comprised of multiple loci (e.g., Native American village site, water conveyance, mining district, ranching complex, multi-component site, Indigenous quarries, etc.) extending past the SSA will indicate the resource continues but was not recorded since it extends beyond the APE or onto private lands or other governmental jurisdictions that may require permission to access (PAI X), or the level of effort is not commensurate with the O&M activity.

### Evaluation of Historic Properties [StipulationClick or tap here to enter text.]

The BLM will comply with Stipulation 6.0 of the Protocol for the evaluation of historic properties. Where cultural resources in the SSA are avoided by project redesign or implementing RPMs, the BLM may treat them as NRHP eligible without formally evaluating or consulting with the SHPO (Stipulation). RPMs implemented to avoid effects to assumed-eligible historic properties must ensure that direct and indirect effects do not alter the characteristics of the property that would make it eligible and must ensure the qualifying characteristics of the integrity of the property are not diminished.

To determine whether the utility facilities themselves are eligible for the NRHP, the Utilities will prepare formal NRHP evaluations of historic-era electric infrastructure occurring within the APE, within the first two years of issuance of ROW grants associated with this Plan.

The BLM, through consensus agreement between the BLM CR Staff and the FM, may determine that cultural resources identified within SSAs are not eligible for the NRHP, pursuant to Stipulation Click or tap here to enter text.of the Protocol. The BLM also has discretion to formally determine that cultural resources are NRHP eligible by following the process in Protocol Stipulation X. These determinations will be based on recommendations made by Consultant CRSs and will be appropriately documented by the Field Office in its SHPO annual report data submitted to X.

### Finding of No Adverse Effect on Historic Properties [StipulationClick or tap here to enter text.]

The BLM found that the undertakings will have no adverse effect on historic properties (Stipulation X). The Class 2 inventory (CRMP Section X) results demonstrate the BLM took steps to consider effects of the undertakings on historic properties. The Utilities, working with the BLM, will ensure Class 3 intensive field survey is performed for those SSAs without adequate survey coverage, and implement RPMs as appropriate, prior to O&M activities.

Management Plan

##### Managing Separate Undertakings for Adverse Effect [Stipulation X]

In the event adverse effects cannot be ruled out by BLM CR staff, the FM will then apply the Criteria of Adverse Effect, and the individual O&M activities will be managed as separate undertakings (CRMP Section X) in accordance with 43 CFR § 2807.11(b) or 43 CFR § 2807.11(d) (CRMP Section X). In that situation, the undertaking shall be subject to the provisions of the Protocol or 36 CFR § 800 and will be managed separately from the undertakings defined in CRMP Section X and their subsequent Findings of No Adverse Effect on Historic Properties (CRMP Section X).

When applicable, the undertaking may be treated as an exempt undertaking under the Protocol (Protocol Appendix X).

### Data Sharing [Stipulation X

### The BLM developed and maintains a cultural resources geodatabase that includes cultural resources information in a Geographic Information System (GIS) program in compliance with Section X of the NHPA and Protocol Stipulation X. To ensure the CRSP uses current geospatial data, the BLM State SO, the BLM FO, and the Utility will enter into a Data Sharing Agreement (DSA). By sharing data via the DSA, there is reduced risk of redundant site recordation, confidential data is reconciled, and a process is established to govern data sharing and management of both the X SO geo-spatial data and Field Office-specific site and survey data that intersect the APE.

The DSA shall be signed by all parties up-front which allows BLM CR Staff the opportunity to review all prior adequate survey coverage. BLM CR Staff and Utility CRSs may also share data on an O&M activity-specific basis in accordance with applicable PAI conditions. Each Field Office will enter into a DSA with the Utility, unless otherwise directed by the FM. The template DSA is in CRMP Attachment X.

##### Cultural Resource Data Reconciliation

Data sharing will follow procedures in the DSA. These shared data will be subject to ongoing reconciliation and management to ensure the data are current and relevant for resources and adequate survey reports that intersect utility facilities. To facilitate the reconciliation of shared cultural resources data, the Utilities shall consolidate multiple independent records and designations generated for the same cultural resource (e.g., updated DPR site record referencing past resource designators) when that resource occurs within an O&M activity’s SSA. This may be done as a larger initiative, or on an O&M activity basis. Data reconciliation is critical for the utility CRSP and helps to support the BLM’s responsibilities for resource management under the Federal Land Policy and Management Act (FLPMA), the Archaeological Resources Protection Act (ARPA), and NHPA.

### Best Management Practices and Resource Protection Measures [BLM Manual 8140 – Protecting Cultural Resources]

BLM Manual 8140 – *Protecting Cultural Resources* defines several direct and administrative cultural resource conservation and protection measures. Where RPMs are intended to conserve cultural resources in place, the measures and methods should be carefully selected to fit the nature of the resource and data being protected. Utilities, O&M work contractors, and Consultants CRSs, will refer to Appendices D and E of the Plan, Manual 8140, and rely on RPMs in Table X when performing O&M activities within and adjacent to cultural resources. As outlined in the CRSP, for O&M activities with cultural resources in the SSA, BLM CR Staff will review Utility-proposed RPMs prior to O&M activities. It is at the BLM CR Staff’s discretion to approve, modify, and/or suggest additional activity-specific RPMs to successfully avoid effects to historic properties.

