

June 1, 2016

County of El Dorado Board of Supervisors
330 Fair Lane
Placerville, California 95667

**Subject: RE Letter to County of El Dorado Supervisors, Dated May 31, 2016
Item Number 3: Cultural Resources Survey
Swansboro/ Ensite #22971 (285387)
One Eye Creek Road
Placerville, El Dorado County, California 95667
EBI Project No. 6114009174**

EBI Consulting (EBI) has prepared an environmental review on behalf of *Verizon Wireless* for the property noted above as part of its regulatory review by the Federal Communications Commission (FCC). The review is focused on the National Environmental Policy Act (NEPA) compliance and includes an evaluation of whether historic properties or archaeological sites may be affected by the proposed telecommunications facilities at the address noted above under Section 106 of the National Historic Preservation Act (NHPA).

A letter regarding the above-referenced telecommunications facility project was submitted anonymously to the County of El Dorado Board of Supervisors on May 31, 2016. This letter, titled *RE: Appeal of Verizon Wireless Application S54-0001 One Eye Creek Road; Appeal of the approval of Special Use Permit S15-0001/Swansboro Verizon Cellular Tower by the Planning Commission 4/28/2016. (Please do not follow the new Planning Commission's approval)*, asserts, under Item Number 3, that the Cultural Resources Survey is inadequate; however, a review of the associated Cultural Resources Survey report has determined that these assertions are unfounded.

Specifically, under Item Number 3: *Cultural Resources Survey Swansboro/Ensite #22971 for a location in Section 15 instead of the cell tower actual site in Section 10*, the anonymous author asserts that an evaluation of the incorrect Project Area was undertaken due to the fact that the included USGS topographic quadrangle and historical mapping indicates the Project Area is located in Section 15, T11N, R11E rather than Section 10, T11N, R11E.

I, Ms. Aniela Travers, MS, RPA, Program Manager, Archaeology—Principal Investigator with EBI Consulting, have reviewed the Cultural Resources Survey report produced by EBI Consulting on February 19, 2016, and have determined that the discrepancy is a result of poor georeferencing. Georeferencing is a process that takes a non geo-enabled file and assigns geographic attributes. Due the nature of this process there is a small margin of error, which resulted in this specific discrepancy.

When one plots the Project Area's coordinates in GoogleEarth, a modern georeferencing resource, the Project Area is correctly identified as being located within Section 10, T11N, R11E (Figure 1); however, when one attempts to plot the Project Area on the 1976 *Slate Mountain, California 7.5' USGS Quadrangle* using the same coordinates the Project Area is shown slightly to the south in Section 15, T11N, R11E (Figure 2).

This mapping discrepancy has no bearing on the results of the pedestrian survey of the Project Area by the field archaeologist. EBI Consulting's Project Archaeologist, Ms. Virginia Clifton, conducted a close interval pedestrian survey of the Project Area on February 5, 2016. Ms. Clifton identified the Project Area location using the project coordinates, the Project Plans (as provided by *Verizon Wireless*), and a review of aerial images on GoogleEarth prior to the fieldwork date. Therefore, the Township, Range, and Section would not and did not affect the outcome of this survey, which was negative for cultural resources.

Furthermore, the anonymous letter asserts that the research results presented in the Cultural Resources Survey report are also flawed due to this same Township, Range, and Section discrepancy, as the North Central Information Center (NCIC) provides their records search services based on Township, Range, and Section location information. However, EBI Consulting performed the records search by visiting the NCIC in-person; the NCIC was not contracted to perform this research. Ms. Clifton conducted a records search at the NCIC on February 9, 2016. The records search process involved pulling a base map, in this instance the entire 1976 *Slate Mountain, California 7.5' USGS Quadrangle*, and reviewing it for known archaeological sites and prior cultural resource surveys within ½ mile (804.7m) of the general Project Area. As a result, Ms. Clifton would have reviewed potential resources located in Sections 10, 11, 14, and 15; not just Section 15 as the letter's author asserts. Two archaeological resources were identified by Ms. Clifton upon completion of this process; however, the anonymous author incorrectly indicates the research results did not identify any cultural resources.

Moreover, Ms. Clifton also contacted Ms. Dorit Buckley, Georgetown District Archaeologist with the Eldorado National Forest (ENF) on February 5, 2016 to determine if the ENF might have knowledge of additional resources not typically mapped at the NCIC within the Project Area vicinity. On February 9, 2016, Ms. Dorit responded that no additional resources, beyond the two sites already identified by Ms. Clifton, have been recorded by the ENF.

Based on the above information, it can be concluded that the Township, Range, and Section information would not and did not affect the results of the records search/the identification of known archaeological sites within the vicinity of the Project Area as reported in the Cultural Resources Survey report by EBI Consulting.