**Table 3. Resource Protection Measures**

**RPMs**

1. Archaeological monitoring
2. Avoidance measures
3. Designate Environmentally Sensitive Area (ESA) with flagging during O&M activities
4. Relocation of utility facility and associated O&M work outside of a recorded cultural resource
5. Use of mats or other temporary surface protections
6. Vegetation management protection measures (e.g., directional felling, climb, limbed and rope down, removing felled trees using non-ground-disturbing techniques [hand bucking, chain saws, hand carrying, rubber-tired loader, crane/self-loader, other BLM-approved measures])

The most common RPM is archaeological monitoring. Depending on the O&M activity and nature and context of cultural resource in the SSA, archaeological monitoring may be necessary during O&M activities. A subsequent DPR site record update may also be necessary. In accordance with Protocol Stipulation 12.5, if archaeological monitoring is performed, a monitoring and condition report will be submitted to BLM CR Staff to document observations and monitoring efforts. An Archaeological monitoring report template is located in CRMP Attachment X.

### Post-Review Discoveries and Unanticipated Effects [Stipulation X]

The Protocol defines post-review discovery as the identification of previously unknown historic properties within the context of BLM activities other than planned archaeological excavations. It defines an unanticipated effect as the determination that the implementation of the undertaking will affect a previously unidentified cultural resource that may be eligible for the NRHP or affect a known historic property in an unanticipated manner. In the context of the Plan, post-review discovery examples include an archaeological monitor identifying a new cultural resource during O&M activities, a BLM third-party environmental consultant performing an audit of O&M activities once they are complete, etc. During the post-review discovery process, the BLM will manage the situation by following the process in CRMP Section X, and in accordance with Protocol Stipulation X and 36 CFR § 800.13(b)(3).

##### Post-Review Discovery Process and Notification

O&M work contractors are required to stop work if they encounter previously unidentified cultural resources. In this situation, the following process is followed:

1. O&M work contractors will stop work and contact a Utility CRS.
2. Utility or Consultant CRS will assess the discovery. A Consultant CRS may already be present conducting planned monitoring during implementation of the O&M activity to ensure protection of a previously identified cultural resources.
3. If the discovery is thought to be archaeological in nature, the Consultant CRS will establish a 100 ft ESA around the discovery.
4. Consultant CRS will immediately notify the BLM CR Staff and/or FM via phone or email.
5. BLM will confirm the discovery is archaeological or request additional information.
6. If the discovery also involves human remains, CRMP Section X will be followed. Additional site-specific efforts and communication to secure the discovery will be performed.
7. Within 24 hours (or as soon as feasible) of confirming the discovery is archaeological in nature, a Utility CRS or Consultant CRS will provide BLM CR Staff with a description of the discovered cultural materials, NRHP eligibility recommendation ( e.g., eligible, ineligible, or more investigation needed), feasibility of avoidance, description of unanticipated effects (if applicable), and additional RPMs to address potential adverse effects.
8. The BLM will then follow the notification process in CRMP Section X.

The information provided to the BLM represents the Incident Management’s “Initial Report” described in Section 5.3 of the Plan and may help to facilitate Incident Management procedures (CRMP Section X).

##### Unanticipated Effects

If the situation involves an unanticipated effect to a known cultural resource, steps 1 -3 of the Post-Review Discovery Process and Notification will be followed (CRMP Section X). Upon their arrival, a Consultant CRS will assess the scale of effect caused by the O&M activity. The Consultant CRS will then follow Steps 4-8 in CRMP Section X. The FM, with the information provided by the Consultant CRS and guidance from the BLM CR Staff, is the authority to find whether there is an effect to a historic property.

##### Notification to SHPO/Tribes and Consulting Parties

After receiving information regarding a post-review discovery (new discovery or unanticipated effect to a known historic property), the FM, assisted by the BLM CR Staff, will notify the SHPO, Tribes, and the ACHP via email within 48 hours[6.](#_bookmark47) The notification will describe the BLM’s assessment of NRHP eligibility, proposed actions to resolve adverse effects (if the BLM believes

6 Under 36 CFR § 800.13(b)(3) the agency official (in this case, the BLM Field Manager) has 48 hours to notify the SHPO, Tribes, and the ACHP of the affected property. To meet this requirement, this Plan directs that the Utility contractors to submit the necessary recommendations to the BLM CR Staff within 24 hours and then provides another 24 hours for the BLM to notify the SHPO, Tribes, and ACHP.

that these effects have occurred), and request responses from the SHPO, Tribes, and ACHP within 48 hours of notification, in accordance with 36 CFR § 800.13 (b)(3).

The BLM will consider recommendations from consulting parties regarding NRHP eligibility, may assume any discovered property NRHP eligible, and implement appropriate actions with support from the Utilities and the Consultant CRSs (e.g., NRHP eligibility assessments, treatment plans, associated reports, etc.), and the O&M work contractors. The BLM will then provide the SHPO, Tribes, and ACHP a report of the actions when completed.

### Identification and Treatment of Human Remains [Stipulation X

### The BLM and Utilities will comply with Stipulation X of the Protocol and other applicable laws and regulations regarding the identification and treatment of human remains. Further, in accordance with PAI Special Permit Condition b, the “Permittee shall cease work upon discovering any human remains and shall immediately notify the approving official or bureau field official. Work in the vicinity of the discovery may not resume until the authorized official has given permission.”

##### Discovery Procedure for Human Remains

The following procedure is required whether the discovery occurs prior to (during field survey), or during implementation of the O&M activity. If the discovery occurs during implementation, the procedures below will be coordinated with post-review discovery procedures in CRMP Section X.