Finally, Native American Consultation was completed as required by the FCC and California State Historic Preservation Office and documented in the FCC F620 New Tower Submission Packet. This consultation is initiated based on the Project Area's coordinates, so Township, Range, and Section information would not and did not affect the results of this consultation—no objections were received from the consulting Tribal Parties.

Please feel free to contact our office [Aniela Travers at (707) 208-6410] if you should have any questions or comments regarding EBI Consulting's Cultural Resources Survey report.

Sincerely,



Aniela Travers, M.S., RPA

Program Manager, Archaeology--Principal Investigator

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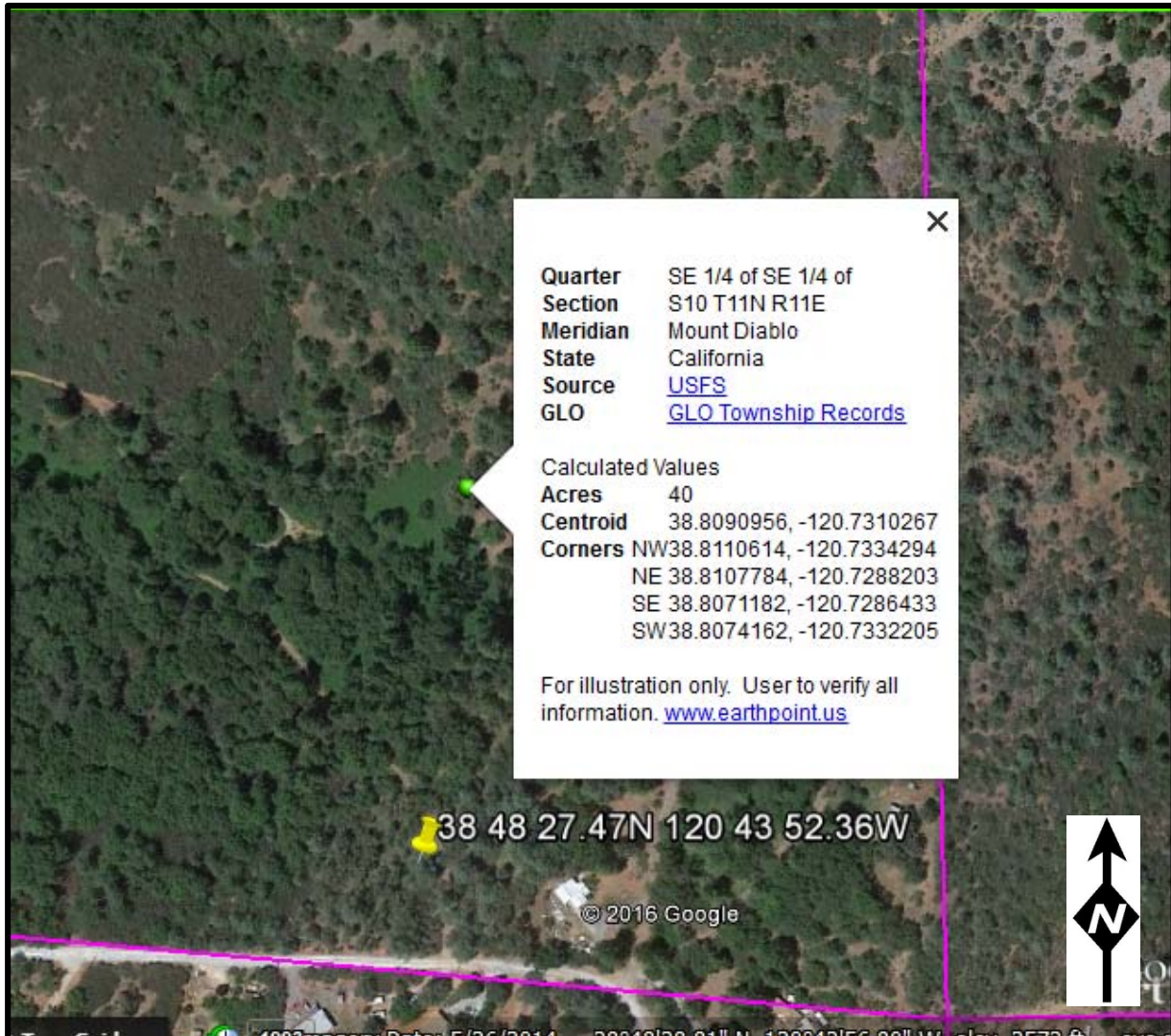