1. When a discovery occurs, or is suspected, in connection with an O&M activity on BLM- administered lands, any activity within a minimum of 100 ft of the human remains shall stop and a reasonable effort shall be made to secure and protect the remains.
2. The Utilities, with help from their contractors, will also contact Field Office CR Staff and FM via email with a follow-up phone call as soon as possible (within 24 hours).
3. In consultation with the BLM, the Utilities, with help from their contractors, will secure and protect discovered human remains by stabilizing or covering them. The Utilities will provide additional expertise in human remains identification if the BLM determines that is necessary.
4. In compliance with X state law, the Utility contractors who made the discovery will contact the County Coroner’s Office of the county in which the human remains are located. This contact will be made at the earliest opportunity. The coroner has two working days to examine the remains after notification. The coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions to be answered.
5. The Field Office CR Staff (and other Field Office staff as appropriate) will determine and confirm whether the remains are located on BLM-administered lands.

1. The BLM CR Staff will contact BLM law enforcement. It is important that human remains, or suspected human remains, and area surrounding them, be secured and the proper law enforcement authorities called as soon as possible to the scene in case a crime scene exists.
2. After these notifications, and if it is determined that the remains are on BLM-administered lands and are of archaeological or historic origin, the BLM CR Staff will also contact the Native American Graves Protection and Repatriation Act (NAGPRA) program lead at the BLM CASO.

If the Coroner's Office determines that the remains on BLM-administered land are of archaeological or historic origin, the state of California legal requirements are completed, and the Native American Heritage Commission (NAHC) is not contacted and do not have any responsibility in this process.

The materials are, by definition, federal archaeological resources, and the appropriate federal laws apply.

If the BLM determines that the remains are Native American in origin, the steps, as outlined in NAGPRA, 43 CFR § 10 Subpart B (Inadvertent discoveries), and BLM policy within the BLM 1780 Handbook will be followed. If the BLM determines that the remains are not Native American in origin, then the BLM will follow ARPA and other applicable laws, regulations, and policy, with respect to those situations. That process will be coordinated with relevant Protocol stipulations, including 9.0 (Post-Review Discoveries) and 11.0 (Identification of Human Remains) as necessary. Work cannot resume within the 100 ft ESA until authorized by the FM.

The Utilities and their contactors will help support the process by doing the following:

1. Help secure the discovery location,
2. identify human remains and their possible ethnic affiliation,
3. recommend stabilization/protection measures for the discovery,
4. help implement those stabilization/protection measures,
5. prepare other recommendations for treatment,
6. implement those prepared treatments (e.g., intentional removal/excavation of cultural items pursuant to ARPA and NAGPRA) and facilitate field visits by BLM staff and tribal members.

### Incident Management

Activities or occurrences considered by the Utilities or BLM as noncompliant with the procedures outlined in the Plan are subject to a noncompliance documentation process. The Utilities are responsible for disclosing and remediating the non-compliance when remediation is deemed necessary by the BLM (Plan Section X).

Cultural resource-related incidents are activities or occurrences that may be noncompliant with one or more of the applicable cultural resource management controlling documents/permits: Protocol, PAI/FWA, DSA(s), the Plan/ROW grant, and the respective laws and regulations from which the Plan follows (Appendix A). The procedure in CRMP Section X, which aligns with the Plan, shall be followed when a cultural resource-related incident is identified.

The BLM may rely on a third party to identify cultural resource-related incidents. Incidents may be identified regardless of how much time has elapsed since the incident occurred. See CRMP Section

X for additional performance monitoring responsibilities.

##### Incidents Involving Cultural Resources

If an incident occurs that may involve cultural resources (e.g., failure to implement planned resource protection measures, unplanned damage to cultural resources, etc.), all work will immediately stop. Incidents involving cultural resources may also be detected after the O&M activity has been completed, as mentioned above.

If the incident involves a SSA that has not been screened prior to an O&M activity (CRMP Section X), the SSA will be screened following the procedures outlined in CRMP Section X. If cultural resources are present in the SSA, the O&M activity is a Class III activity and may ultimately be managed as a Conditional Class III activity and separate federal undertaking through the process outlined in CRMP Sections X and. In these cases, the separate federal undertaking may result in a BLM finding of adverse effects to historic properties and potential ARPA violation. In addition, the incident is still subject to the non-compliance procedures in Section X of the Plan, along with the respective BLM ROW non-compliance procedures (43 CFR § 2808).

If the incident involves a SSA that has been screened and there is a post-review discovery, the procedures for post-review discoveries will be followed (CRMP Section X). In addition, the incident may still be subject to the non-compliance procedures in Section X of the Plan along with the respective BLM ROW non-compliance procedures.

##### Cultural Resource-Related Incidents

Other types of incidents that do not directly involve cultural resources, but are cultural resource- related may include, but are not limited to:

1. Operating without an FWA
2. Missed notifications
3. Repeated cultural resource-related non-compliance events
4. Unauthorized confidential cultural resources data sharing

Cultural resource-related incidents may be subject to review by the X SO as a PAI compliance issue (e.g., past-due and/or poor-quality deliverables), or by the Field Office as an FWA compliance issue. These may merit disciplinary action related to the PAI/FWA which is governed by various laws, regulations, and BLM policies[7,](#_bookmark53) and managed by the State SO/Field Office. BLM CR Staff will document their investigation and coordinate as necessary with the BLM X Deputy Preservation Officer (DPO).

### Permitting Performance Monitoring

By policy, FMs and BLM CR Staff are responsible for monitoring the Consultant’s/permittee's performance at various intervals throughout the life of the PAI/FWA. Performance monitoring is intended to verify the Consultant’s/permittee's adherence to administrative conditions, and adherence to technical (professional qualifications) and resource protection conditions.

Administrative conditions to adhere to include, but are not limited to, data sharing, deliverable timeframes, deliverable quality, conducting the survey at the times agreed to, and having the required personnel present during field work.

Performance monitoring should be carried out often enough that developing problems are

recognized and brought to the Consultant’s/permittee's attention, without requiring a formal action by the BLM CASO. The BLM may provide feedback/concerns to the Utility and Consultant CRSs, who will work together to resolve performance issues that may result in PAI/FWA compliance issues and inform the BLM CR Staff on proposed solutions.

##### Plan Performance and Consistency Review

Performance monitoring and consistency reviews will be performed in accordance with Section X of the Plan. Review results will be shared between the BLM and Utilities on an annual basis as part of the annual meetings to identify processes that are working successfully and opportunities for improvement. Review results shall also be shared on an as needed basis when issues arise that require immediate attention.

### Emergency Situations [StipulationClick or tap here to enter text.]

Emergencies are defined in Stipulation X of the Protocol, as an emergency declared by the President, a Tribal government, or the Governor of a State. In the event of Protocol-defined emergencies, the BLM shall comply with the provisions of 36 CFR § 800.12 and 36 CFR § 78 for such undertakings. The BLM and its mutual aid partners will implement to the extent prudent and feasible any measures that could avoid or minimize effects to historic properties and shall implement post‐emergency rehabilitation measures and evaluations for properties which may have been damaged by agency activities during the emergency (Protocol Stipulation X).

Utility emergency response activities do not meet the definition of a Protocol-defined emergency and are not considered to be routine O&M activities (Plan Section X).

### Biannual Meetings and Reports [Stipulation]

##### Biannual Meetings

Meetings shall take place twice a year between the Field Office BLM CR Staff and Utility CRSs to discuss cultural resource management issues and ensure all stakeholders are consistently implementing the CRMP to maintain a streamlined and efficient compliance process in alignment with the Protocol. Biannual meetings will also be used to review the cultural resources screening of O&M activities and determine whether additional information is necessary (e.g., updated historic

and ethnographic context statements, different CRIR fields, redundant Class III activities, etc.), and update contact information for tribal partners requesting O&M activity notifications. Field Office BLM CR Staff shall invite other staff (FM, District Archaeologist, DPO) to participate as appropriate. An assessment at the end of the first year shall be made by the participants and, if there is agreement, the biannual meeting frequency may be reduced or increased as needed.

These meetings may result in mutually agreed-upon CRMP amendments and minor modifications to address new cultural resource laws and policy and improved cultural resource management practices (CRMP Section X). Implementation of proposed CRMP amendments and minor modifications will follow the process outlined in Section X of the Plan.

##### O&M Activity Annual Report Summary [Stipulation ]

The State SO submits an Annual Report to the State SHPOs, which includes a list of prior fiscal year undertakings, determinations of NRHP eligibility, and a short narrative summary of Section 106 work (Stipulation). Conditional Class III activities with adverse effects will have their own entry in the Annual Report, managed as separate undertakings. Conditional Class III activities will be included in the annual report for the fiscal year in which SHPO concurrence is received (CRMP Section X). The undertakings and their related O&M activities will be reported in the SHPO Annual Report by the Field Offices.

To help facilitate the BLM’s annual report to the SHPO, the Utilities will provide BLM CR Staff with an O&M activity annual report summary table. The O&M activity annual report summary will include, but not be limited to, the following tabulated data:

1. Consultant information
2. Tabular list of Class II, III, and Conditional III activities
3. Number of notifications
4. Notifications with new survey
5. Acres of Class 3 intensive field survey
6. New cultural resources recorded
7. Cultural resources updated
8. Cultural resources monitored
9. Number of non-compliance incidents with a brief narrative
10. GIS spatial data
11. Incident management

### Supplemental Procedures and Revisions

If a Field Office is found to not have maintained the basis for its Protocol certification and the Field Office has been decertified (Stipulation X), the CRSP will still be maintained as a term and condition of the ROW grant. All other Protocol-tiered processes outlined in the CRMP will be processed under the authority of their respective laws and regulations.

This CRMP is intended to be responsive to changing circumstances. Therefore, it will track and align with future Protocol revisions. These updates may be made at the scheduled Plan meetings or may be updated and modified as needed. The CRMP will also be subject to Section X of the Plan to address periodic modifications, clarifications, or revisions. Any modifications or amendments to the CRMP will be in accordance with applicable legal requirements.

SHPO Letter and Concurrence

**Cultural Resource Field Office-Specific Attachment**

### Introduction

The purpose of the Cultural Resource Field Office-Specific Attachment (CR-FOSA) is to document data points (i.e., APE, adequate survey dates, definitions, etc.) unique to individual Field Offices and identify additional resource protection measures needed to manage O&M activities after the O&M Plan’s Cultural Resources Screening Process is applied. Cultural resource-specific protection measures are captured in Table 1 and may be changed with BLM-Utility mutual agreement.

* conditions (e.g., alluvial plains, shifting sands, etc.).
* Field Office areas with specific cultural resources survey limitations.
* Larger cultural landscapes that intersect Field Office boundaries.

**Permit Templates**

**Location**

This application is for cultural resource use permit for all public lands administered by the BLM within the State of California. Specific locations, including counties and administrative units, would be contingent upon the geographic extent of fieldwork authorizations for individual projects and Field Offices.

**Description of the purpose, nature, and extent of the work proposed**

The purpose, nature, and extent of the work is to conduct non-disturbing archaeological field surveys on lands administered by the Bureau of Land Management Lands (BLM) on projects related to the operation and maintenance of Utility facilities under existing or proposed Right of Way Grants. See attached Map.

**Field Work Authorizations:** Prior to survey work for a specific project, a Fieldwork Authorization Request will be submitted to the appropriate Field Office. The form will include specific project information and methodology in accordance with BLM Manual 8100 Guidance. At a minimum the following will be employed.