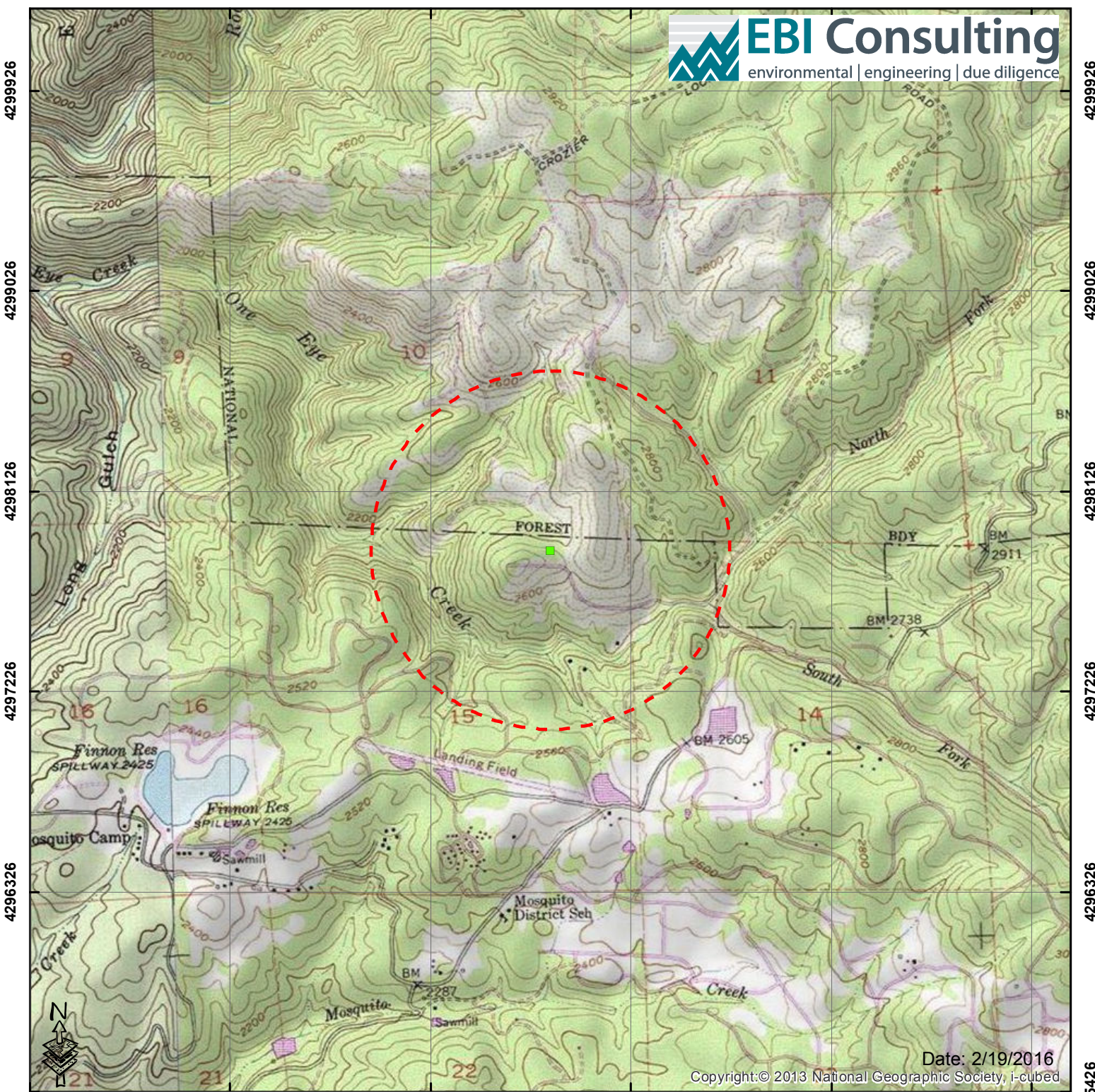


Figure 1: 2016 GoogleEarth Aerial Image with Project Area (Yellow Pin).

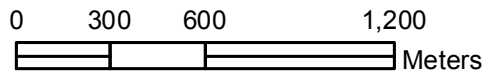


Date: 2/19/2016

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Legend

- Project Site
- ⋯ 1/2 Mile Radius



Source: Selected data from USGS and EBI.

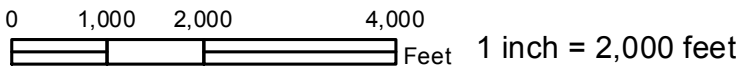


Figure 2 - USGS Quad Location Map

Ensite #22971 (285387) / Swansboro
One Eye Creek Road
El Dorado County
Placerville, CA 95667

USGS 24K Quad: Slate Mountain, CA 1976 & Garden Valley, CA 1976

Section Township Range
 NENE - S15 T11N R11E

Easting: 697009 E Northing: 4297860 N
 Longitude: -120.73111 W Latitude: 38.8075 N

Coordinate System:
 NAD 1983 UTM Zone 10N
 Projection: Transverse Mercator
 Datum: North American 1983