**Pre-field Record Search -State:** A records search will be conducted prior to field work. Record searches will include information on previous investigations and previously recorded cultural resources within a 0.25 mile radius of project area, including ancillary project features. All work will be conducted to BLM standards.

**Confidentiality of Data:** Archaeological site location information collected under this permit is protected data that cannot be released by the permittee to another party without the express permission of the BLM.

**Field Survey Standards:** The field survey will be designed to reasonably identify all resources within and immediately adjacent to the O&M activity Standard Study Area (SSA), as defined in the Master

Operations and Maintenance Plan (O&M Plan). A Class 3 intensive pedestrian survey, as defined in BLM Manual 8100 Guidance, will be completed.

Field surveys will employ transects no more than 15 meters apart. During the surveys, the field crew will locate any previously recorded cultural resources and update the associated CA Department of

Recreation (DPR) site forms according to State SHPO standards. Newly discovered resources (sites, features, isolates) will be recorded on California Department of Parks and Recreation (DPR 523 series) forms, photographed, and depicted on a sketch map. Isolates will also be documented on DPR 523 series forms and will be sketched or photographed when appropriate. The exact positions of the archaeological resources will be determined using GPS equipment. Please refer to California OHP publication "Instructions for Recording Historical Resources" (1995).

**Cultural Resources Reporting:** The O&M Plan Cultural Resource Inventory Report (CRIR) template (O&M Plan Attachment D-##) will be used to document the field activities, including dates, times and locations, findings, samplings, and analysis per the “BLM Manual 8110 Guidance (Identifying and Evaluation

Cultural Resources, 2004) and California Office of Historic Preservation Guidance as provided in the

*Archaeological Resources Management Report* (ARMR, 1990).

A digital CRIR will be submitted to the Field Office for review and comment. Draft report will be updated per comments received. All finalized reports and site records will be submitted to the CHRIS.

**Limited Testing and/or Collection (project-specific):** Limited testing and/or collection will be conducted as needed on a project by project basis. Any non-human archaeological materials, final reports, field

notes, and other standard documentation collected during a project shall be permanently curated at a

facility that meets the standards identified in 36 CFR 79.9, and specifically set forth by the *Department of Interior - Museum Property Handbook*, DM 411. Exceptions to this procedure are Native American human remains, associated and unassociated funerary objects, sacred objects, objects of cultural patrimony and any other related tribal cultural resources. All human remains and associated artifacts will be addressed pursuant to the Native American Grave Protection and Repatriation Act (NAGPRA; 25 USC Ch. 32).

|  |  |
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| **UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT** | INFORMATION  REQUIREMENT APPROVED OMB NO. 1024-0037 |
| Field work authorization  **To Conduct Specific Cultural Resource Work Under the Authority of**  **a Cultural Resources Use Permit Issued by the Bureau of Land Management Pursuant to Sec. 302(b) of P.L. 94-579, October 21,1976, 43 U.S.C. 1732**  **and Sec. 4 of P.L. 96-95, October 31, 1979, 16 U.S.C. 470cc** | FOR BLM USE ONLY |
| FWA Request No. |
| Reviewed and Approved by: |
| 1. Permit for Archaeological Investigation Number and Date Issued Name of Permittee  **[PAI Number and Issuance and Expiration Date] [Consultant Name]** | |
| 2. Mailing Address 3. Telephone Number(s)  **[Consultant Mailing Address] [Consultant Phone Number]** | |
| 4. Nature of Cultural Resources Work (If Consultation Work, Identify Client and Project):  **[Consultant name] is performing surface archaeological investigations and monitoring for archaeological resources in support of operations and maintenance (O&M) activities defined in the Master O&M Plan, within the BLM [Field Office Name] through [PAI Expiration Date].**  **Survey area, results, and GIS spatial data will be submitted in compliance with the Master O&M Plan Appendix C: Cultural Resources Management Plan. Reporting requirements will also comply with BLM California State Office modified PAI conditions.** | |
| 1. Location of Proposed Work (Include Map)    1. Description of Public Lands Involved b. Identification of Cultural Resource(s) Involved (if applicable)   **Utility electrical facilities on BLM [Field Office Name] - administered lands** | |
| 6. Period During Which Work Will be Conducted  From: **[Submittal Date]** To: **[PAI Expiration Date]** | |
| 7. Name of Individual(s) Responsible for Planning & Supervising Field Work & Approving Reports, Evaluations, & Recommendations:  **[Names of Consultant Principal Investigators and Field Directors]** | |
| 8. Signature of Applicant  /s/ **[Digital Signature] [Date of Signature]** | |
| 9. Signature of BLM Authorizing Officer  /s/ | |

Form 8151-3

### Cultural Resource Inventory

**Report Template**

###### Cultural Resources Inventory Report

**Template Instructions**

Template is on the following page.

All text in **Black** is standard text that should not be altered without discussion with SCE or PG&E All text in RED choose one option and delete the other

All text in BLUE edit as appropriate

All text in Purple are additional instructions

**Report Instructions**

The Cultural Resources Screening Process (CRSP) for O&M activities requires a desktop review and adequate survey coverage. The CRSP is outlined in Section C.8 of the Cultural Resources Management Plan (CRMP). CRSP results are documented in the Cultural Resources Inventory Report (CRIR). The following are the CRIR requirements:

* The CRIR is used for all O&M activities.
* Submit CRSP results via Notification Number-specific CRIR per the attached template.
* Submittal shall include GIS survey and resource spatial data in BLM’s Schema.
* Submittal of GIS to Utilities may use different Schema.
* Additional documentation may be required when Class 3 intensive field survey results in the identification of existing or newly recorded cultural resources in the SSA.
* Depending on the nature and context of the O&M activity and cultural resource(s), presence/absence testing may be recommended. In these situations, the O&M activity is managed as a Class III or Conditional Class III activity.
* When feasible, Consultant CRSs shall provide NRHP eligibility/ineligibility recommendations within newly created and updated DPR forms for cultural resources that intersect the SSA (CRMP Section C.9). See Section 2.4 of the Field Office-specific Attachment (CRMP Attachment 3) for Field Office-specific guidance on cultural resource recordation and eligibility recommendations.
* Field Offices may request additional information (e.g., updated context statements) to assist in the concurrence of NRHP eligibility recommendations and determinations of effects.
* Consultants CRSs may submit prior survey reports that do not meet all adequate survey requirements (CRMP Section C.8.1) to BLM for approval on an O&M activity-specific basis.
* An annual report will include all positive and negative results during the reporting period.
* The annual report and associated GIS will be submitted to the BLM Field Office Cultural Resource Staff and include data described in Section C.19.2 of the CRMP.

**Table Instructions**

* Each O&M activity SSA shall be entered in individual rows.
* When completing Column D in the Cultural Resources Inventory Report Table, refer to Chapter 3 of the O&M Plan and Table 1 of the CRMP (Section C.2.4) for O&M activity classification descriptions.
* In Column O, include cultural resource identifier, description, and distance to work location (if applicable) for O&M activities with positive findings.

### Cultural Resources Inventory Report

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| **1. Cultural Resources Inventory Report Summary Data** | | | | | |
| **Project Number:** | | | **Report Date:** | | |
| **Notification Number (if applicable):** | | | **BLM CRIR Number:** | | |
| **Project Order Number:** | | | **Field Work Date(s):** | | |
| **O&M Activity(ies):** [List all O&M Activity Types.] | | | **Consulting Firm:** | | |
| **O&M Activity** ☐ ☐ ☐  **Classification:** Class II Class III Conditional Class III | | | **Principal Investigator/Field Director Name(s):** | | |
| **BLM Field Office:** | | | **Previous Class 3 Survey Acreage:** | | |
| **BLM State CRUP/PAI and Fieldwork Authorization No.:** | | | **New Class 3 Survey Acreage:** | | |
| **Number of Standard Study Areas and Total Acreage:** | | | **Total Class 3 Survey Acreage:** | | |
| **a. Number of Cultural Resources in the Standard Study Area(s):** | | | | | |
| *New Resources/DPRs:* | *Previous Resources:* | | *Updated DPRs:* | | *Isolates:* |
| **b. NRHP Status of Cultural Resources in the Standard Study Area(s):** | | | | | |
| *BLM-Determined NRHP – Ineligible:* | | | *Determined NRHP – Eligible/Unevaluated:* | | |
| **c. Determined NRHP – Eligible/Unevaluated Cultural Resource Effects Assessment:** | | | | | |
| *Avoidable:* | | *Potentially Affected:* | | *Additional Mitigation Required:* | |

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| **2. Project Description and Location** | | | |
| [Include high-level summary of the O&M activity being conducted and project location(s) where work will occur, including Quad and T/R/S info. Refer to CRIR table and exhibits here.] | | | |
| **3. Standard Study Area** | | | |
| [Describe the Standard Study Area (SSA) for the O&M activity per Table 2 of the CRMP.] | | | |
| **4. Regulatory Context** | | | |
| [Confirm the results are consistent with the obligations of the CRMP.]  This project is compliant with the *State Protocol Agreement among the California State Director of the Bureau of Land Management (BLM) and the State Historic Preservation Officer Regarding the Manner in which the BLM Will Meet its Responsibilities Under the National Historic Preservation Act and the National Programmatic Agreement among the BLM, the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers* (Protocol), the Utility Operations and Maintenance Plan (Plan) and associated Cultural Resources Management Plan (CRMP), and 43 CFR § 2807.11(d). | | | |
| **5. Cultural Resources Screening Process Desktop/Literature Review Results** | | **Latest BLM Data Share Date:** | ***MM/DD/YYYY*** |
| [Include a brief summary of the CRSP results, adequate survey references, SSA coverage, need for additional survey, request for adequate survey approval (if needed), etc. Include a reference to CRIR table with CRSP results for each location.] | | | |
| **a. Previous Survey Coverage** | **b. Previously Recorded Cultural Resources** | | |
| * SSA previously surveyed 100% * SSA partially surveyed % | * Previously Recorded Cultural Resources in the SSA * **No** Cultural Resources in the SSA | | |

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| * No previously conducted survey |  | |
| **c. Changes in Environmental Conditions?** | * **Yes** | * **No** |
| [Has the SSA undergone changes in environmental conditions (e.g., wildfire, shifting sands, landslides, etc.) since the most recent survey was conducted?] | | |
| **d. Additional Fieldwork Recommended?** | * **Yes** | * **No** |
| **6. Cultural Resources Fieldwork** | | |
| **a. Fieldwork Methods** | | |
| [Describe Class 2 and/or 3 field surveys. If survey was not performed, describe why (i.e., previously surveyed). If surveyed, describe previous adequate survey (CRMP: C.8.2), new Class 3 intensive survey, which staff went out into the field on which days, and the methods used to conduct the survey using standard methods (i.e., transect spacing, intensive, intuitive, mixed-strategy).] | | |
| **b. Survey Results** | | |
| [Include a summary of Class 3 intensive field survey results (e.g., number of survey locations, cultural resources, environmental conditions, etc.) and reference the attached table for details. Also include summary of environmental conditions (e.g., visibility, access issues, surveyable percentage, etc.) and site number/description for any resources identified within the SSAs. Include a reference to CRIR table with survey results for each location.] | | |
| **7. Cultural Resource Management Recommendations (Resource Protection Measures and Best Management Practices)** | | |
| [Include recommended Resource Protection Measures (see CRMP Table 3) and how they relate to the O&M activity. Reference the attached CRIR table with management recommendation for each location.] | | |
| **8. Attachments** | | |
| 1. Location Map [Typically 1:24,000 topographic quad background; supplement with larger scale aerial imagery as appropriate to convey the necessary information.] 2. Survey Coverage Map [Depict previous survey coverage, new coverage by intensity, and areas not surveyed. Explain un- surveyed areas in text.] 3. Resource Location Map [Depict new and known cultural sites.] 4. Field Photos 5. Cultural Resources Inventory Report Table [Includes all locational data, CRSP results, survey results, management recommendation.] 6. Resource records (newly identified and updated records) 7. New/External Records Search Files [if any files are more recent than, or not included in, the BLM Data Share] 8. GIS [New survey coverage, new/updated resource boundaries, and tabular attributes consistent with Cultural GIS Specifications.]   [Note: delete any attachment lines that are not relevant to the current report.] | | |

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| **Table 1. Cultural Resources Inventory Report Table** | | | | | | | | | | | | | | | |
| **Project Order Number** | **Structure/ OID#** | **O&M Activity** | **O&M Activity Classification** | **Circuit Name** | **Latitude** | **Longitude** | **USGS**  **Quad** | **PLSS**  **Description** | **Cultural Resources Screening Process** | | | **Cultural Resources Fieldwork** | | | **Management Recommendations**  **(Include Resource Protection Measures required for avoidance [if applicable])** |
| **Previous Class 3 Survey Citation** | **Previously Recorded Cultural Resources and NRHP Status**  **(include site number and**  **description)** | **Additional Fieldwork Recommendation** | **Survey Date** | **Survey Results** | **Resource Descriptions**  **(include site number, resource description, distance to work location [if applicable])** |
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Page 1 of 1

### Cultural Resource Monitoring

**Report Template**

###### Cultural Resources Monitoring and Condition Report

**Template Instructions**

Template is on the following page.

All text in **Black** is standard text that should not be altered without discussion with SCE or PG&E All text in RED choose one option and delete the other

All text in BLUE edit as appropriate

All text in Purple are additional instructions

**Reporting Instructions**

Per section C.13 of the Cultural Resources Management Plan (CRMP), if archaeological monitoring is performed, a cultural resources monitoring and condition report will be submitted to BLM CR Staff to document observations and monitoring efforts.

* The CRIR is used for all O&M activities.
* Submit CRSP results via Notification Number-specific CRIR per the attached template.
* Submittal shall include GIS survey and resource spatial data in BLM’s Schema.
* Submittal of GIS to Utilities may use different Schema.
* An annual report will include all monitoring activities during the reporting period.
* The annual report and associated GIS will be submitted to the BLM Field Office Cultural Resource Staff and include data described in Section C.19.2 of the CRMP.

**Table Instructions**

* Each O&M activity SSA shall be entered in individual rows.
* In Column J, include cultural resource identifier, description, and distance to work location (if applicable).

### Cultural Resources Monitoring and Conditions Report

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **1. Cultural Resources Monitoring and Conditions Report Summary Data** | | | | |
| **Project Number:** | **Report Date:** | | | |
| **Notification Number (if applicable):** | **BLM Report Number:** | | | |
| **Project Order Number:** | **Monitoring Date(s):** | | | |
| **O&M Activity(ies) Monitored:** [List all O&M Activity Types.] | **Consulting Firm:** | | | |
| **BLM Field Office:** | **Principal Investigator/Field Director Name(s):** | | | |
| **BLM State CRUP/PAI and Fieldwork Authorization No.:** | **Field Director/Monitor Name(s):** | | | |
| a. **Cultural Resources Monitored:** | **Site Updated?** | | **Resource Impacted by Current**  **O&M Activity?** | |
| [List site numbers and descriptions of all resources monitored, add additional rows below this row as needed if more than one resource was monitored.] | * Yes | * No | * Yes | * No |
| b. **Resource Protection Measures Implemented:** | | | | |
| [List RPMs implemented per Table 3 of the CRMP.] | | | | |

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| **2. Project Description and Location** |
| [Include high-level summary of the O&M activity that was monitored and project location(s) where work occurred, including Quad and T/R/S info. Refer to stand-alone Table and exhibits here.] |
| **3. Standard Study Area** |
| [Describe the Standard Study Area (SSA) for the O&M Activity per Table 2 of the CRMP. Also, include if the SSA changed, such as expanded, from the original inventory.] |
| **4. Regulatory Context** |
| [Confirm the results are consistent with the obligations of the CRMP.]  This project is compliant with the *State Protocol Agreement among the California State Director of the Bureau of Land Management (BLM) and the State Historic Preservation Officer Regarding the Manner in which the BLM Will Meet its Responsibilities Under the National Historic Preservation Act and the National Programmatic Agreement among the BLM, the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers* (Protocol) and the Utility Operations and Maintenance Plan (Plan) and associated Cultural Resources Management Plan (CRMP). |

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| **5. Monitoring Results** |
| a. **Summary of Monitoring Activity** |
| [Include details on equipment used, O&M actions taken, times and dates, soil conditions, resource monitored, etc. If the SSA required additional survey prior to work, also include summary of that effort as well. Include reference to attached monitoring table (Table 1).] |
| b. **Cultural Resource(s) Monitored** |
| **[SITE NUMBER 1]** [Add one for each resource] **Update Prepared:** ☐ **Yes** ☐ **No** |
| **Description:** |
| **Field Observations/Conditions Assessment:** [Include any information about resource disturbances observed prior to the start of the O&M activity, any disturbances observed during the O&M activity, if the resource may not need additional/future monitoring based on current observations, etc. Update the DPR to document this information.] |
| **NRHP Status:** [Include either previous status or recommendation.] |
| **Resource Protection Measures Applied:** [List RPMs implemented per Table 3 of the CRMP.] |
| **Resource Impacted by Current O&M Activity?** ☐ **Yes** ☐ **No** |
| **If yes, explain impacts.** |
| **6. Attachments** |
| 1. Location Map [Typically 1:24,000 topographic quad background; supplement with larger scale aerial imagery as appropriate to convey the necessary information.] 2. Monitoring Area Map [Depict area monitored, include if the SSA was expanded or if any additional areas were surveyed.] 3. Resource Location Map [Depict new and known cultural resources.] 4. Field Photos [Include before, during, or after photos.] 5. Cultural Resources Monitoring and Conditions Report Table [Includes all locational data, resource information, monitoring results, impacts, etc.] 6. Resource records (newly identified and updated records) 7. GIS [Monitored area, SSA updates if the SSA was expanded or additional areas were surveyed, new/updated resource boundaries, and tabular attributes consistent with Cultural GIS Specifications.]   [Note: delete any attachment lines that are not relevant to the current report.] |

TABLE 1. PROJECT LOCATION.

|  |  |  |  |  |  |  |  |  |  |  |  |
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| **Table 1. Cultural Resources Monitoring and Condition Report Table** | | | | | | | | | | | |
| **Project Order Number** | **Structure/ OID#** | **O&M Activity** | **Circuit Name** | **Latitude** | **Longitude** | **USGS Quad** | **PLSS**  **Description** | **Cultural Resources Fieldwork** | | | |
| **Monitoring Date** | **Resource Monitored**  **(include site number, resource description, distance to work location [if applicable])** | **Resource Protection Measures Applied** | **Resource Impacts?**  **(if yes, explain)** |
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Page 1 of 1

### Data Sharing Agreement

###### Overview of the Utility ROW grant

**Introduction**

Click or tap here to enter text.; Utility) operates and maintains electric transmission and distribution facilities on XXX Bureau of Land Management (BLM) Field Offices withinClick or tap here to enter text.. These facilities are authorized via Utility right-of-way (ROW) grants issued by the BLM Field Offices.

The Utility ROW grants are accompanied by the Utility Operations and Maintenance (O&M) Plan (Plan), which describes how the Utility will plan and implement O&M activities in compliance with the authorizations over the next 45 years across their powerline corridors and associated access routes.

The Plan describes the O&M activities conducted by the Utility to operate and maintain electric transmission and distribution lines. The Plan categorizes O&M activities by classes (Class I, Class II, Class III, and Conditional Class III) to describe the coordination between the BLM and the Utility in conducting the work necessary to operate utility facilities safely and reliably. The Plan also establishes an environmental screening process and a work notification/authorization process.

**Cultural Resources Management Plan**

The Cultural Resources Management Plan (CRMP) is Appendix C of the Plan. The CRMP serves as a nexus between the *State Protocol Agreement* (Protocol) and the Plan. In addition to establishing a cultural resource screening process (CRSP), the CRMP standardizes Standard Study Areas (SSAs) for O&M activities, applicable resource protection measures (RPMs), and a process for using non-intensive inventory methods. Chief among the requirements of the Plan and CRMP are data exchanges (CRMP Section C.12) and annual reporting (CRMP Section C.19.2) to demonstrate compliance and facilitate BLM reporting to the California State Historic Preservation Officer (SHPO) under the Protocol. O&M activity classes, as they pertain to cultural resources, are defined in Table 1 of the CRMP.

The annual report is a requirement of Section Click or tap here to enter text.of the CRMP. The intent of the annual report is to summarize all cultural resources management performed in support of O&M activities executed under Click or tap here to enter text.existing authorization during a given fiscal year. The annual report documents all new cultural resources surveys (with both positive and negative results); non-intensive inventory strategies; newly recorded/updated cultural resources and associated California Department of Parks and Recreation (DPR) 523 forms; historic properties affected (if any); associated GIS deliverables; and any impact minimization and mitigation efforts conducted for Class II, Class III, and Conditional Class III activities. The report will conform to the BLM Protocol Stipulation 14.3 and will be submitted in time to align with Click or tap here to enter text.annual report submittal to SHPO.

***Cultural Resource Screening Process***

The purpose of the Cultural Resources Screening Process (CRSP) is to identify resources prior to a Utility O&M activity; plan the activity to avoid or minimize impacts; implement BMPs and RPMs when necessary to avoid or minimize potential impacts; coordinate with the BLM when needed; and maintain compliance with all applicable laws, regulations, and authorities. A qualified archaeologist (Utility cultural resource specialists [Utility CRS] or Consultant cultural resource specialists [Consultant CRS]) who meets, or is directly overseen by one who meets, the Secretary of Interior Standards (36 CFR Part 61) will perform the CRSP.

###### References

## Appendix A

Tables 5 and 6

**Table . Summary of Incidents Out of Compliance with the Plan**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Date of Incident** | **Type \*** | **Notification No.** | **Resource Present (Y/N)** | **Resource Identifier** | **Summary of Incident** | **Resolution** |
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\*1. Work performed without the required monitor

\*2. Work performed ahead of the schedule provided to BLM

\*3. Pole excavation conducted prior to completion of pre-construction archaeological work

\*4. Work performed prior to approval by BLM

\*5. [ Add scenarios as needed]

## Appendix B

Notification, New Survey, and New and Updated Resource Maps